

ANNEX 5: MAIN ISSUES & RECOMMENDED RESPONSES (PREFERRED OPTION STAGE)

Vision, Strategy & Strategic Objectives

Policy/Section	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
Vision & Strategy	A number of respondents have raised issues about the realism and clarity of the Vision and Strategic Priorities set out in the draft Plan.	<p>More detailed responses to particular housing and employment issues can be found in other parts of this Schedule relating to specific policies.</p> <p>However, there is a general point regarding the realism and clarity of the Vision and Strategic Priorities for the draft Plan.</p> <p>The Vision and Strategic Priorities set out in the draft Plan were relevant at the time of writing. The Council recognises that some significant changes have taken place in the local area of the last 2 years, which require a review of some of the detailed elements of the Strategy.</p> <p>However, the overall strategy to meet housing requirements and to help strengthen and diversify the local economy remain valid. The overall employment projections, in relation to housing need, are broadly consistent with the work undertaken for the Preferred Options stage, although the trend employment figure is higher.</p>	Amend vision and strategy section to recognise changes in the district and to set out how the Council will use the Local Plan to address changing circumstances.

<p>Vision</p>	<p>The main part of the vision that we disagree with is the intention of the plan to promote Westwood as a new integrated community. As we explain in response to Policy SP05 [Policy SP07] in the questionnaire, we acknowledge that Westwood has grown as a major retail centre and that this has been designated for some time as a town centre in planning terms. However, it functions as an out of town shopping destination rather than as a town centre. Because of this, we consider it is inappropriate to try and justify it as a town centre by proposing a new residential community around it. This will only serve to push the urban area further into the countryside and will go a long way to infilling the 'horseshoe' of coastal urban development that is described in the plan as being characteristic of Thanet. It will also continue to undermine the vitality and viability of the coastal communities. We do not consider that such further expansion of Westwood to create a new residential community is justified.</p> <p>Furthermore, we believe that by focusing further growth at Westwood other elements of the vision will be undermined, especially</p>	<p>This issue is dealt with in detail under Policy TC07.</p>	
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	the revitalisation of the coastal towns. Indeed, we believe that it has been the growth of Westwood that has in large part lead to the demise of the economic fortunes of the coastal towns.		
Strategic Priority 1	Comments raised about whether Manston Airport and Port Ramsgate should be included in this Strategic Priority	<p>The Airport closed in 2014, and since that time, the Council has been investigating whether the site might be brought back into full and active Airport use. The most recent aspect of that investigation was the “soft marketing” process to invite Expressions of Interest in operating the Airport.</p> <p>The Harbour and Port have undergone some changes since the draft Plan was written. This section needs updating to reflect those changes.</p>	<p>Airport position to be determined.</p> <p>Retain and update references to Port Ramsgate and Harbour.</p>
Strategic Priority 3	Strategic Priority 3 – we support the stated priority and objectives, though as we have explained elsewhere in our comments the housing target is too high being based on an unrealistically high employment growth target. We believe that the priority and objectives can equally be achieved if a lower housing target is set. We also consider that an objective should be included which seeks to ensure that the many long-term vacant dwellings in the district are brought back into beneficial	<p>The housing target aspect of this comment is dealt with in the Housing schedule.</p> <p>In relation to the vacant properties point, for some time the advice of the Planning Inspectorate has been that empty properties cannot be counted in the housing land supply, because they are already part of the housing stock.</p> <p>However, more recent advice indicates that some empty properties can be counted towards the supply, but only under strict circumstances, as follows:</p>	Amend residual housing target to make allowance for 540 dwellings to be brought back into use during the Local Plan period.

	residential use.	<p>(1) The properties in question have been empty for a period of 4 years or more; and</p> <p>(2) The Council has an active and robust programme for bringing those properties back into use.</p> <p>The Council has therefore carried out a rigorous review of empty homes based on these criteria, and the likely impact of its Empty Homes Initiative over the period of the Local Plan.</p> <p>It has calculated that it can make an allowance of 540 dwellings coming back into residential use during the period of the Local Plan.</p>	
Policy SP01	<p>Policy SP01 and associated map 4 and 5 - showing the hierarchy of development, Natural England would wish the evidence base of farmland birds and functionally related habitats to SPAs to be taken into account prior to allocation this should be addressed both in the HRA and SEA, that should consider these impacts. There is data that would help with (i.e. HLS/ELS, report on where over 50% of SPA feed offsite around Pegwell Bay, the importance of Birchington and Plum pudding with regard to roosting birds etc. and farmland bird targets) and we would be happy to discuss with the LA.</p>	<p>The Council recognises the importance of land functionally related to the Special Protection Area, and has commissioned Golden Plover surveys in discussion with Natural England. The results of the surveys indicate that there are no significant issues in relation to the proposed site allocations. However, it is the intention to require affected sites to include mitigation measures in conjunction with Natural England.</p>	<p>It is proposed to delete Policy SP01.</p>

Economic Strategy

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
SP02	Over-ambitious growth target	The Baseline scenario forecasted job growth in Thanet at 3,100 based on the economy performing as it does at the moment and therefore this scenario would maintain the status quo. This scenario would not deliver the improvements to Thanet's economy that the Council wishes to see. This target also includes an element of growth on the airport site which is a reasonable assumption over the plan period. In addition the 2015 SHMA carried out by GL Hearn looked at the employment growth scenario used by the South East LEP produced by Oxford Economics using the East of England forecasting model. This showed that the baseline forecast for Thanet at 4,800 which is close to the 5000 target.	No change
SP02	Growth target not ambitious enough	The figure is based on assessment of future employment need carried out by Experian. Three scenarios were provided and a level between the baseline figure and an optimistic level of employment growth was selected. An overly high target would not be capable of being delivered.	No change
SP02	Lack of clarity on where jobs are coming from	The job growth figures are the result from an Economic and Employment Assessment. The report breaks down the job growth figures to employment sectors (SIC level). The nature of forecasting is that detail is very difficult to accurately capture. Alongside the adoption of	No change

		the Local Plan other projects are in play that aim of to attract employment growth to Thanet, such as the Economic Growth Strategy.	
SP02	Querying growth sectors	The growth sectors identified in the “Policy On” economic growth scenario assumed enhanced performance in the tourism and green sectors. These are sectors that Thanet are currently strong in and they have also been targeted in the Councils Economic and Regeneration Strategy. Other sectors that Thanet are particularly strong on include public sector administration, education and health. Increasingly the cultural and creative sectors are growth areas, this is particularly true in Margate.	No Change
SP02	Why the differential between housing and job numbers	The housing target and job target in the Local Plan do not appear to align due to the fact that many people that need to be housed are economically inactive. There is a very large growth in the retired population that will not need a job. In addition the housing target takes account of people that are already in Thanet in overcrowded households. Many of these people already have jobs and would simply be moving out of their parents’ house, for example.	No Change
SP02	Too much weight is given to growth at the airport in the jobs target	It is clear that some people refer to other documents such as KCCs Growth Without Gridlock and Infratil’s Airport Masterplan that all predict job growth at the airport. The Draft Plan did not base growth forecasts on these documents but rather used the Economic and Employment Assessment 2012.	No Change

		<p>The Council assumed that given the recent uncertainty at the airport that the low growth scenario at the airport should be assumed. This assumes 240 jobs until 2031. It was considered that it is reasonable to assume that the site will deliver a level of job growth over the plan period.</p>	
SP03	There should be a reduction in the employment land supply	<p>The Council is aware of the oversupply of employment land has re scored all of the allocated sites to assess their contribution to the overall employment strategy. The assessment concluded that 19.7hecatres should be released. With the subsequent removal of much of the employment allocation from Eurokent following the appeal decision released employment land has risen to over 34 hectares.</p>	No Change
SP03	Employment sites should be used to accommodate some of the housing	<p>The Council is aware of the oversupply of employment land has re scored all of the allocated sites to assess their contribution to the overall employment strategy. The assessment concluded that 19.7hecatres should be released. Some of these sites have been allocated for housing.</p>	No Change
SP03	Employment oversupply is contrary to the NPPF that states we should avoid the long term protection of employment sites	<p>The Council is aware of the oversupply of employment land has re scored all of the allocated sites to assess their contribution to the overall employment strategy. The assessment concluded that 19.7hecatres should be released. With the subsequent removal of much of the employment allocation</p>	No Change

		from Eurokent following the appeal decision released employment land has risen to over 34 hectares.	
SP03	Some felt there should be more flexibility on allocated strategic employment sites	The Eurokent site has been identified as Thanet's flexible employment allocation and is included within the sequential test to allocate town centre and leisure uses should the scale and format preclude their location within the identified town centres. An element of development that is ancillary to the employment use would be acceptable on all employment sites.	No Change
SP04	Support from statutory authorities and a mixed response from local people. Seems to be based on a misunderstanding that it is part of the airport.	The Manston employment site is an established site and is approximately half developed. Due to the name of the business park it would appear that some people thought that this is part of Manston Airport.	No Change
SP05	Mixed response – majority indicate wish for Airport to remain open, some arguing that the Council should serve a CPO; some respondents suggest the site should be developed for housing as an alternative to other allocated sites.	Cabinet resolved on 31st July 2014 to carry out a soft-market testing exercise to identify a CPO Indemnity Partner – a third party who could cover the costs of compulsory purchase of the Manston Airport site. Subsequently in December 2014 Cabinet resolved that no further action be taken at the present time on a CPO of Manston Airport, on the basis that the Council has not identified any suitable expressions of interest that fulfil the requirements of the Council for a CPO indemnity partner and that it does not have the financial resources to pursue a CPO in its own right. In July 2015 Cabinet decided to review the	Draft Mixed-Use policy for the airport site
SP05	The issue with the CPO needs to be resolved before the Local Plan proceeds		
SP05	Some support for alternative mixed use development as they believe the airport is no longer viable		

SP05	Some think night flights are needed to make the airport more viable	<p>December decision and authorised that advice be obtained to determine whether RiverOak are a suitable indemnity partner in relation to a CPO for Manston Airport and to provide advice on the indemnity agreement and CPO process generally. Subsequently in October 2015 Cabinet reviewed its position and decided that no further action be taken at the present time on a CPO of Manston Airport, on the basis that RiverOak do not fulfil the requirements of the Council for an indemnity partner;</p> <p>In December 2015 Cabinet sought to set out a formal process for identifying interest from third parties to be a Council indemnity partner for a potential CPO for Manston Airport.</p> <p>Subsequently in June 2016 Cabinet considered a report which drew the conclusions that in terms of the key lines of enquiry, the market cannot deliver on the council's requirements; there is no established market which is able to deliver, or an adequate number of operators; the market has no capacity to deliver the requirements and there is no cost or other benefits in taking this matter further. Cabinet noted the results of the soft market testing assessment and decided to take no further action in respect of the interested parties.</p> <p>Also in 2016 the Council commissioned an airport viability study to assess whether an airport was a viable option for the site within the plan period to 2031.</p> <p>The report concluded that airport operations at Manston are very unlikely to be financially viable in the longer term, and almost certainly not possible in the period to 2031.</p>	
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		Taking on board the conclusions of the airport viability report and given the level of objectively assessed housing need the Council considers that the best use for this 320ha brownfield site is for a mixed use development primarily focused on residential.	
SP05	There is no “need” for the airport as an employment site	Partially agree. The airport site is not included as part of the employment land portfolio as it is such a unique use. A small element of the jobs target assumes the delivery of some jobs on the site over the plan period. If the site is not an airport it is considered that it shouldn't be solely residential and should be a sustainable mixed use settlement comprising employment, retail and community facilities, as well as residential.	Draft Mixed-Use policy for the airport site

Town Centre Strategy

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
SP07 (SP06?)	Objections to the role/status of Westwood. More effort should be put into the other centres	Many people have expressed concern that Westwood is identified as being at the top of the retail hierarchy. This is the case merely because it has the largest catchment of all the town centres and this catchment extends outside the District. The hierarchy reflects the	Make it clear in the text that Westwood is not prioritised over the town centres.

		<p>inter relationship between the town centres as is required by the NPPF.</p> <p>The Plan does not propose to extend Westwood beyond its built up limits and has concluded that there is very little retail need to the end of the plan period and therefore any development can be accommodated by mezzanine and reconfiguration of the site. The Council have decided not to increase the market share of Westwood.</p> <p>Westwood's status as a town centre was established in the 2006 Local Plan as a response to the piecemeal developments taking place and the leakage of retail expenditure out of the District, and in particular to Canterbury.</p>	
SP07	<p>There is some misunderstanding that the Council wishes to expand Westwood Retail area. Many are against expansion making reference to the existing traffic problems around the area</p>	<p>Many people have expressed concern that Westwood is identified as being at the top of the retail hierarchy. This is the case merely because it has the largest catchment of all the town centres and this catchment extends outside the District. The hierarchy reflects the inter relationship between the town centres as is required by the NPPF.</p> <p>The Plan does not propose to extend Westwood beyond its built up limits and has concluded that there is very little retail need to the end of the plan period and therefore any development can be accommodated by mezzanine and reconfiguration of the site. The Council have decided not to increase the market share of Westwood.</p> <p>Any development in the vicinity of Westwood will be expected to have regard to the</p>	No Change

		Westwood Relief Strategy and pedestrian connectivity.	
SP07	Re Westwood, some think we are putting too much faith in a failing centre	Retail need has been assessed by Nathaniel Lichfield and partners and they have concluded that 27,870 metres squared of retail floorspace is required at Westwood. 14,124 sqm of which has been taken up by the Sainsburys permission. 22,864 of the committed development is open and trading. The remaining floorspace requirements can easily be accommodated within the footprint of Westwood. The scenario of increasing the market share was tested and the Council decided against further expansion of Westwood. It is unrealistic to de allocate Westwood as it has already established its role in the retail hierarchy. Peaks and troughs of vacancy's are to be expected especially at the time of rent reviews.	No Change
SP08	Margate should not flourish at the expense of Ramsgate	The town centre policies treat all of the centres the same in terms of allocating primary and secondary frontages and highlighting specific areas of interest within the towns (Opportunity areas?) The overall town centre strategy seeks to build on the strengths of all of the town centres. In terms of tourism and leisure uses the Council sees Thanet as a destination encompassing the range of areas and assets.	No Change
SP09	General support for the policy but scepticism expressed over the future of the Port/ferry operation	The policy is supportive of development of the port which would contribute to Thanet's economy and the aspirations of the Port Masterplan. In relation to the scepticism it is	No Change

		worth noting that since the consultation period a freight operator has been found representing the car industry which is an encouraging development.	
SP09	The port should be used for leisure uses/luxury apartments rather than for concrete processing	Ramsgate Port is safeguarded for port related uses. Leisure and tourism uses are permitted within the Ramsgate Waterfront area around the Royal Harbour. The reference to concrete processing refers to a piece of pre application advice and this is not a proposal of the Local Plan.	No Change

Housing Strategy

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
SP11 – Housing Provision			
	<p>In broad terms:</p> <ul style="list-style-type: none"> • support for the proposed housing numbers comes from statutory bodies such as the Homes & Communities Agency, neighbouring authorities and KCC • some house-builders/developers have objected because they believe the housing numbers should be higher to meet Government guidance • significant volume of objections seeking lower housing figures: (see bullets in row below) 	<p>Government guidance expects dwelling provision to be informed by Objective Assessment of Need. Housing numbers in the PO Plan were informed by scenario based dwelling forecasts (published as part of evidence base) and in light of economic aspirations. However, this evidence is being reviewed through an updated Strategic Housing Market Assessment conducted in light of government guidance and, alongside other evidence, including the Strategic Housing Land Availability Assessment, will inform review of the quantity and type of dwellings to be provided for in the pre-submission Plan.</p>	<p>Housing provision to be reviewed and established in light conclusions of updated SHMA and any other relevant aspects of the evidence base, in line with Government Guidance.</p>
	<p>Lower housing numbers - not needed – where is evidence for housing numbers?/flawed assumptions</p>	<p>See response above</p>	<p>As above</p>
	<p>Who is housing for? In-migration/London overspill</p>	<p>In line with Government Guidance the starting point for objectively assessing need will be household forecasts published by Department For Communities and Local Government. These are trend based and therefore the implied requirement can be expected to reflect an element of continuing inward migration an element of which has been from London.</p>	<p>No change</p>

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
	Why not use empty properties first?	<p>In considering how much greenfield land is needed to meet total housing requirements, some allowance has been made for empty property. The Council works vigorously to bring empty property back into beneficial use.</p> <p>As a result of recent advice, the Council has calculated the amount of empty properties brought back into use after a vacancy of 4 years as a direct result of the Council's Empty homes programme, and projected that forward for the rest of the Plan period. This can be included as part of the housing land supply and totals 540 units.</p>	Amend Table 2 (p54) accordingly, but no other change required.
	Should use more brownfield first – protect “green belts”	An expectation stated in the NPPF is that policies should make effective use of previously developed (brownfield) land. In identifying sites to accommodate total housing requirements the Council's approach has been to optimise the capacity of previously developed land. However, to meet the total requirement, greenfield land is also required.	No change. This aspect has already been factored into the strategy for planned location of housing.
	Loss of best quality agricultural land	While acknowledging potential economic and other benefits of best and most versatile agricultural land, the NPPF does not signify that its presence would justify reducing housing targets below objectively assessed need, and states that where significant development of agricultural land is demonstrated as necessary, the local planning	No change. This aspect has already been factored into the strategy for planned location of housing.

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		housing provision figure also takes account of the need to accommodate the additional labour requirement to meet the level of employment growth anticipated in the District's Economic and Regeneration Strategy. It is not anticipated that a reduced employment target would reduce overall housing need which is largely driven by demographic factors including household formation.	
	Utilities not capable of supply Sewerage system inadequate	Engagement of the utility services including the agency responsible for sewerage is ongoing. The Plan will be supported by an Infrastructure Delivery Plan informed by such engagement. This process will assist these providers in understanding the impact of the Plan on their service delivery programmes and inform the Plan by identifying the infrastructure and resources needed, when they will be required and how they will be provided/funded.	No change other than to continue engagement to inform Infrastructure Delivery plan and Local Plan policies.
	Impacts on environment	<p>The process of identifying sites to accommodate future homes has included criteria to assess relative impact of options on the environment including issues such as landscape and sustainability of location.</p> <p>The NPPF is clear that the Plan should meet in full objectively assessed need for housing, as far as consistent with policies set out in the Framework. It identifies specific environmental features and designations where in general a</p>	No change as this aspect is considered to be adequately addressed through the Strategic Housing Land Availability Assessment and Strategy for Planned Location of Housing

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		<p>presumption against harmful development applies: (Green Belt, National Parks, the Broads, Areas of Outstanding Natural Beauty and within or otherwise likely to adversely affect a Site of Special Scientific Interest). The only such designation applying to Thanet is the SSSI (largely coinciding with European nature conservation designations. However, this designation is essentially limited to the foreshore and housing development will be subject to sufficient mitigation. On this basis the policies in the Framework do not signify any constraints that would justify a level of housing provision below that of objectively assessed need.</p>	
	<p>Increase in deprivation Increase in crime</p>	<p>These representations evidently reflect concerns that providing more homes than needed by Thanet's existing population may fuel in-migration by vulnerable and benefit dependent households.</p> <p>Government policy as expressed in the NPPF is to boost the supply of homes, and in referring to its household projections as a starting point for assessing local need, it is clear that objectively assessed need will incorporate a continuing element of in-migration.</p> <p>The draft Plan acknowledges that the district is relatively deprived and contains pockets of severe deprivation. However, it aims to ensure</p>	<p>No change as these factors are considered to be already addressed.</p>

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		<p>that planned development should serve to improve the social and economic position of the district by through a more aspirational and economically independent community through the measures summarised below.</p> <ul style="list-style-type: none"> • Adopting a positive economic and regeneration strategy to diversify and expand local job opportunities, • supporting a Parkway Station • setting out area based housing objectives including improvements to the quality and configuration of housing stock and environment in certain areas to support a mixed, settled and inclusive community. <p>The NPPF notes that the planning system can serve to facilitate social interaction and create healthy, inclusive communities and expects policies and decisions to promote safe and accessible environments where crime and disorder and fear of crime do not undermine quality of life. The Plan's primary aims for development include promoting inclusive design, including a policy requirement that development must improve people's quality of life by creating safe and accessible environments and promote public safety and security.</p>	
	Out of date evidence	It is acknowledged that the Strategic Housing	Content of Pre-Submission Draft

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		Market Assessment (SHMA) is dated. The SHMA has been revised to provide up to date evidence for the objectively assessed housing need for Thanet and the types and affordability of homes required. These will inform the level, size, type and affordability of housing to be provided for in the pre-submission draft Local Plan. The SHLAA will be updated for the pre-submission draft Local Plan.	Plan to be informed by updated Strategic Housing Market Assessment by GL Hearn.
	12,000 far too many for the district	The Council is required to set housing provisions having regard to objectively assessed need. Previous forecasts suggested that, alongside economic aspirations, 12,000 was the appropriate requirement. This situation is under review as outlined above.	Level of housing provision proposed in the pre-submission draft to be reviewed in light of the updated Strategic Housing Market Assessment.
	Urban sprawl will have an adverse effect on tourism	In making provision to meet the housing target, the Council has assessed potential new housing locations against a variety of important criteria, including coastal wildlife designations, landscape, archaeology and conservation and transport in order to identify the most suitable and sustainable sites.	No change
	Target is not localism	Government guidance is quite clear that establishing housing requirements to be provided for should be informed by an objective assessment of need (OAN), and that the starting point in this process is Governments published household growth projections. Other than coastal wildlife designations (which are not proposed as	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		housing allocations in Thanet) the guidance identifies no other constraints currently relevant in Thanet which may justify providing below the objectively assessed need.	
	More care and supported homes needed for our ageing population	The Plan acknowledges that housing requirements extend beyond conventional dwellings to include homes suited to households with mobility limitations and specialised accommodation such as sheltered housing, extra care housing and homes providing 24/7 care. Policy H07 expresses the Council's intention to seek to approve proposals for such housing for which there is evidence of need. The updated Strategic Housing Market Assessment (SHMA) together with Kent County Council's strategy for accommodation of adult social care clients will be important sources of reference regarding evidence of need.	No change other than to review policy supporting care and assisted homes in line with most recent evidence including the updated SHMA
	Conflict with not developing in the countryside	<p>Strategic Priority 4 of the draft Local Plan includes protection and enhancement of Thanet's environment including the coast and countryside.</p> <p>In making provision to accommodate the housing target, the approach has been to optimise the number of such homes which can be accommodated on previously developed land in the district. However, the Strategic Housing Land Availability Assessment demonstrates that it will not be possible to meet the overall requirement without a</p>	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		significant call on greenfield land in the countryside. In identifying the best greenfield sites selection criteria have included landscape and role of sites in maintaining separation between and identity of individual settlements.	
	Homes will not be affordable for local people	The type, size and affordability of the new homes required will be reviewed in the updated Strategic Housing Market Assessment. This will take account of data on local incomes and house prices. This will serve to inform policies regulating the type of housing to be delivered and how much should be delivered as affordable housing.	No change other than to review the calibration of policies regarding the type and quantity of homes required and target proportion of affordable homes in light of the conclusions of the updated SHMA.
	The location of houses does not follow the issues and options consultation as the chosen locations are villages	The issues and options consultation included scenarios featuring some housing at and adjoining rural settlements. The large majority of allocated housing sites are located within or adjoining the coastal urban belt containing the main Thanet towns and Westwood. A relatively modest element of housing is identified at the more sustainable rural settlements.	No change
	Unfair concentration of housing on Ramsgate	Table 12 on page 54 of the draft Plan shows an indicative distribution of housing numbers between the individual settlements. Aside from Westwood, Ramsgate has a higher notional total than the other settlements. (Much of its total figure is by way of sites in the urban area many of which already have planning consent). Reference to the map on page 226 gives a	No change

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		clearer picture of the broad distribution of sites including the strategic sites adjoining the urban area containing the main towns. Selection of allocated sites has been informed by a range of criteria to identify the most sustainable options. On the basis of the illustrative disposition presented on the map, the distribution is not considered in any way disproportionate.	
	Some respondents saying SHMA needs review.	Agree. The content of the pre-submission draft will be informed by the updated SHMA.	The content of the draft Plan will be informed by an updated SHMA (conducted in 2015) prior to publication of the pre-submission consultation draft Plan.
	Comments relating to environmental capacity/optimum population.	National planning policy implies the need to provide for objectively assessed housing need, for which the starting point will be government's trend based household projections. It signifies (Footnote 9) that the specific environmental constraints which might exceptionally justify a lower housing target include various designations (such as Green Belt, AONB, National Park) which are not present in the district. It does refer to protected species and SSSI which are present in the district and protected in other local plan policies. In identifying sites to meet requirements, local assessment criteria have been applied to identify the most sustainable options including role of sites in retaining separation between settlements, biodiversity, landscape and	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		archaeology.	
	No significant objections from utilities, infrastructure providers.	Noted. However, engagement is ongoing and will be applied in reviewing most suitable sites to allocate and infrastructure requirements to be addressed.	No change (engagement ongoing)
	“In combination” recreational effects of housing sites on the SPA need to be addressed through the SAMM work.	Noted. The Mitigation Strategy reflects the overall level of housing development envisaged over the Plan period, and the Plan includes the requirement for housing developments to demonstrate sufficient mitigation.	No change
	Manston Green – building housing under the flight path could impact on airport operation and viability.	Policy SP13 relating to this site allocation clearly indicates that built development will be focused at the northern part of the site and that master planning will be expected to take account of the alignment of the airport runway and the operational needs of the airport.	No change
	(See also comments on strategic sites; majority of comments from local people living in the vicinity of the proposed sites).	Many representations oppose allocation of specific sites for housing development. The selection criteria which have informed identification of these sites is set out in the Strategy for Planned Location of Housing land. (See also section below).	See below
SP12, 14 & 15/H02C - HOUSING ALLOCATIONS			
	Significant level of local objections to allocations (particularly Birchington and Westgate), but also other sites, on a number of grounds as shown below		
	Lack of community services/impact on existing services (education; health; etc.)	Engagement with community service providers is ongoing and will serve to identify the additional/augmented facilities and services needed to support development. These will be incorporated into the Infrastructure Delivery	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		Plan which will support the Local Plan by identifying what is needed, when and how it will be funded.	
	Traffic/parking problems and related pollution	The Local Plan will be supported by a Transport Strategy setting out the transport improvements and infrastructure investment needed to deliver the Plan's proposals. This strategy has been informed by assessments of the impact on the road network of traffic associated with these proposals including planned future housing. The Plan includes policies regarding parking provision for new developments and to safeguard town centre parking provision in line with the Council's car parking strategy.	No change
	Inadequate services	Engagement with utility and service providers is ongoing to assess the infrastructure requirements and resources that will be needed to support development. This will inform the Infrastructure Delivery Plan which will support the Local Plan by identifying the infrastructure needed, when it must be provided and how it will be funded.	No change
	Flooding (historic) Urbanisation will lead to surface water	Flood risk is one of the principal criteria applied in assessing the suitability of sites for allocation. With the exception of the existing built up area in the vicinity of Margate Old Town, residential site allocations generally exclude land in Thanet's low lying identified flood risk areas. In relation to surface water management the Plan contains a policy	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		expectation for development to incorporate appropriate sustainable drainage systems/methods.	
	<p>Loss of views Loss of agricultural land/"green belt" Impact on wildlife Loss of community and historic identity (e.g. settings of Dent de Lion and Quex) Hedgerows</p>	<p>In identifying the most appropriate sites to accommodate planned housing requirements optimum use has been made of previously developed land. However to meet total requirements a significant call is placed on what are currently countryside sites.</p> <p>The Strategy for Planned Location of Housing sets out the key principles and criteria that have been applied in assessing and identifying the most sustainable sites to meet the requirement.</p> <p>These representations identify just some of the factors that have been taken into account (including landscape agricultural land quality, ecology, potential impact on separation between settlements, archaeology and heritage.</p> <p>Any new development will potentially result in loss of existing views. However, proposals will be judged against general design principles set out in the draft Plan (including high quality inclusive design, development relating to the surrounding development, form and layout, compatibility with neighbouring buildings and spaces, and landscape and boundary treatments being designed as an integral part</p>	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		of development and coordinated with adjacent sites).	
	Lack of jobs in area	The Council's Economic and Regeneration Strategy aims to accelerate economic growth and create more jobs. This has been taken account of in assessing how many new homes will be required. However, housing requirements are driven by a range of factors beyond employment : for example demands for additional homes from Thanet's existing population as well as from additional households who may elect to seek a home in the district over the Plan period.	No change
	Loss of walks and rights of way	The Plan recognises the recreational and health benefits of walking and refers to the local walking strategy which identified barriers to walking and specifies a network of routes to be improved. Policy SP34 states that new development must provide safe and attractive walking opportunities. Public rights of way are protected by Policy SP26 which signifies that built development or change of use will not be permitted. Where the need for development is overriding alternative provision would be required. Similar protection is also provided by policy CM02.	No change
	Housing will add to drought problem	Engagement with Southern Water has been ongoing and has informed preparation of the	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		<p>Infrastructure Delivery Plan that will support the Local Plan by identifying what infrastructure will be needed and when.</p> <p>Southern Water uses local plans to inform its investment proposals and has indicated that it finds no fundamental constraints to development proposed in the Plan in terms of water resources.</p>	
	There were also comments from some developers on viability of some of the phasing/other housing sites	Phasing of allocated housing sites has been reviewed including by means of direct contact with promoters of key sites to assess what is likely and feasible.	No change
	Briary Close is not a suitable access for the housing site	The Plan does not signify that Briary Close would provide the/a fundamental access to the site allocation (reference ST1). As indicated in the site specific policy, master planning of development would need to be informed by a transport assessment supported by junction modelling and demonstrating appropriate road and junction improvements and signalling.	No change
	There was some support for a single new settlement elsewhere	<p>Responses to consultation at Issues and Options stage showed only limited support for a new settlement. The interim sustainability appraisal showed that the option of a new settlement (and of freestanding countryside sites) showed significant negative impacts against various criteria compared with other options.</p> <p>Since that time the Council has received additional guidance on how the negative effects of new settlements can be mitigated</p>	Draft new mixed-use policy for the former Manston Airport site

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		and the Council therefore believes that a new settlement could form a legitimate part of the housing strategy	
	There are also some objections from landowners/agents whose sites have not been allocated:	These are being considered on their individual merits in line with established assessment procedures set out in the evidence base	No change
SP19 - Affordable housing			
	Some local objections – appears to be on the assumption that such housing would be for people sent from London boroughs.	Government Policy Guidance indicates that the starting point in assessing the level of housing to be provided for is its latest household forecasts. These forecasts are trend based and thus reflect need and demand for housing from the existing local population and those who may choose to come to live in the district. In this respect an element of total provision arises from the assumption that people will continue to come to the district and some of these may be from London and elsewhere. However, neither the level of housing proposed or the site allocations are based on any assumption or intention of accommodating people sent from the London boroughs.	No change
	Objections from developers relate to viability/deliverability.	The Plan is supported by an Economic Viability Study which has appraised the development proposals including housing and demonstrates that the Plan is deliverable in these terms.	No change
	The percentage of affordable housing should be higher	The element of affordable housing to be negotiated for on housing developments has been informed by the Strategic Housing Market Assessment and the Whole Plan Viability	No change

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		<p>Study. It aims to accommodate forecast need as far as consistent with economic viability of such developments.</p> <p>Review in light of conclusions of new SHMA and final whole plan viability study.</p>	

Environment Strategy

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
SP20	<p>Policy does not meet the test of soundness as it is not positive and lacks evidence to restrict development in rural areas. Landscape can be enhanced through proper planning</p>	<p>The local plan has allocated enough employment and housing land to meet the identified need, therefore it is not necessary to build in the countryside (other than on allocated greenfield sites). The supporting text to policy SP20 sets out further justification.</p> <p>Policy SP20 meets NPPF requirements in 'recognising the intrinsic character and beauty of the countryside' and 'should avoid new isolated homes in the countryside'</p> <p>Thanet's countryside has always been protected from development by planning policy in response to the pressures of development. Structure Plans have recognised the importance of the countryside and included a policy protecting it from non-essential</p>	<p>No change in respect of this comment, however, policy SP20 will need to refer to the Policies map rather than the 2006 Local Plan.</p>

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
		development and protecting the countryside for its own sake. This has been implemented through local plan policies in the Thanet Urban Local Plan 1984 (policy CAC1), Isle of Thanet Local Plan 1998 (policy CL1) and Policy CC1 in the Thanet Local Plan 2006.	
SP21	Include areas between Westgate and Garlinge, and Westgate and Birchington	The area between Westgate and Garlinge is already partially built-up as part of the urban area. As there is not complete physical separation between the two, it would be inappropriate to allocate this as Green Wedge. There is already a Green Wedge between Westgate and Birchington.	No change
SP22	Policy does not meet the test of soundness as it is not positive and lacks evidence to restrict development in rural areas. Landscape can be enhanced through proper planning	The aim of this policy is not to restrict development in rural areas, but to safeguard and enhance the open and historic characteristics of Thanet's countryside and landscapes. Any development should respect the character of these landscapes	No change in relation to this comment. However, this policy may need reviewing in response to further work on landscape character.
SP24	Amendments required to ensure compliance with the Habitats Regulations.	Compliance with Habitat Regulations is addressed in other policies in the plan such as SP25. The aim of this policy is to encourage greater biodiversity through habitat enhancement, restoration and creation rather than being a restrictive policy. However the current policy wording could be improved and should be amended accordingly to refer to the joint work with KCC, Natural England, KWT and other partners on the identification of the Biodiversity Opportunity Areas.	Reword policy SP24 and supporting text with references to Biodiversity Opportunity Areas.
SP25	Amendments required to ensure	Work on a Strategic Access Management and	Rewrite Policy SP25 and supporting

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
	compliance with the Habitats Regulations.	Monitoring Strategy (SAMMS) has progressed since the draft preferred options local plan was prepared. In light of this, it is considered appropriate that policy SP25 and the supporting text be re-written.	text to reflect recent work on SAMMS and Natural England's comments and advice, to reflect the hierarchical nature of designations. Include a new policy relating to the protection of nationally designated nature conservation sites such SSSIs and Marine Conservation Zones.

Transport Strategy

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
SP36: Transport infrastructure	Transport – roads should be in place before the housing – learn from Westwood.	<p>The Council is preparing an Infrastructure Delivery Plan (IDP), which includes transport measures, in conjunction with KCC and others. The IDP seeks to identify all necessary infrastructure to support the development set out in the draft Local Plan, and how that infrastructure should be implemented.</p> <p>The recent improvements around Westwood are indicative of what can be achieved, and the IDP process should help to ensure that occurs in other parts of the district as well.</p> <p>Given the relatively low level of direct government funding for such schemes, it is unlikely that significant infrastructure can</p>	<p>An implementation section, and new Policy should be added to the draft Plan to explain how infrastructure (including transport) will be provided and funded.</p> <p>An Infrastructure Delivery Plan will also be prepared alongside the next stage of the</p>

		<p>be put in place before any development occurs. However, road infrastructure should be provided in parallel with new development, and the Council with KCC is seeking other sources of funding to support the provision of new infrastructure.</p> <p>In taking forward its IDP, the Council will seek to provide a reasonable balance between deliverability, affordability and residual highway impact, between the phases of implementation within the identified mitigation strategy.</p>	draft Plan.
SP38: Strategic Road Network	<p>Highways England have indicated that their main concern is the impact of any planning documents or development management decisions on the M2/A2 corridor, principally M2 junction 7 (Brenley Corner) and A2/A256 junction. While these junctions are located some distance from Thanet, impacts of plans adopted and planning decisions made will be felt beyond individual district boundaries. All transport assessments for strategic sites should address this issue.</p>	<p>This is a matter that Highways England have been raising for some time. The Council's view is that it is highly unlikely that developments in Thanet will have a significant impact on these two junctions.</p> <p>However, the Council is committed to working with neighbouring authorities to assess the potential combined impact of development in East Kent on those two junctions.</p>	No change required to draft Policy SP38.
SP39: Parkway station	<ul style="list-style-type: none"> • Impact on Cliffsend – noise • traffic • People using Cliffsend as free parking • What benefit does it bring? • Wrong location – not joined up with public transport • Make journey time from Ramsgate to London longer 	<p>The proposal for a Parkway Station in Thanet was based on the wider economic benefits that could arise both for Thanet and Dover districts. A business case has been prepared by KCC, and Regional Growth Funding has been earmarked for the project through the South East Local Enterprise Partnership.</p> <p>Initially, it was seen as a driver for the Airport and Discovery Park. However, if the Airport is developed for mixed uses</p>	No change to principle of policy.

	<ul style="list-style-type: none"> • Future of Ramsgate Station? Use swimming pool site for parking • Will lead to pressure for housing • The station should be considered at Manston 	<p>including commercial uses, the Parkway Station could as easily serve that development.</p> <p>The Council also believes that there are wider benefits for the local economy, through improving journey times to the wider South East and London.</p> <p>A number of potential sites were considered for the location of the Parkway Station, and this location near Cliffsend was identified as the most suitable, based on a range of factors.</p> <p>The Council recognises that there may be localised impacts that need to be mitigated, and the draft Policy indicates that such mitigation will need to be provided.</p>	
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Housing

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
H4 – Housing at Rural Settlements			
	<p>General objections to various rural housing sites:</p> <ul style="list-style-type: none"> • change character of settlement • traffic/inadequate roads • lack of/pressure on services • loss of farmland/wildlife • flooding • lack of services/infrastructure 	<p>The majority of housing provision is focused within and adjacent to the urban area containing the Thanet towns. However, the rural settlements have a role not only in meeting local housing need but also in providing a degree of locational choice. As indicated in the topic paper addressing housing levels in the rural settlements, certain of Thanet's rural settlements are considered sufficiently sustainable as to be capable of accommodating development of a scale beyond minor infilling and have been assessed for potential alongside other sustainable locations. The size and location of sites allocated has been informed by the criteria set out in the Strategic Housing land Availability Assessment and Strategy for Planned Location of Housing. This includes character of locality, townscape, trees, sustainability, access, highway capacity, agricultural land quality, ecology, flood risk. Availability of services is subject to ongoing engagement with delivery agencies.</p> <p>Policy H04 subjects all proposals to being compatible with the size form, historic character and historic scale of growth of the settlement</p>	No change
	Not for local people	<p>An element of the housing need to be provided for will be to accommodate the needs of Thanet's existing population as their circumstances change. However, government policy requires that requirements be founded on trend based projection of need and this will thus reflect a continuing degree of in-migration. The Strategic Housing Market Assessment will assess affordability of homes in relation to local incomes and inform policies which aim to assist those who cannot meet their needs through the local market.</p>	No change

	<p>Minster has had too much housing development already</p>	<p>A range of criteria including accessibility to services and character of location has been applied in identifying the most suitable sites to accommodate total housing requirements. These are set out in the Strategic Housing Land Availability Assessment, the topic paper on Housing Levels for Rural Settlements and the Strategy for Planned Location of Housing. Within the rural settlement hierarchy Minster is a highly sustainable settlement.</p> <p>Total housing provided for in the draft Plan (12,000) would represent an increase of over 18% of the district's current housing stock over the period to 2031. The provisions indicated for Minster in the draft Plan would represent a significantly lower proportion (less than 12% increase to the village's housing stock) over that period.</p> <p>In light of the overall level of provision and the criteria applied in selecting suitable sites, the quantity proposed for Minster is considered appropriate and proportionate.</p>	<p>No change</p>
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Safe & Healthy Environment

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
<p>Para 16.17</p>	<p>Objection to SuDS reference – suggested the following wording:</p> <p>Many parts of Thanet have vulnerable groundwater, as a consequence discharges to the ground must be</p>	<p>It is considered important to raise the issue of Sustainable Urban Drainage Systems SUDs and groundwater to increase awareness of the potential consequences of inappropriate SUDs. However, agree that the paragraph could be more positive about SuDs.</p>	<p>Reword paragraph 16.17 accordingly.</p>

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
	carefully designed to ensure that they are appropriate and does not cause further degradation. SuDS can be designed so that pollutants are removed prior to discharge, we would recommend in sensitive areas that these are considered and properly designed in order to improve the groundwater quantity where possible. Discharges to the ground in sensitive areas should be approved by the Environment Agency.'		
CM01	New community facilities should have regard to viability	Agree that the plan should set out how new facilities will be delivered – either through developer contributions or through Community Infrastructure Levy (CIL). The viability for S106 contributions and CIL are considered in the Plan Viability Study. Viability is taken into account when planning applications are assessed in respect of the provision of new community facilities.	Additional policy to be included in a new section on Implementation and Monitoring relating to contributions via S106 or CIL.
CM02	The policy protecting community facilities is over-restrictive and unsound.	<p>Paragraph 70 of the NPPF states that planning policies and decisions should</p> <ul style="list-style-type: none"> •guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; • ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community..... 	No change in relation to this comment. However, supporting text may need to be strengthened to refer to a minimum time period for marketing the facility.

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
		It is considered important to safeguard community facilities, or land which has been occupied by a community facility, as in some areas of Thanet -particularly the villages, once a community facility site has been lost there would be little or no scope to provide new community facilities in the future. Paragraph 17.8 of the draft local plan explains how the change of use or redevelopment of a community facility can be justified to ensure that the policy does not restrict growth or have a negative impact on the community.	

Transport

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
TP05 – Coach Parking	A number of respondents have highlighted coach parking as a problem, particularly the perceived unsuitability of Barnes Avenue Car Park and coach parking in general in Broadstairs.	<p>The draft Local Plan protects existing coach parking areas, but also recognises the problems of limited coach parking in certain areas of the district. The provision of suitable coach parking areas is important in ensuring that the visitor economy is supported.</p> <p>The draft Plan also indicates that the Council will consider the need to identify a site to meet demand at Ramsgate.</p> <p>The Council is now undertaking a review of coach parking in</p>	<p>The draft Plan should be amended to reflect the current corporate coach parking review.</p> <p>Draft Policy TP05 should be amended once the review is complete to include any new sites that are</p>

		the district. The draft Local Plan will be amended in due course once the review has been completed.	identified through the review process.
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General points

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc)	Outline change (or say no change)
Consultation process	A number of issues have been raised by various respondents regarding the length and complexity of the consultation.	<p>This consultation was not a statutory part of the Local Plan process. However, the Council considered that it would be helpful to carry out an extended 8-week consultation.</p> <p>It is appreciated that the Local Plan is complex, so Council staff were available at a number of drop-in sessions to help people respond to the consultation. A list of Frequently Asked Questions was also produced after the consultation opened, and was revised as new questions were raised.</p> <p>The questionnaire for this consultation was long. This was because it set questions for each of the policies in the plan which was necessary in order to provide the Council with the most meaningful feedback.</p> <p>Details are given below of the methods used to inform people about the consultation:</p> <p>Press Coverage</p> <ul style="list-style-type: none"> • Press release on the website - Press briefing took place on 8 January 2015. 	<p>No change required to draft Local Plan.</p> <p>With the Communications Team, a plan has been prepared for consultation and engagement at the next stage of the draft Local Plan.</p>

		<ul style="list-style-type: none"> • Coverage in the KM Thanet Extra (33,000 circulation)(14 January 2014) – Focus On Local Plan – including drop-in session details • Coverage on www.kentonline.co.uk – including drop in session details (average 637,396 visits a month) • Some coverage in the Thanet Gazette (mainly relating to Westgate/Minster) - 9,000 circulation <p>Press Advertising</p> <ul style="list-style-type: none"> • Half page advert in Thanet Gazette (9 January 2015) – promoting consultation and drop-in sessions (9,000 circulation) • Half Page advertisement in KM Thanet Extra (16 January 2015) - promoting consultation and drop-in sessions (33,000 circulation) • Digital space booked on Thanet pages of www.kentonline.co.uk <p>Social Media</p> <ul style="list-style-type: none"> • Twitter - sent out on 9 January 2015 to 4,500 followers • Facebook - two posts to Facebook to 624 followers: <ul style="list-style-type: none"> - Post 1 (2 January 2015) – Drop in dates and times - reached 490 people - Post 2 (9 January 2015) – Local Plan Launch (including drop in sessions) - reached 651 people • Facebook paid for advert – promoting the Local Plan and drop-in sessions - started on Friday 9 January - advert seen by 	
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		<p>11,436 people</p> <p>Mail/Email distribution</p> <ul style="list-style-type: none"> • Email sent to 12 business networks who forward to their members and contacts • Emails and letters sent to Planning list of those who have previously taken part in consultations (about 1000 contacts) <p>Poster/Leaflet Distribution</p> <ul style="list-style-type: none"> • Posters and leaflets were sent to Parish Councils; Libraries; Council Offices; Thanet Gateway <p>Events</p> <ul style="list-style-type: none"> • Drop-in sessions at Birchington (13 Jan 2015); Broadstairs (21 Jan 2015); Ramsgate (29 Jan 2015); Hartsdown Leisure Centre (3 Feb 2015); Margate (10 Feb 2015); and Westwood Cross (600+ visitors in total) • Staff briefing sessions • Member briefing sessions • School Sixth Form briefing sessions and workshop (5 Jan 2015) • Officers (and in some cases Members) attended public meetings at Westgate (16 Jan 2015); Birchington (13 Feb 2015); Minster (25 Feb); St Nicholas (23 Feb); Monkton (24 Feb); Ramsgate (14 Jan); and Cliffsend (22 Jan). • Briefings to: Thanet Business Forum (8 January 2015); Ramsgate Town Council (14 January 2015); Invest Thanet Board (16 January 2015) 	
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Documents	<p>Infrastructure Delivery Plan, Sustainability Appraisal, Viability assessment and Transport Modelling work should have been published as part of the consultation.</p>	<p>The Preferred Option consultation is not a formal stage of consultation. However, the Council has published evidence base documents and information in the past, and is committed to continue doing so, as and when evidence is available and at the appropriate stage.</p> <p>The Council recognises that these are important elements of evidence for the Examination. It is the intention to publish the evidence mentioned at the next stage, if available.</p>	<p>No change required. Intention to publish all available evidence at next consultation stage.</p>
Duty to cooperate	<p>Thanet has failed to cooperate on major cross boundary issues and evidence base documents</p> <p>Not meeting duty to cooperate (specifically in relation to housing numbers)</p>	<p>Do not agree. The Council has a long history of cooperation with neighbouring authorities dating back to the preparation of the South East Plan and beyond.</p> <p>The Council has engaged with neighbouring authorities (as well as KCC and other statutory bodies) over a long period of time on a range of issues, including housing numbers, economic strategy and employment land, retail provision, transport matters, Habitat Regulations matters, social and physical infrastructure, green infrastructure and so on. The duty is supposed to focus on those matters where there is a strategic cross-boundary issue.</p> <p>In relation to housing, the East Kent districts have co-operated on the approach to this matter over many year, including through the South East Plan process. More recently, the Council has engaged with neighbouring Councils both in relation to its</p>	<p>No change required to draft Local Plan. It is the intention to publish more information on duty to cooperate at Publication stage.</p>

		<p>own Strategic Housing Market Assessment work, and the work currently being undertaken by Dover in relation to their housing requirements.</p> <p>That engagement is ongoing, and it is believed that any outstanding issues can be resolved prior to Submission of the draft Plan.</p> <p>The Council has also adopted the East Kent Memorandum of Understanding of the Duty to Cooperate.</p>	
<p>Infrastructure provision/s106/CIL/viability</p>	<p>Many respondents have raised concerns about the provision of various elements of key infrastructure to support the proposals in the draft Local Plan – transport, water, sewerage, education, health, and so on – either in terms of absolute provision; the viability of infrastructure provision; or the timing of infrastructure provision.</p>	<p>The provision of infrastructure to support development is vitally important. The Council has been working with the relevant agencies to ensure that it is fully informed about future infrastructure requirements and the timing of those requirements.</p> <p>The Council has also prepared a draft Infrastructure Delivery Plan (IDP) in conjunction with those agencies, setting out the infrastructure requirements and the known costs; the phasing of the requirements and the body responsible for ensuring delivery. Some infrastructure would need to be provided directly by a developer on a given site; some would be off-site infrastructure funded by a developer and some would be funded by other mechanisms. The IDP will also need to address any viability issues.</p> <p>The IDP addresses the full range of infrastructure.</p> <p>KCC have (with TDC) been preparing a new Transport Strategy for the district, the primary</p>	<p>It is proposed to amend the draft Local Plan to include an implementation Policy and explanatory text to explain how the Plan addresses the issues of implementation, monitoring, infrastructure delivery and viability.</p>

		feature of which is the development of an “inner circuit” to improve traffic flows between the different parts of the district and to provide some relief to the existing road network. KCC have also sought grant funding (through the RGF) for parts of this scheme.	
Viability issues	A number of respondents have raised concerns about whether development in this area will be viable; particularly in relation to supporting infrastructure.	<p>The draft Local Plan has been subject to a Whole Plan Viability Assessment, which will be published shortly.</p> <p>The Assessment indicates that, including key infrastructure, the draft Plan is viable. Some areas of the district experience higher development values than others, but as a whole it is regarded as viable. Further testing of key components will be undertaken as part of the IDP process.</p>	No amendment to draft Local Plan.