Draft schedule of main issues and proposed responses

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Support for mixed use policy on the airport site. Airport not viable - Several attempts at operating a commercial airport have failed. Jobs and homes are needed therefore it is making best use of a redundant facility.	Noted	**No change**
Housing on airport should be subject to a proper masterplan including parking, broadband, amenities, trees and open space.	Agree. The current policy requires a development brief and comprehensive masterplan detailing open space, and landscaping. Other proposed policies in the plan cover digital infrastructure and parking.	**No Change**
No desire for night flights and pollution. Cargo facility will lead to night flights which will be detrimental to Thanet. Welcome reduction in noise and pollution if the airport changes use.	Noted.	**No Change**
Airport is a national infrastructure asset. Once lost it can never be recovered. Safeguarding the airport would alleviate capacity issues at Heathrow and Gatwick. Advantage over London airports due to weather conditions (fog). Need for an emergency landing strip. Airport needed for post Brexit cargo.	There is currently a DCO process underway which provides the framework for the consideration of national infrastructure. The Davies Commission's Report into airport capacity did not reach the same conclusion in July 2015. The report by AviaSolutions into the Commercial Viability of Manston Airport 2016 looked at scenarios about how future passenger and freight demand might be distributed around the six airports in the London area when coming to the conclusion about the viability of Manston airport. (including the scenario in which no new runways are developed was also looked at and this most favoured Manston.) Advice from Avia is that it is still too early to assess the impact of Brexit as an agreement has not been reached.	**No Change**

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Mixed use would have environmental consequences and damage the aquifer (Paleogene Thanet Sand Formation often mentioned). There will be water and sewerage issues. Manston is a rainwater catchment area so development will lead to drought. Mixed use development will affect drinking water.	Potentially any development on the airport site could have environmental consequences and damage the aquifer. Policies in the Local Plan seek to ensure that no development can take place that would risk the contamination of groundwater sources. The Council will work closely with the Environment Agency and Southern Water to ensure this.	**No Change**
Lack of infrastructure for housing - doctors, dentists, schools, roads shops, utilities, sewerage etc.	The Council has been producing an infrastructure delivery plan in liaison with utility providers, the Clinical Commissioning Group and Kent County Council education and highways.	**No Change**
Functioning airport will bring much needed employment. Airport is important for the regeneration of the area. Thanet needs the airport for employment	It is agreed that the site has the potential to deliver job growth. The Plan identifies 85,000sqm metres of employment floorspace on the site which should provide employment. The Council has to ensure that the plan is deliverable and has to have evidence to support this.	**No Change**
A functioning airport use would support the parkway development.	The Business case for the Parkway states the Thanet Parkway is not dependent on the Airport and is required because the network is already at capacity.	**No Change**
SP05 should accommodate self build.	Agree that all Strategic sites should support new build. This is mentioned in the Policy.	**No Change**
Should wait for DCO before making decisions about the site.	Current advice from the Department of Communities and Local Government is not to delay the submission of Local Plans. There is the risk of Government intervention in doing so. The DCO process has a long timescale and there are risks to the Council in waiting for this to be resolved. If the DCO process is successful then the issue of the airport site can be revisited at that time.	**No Change**

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Airport would harm the regeneration efforts in the district. A reopened airport would blight Ramsgate when it has begun to flourish.	Noted.	**No Change**
Thanet doesn't need more housing.	The Strategic Housing Market Assessment has identified a housing need for Thanet of 17,140 homes to the end of the Plan period in 2031. This assessment was carried out in accordance with the methodology in the NPPF and NPPG.	**No Change**
Flawed evidence in Avia report. Some refer to the disclaimer Avia made. Others say that is didn't look sufficiently at Cargo.	Avia are responding to the representations which relate directly to their report and this will be reported to Members in due course. Members will be aware that Avia have previously responded to criticisms of the report by RiverOak. See link https://www.thanet.gov.uk/media/3553862/AviaSolutions-RiverOak-Response-TDC-Manston-Airport-Viability-Final.pdf	**No Change**
No environmental impact carried out of mixed use development on the airport site.	The policy would not permit development that would have an adverse environmental impact. There are many provisions ranging from landscape and visual impact to protection of habitats and prevention of the contamination of groundwater.	**No Change**
We should increase the amount of housing on the airport so as to avoid using high quality farmland.	The number of homes on the site is driven by the goal of creating a sustainable community rather than site capacity. There are also risks to delivery associated with over reliance on large strategic sites. There may be scope to increase the number of homes on the site beyond the plan period.	**No Change**
Topography of the site is not great for housing and is better suited to airport or other commercial development if an airport operator is not found.	The airport is located on the central chalk plateau which is one of the highest points of the District. Any development of the site would have to avoid skyline intrusion and the policy requires a landscape and visual assessment survey to address this.	**No Change**

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Transport solutions for a mixed use airport site need to consider walking, cycling and routes to Westwood.	Agreed. The policy seeks specific road improvements to ameliorate development of the site. The Local Plan is also accompanied by a Transport Strategy which sets out a series of road improvement to facilitate development.	**No Change**
There is nothing in the NPPF that overrides existing airport policies.	Paragraph 22 of the NPPF states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. This does not override the currently adopted airport policies but it does mean that the airport allocation should be reviewed and evidence into the prospect of development for the intended use investigated.	**No Change**
Closing the airport is detrimental to the jobs market in the District.	The Council did not close the airport. The current owners of the airport are pursuing a mixed use development on the site as they state they were making losses running it as an airport. The current proposals include 85,000sqm of employment floorspace which should deliver jobs. The Economic and Employment Assessment 2012 concluded that the site would deliver a modest amount of employment growth over the plan period.	**No Change**
Concern about levels of and impact on archaeology.	The current proposed policy requires a pre design archaeological assessment. Proposed policy HE01 further sets out how archaeology will be managed through applications and the strategic housing policy will be updated to give further guidance on this. The Council will work closely with KCC and Historic England to achieve the best outcomes.	**No Change to Policy SP05**

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Concern over the future of the museums.	The museums are an important part of the Airport's heritage and should be safeguarded. Details of this will be required through the Design and Heritage Statement.	**Add to the Design and Heritage Statement list: Details of how the RAF Manston Spitfire and Hurricane memorial Museum and RAF History Museum will be safeguarded.**
No justification for the designation of more employment land.	This justification will be available at submission in an economic development needs assessment style document. This will explain the amount of floorspace needed over the plan period. Thanet's reasons for maintaining an oversupply of employment land (i.e. deliverability issues, accommodating flexible uses and providing a choice of sites) and details of the employment land supply including the loss of Eurokent following the appeal decision and that there is no net addition to the oversupply in allocating 85,000sqm of employment space at the former Manston Airport site.	**No Change**
Concern about the size and impact of the District Centre.	The District Centre is described in the retail hierarchy detailing the catchment the centre is expected to serve ie the development itself. A centre that would serve a larger catchment would not be appropriate and would be contrary to the clause in the proposed policy. Furthermore Thanet proposes to apply a stronger threshold for the impact test than the NPPF suggests which we believe is justified by local circumstances. The NPPF states that the impact test should be applied for developments of over 2,500sqm or less if local circumstances suggested otherwise.	**No Change**

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
	Thanet currently proposes that the impact test be applied to developments that are over 1000sqm in the urban area and 280sqm in the rural area.	
Development of the site should consider and provide for bridleways.	Agree. The policy currently says that applications should be accompanied by a design and heritage statement to include equestrian routes and facilities.	**No Change**
There is not enough brownfield land available to build 2,500 homes on.	The availability of large brownfield sites across the District is limited. Past delivery of housing on brownfield sites has been high but the supply has been depleted. The site offers at least an element of brownfield land.	**No Change**
The additional housing will lead to traffic congestion particularly at Westwood.	The transport strategy that accompanies the Local Plan requires a range of improvements in order to facilitate the development proposed in the Plan. A specific project in the Strategy is the Westwood Relief Strategy which is well underway and is alleviating traffic at Westwood. Policy SP05 also stipulates upgrades to Manston Court Road and Spitfire Junction which could alleviate the network around the Westwood Area.	**No Change**
There is enough housing land allocated in the Local Plan and there is a surplus of employment land.	The objectively assessed need over the plan period is 17,140 home. 2,500 of this requirement is allocated at the site of the former Manston airport. If this allocation does not go forward then 2,500 homes will need to be found elsewhere. Thanet deliberately maintains an oversupply of employment land due to deliverability issues at Thanet's largest employment allocation and also to maintain a choice of sites for businesses and to allow for flexible uses in accordance with the NPPF. This is discussed further in the Economic development Needs Assessment that will be submitted to the Secretary of State alongside the Plan.	**No Change**

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Concern over the amount of contamination of the site due to its former use.	Development of the site will be subject to the satisfying the requirements of the Council's Contaminated Land policy which currently states that development on land known or suspected to be contaminated will only be permitted subject to investigation, assessment and remediation criteria and permission may be subject to planning conditions. TDC will work closely with the Environment Agency and other relevant authorities	**No Change**
The site should have a secondary school.	Thanet does need the development of a new secondary school within the Plan period. Kent County Council's Education Commissioning Plan will identify how this need is to be delivered. TDC are working closely with KCC to facilitate this delivery and the Local Plan will reflect this.	**No Change**
The site should incorporate a hospital.	TDC is liaising with the Clinical Commissioning Group through the Infrastructure Delivery Plan. Contributions from development will be made to ward health care in Thanet including at the existing hospital in Thanet (the QEQM).	**No Change**
Concern over the size of the primary school.	The policy states that the development needs to provide 4 forms of entry but it is not prescriptive about how this is delivered. This could be 2x2 forms of entry for example. The Policy should clarify this.	**Amend policy wording to state that 2 primary schools each of 2 forms of entry capacity will be required.**
2,500 homes are not needed as there are 3,000 empty properties.	LPA's are not allowed to take into account all empty properties in their housing supply because they are not readily available. LPA's are allowed to take into account homes that have been empty for 4 years that are subject to a scheme to bring them back into use. The Council has such a scheme in place and is therefore able to minus of 540 homes. This has already been taken into account and the 2,500 homes are still needed.	**No Change**

SECTION 2 – Revised Policy SP05 - Former Airport Site		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Where will the occupants of the housing work	The policy also allocates the site for 85,000sqm of employment and leisure floorspace. Over the plan period over 56ha of employment land is allocated and the Economic Growth Strategy sets out the key priorities and transformational initiatives to deliver growth.	**No Change**
Development needs to make fullest use of public transport, walking and cycling opportunities	Agree. The current proposed policy requires a travel plan to be submitted to include a public transport strategy to link the site to existing services. In addition it requires integrated green infrastructure to include walking, cycling and equestrian routes and facilities.	**No Change**
Owners should demonstrate actual businesses so as not to merely deplete employment sites in the rest of the District.	Agree. The current proposed policy requires a business plan to demonstrate how the employment will be delivered, and how it will relate and link to Manston Business Park.	**No Change**
Adds open spaces to Ramsgate which has been lacking	Agree. The 31.77ha of open space required by the current proposed policy will act as a resource for the whole District.	**No Change**
The site must include vehicle charging points	Agree. The current proposed policy requires one electric car charging point for every 10 parking spaces provided.	**No Change**
Skyline views must be maintained even for mixed use development	Agree. The current proposed policy specifies this.	**No Change**
Development of the site should explore the opportunity of biodiversity enhancement.	Biodiversity enhancement is required in Policy SP23 Green Infrastructure but agree that this should be mentioned in relation to the strategic site.	**Add a requirement for biodiversity enhancement.**

SECTION – 3 – REVISED POLICY SP11 – HOUSING PROVISION		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Challenges to the Objectively Assessed Need (OAN) calculations	The Councils OAN was prepared by consultants using a methodology consistent with national guidelines.	**No change**
Over-reliance on windfall sites and empty properties to deliver the OAN – too much reliance on unidentified sites	The evidence to support windfall sites and empty properties is robust and based on local evidence. However allocation of smaller sites may be considered	**Include allocations of smaller sites as appropriate**
Land at Westwood – (S511, S553 and S447) – create flexibility for the expansion of Margate Cemetery	The location of the cemetery extension is under discussion with developers who own the currently allocated site.	**Amend map as appropriate**
Land at Tothill Street, Minster (S512, S436) – Capacity needs reviewing – current proposal of 150 dwellings would be very low density (15 dwellings per ha) – suggest 250 dwellings	Agree in principle. Capacity was limited in the first instance due to Highways issues. Agree that capacity could be increased subject to an acceptable resolution on Highways impacts on the Prospect Roundabout/Laundry Road resulting from this development and cumulative impact from other nearby allocations	**Increase capacity if resolutions to highways issues can be demonstrated**
Over-reliance on large strategic sites – will not meet the required levels to maintain a 5 year supply. Smaller sites should be allocated and recognise the role of SME housebuilders.	Allocation of smaller sites may be considered if necessary to support 5 year supply	**Include allocations of smaller sites as appropriate**
The 2013 consultation asked for views on where housing should go for around 7000 houses. If that consultation had been for 17,100 houses people may have suggested a new settlement rather than individual allocations bolting on to existing towns. This could have saved large areas of agricultural land and distress caused by adhoc bolt on allocations to towns and	The Sustainability Appraisal advice is that new development should be located on the periphery of existing settlements rather than create a new settlement in an unsustainable location. The new settlement proposed at the former Manston Airport site is a sustainable location due to it being a Brownfield site with a significant amount of infrastructure already in place. (This site was not available in 2013 as it was still operating as an airport). The actual housing requirement figure is just over 9,300 dwellings as about 7,800 have already been accounted for in planning	**No change**

SECTION – 3 – REVISED POLICY SP11 – HOUSING PROVISION		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
villages	permissions, windfalls and empty homes brought back into use.	
The Plan makes no reference to provision of broadband and should include a policy to promote Fibre to the Premises (FTTP) – it is imperative that new development, wherever practical, adopts the FTTP initiative.	Agree	**Include in new General Housing Policy – requirement for new development to adopt the Fibre to the Premises**

SECTION – 4 – REVISED LOCATION OF HOUSING		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Collective additional site allocations and infrastructure (ie roads) have a possible effect on numerous heritage asset and their settings and potential unidentified significant archaeological resources. Present wording of new policies does not provide adequately for assessments that would provide mechanism for understanding, safeguarding and enhancing their significance. HIA as early as possible methodology for achieving this	Agree	**Include wording in new General Housing Policy applicable to strategic sites and infrastructure for a requirement for Heritage Impact Assessments to be carried out**
Birchington sites show incorrect land ownership boundaries	Factual amendment – correct boundaries have been supplied	**Amend boundaries accordingly**
S525 (Land at Holy Trinity Primary School) has planning permission so should be removed from allocations	Noted	**Remove from Appendix B and include in list of allocations with planning permission**

SECTION – 5 – LAND AT MANSTON COURT ROAD/HAINE ROAD		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Occupiers of the new dwellings would be disrupted by aircraft noise day and night if Manston is operating as an airport	The site is allocated for a mixed use development. Policy SE06 in the Safe and Healthy Environment section relates to noise sensitive development.	**No change**
'Provide one electric car charging point for every 10 parking spaces provided' – this should specify 'in communal parking areas'. An additional requirement should be for every dwelling with parking provision in its curtilage to be provided with one car charging point.	Agree – this is appropriate following the government's announcement to ban new petrol and diesel cars and vans from 2040 due to the risk to public health from rising levels of nitrogen oxide.	**Amend clause in new General Housing Policy to specify 'in communal parking areas' and for a charging point to be provided for every new dwelling with parking provision within its curtilage.**
Alternative housing options were not considered if they didn't assist with the delivery of the proposed Highway Strategy. Concentration has been to deliver a transport solution rather than the broader housing strategy that might meet the wider needs of other communities.	All sites submitted were assessed under the same criteria as part of the Strategic Housing Land Allocation Assessment	**No change**
Site should be listed as expansion of existing allocations, not a new site for development.	The policy acknowledges the existing allocations and requires a development brief and masterplan for the whole site integrating with development at the adjoining sites.	**No change**

SECTION – 5 – LAND AT MANSTON COURT ROAD/HAINE ROAD		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
The western boundary of sites S549 and S535 (Land west of Old Haine Road) should be expanded to be consistent with the western boundary of this site	The cumulative impact of extending the boundaries (and presumably increasing dwelling numbers) would have a significant detrimental impact on the landscape. The allocated sites meet the housing target requirement so there is no need for further allocation of greenfield land.	**No change**
There is no mention of cycling and walking provision between proposed developments	Noted. This issue should be addressed in the emerging Transport Strategy.	**No change**
Timescales for the proposed delivery of sites S511, S553 and S447 (Westwood) is optimistic and will have a knock on effect on the total number of units that can be delivered over the plan period – will be unable to demonstrate 5 year supply.	Noted. The indicative phasing for strategic sites and smaller allocations is being reviewed to ensure a 5 year supply can be demonstrated.	**Indicative phasing in Appendix B to be reviewed**
Policy should require Sustainable Drainage Systems	Policy CC02 – Surface Water Management requires new developments to use Sustainable Drainage Systems and for any developments within the Groundwater Source Protection Zones to demonstrate that suitable methods will be used that will not cause detriment to the quality of the groundwater.	**No change**
Policy wording should include 'masterplanning shall take into account the archaeological heritage of the site and be informed by appropriate assessment, survey and field evaluation'.	This is addressed in Policy HE01 which states that planning permission will be refused without adequate assessment of the archaeological implications of the proposal.	**No change**
Policy wording should include 'masterplan will be informed by up to date ecological surveys and site plan will be designed to retain ecological interest'	Agree. This comment has been made to other housing allocations – include in general housing policy.	**Add suggested wording to general housing policy**

SECTION – 5 – LAND AT MANSTON COURT ROAD/HAINE ROAD		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Concern that development will affect the Brown Hare (a Kent Biodiversity Action Plan species), dormouse, harvest mouse and breeding birds. Recommend the following be included in policy wording: • No net loss of field margins and boundary features • provide specific mitigation and compensation measures where loss is unavoidable • identify open space within the Green Infrastructure network for habitat creation of bird breeding sites and boundary features'.	Addressed under Policy GI03 – Protected Species and Other Significant Species and GI06 – Landscaping and Green Infrastructure	**No change**
Policy should include the following wording to recognise the requirement for adequate utility infrastructure to serve the proposed development: 'The development must provide a connection to the sewerage system at the nearest point of adequate capacity, in collaboration with the service provider'. The facilities need to be protected for new and existing residents so the following wording should be included: 'Development proposals must ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes'.	Noted. This should apply to other potential development sites so should be included in new General Housing Policy.	**Include suggested wording in new General Housing policy.**

SECTION – 5 – LAND AT MANSTON COURT ROAD/HAINE ROAD		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Masterplanning should include a specific requirement for an internal spine road to be provided and laid out in accordance with requirements set out in the draft Transport Strategy.	Agree.	**Reword Clause 1 of the policy: 'Contributions to provide an internal spine road laid out in accordance with the requirements set out in the draft Transport Strategy'**
Policy wording recommended: 'masterplanning shall take into account the archaeological heritage of the site and be informed by appropriate assessment, survey and field evaluation'	Addressed under Policy HE01 - Archaeology	**No change**

SECTION 6 – Local Green Space		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
A total of 43 submissions have been proposed by individuals, local groups, parish and town councils. The proposed sites broadly fall into the following categories - local plan allocations or sites with planning permission; coastal clifftop; parks, gardens, playing fields and recreation grounds; allotments; amenity areas and other areas within urban areas; and small amenity areas on residential estates.	These have been assessed against the NPPF criteria for their suitability. This is the subject of a separate report.	Identify in the submission plan, those sites that meet the local green space criteria as set out in the report.
Support for the concept of local green space although some comments state that there are not enough green spaces within Thanet. Another comment is that existing open spaces should be properly maintained.	A number of cliff top areas and parks within the urban area have previously been protected as open space. An open space strategy is currently being prepared for the Council which will identify existing and future needs which will need to be reflected in the plan.	No change
Concern that local green spaces will be suggested for sites that are allocated or on farmland and landowners should be formally notified and consulted.	Land that has been allocated or is the subject of planning permission, or is a large tract of farmland is unlikely to meet the NPPF criteria for local green space designation.	No change
Council should consider whether there are any playing fields that are suitable for local green space	These types of sites could be considered however, the NPPF states that the local community should identify green spaces that are important to them.	No change
It is vital that local green space is provided, maintained and hopefully enlarged with any development proposals	Local green space can only be suggested by the community. It is advisable to consider how the space will be managed in the future.	No change

SECTION 7 - Parkway Station		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
No need/benefit to Thanet/travel costs will put off potential commuters/it will reduce services at existing stations/it will attract more commuters to London rather than attract inward investment	The scheme needs to be seen in the context of wider service proposals and the review of the current Rail Franchise. The Council is keen to ensure that the overall service package serves local people who commute elsewhere to work and benefits the wider economy of the area.	**No change**
Not a sustainable location/it will attract car borne traffic/fast dual carriageway entrance is not conducive to walking and cycling; location would be better east of the Cliffsend level crossing; objection to building on agricultural land	The key factor in selecting a suitable location for Parkway is the proximity to a suitable point on the rail network, and this clearly limits the options available for sites. In addition, the detailed scheme will address the needs of pedestrians and cyclists. Any location along the line in this area would be likely to be on agricultural land.	**No change**
Concerns expressed about detailed design/ management issues and proximity to housing; congestion; parking in Cliffsend; landscape impact; car parking charges; provision for future expansion	Detailed design matters will be dealt with through the project design and planning application process, being led by Kent County Council. KCC ran a parallel, more detailed, consultation on the Parkway Station, and some the representations reflect the comments on the draft Local Plan.	**No change**
Ashford-Ramsgate line needs improving/ it will slow down the journey times to London for existing Thanet stations	Network Rail is undertaking other network improvements on the Ashford-Ramsgate line, which should benefit both the Parkway Station and the wider network.	**No change**
Parkway would support the Airport	The provision of the Parkway would support whatever development takes place at the Airport site.	**No change**
Access to the station is dangerous. Putting traffic signals on the A299 high speed road is a poor design. Access to the station should be via slip road off the southbound A256 Richborough Road	The initial design work was the subject of a safety audit, and clearly it will be important to make sure that whatever access arrangements are finally agreed provide safe travel to and from the site.	**No change**

SECTION 7 - Parkway Station		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
proceeding adjacent to and along the north side of the railway line. Egress from the station should be along the north side of the railway line and thence to a slip road onto the westbound A299. Access should be from the roundabout		
Needs Habitat Regulations Assessment	The draft Local Plan has been the subject of Sustainability Appraisal and Habitat Regulations Assessment. It is recognised other assessments may be required when the planning application is submitted.	**No change**

SECTION 8 – Strategic Routes policy		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
No need for these roads – Thanet isn't that congested compared to other parts of the country (eg: outskirts of London)	It is important, as part of the Local Plan process, to deal with the related transport issues, to ensure that the relevant infrastructure is in place to serve new development. The Highways Authority (KCC) have advised the Council that new roads/road improvements are necessary to serve new development and these form part of the draft Local Plan.	**No change**
Should be linked to Transport Strategy – these proposals should be delayed until then	These proposals form part of the strategy for both the Local Plan and the Transport Strategy. It is the intention to publish the draft Transport Strategy alongside the Local Plan, so that people can see the links between the two documents, and the evidence base that supports them.	**No change to draft Local Plan**
Impact of roads on other parts of the network: • Potential impact on Brenley Corner (DDC, HE) • Park Lane – how will traffic flows be dealt with? • One-way section in Birchington seems unnecessary • Impact of new Minnis link on Minnis Road at the railway bridge • Impact on Garlinge High Street from closure of Shottendane Road/Manston Road • Link to Thanet Way from Birchington needs upgrading • Impact on properties in Manston Court Road area • Coffin House Corner and Victoria Road junctions – close Manston Road approach to Coffin House Corner • Alternative suggestion for Birchington – new	The road proposals shown in the draft Local Plan are indicative only and do not show an exact route. More detailed proposals will be included in the Transport Strategy, and detailed designs will be developed as the Local Plan progresses. However, the routes shown in the draft Local Plan are considered to provide the most effective for helping to relieve the existing urban route network; providing a freer flow of traffic (including buses) between centres; and dealing with localised air quality issues. The Council would only use compulsory purchase powers as a last resort. The intention is to identify road improvements that cause the least local disruption, including to existing residents. It is not believed that the road improvements will have more than a marginal effect on Brenley Corner.	**No change**

SECTION 8 – Strategic Routes policy		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
road from the A28 (east of St James Terrace, Birchington) to Park Road (near North Lodge, Quex Park) • Should include new road at "Manston Green" • Also need improvements to Nash Road and A28 between A299 and Birchington to dual carriageway standard		
More detail needed on design at local level; may create new rat-runs; design of routes needs to be of high quality (careful lighting; tree-planting; not urbanising)	The road proposals shown in the draft Local Plan are indicative only and do not show an exact route. More detailed proposals as to the exact route and design will be included in the Transport Strategy. Issues such as lighting, rat-running, design, landscaping, etc will be addressed at the detailed design stage.	**If detailed route designs are available, amend draft Plan to indicate such routes.**
Developers should pay for these roads and be delivered before new housing is built; How will this be funded?; Developer concerns about phasing and costings	The Infrastructure Delivery Plan indicates that the funding of road infrastructure will be primarily the responsibility of site developers. TDC and KCC are also committed to pursuing external funding where it is available to try to accelerate the delivery of such infrastructure. The Council, with KCC, are working with developers to ensure that the phasing of development is consistent with the provision of infrastructure.	**No change**
These new roads are needed already (parking at key destinations – eg: Margate Football Club); What about dangerous roads elsewhere?; Should be concentrating on improving the roads in existing centres/existing roads are in a bad state of repair and should be the priority; Margate-Ramsgate Road should be dualled as much as possible	See other responses in relation to the new road proposals. KCC are aware of other issues on the network and are considering various mitigation schemes, some of which form part of the Inner Circuit or related schemes. This issue of road maintenance is acknowledged, but it does not fall within the scope of the Local Plan, unless it is addressed by	**No change.**

SECTION 8 – Strategic Routes policy		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
	the implementation of one of the identified road schemes. The dualling of the Margate-Ramsgate has not been identified as one of the key schemes to be undertaken as part of the improvements associated with the Local Plan. This is a route served by the dedicated "Loop" bus route, and proactively encouraging additional car use along this route is not desirable. In any event such proposals would almost inevitably lead to the demolition of a substantial number of properties, or to a significant diminution of residential amenity for occupiers of properties along the route.	
If there was less housing, not so many new roads needed/roads are just a reaction to development. New housing sites to support roads or roads are just a reaction to development	The Local Plan needs to make provision for sufficient housing land to meet the Objectively Assessed Need for new housing identified in the Strategic Housing Market Assessment. In selecting sites, a key factor is the nature of the existing road and transport network, assessing where there is capacity and where there are potential improvements. The Highways Authority (KCC) have advised the Council on these matters and it is considered that the proposed new roads/road improvements are the most suitable solution.	**No change.**
Not very sustainable on its own. Need to also address non-car travel – cycling; buses; rail services. New roads need high quality cycle paths, links to National Cycle Routes	The Local Plan and emerging Transport Strategy both need to address other forms of transport than the private car. The draft Local Plan already contains policies (draft Policies TP02, TP03 and TP04) to support bus services and cycling and walking. The Council and KCC are working to encourage new services incorporating the allocated strategic sites.	**No change to draft Local Plan.**

SECTION 8 – Strategic Routes policy		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Manston Court Road improvement could have a detrimental impact on Manston village's historic centre	The road proposals shown in the draft Local Plan are indicative only and do not show an exact route. More detailed proposals as to the exact route and design will be included in the Transport Strategy. Issues such design, conservation, etc will be addressed at the detailed design stage.	**No change to draft Local Plan.**
Need to be aware of: • archaeology/heritage assets • air quality issues and AQMA • water run-off protection • loss of best and most versatile farmland • public bridleways – need to provide crossings and protect Half Mile Ride	Agreed. These matters are addressed by other policies in the draft Local Plan and will need to be addressed as detailed schemes are developed.	**No change.**
Farmers need to be involved in discussions as main landowners and need to ensure that the scheme does not have a detrimental impact on farming – need to keep compulsory acquisition to a minimum	KCC and TDC will need to discuss routes with landowners (including farmers) as necessary as detailed design work progresses.	**No change.**

SECTION 9 – Implementation policy		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Costs need to be proportionate to proposed development; need to consider all other relevant forms of funding – not clear what the full obligations for each site might be. Needs more detail; viability testing/evidence; what is the relationship with CIL?	The Council has undertaken Whole Plan Viability work, which will help to inform the draft Plan. The Council is also committed to ensuring the development contributions to key infrastructure meet the requirements of Government guidance. As part of the IDP process, the Council is seeking to ensure that the infrastructure is deliverable and is also committed to pursuing external funding where it is available. Provisionally, the Council's position is that key infrastructure should be delivered via s106 on strategic sites, and that smaller, less critical projects funded through the use of CIL.	**No change**
30% Affordable housing may not always be possible – flexibility may be needed on this to deliver other infrastructure requirements	There is built-in flexibility in the planning and s106 processes for viability to be considered in relation to individual circumstances. In dealing with applications, the Council takes a robust, but pragmatic approach to development viability, and commissions independent advice, where necessary.	**No change**
Different views expressed about whether larger sites should or should not be CIL-free	Provisionally, it is the Council's view that, in order to deliver some elements of key infrastructure at an early stage of development, the s106 model provides the most flexible and effective tool. It is important to ensure that development is viable, so the use of CIL on strategic sites will be dependent on the balance of contributions (whether financial or "in kind" on-site) to infrastructure across all the sites in the draft Plan.	**No change**
Infrastructure Delivery Plan (IDP) requirements not sufficient to meet community needs	The IDP is not a static document, and the Council recognises the need to maintain the IDP as a working document through the Plan process. The IDP is a reflection of advice from statutory bodies and infrastructure providers, so the Council considers that it	**No change**

SECTION 9 – Implementation policy		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
	represents the appropriate level of infrastructure to support new development. However, if new key infrastructure is identified as the IDP develops, that can be incorporated as necessary.	
Concerns raised about water supply	The water supply industry has its own business planning process, and regularly reviews its provisions in relation to new development. However, the Council is seeking to involve all service providers in the infrastructure planning process to make sure that key infrastructure is delivered in a timely manner alongside new development.	**No change**
Important to deliver infrastructure early in the development process, even now before any new housing is built	The Council is committed to working with site developers to make sure that infrastructure is delivered in a timely way alongside development. The point at which delivery of individual elements of infrastructure are brought forward will depend on the individual developments. Delivery programmes will be secured through s106 agreements or other suitable mechanisms.	**No change**
The infrastructure requirements of development (especially on strategic sites) should be detailed within the policies of the draft Local Plan and should not be delegated to a non-statutory unadopted document, which carries limited weight in planning terms as at best it would be considered a material consideration.	The draft Local Plan in its strategic site policies identifies a range of key infrastructure where it needs to be delivered on the site. Other policies in the draft Plan identify other infrastructure that needs to be provided, or where a contribution is required to off-site infrastructure.	**No Change**
More detail needed on Transport Strategy; concerns raised about ability of roads to cope with new development	The Transport Strategy is a joint document prepared by KCC and TDC. It addresses a range of transport issues and sets out measures for improving both public and private transport. KCC has undertaken a strategic assessment of the impacts of new development on the network, and the proposal for the Inner Circuit developed from that assessment, which should help to	**No change to draft Local Plan**

SECTION 9 – Implementation policy		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
	significantly relieve pressure on the existing road network.	
Need to work with: • CCG/NHS to ensure adequate healthcare infrastructure. No actual policy for QEQM. • Kent Police - requests £13m for Police Service requirements (mainly accommodation costs) • KCC/EFA on both primary and secondary education provision - needs specific reference in the draft Local Plan	The Council is aware of the requests of the various bodies and is aiming to address these through the IDP process, subject to viability. It is also the intention to carry forward the allocation in the adopted Local Plan to allow for possible expansion of facilities at QEQM.	**Amend the draft Local Plan to include a policy for expansion of QEQM (see adopted Policy CF4)**
Other matters need to be addressed: • Strategic Route Network impacts • identified needs of villages • need to attract business to the area should be a priority • SPA mitigation measures	The Council (working with KCC) has undertaken an assessment of the potential impacts of the development proposed in the Local Plan on the junctions of the strategic route network (ie: with the A2). The assessment indicates that the impact of new development is marginal. The needs of villages can be addressed to some extent through Neighbourhood Plans, but where specific requirements arise as a result of new development in villages; these can be addressed through the Infrastructure Delivery Plan process. The Council has adopted an Economic Growth Strategy which sets out the Council's priorities for economic development over the next few years. This sets out a number of initiatives and priorities to support local business and new business in the district. SPA mitigation measures are already included in the draft Local Plan (draft Policy SP25) and through the Strategic Access, Management & Monitoring (SAMM) strategy.	**No Change**

SECTION 9 – Implementation policy		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Other agencies need to guarantee their contribution to infrastructure provision – how can this all work with Government cuts?	The Council's intention is to seek the agreement and commitment of the relevant bodies to delivering their elements of the Infrastructure Delivery Plan in a timely way through the Plan period.	**No change**
Manston Airport is an infrastructure asset and should be retained; development of the Airport for housing would put a strain on local services	This issue is addressed under section 2. However, the draft Plan needs to identify land to meet the Objectively Assessed Need for housing in the Strategic Housing Market Assessment, and so the need to address local service requirements is necessary for the IDP.	**No change to Implementation section**

SECTION – 10 – LAND AT MANSTON ROAD/SHOTTENDANE ROAD		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Issues with Shottendane Road – speeding problems, blind area turning out of Firbank Gardens, surface water flooding	These issues will be addressed in the detail of the emerging Transport Strategy and detailed masterplanning of the site.	**No change**
Policy should include requirement for a HIA to assess the effects on St Johns Cemetery and sites within it, as cemetery is of some historical significance and there are a number of listed memorials within it.	Agree – this is an issue specific to this site.	**Add wording to policy requiring a Heritage Impact Assessment to assess the impacts on St Johns Cemetery**
No masterplan yet so unlikely that first dwellings will be completed by 2020-21	The indicative phasing for strategic sites and smaller allocations is being reviewed	**Indicative phasing in Appendix B to be reviewed**
Policy should include a clause requiring that consideration is given to policies CSW 16 and DM 8 of the adopted Kent Minerals and Waste Local Plan (July 2016) to ensure the identification of the potential impacts of new development on existing waste management capacity and associated mitigation measures.	Noted.	**Include references to relevant policies of the adopted Kent Minerals and Waste Local Plan in the policy.**
Designated Bridleways TM28 and TM14 should be retained. TM13 should be designated as a footpath – could be upgraded to a multi user route. TM23 and TM28 could be multi user routes.	Agree that bridleways should be retained and/or upgraded either as existing or new routes.	**Include wording in the policy to retain or upgrade designated bridleways.**

SECTION 11 – National Standards: Water Efficiency		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
There has been much support for the national standard relating to water efficiency as Thanet is within a water-stressed area.	Noted	Include the text and a policy relating to water efficiency in the submission local plan
Comments received relating to insisting that Southern Water must improve facilities to ensure waste water leakages into the sea never occur again.	The Council will continue to work with Southern Water to improve facilities.	Include a reference in the local plan to working with southern water to improve facilities.
Water efficiency should also include: • Water harvesting and purification for low-grade functions eg toilet flushing and watering gardens • A greywater system so that water used in the shower and bath can be recycled through a cleansing unit and reused for toilet flushing or garden • Ground source water which should be for drinking use	The inclusion of other water efficiency measures may be appropriate in certain circumstances where they do not affect viability of a scheme.	Include a reference in the submission local plan to other water efficiency measures where appropriate.
Government should take into account that Thanet is a water-stressed area when imposing an unsustainable number of new housing.	One of the Government's main objectives is to address the housing crisis through increased provision, therefore the district is required to provide a certain level of housing. In order to ensure that new development does not have a detrimental impact on water resources the Council can include a requirement for water	Include the text and a policy relating to water efficiency in the submission local

SECTION 11 – National Standards: Water Efficiency		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
	efficiency and apply a reduced water usage limit in the local plan which can be implemented through the building control process.	plan
If the current best practice is for 105lpd then why is the proposal to include only 110lpd	Although EA and SW recommend 105 lpd the current mandatory national standard set out in building regulations is 125lpd. The Housing Optional Standards state that where there is a local need a reduced usage allowance per person of 110lpd can be implemented.	Include the text and a policy relating to water efficiency in the submission local plan

SECTION 11 – National Standards: Internal Space Standards		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
There has been one objection to the internal space standards stating that maximum flexibility should be provided to housebuilders to allow for new housing products to be tested and a reduction in space standards can still provide a quality product.	One of the main objectives of the plan is to improve the health and well-being of residents by providing good quality accommodation. The council has for a long time been concerned about the size of units in development, for example the 1988 Conversion to Flats Guidelines and the Cliftonville DPD 2010. As development densities increase on new developments this can have an effect on space standards for individual units which the Council is trying to address through implementing the national internal space standards	The council will draw on local evidence to support implementing the National Space Standards. Include a policy in the Submission draft relating to internal space standards.
National Standards for internal space in new development; accessible and adaptable accommodation; and water efficiency; TDC should adopt codes of sustainable building. At the moment, developers are permitted to make a profit from the sale of homes built unsustainably. It is left to the new occupiers to pay high bills for energy, water, etc. Swale has, for at least 5 years, demanded that developers meet a high standard. TDC should do the same. This is from Wikipedia "As a result of the increased interest in green building concepts and practices, a number of organizations have developed standards, codes and rating systems that let government regulators, building professionals and consumers embrace green building with confidence. In some cases, codes are written so local governments can adopt them as bylaws to reduce the local environmental impact of buildings.	The Government has revised its approach to sustainable construction since the production of the preferred option local plan in 2015. This section of the plan needs to be rewritten to reflect this change and the supporting text will include a reference to rating systems such as BREEAM.	This section is to be rewritten in light of changes of government guidance.

SECTION 11 – National Standards: Internal Space Standards		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Green building rating systems such as BREEAM … help consumers determine a structure level of environmental performance. They award credits for optional building features that support green design in categories such as location and maintenance of building site, conservation of water, energy, and building materials, and occupant comfort and health." I would also urge TDC to apply the same standards to conversions.		
There have been a number of planning applications agreed in recent years in Broadstairs where accommodation is too small and the development squeezed onto a very small plot, to the detriment of the new residents and neighbouring properties.	Noted	Include a policy in the Submission draft relating to internal space standards.
There are a number of general comments from various local groups supporting the application of internal space standards.	Noted	Include a policy in the Submission draft relating to internal space standards.

SECTION 11 – National Standards: Accessible and Adaptable Accommodation		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
General comments in support of implementing the Accessible and Adaptable Accommodation standard to allow residential units to meet the needs of elderly and those with mobility problems.	Noted	Include a policy relating for accessible and adaptable accommodation in the submission draft.
Encourage TDC to opt for at least a 10% minimum percentage of dwellings meeting requirement M4(2) of accessible and adaptable dwellings. We believe the long term viability and sustainability of communities should be key in all such decisions, and Thanet's population is older than average with a poorer than average health profile.	Noted	Include a policy relating for accessible and adaptable accommodation in the submission draft.
All new dwellings should be built to provide disabled access. It is not sufficient for the disabled to have access to their own properties. They also require free access to the homes of their friends and families, along with accessible toilet provision	Whilst this is desirable, there may be viability issues for smaller developments. It may be more appropriate to relate this need as identified on the housing register.	Include a policy relating for accessible and adaptable accommodation in the submission draft.
Support for 10% minimum of all homes to be designed to building regulation optional requirement M4(2). Although there was a comment for this to be increased to 15%	Noted	Include a policy relating for accessible and adaptable accommodation in the submission draft.

SECTION 11 – National Standards: Accessible and Adaptable Accommodation		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
In order to accommodate the ageing population, developers do not need 'encouragement', they need tight standards that ensure that the appropriate housing is constructed. For example: A minimum of 1 in 10 units constructed must be fully wheelchair accessible. All units constructed must have basic wheelchair accessibility to the ground floor accommodation.	This requirement needs to be balanced against viability considerations. The council is looking to relate the policy to the household need on the housing register.	Include a policy relating for accessible and adaptable accommodation in the submission draft.

AMENDMENTS TO APPENDIX B OF THE PREFERRED OPTIONS DRAFT LOCAL PLAN		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Housing developments at Manston Road/Shottendane Road and Nash/Manston Roads should specify earlier delivery periods in order to prioritise improvements to the road networks at these locations. These improvements are required now, unlike other road proposals which are required because of new development.	Noted. The indicative phasing for strategic sites and smaller allocations is being reviewed	**Indicative phasing in Appendix B to be reviewed**
Current delivery plan suggests the strategic sites will deliver a total of 1590 dwellings in the first 5 years. Several of these sites will be competing within the same market area. Unlikely that three developers on the same large site could deliver 50 dwellings pa each, ie 150 pa. Therefore maximum delivered on these sites is likely to be around 100-120 pa with three housebuilders on site.	Noted. The indicative phasing for strategic sites and smaller allocations is being reviewed	**Indicative phasing in Appendix B to be reviewed**
Tothill Street, Minster and west of Cliffsend – proposed delivery rates are shown as starting in 2019-20 and 2020-21. Sites have been subject of pre-application submissions with intentions of early planning applications in 2017. Appendix B should be amended to show delivery periods of 2017-18 and 2018-19. Reasonable to assume an average of 50 dwellings pa given favourable market demand for these sites.	Noted. The indicative phasing for strategic sites and smaller allocations is being reviewed	**Indicative phasing in Appendix B to be reviewed**

AMENDMENTS TO APPENDIX B OF THE PREFERRED OPTIONS DRAFT LOCAL PLAN		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Land at Manor Road, St Nicholas at Wade, should be amended from 17 units to 39 to reflect recent planning application.	The 17 units relate to the net number of dwellings and does not include the 39 dwellings on part of the site that already has planning permission.	**No change**
Allocations S536 (Land off Northwood Road, Ramsgate) and SS34 (Thanet Reach, Southern part) – addresses are misleading as they lie adjacent to each other on the south of Millenium Way. More realistic trajectory needed as they should be capable of coming forward earlier than 2019-20 and 2020-21 as assumed in Appendix B.	The indicative phasing for strategic sites and smaller allocations is being reviewed. Agree re-naming the sites would be clearer.	**Indicative phasing in Appendix B to be reviewed. Rename sites as 'Land south of Millenium Way'**

PROPOSED NEW SITES FOR DEVELOPMENT		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
New sites proposed for residential development (some have been submitted previously but not allocated): • Sarre Windmill • Land off Pudding Mill Lane, to the west of Birchington • Land to the west of Minnis Road • Land adj Manston Park Bungalows and Esmonde Drive • Land at Summer Road, St Nicholas at Wade • Land at Shottendane Farm, Shottendane Road, Margate • Land to the south of Monkton Street, adjacent to Foxhunter Park, Monkton • Land at corner of Manor Road and Canterbury Road, St Nicholas at Wade • Land at Woodchurch • Land between Manston Road/Preston Road, Manston • Site known as Lanthorne Court, Broadstairs • South west of Sarre Business Park, Canterbury Road, Sarre • Former Manston Court Garage and Worlds Wonder, Manston • Land at Walters Hall Farm yard,	These sites are currently being assessed under the Strategic Housing Land Allocations Assessment process.	**Include any new sites suitable for allocation in Appendix B to meet housing target requirement.**

PROPOSED NEW SITES FOR DEVELOPMENT		
Issues Raised	**Council response** (including reason for change/no change including any relevant new guidance etc.)	**Outline change**
Monkton • Land at Chantry Park, Sarre, Birchington • Land east of Sarre Court, Sarre • Land north of Millenium Way • Additional land to Birchington Allocation • Additional land to Manston Court Road/Haine Road		
Sites suggested but not as a formal proposal.	Some suggestions were made which were not formal site proposals so did not include details such as site plans, proposed capacities and ownership details. If these suggestions were to come forward for residential development they would be counted as windfall sites.	**No change**