

THANET LOCAL PLAN – PRE-SUBMISSION PUBLICATION STAGE (REGULATION 19 OF THE TOWN & COUNTRY PLANNING (LOCAL PLANNING)(ENGLAND) REGULATIONS 2012

Extraordinary Council	18 January 2018
Report Author	Helen Havercroft, Head of Growth & Development
Portfolio Holder	Cllr Lin Fairbrass, Portfolio Holder for Community Safety & Environmental Services
Status	For Decision
Classification:	Unrestricted
Key Decision	Yes
Reasons for Key	Significant effect on communities
Previously Considered by	Cabinet – 25 October 2017 Overview & Scrutiny Panel – 21 November 2017
Ward:	All

Executive Summary:

The Local Plan supports the Council's Corporate Plan priorities and is one of the Council's key strategies in delivering on its priority to promote inward investment and job creation. It helps set the strategic framework for delivery of the Council's economic ambitions. Not only does it help to deliver the economic strategy, it also makes provision for new housing to meet local needs and to support the growth of the workforce, and other development requirements, and supports the provision of key new infrastructure.

It is also a statutory document that is assessed by an independent Planning Inspector, and this report describes the legal requirements and processes for the Local Plan at this stage, and the guidance which affects decisions through the Local Plan process.

This report sets out the main issues raised during the Proposed Revisions consultation (January 2017); and provides recommended responses to those issues.

The report also addresses the updating of the evidence base for the Local Plan process; and indicates the key changes that are being proposed for the formal Publication stage of the draft Local Plan.

The report recommends that Council agree, that following Publication stage, the draft Local Plan be submitted to the Planning Inspectorate for Examination; along with the supporting evidence base, and the representations received during Publication.

Recommendation(s):

That Council agree that, following the Publication period, the draft Local Plan be submitted to the Planning Inspectorate for Examination.

CORPORATE IMPLICATIONS									
Financial and Value for Money	<p>The publication arrangements are anticipated to cost about £10,000, taking into account printing costs; venue costs; etc. This is within the current budget.</p> <p>There are no specific requirements under Contract Standing Orders/ Financial Procedure Rules relating to the publication stage.</p>								
Legal	<p>This report relates to the next stage of the Local Plan process, and needs to be carried out in accordance with any relevant Regulations and Government guidance, and in line with the Council's adopted Statement of Community Involvement (SCI).</p> <p>The report reflects advice from the Barrister advising the Council on the Local Plan.</p>								
Corporate	<ul style="list-style-type: none"> • Primary corporate risk is not having a well-evidenced Local Plan. Lack of Plan places the Council "at risk" in terms of Appeal decisions and also delays the provision of infrastructure, effectively losing control of the development process. There is also a significant risk of intervention by DCLG, if timely progress is not made on preparation of the draft Plan. Any decision on the draft Plan that runs counter to the available evidence would be likely to fail at Examination and also potentially subject to Judicial Review. This risk is greatly exacerbated by the implications of the DCLG consultation on new housing methodology set out in the main body of this report. • There is a strong "fit" between the draft Local Plan and corporate strategy priorities. • Environmental implications – none directly from the proposed Publication. Environmental issues related to the provisions of the draft Plan are considered through the Sustainability Appraisal/Strategic Environmental Assessment/Habitat Regulations Assessment, which are also proposed to be available for comment at Publication stage. 								
Equalities Act 2010 & Public Sector Equality Duty	<p>Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to the aims of the Duty at the time the decision is taken. The aims of the Duty are: (i) eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act, (ii) advance equality of opportunity between people who share a protected characteristic and people who do not share it, and (iii) foster good relations between people who share a protected characteristic and people who do not share it.</p> <p>Protected characteristics: age, gender, disability, race, sexual orientation, gender reassignment, religion or belief and pregnancy & maternity. Only aim (i) of the Duty applies to Marriage & civil partnership.</p> <table border="1"> <tr> <td colspan="2">Please indicate which aim is relevant to the report.</td></tr> <tr> <td>Eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act,</td><td></td></tr> <tr> <td>Advance equality of opportunity between people who share a protected characteristic and people who do not share it</td><td>✓</td></tr> <tr> <td>Foster good relations between people who share a protected characteristic and people who do not share it.</td><td>✓</td></tr> </table>	Please indicate which aim is relevant to the report.		Eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act,		Advance equality of opportunity between people who share a protected characteristic and people who do not share it	✓	Foster good relations between people who share a protected characteristic and people who do not share it.	✓
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	<p>The PSED is engaged by the Local Plan topic. The draft Local Plan is the subject of a continuing Equalities Impact Assessment, which indicates that the duty is met by the draft policies in the Plan.</p> <p>A number of policies within the draft Plan address issues that could otherwise have an impact on groups with protected characteristics. For example, policies relating to air quality; transport; provision of key social and physical infrastructure; accessible housing; protection of open space; internal space standards and water efficiency measures in new housing, all assist with meeting the aims of the PSED.</p> <p>It is therefore the view of officers that the duty is met by the policies set out in the draft Plan.</p> <p>Following Publication, officers will review representations for equality issues in addition to those already considered as part of previous consultations.</p>
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CORPORATE PRIORITIES (tick those relevant)✓	
A clean and welcoming Environment	✓
Promoting inward investment and job creation	✓
Supporting neighbourhoods	✓

CORPORATE VALUES (tick those relevant)✓	
Delivering value for money	
Supporting the Workforce	
Promoting open communications	✓

1.0 Introduction and Background

- 1.1 The Council's Corporate Plan sets out the Council's aspiration to grow the local economy. One of the priorities is to promote inward investment and job creation (Corporate priority 3). Part of the Council's vision is to accelerate growth and achieve greater economic prosperity for our district; seeking opportunities for inward investment and high quality job creation, and working with partners to ensure we have the right skills, infrastructure and plans in place.
- 1.2 The Local Plan is one of the Council's key strategies in supporting economic growth and regeneration and is specifically identified in the Corporate Plan priorities. Not only does it help to deliver the economic strategy, it also identifies locations for new housing to meet local needs and to support the growth of the workforce, and other development requirements. It also supports the provision of new infrastructure (such as schools, medical facilities, transport and so on) through the infrastructure delivery plan, working with key partners to ensure the infrastructure is delivered in a timely way.
- 1.3 The Local Plan also has a role in supporting the other corporate priorities by seeking to improve design and quality of new development; protecting publicly-accessible open spaces and important wildlife sites; providing a framework for the preparation of Neighbourhood Plans; and working with other statutory providers to seek to ensure that local health, education and other services are provided alongside new development.

- 1.4 The Local Plan supports the current priorities set out in the Corporate Plan, but to some extent will also help to frame future priorities beyond the current Corporate Plan period.
- 1.5 The Local Plan process is also a statutory process. The draft Local Plan is assessed by an independent Planning Inspector through an Examination-in-Public, and this report describes the legal processes for the Local Plan and the guidance which affects decisions through the Local Plan process.
- 1.6 This report sets out the main issues raised at the previous Local Plan consultation; the key findings from development of the Local Plan evidence base; and proposes a number of changes to the draft Plan for pre-Submission Publication (Regulation 19).
- 1.7 The Council produces a Local Plan under the Planning and Compulsory Purchase Act 2004, and there are duties and legal requirements for the Council as local planning authority. These are also set out in the report below.
- 1.8 The issues addressed in this report have been considered by the informal Local Plan Working Group.
- 1.9 Cabinet (meeting of 25th October 2017) have authorised the publication of the draft Plan and Sustainability Appraisal for comment; the publication of the Thanet Landscape Character Assessment for comment, with the intention of adopting it as a Supplementary Planning Document; and amendments to the Local Development Scheme to reflect the new programme.
- 1.10 The report has been considered by the Overview & Scrutiny Panel, and no recommendations were made to Cabinet.
- 1.11 The Transport Strategy was also discussed by the Joint Transportation Board on 12 December 2017. JTB endorsed the document for an initial public consultation exercise and subsequent consideration through the examination of the Thanet Local Plan process.
- 1.12 It was agreed via an individual cabinet member decision made by the Leader on the 14 December that the draft Transport Strategy as drafted would go to consultation for a period of 6 weeks.

2.0 Consultation on Proposed Revisions, Evidence Base and Main Issues

- 2.1 In January 2017, the Council consulted on Proposed Revisions to the Preferred Option draft of the Thanet Local Plan. The consultation was focussed on a number of key issues – housing numbers; new housing sites; the future of the Airport; infrastructure provision (including the proposed “Inner Circuit”); and an invitation to propose sites as Local Green Space.
- 2.2 About 900 sets of comments were received, with a total of some 1,500 individual comments. The representations have now been published on the Council’s web-site (<https://consult.thanet.gov.uk/consult.ti/TLPPOR/consultationHome>), and Members should take the opportunity to view those in preparation for the consideration of this report.
- 2.3 Proposed Revisions consultation and main issues raised
- 2.4 The main issues arising from the consultation related to housing numbers and sites; the future of Manston Airport; the proposed new site for the Parkway Station and the provision of infrastructure (social and physical), including the proposed Inner Circuit.

- 2.5 The main issues raised in the Proposed Revisions consultation are set out in more detail at Annex 1 (in the order of the consultation document).
- 2.6 Responses to main issues
- 2.7 The responses to the main issues at this stage are also set out in the table attached as Annex 1. The recommended main changes to the draft Plan are detailed in Annex 4.
- 2.8 This report addresses the key issues to be considered at this stage.
- 2.9 Government guidance – key requirements
- 2.10 It is important that the draft Local Plan meets the requirements of Government guidance; notably the National Planning Policy Framework (NPPF) and national Planning Practice Guidance (PPG). There are some key matters which must be addressed in the preparation of Local Plans.
- 2.11 The NPPF states (para 182) that a local planning authority should submit a Plan for Examination which it considers is “sound”, as set out above. In other words, draft Plans must be:
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 2.12 Specifically, in relation to Local Plans, the NPPF indicates (paras 156, 157) the way in which Local Plan ought to be prepared, and the range of topics to be addressed in Local Plans. This includes housing; employment land; retail provision; infrastructure delivery; protection of national and international wildlife sites; heritage assets (Conservation Areas, Listed Buildings, etc); pollution matters and so on. In some of these areas, the Local Plan provides the primary policy control; in others the planning authority acts in conjunction with other statutory controls within the Council (eg: Environmental Health), or with other statutory bodies such as the Environment Agency or Natural England.
- 2.13 Para 158 advises that local planning authorities “should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area”.

2.14 Advice of Barrister on key issues

- 2.15 We have sought the advice of Planning Barristers on the way forward for the Local Plan and the matters addressed in this report have been considered by the Barrister prior to this report being finalised.

2.16 Relationship to Neighbourhood Plans

- 2.17 The draft Local Plan has an important role in setting a strategic framework for Neighbourhood Plans. There are currently six such Plans in preparation, at different stages – Birchington, Broadstairs, Cliffsend, Margate, Ramsgate and Westgate – and there may be others to follow. It is therefore important that there is a clear strategy in the draft Local Plan.

- 2.18 This is not to unnecessarily constrain the emerging Neighbourhood Plans, but to set a clear strategic policy framework.

2.19 Duty to cooperate

- 2.20 The NPPF (paragraph 178) states that “Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans”.

- 2.21 Paragraph 181 in the NPPF further states that

- 2.22 “Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development”.

- 2.23 It should be noted that the “duty to cooperate” is not a “duty to agree” (Planning Practice Guidance, para 9-001), but that “local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination”.

- 2.24 The Council has a long history of cooperation with its neighbours in East Kent, and has continued to work with neighbouring Councils and other key organisations on key aspects of Local Plan work. Recent examples include:

- Review of the Strategic Housing Market Assessment – neighbouring Councils and other key stakeholders invited to participate in workshops on the methodology and findings of the SHMA review
- Worked with key organisations on the development of requirements for the draft Infrastructure Delivery Plan
- Worked with Canterbury City Council on the development of a Memorandum of Understanding for implementing their Strategic Access, Management & Monitoring (SAMM) Strategies for the protected coastal areas of the two districts

- Working with Kent County Council and other Kent authorities on best practice in development monitoring and in particular, the re-structuring of the annual Commercial Information Audit
 - In March 2016, the Council adopted the East Kent Memorandum of Understanding on the Duty to Cooperate, which sets out how the various local authorities will work together on cross-boundary aspects of Local Plan work
 - Working with other Kent authorities on a review of the Gypsy & Traveller Assessment for the area
- 2.25 Officers have met with neighbouring authorities and other relevant authorities to seek to resolve outstanding issues. A number of issues have now been resolved, and there is a better understanding of the issues between the authorities. The main outstanding issue is with Dover District Council regarding the former Airport site. Dover DC adopted a Council resolution in 2014 to support the continued use of the site as an Airport, and their submissions to the consultation reflect that position. The future of the Airport site is addressed later in this report.
- 2.26 Sustainability Appraisal/Strategic Environmental Assessment and Habitat Regulations Assessment
- 2.27 The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) and Habitat Regulations Assessment (HRA) are statutory parts of the Local Plan process. The purpose of the SA process is to assess the proposals in the Local Plan, and reasonable alternatives, against a range of social, environmental and economic criteria. The SA also deals with the requirement for an SEA of the draft Plan.
- 2.28 The purpose of the HRA is to consider the Local Plan proposals in the light of international wildlife designations, and to ascertain whether those proposals are acceptable in relation to any “likely significant effect” on the international wildlife sites. The HRA process indicates that there will be no adverse effects on any European sites as a result of the draft Local Plan, alone or in combination. The key measures underpinning this conclusion (the provision of the Strategic Access, Management & Monitoring Plan (SAMP) and its incorporation into the relevant Local Plan policies) have been agreed with the relevant consultees, including Natural England.
- 2.29 A copy of the SA of proposed changes to the Plan is attached to this report (Annex 2). The Sustainability Appraisal from December 2016 can be found at [https://consult.thanet.gov.uk/qf2.ti/-/731202/24295781.1/PDF/-/Thanet Local Plan Sustainability Appraisal Revised Preferred Options December 2016.pdf](https://consult.thanet.gov.uk/qf2.ti/-/731202/24295781.1/PDF/-/Thanet%20Local%20Plan%20Sustainability%20Appraisal%20Revised%20Preferred%20Options%20December%202016.pdf). The Sustainability Appraisal is an iterative process that evolves alongside, and informs, the Local Plan process. The assessments are reported to inform Members of relevant sustainability issues as part of the decision making process.
- 2.30 The Sustainability Appraisal is updated accordingly as the Plan is refined. In preparing the draft Local Plan, account has been taken of the recommendations and advice provided through the SA/HRA process. The submitted plan will be accompanied by the Environmental Report which explains the process gone through. The SA/SEA and HRA need to be published for comment alongside the Publication draft Local Plan.
- 2.31 A Sustainability Report was published alongside the Issues & Options paper, and set out the relative merits of different development strategies. This concluded that an urban edge/infill strategy represented the most suitable option.

- 2.32 However, given the additional housing requirements since that work was carried out and the fact that some sites had been submitted, which whether on their own or adjoining other sites, would effectively act as new settlements.
- 2.33 The New Settlement Mitigation Study concluded that new settlement options could be made more sustainable through the implementation of robust mitigation. These mitigation measures include increased public transport provision; provision of alternative transport such as walking or cycling; provision of green infrastructure and open space; provision of an appropriate housing mix/tenure and biodiversity considerations such as avoidance of priority species.
- 2.34 The New Settlement Strategy and an updated Sustainability Appraisal were published alongside the Proposed Revisions to the draft Plan.
- 2.35 Additionally and for clarity, Members should be aware that the assessment carried out for Policy SP05 (on page G2 of the SA) assessed the option that was in the 2015 draft of the Thanet Local Plan which was the policy that designated the site as an Opportunity Area for the purposes of developing a Manston Airport Area Action Plan (AAP). Consideration of the AAP was to include retention, development and expansion of the airport supported by a feasibility study and Business Plan, while exploring alternative options for the future development of the area for mixed-use development. The basis of the assessment was between development of the site (in whatever form) versus no development of the site.
- 2.36 The assessment was not the assessment for SP05 that allocates the site for a mixed use settlement with the capacity to deliver at least 2,500 new dwellings and up to 85,000sqm of employment and leisure floorspace.
- 2.37 The assessment later goes on to refer to more recent work that was carried out in the form of the New Settlement Mitigation Study which revisited the development strategy and explored the option of a new settlement strategy further and included a comparative assessment of sites, one of which was the airport site.
- 2.38 It was apparent from the representations submitted to the Preferred Options Revisions that this was misunderstood. The Environmental Report will make assessment of the airport site much clearer.
- 2.39 It should be noted that the Sustainability Appraisal December 2016 contained an error in Appendix G. With reference to the Strategic Sites the SA states that these sites were assessed through the SHLAA. The sites were not assessed solely through the SHLAA and the assessment for the location of housing (from which the strategic sites were selected) appears in the assessment for Policy SP20. This has been clarified through an erratum placed on the Sustainability Appraisal page of the Council's website.
- 2.40 Findings from other studies
- 2.41 A number of other studies have been undertaken over the last few months, to ensure that the evidence base for the draft Local Plan remains relevant and up-to-date. The detail and outcomes from these studies, and the implications for the Local Plan process, are set out below.

- **Retail Study**

The Thanet Retail and Leisure Assessment was updated to reflect the findings of the Strategic Housing Market Assessment and has taken into account all recent permissions, developments and commitments in the pipeline.

The retail need at Westwood has been revised down to 23,903sqm to the end of the Plan period from 36,280sqm. Retail need for the main towns is revised down to 39,171sqm. Both of these figures include all the A use classes (this includes shops, financial and professional services, restaurants and cafes, drinking establishments and hot-food take-aways). This is due to a reduction in spending power in the “High Street”, at least partly due to the rise in other forms of shopping, notably via the internet.

The latest expenditure forecast figures from Experian are published in November 2017 and the Thanet Retail Assessment will be updated with this information then. It is anticipated that this will not result in any significant change to the Plan.

- **New Economic Growth Strategy**

The Council’s adopted Economic Growth Strategy has general implications for the draft Local Plan:

- (1) Ensuring that new housing development is of a type, size and quality to be able to accommodate a growing, skilled workforce;
- (2) In addition to other important economic sectors, include a specific reference to advanced manufacturing under the Economic Strategy section of the Plan;
- (3) Supporting tourism development;
- (4) Policy support for Port development;
- (5) The need to bring forward key infrastructure that supports economic development through the Infrastructure Delivery Plan (IDP). This is addressed elsewhere in this report;
- (6) Support the growth and development of local university/college facilities, programmes and partnerships, where needed, to improve and develop the local skills base; and
- (7) Support long-term feasibility modelling for Margate and Ramsgate.

The draft Plan has been amended to take account of the Economic Growth Strategy; for example, by identifying a site to accommodate advanced manufacturing and requiring the provision of community/business space on the strategic housing sites.

- **Open Space, Sport & Recreation assessment**

To meet the requirements of Sport England, an Open Space Study has been undertaken. The study (to be finalised) has raised a number of early recommendations:

1. Existing green open spaces should be safeguarded
2. Existing playing fields should be protected
3. The Council needs to consider the future role of Hartsdown in meeting local needs for indoor sports facilities. The recommendation is that it should be replaced at an increased scale either on the same site or on an alternative site
4. Opening up of facilities which are currently not available for any form of community use
5. Provision of 147 additional fitness stations across the district
6. General provision of more active environments reflecting active travel, safe cycle routes to school, the need to link existing and new communities with walking/cycling/jogging routes

A final report is awaited.

- **Thanet Landscape Character Assessment (LCA)**

The Landscape Character Assessment study identifies a number of landscape types and areas as part of a comprehensive assessment of the district. (<https://www.thanet.gov.uk/media/4002097/Thanet-LCA-Final-Report-0908-10-.pdf>)

It should be noted that the identification of landscape areas does not indicate that these areas should be protected from development. What the study does is to identify the key features of the landscape character, and suggest guidelines in which new development should be considered.

Initial focussed consultation was undertaken with Town and Parish Councils and statutory bodies to provide information for the study.

It is officers' recommendation that this should be adopted as a Supplementary Planning Document (SPD) to assist in guiding new development, so this document would need to be the subject of specific consultation alongside the draft Local Plan.

- **Whole Plan Viability Study (WPV)**

The WPV is required to support the Local Plan, to seek to ensure that the development identified in the draft Plan is deliverable in the Plan period to 2031.

The viability study is at an early stage, and an assessment is currently being made of the viability of the strategic sites. The ongoing viability work will also help to determine the level of Community Infrastructure Levy (CIL) that can be sought alongside the Local Plan.

2.42 Local Green Space proposals

- 2.43 The NPPF (para 76) says that “Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them”.
- 2.44 The Council received 43 such proposals (including a number of duplicate proposals for some sites) for Local Green Spaces (LGS) as part of the consultation in January 2017. As set out in the NPPF, once designated, a local green space will be afforded the same protection as Green Belts and new development will not be permitted other than in very special circumstances. The NPPF sets out the circumstances under which development may be permitted.
- 2.45 The LGS proposals have be considered against the criteria in the NPPF, and taking into account recent case law and best practice. Para 77 of the NPPF advises that LGS should meet the following criteria:
- The green space is in reasonably close proximity to the community it serves;
 - The green area is demonstrably special to a local community and holds a particular local significance; and
 - The green area concerned is local in character and is not an extensive tract of land.
- 2.46 The NPPF also advises that “the Local Green Space designation will not be appropriate for most green areas or open space” (para 77).
- 2.47 It should be noted that the NPPF is clear (para 76) that “identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services”. In other words, the use of local green space designations should not prevent development that is necessary through the Local Plan process.
- 2.48 In broad terms, the recommendation in relation to LGS proposals is that those sites that meet the criteria in the NPPF should be agreed for LGS status. A summary of the assessment of sites proposed for LGS is attached at Annex 3. Coastal sites have been excluded for operational reasons, including the potential need for emergency coastal defence works; this approach has been followed elsewhere.
- 2.49 The following sites are recommended for LGS designation:
1. Kitty's Green, Broadstairs
 2. Culmer's amenity land, Broadstairs
 3. Holmes Park Broadstairs
 4. Land between Windermere and Kentmere Avenues, Ramsgate
 5. Dane Valley Woods, Margate
 6. Village Green, Foads Lane, Cliffsend
 7. Meadow, Cliffs End Road, Cliffsend
 8. Earlsmead Crescent, Cliffsend
 9. Playground, Foads Lane, Cliffsend
 10. Pierremont Park, Broadstairs
 11. Memorial Ground, Lawn Road, Broadstairs
 12. St Peter's Recreation Ground, Broadstairs
 13. Mockett's Wood, Broadstairs
 14. Westover Gardens, Broadstairs

- 2.50 It is equally valid for sites to be proposed as LGS through the Neighbourhood Plan process, but they would need to be subject to the same assessment as those proposed through the Local Plan.
- 2.51 Housing Numbers
- 2.52 As mentioned above, many objections were received to the level of housing proposed at the last stage of consultation, either in principle or because of concerns about related matters such as environmental impact or the need for social and physical infrastructure; or that the Council had come to a conclusion on housing numbers on the basis of out-of-date information.
- 2.53 While these concerns are noted, Government guidance on the provision of new housing through the planning system is clear. The objectively-assessed need (OAN) for housing should be determined through a Strategic Housing Market Assessment (SHMA), with relevant population and other market factors taken into account. The OAN figure should not at that stage take into account constraints, so that the figure fully reflects the housing need in the area.
- 2.54 The latest SHMA update (based on the 2014-based Sub-National Population Projections) identifies the OAN for Thanet as 17,140 dwellings (or 857 dwellings per year).
- 2.55 Members may be aware that the Department for Communities & Local Government (DCLG) has recently published proposals for a new methodology (<https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>) to be applied by all local planning authorities in determining housing requirements. This includes a specific calculation to adjust the housing need figure to take account of market signals, based on a comparison of median house prices and median earnings. DCLG estimate that applying this methodology over the period 2016-26 would raise the requirement for Thanet from 857 dwellings per year to 1063 dwellings per year. If this uplift is also applied to the final 5 years of the draft Plan (2026-31), this would mean a total increase of just over 3,000 dwellings over the period of the Local Plan, taking the total requirement to just over 20,000 dwellings.
- 2.56 The consultation document indicates that, where a draft local plan has not been submitted for Examination by 31 March 2018, the new standardised housing method should be used. This means that, if the Plan is not submitted to the Planning Inspectorate by that date, the Council would need to revise the draft Plan to incorporate the additional housing requirement. This represents a significant risk both to the Council's draft Local Plan and to the wider planning of development in the district. This would also result in significant delay to the draft Plan and additional costs to be borne before the draft Plan reaches Submission stage in the review of evidence (see also section 3 of this report).
- 2.57 In applying the established housing OAN of 17,140, and taking into account completions since 2011; extant planning permissions; anticipated "windfall" sites in the Plan period; and including empty homes being brought back into use, the draft Plan needs to make additional provision (through land allocations) for 9,300 dwellings. The Proposed Revisions to the draft Local Plan addressed the additional housing need through the identification of new sites at Manston Court Road/Haine Road; Manston Road/Shottendane Road and at the former Airport site at Manston.

- 2.58 However, the NPPF (para 47) also requires that Local Plans should demonstrate that the supply is sufficiently flexible and resilient, “to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land”, and there therefore needs to be a sufficient margin of provision above the actual requirement to deal with these circumstances.
- 2.59 It is expected (NPPF, paras 14, 47) that Local Plans will meet the full OAN for the area concerned.
- 2.60 The NPPF does allow for exceptions to this approach, under para 14, which states that “Local Plans should meet objectively assessed needs...unless...specific policies in this Framework indicate development should be restricted”.
- 2.61 These primary restrictions are set out in the National Planning Policy Framework (NPPF)(under Footnote 9, p4), and indicates, for example, those policies relating to:
- sites protected under the Birds and Habitats Directives (see NPPF para 119); and/or designated as Sites of Special Scientific Interest;
 - land designated as Green Belt;
 - Local Green Space;
 - an Area of Outstanding Natural Beauty (AONB), Heritage Coast or within a National Park;
 - designated heritage assets; and
 - locations at risk of flooding or coastal erosion.
- 2.62 Only two of these apply in any significant degree in Thanet – national and international wildlife sites (Sites of Special Scientific Interest; Special Protection Areas; SACs; Ramsar Sites) and new Local Green Space.
- 2.63 However, the national and international wildlife sites are all at the coast and are not directly affected by housing. Indirect effects from recreation can be mitigated, based on advice from Natural England, and this strategy forms the basis for the Thanet Coast Project.
- 2.64 This is set out in more detail in the Strategic Access Management and Monitoring (SAMM) strategy, which provides the mechanism to mitigate the potential in-combination effect of new housing development on the Thanet Coast and Sandwich Bay Special Protection Area. Such mitigation is a requirement of the Habitat Regulations and applies to all new residential development in the district.
- 2.65 The mitigation takes the form of a wardening scheme, and is funded by the collection of S106 for all residential developments of 10 or more dwellings at present, later to be applied to all residential development.
- 2.66 Proposed Local Green Spaces are addressed elsewhere in this report. However, the designations that are recommended to be supported in this report do not impact on the ability of the draft Local Plan to fully meet the housing requirement for the area.
- 2.67 The district also has areas at risk to flooding and designated heritage assets, but the draft Local Plan seeks to avoid areas at risk to flooding, and to ensure that development that could affect a designated heritage asset (including setting) is appropriately designed.
- 2.68 In considering site options, the Council must give consideration to these factors.

- 2.69 Concerns have previously been raised about the loss of best and most versatile agricultural land in the Local Plan. This could act as a constraint, but only a partial one. The NPPF states (para 112) that “Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”
- 2.70 In Thanet district, there is a high proportion of best and most versatile farmland, and (according to the Defra Agricultural Land Classification map) those areas of a lower quality are located in small patches or in flood risk areas, and it is therefore very difficult to make the distinction set out in the NPPF. What is clear is that this is regarded as a less significant restriction than those listed in Footnote 9 (see above).
- 2.71 The provision of physical and social infrastructure, a concern of many respondents, is addressed later in this report.
- 2.72 Use of empty properties
- 2.73 The Proposed Revisions, published in January 2017, included an allowance of 540 housing units to come from empty properties being brought back into use.
- 2.74 This is based on a calculation using the following criteria:
- (1) The properties in question have been empty for a period of 4 years or more.

This is based on the position that over that period it can be argued that those properties have been vacant and unused for such a long period that they are no longer available in the housing market and therefore not part of the active housing stock; and
 - (2) The Council has an active and robust programme for bringing those properties back into use.

This is based on the position that such housing is returned to the market, almost as if it were new housing stock.
- 2.75 In May 2017, Thanet District Council committed additional resources to its empty homes work by appointing a new Empty Property Officer. The existing Empty Property Support Officer will continue to focus on offering advice and support to the owners of empty homes, together with facilitating empty homes loans in partnership with Kent Council Council. The new Empty Property Officer will be tackling the most difficult and dilapidated properties with a view to taking robust action to bring these back into use.
- 2.76 The outcomes from this programme will need to be regularly monitored, and is dependent on the Council’s Empty Homes programme continuing through at least the Plan period.
- 2.77 Calculation of “windfall” supply
- 2.78 “Windfall” sites are those sites which come forward during the Plan period, but without being specifically identified through the Local Plan process. These sites are almost exclusively previously-developed (brownfield) land. There is a long history of such

sites coming forward in Thanet, and the NPPF allows a reasonable calculation of such sites to be included in the Local Plan housing land supply. In the draft Local Plan, an allowance of 2,700 “windfall” permissions is identified. This is on the basis of the history of windfall housing delivery over the last 8 years, it is recommended that a figure of 2,700 is included in the housing land supply.

2.79 A number of representations at the last consultation suggested that the housing land supply identified in the draft Local Plan places too much reliance on windfall sites.

2.80 This is not considered to be the case. The calculation of windfall sites only applies to “small sites” [up to 9 units]. Historically, Thanet has also seen larger windfall sites making a significant contribution to housing land supply, and they were at one stage a sizeable proportion of housing completions. However, this trend has been entirely discounted from the calculation of future housing supply, to ensure that robustness of the housing land supply position.

2.81 Furthermore, the first three years of the remainder of the Local Plan period have been discounted to ensure that there is no double-counting of potential housing land supply, an approach suggested and supported by the Inspector at the examination of the Canterbury Local Plan. Officers’ advice therefore is that the windfall figure is robust for the purposes of Local Plan preparation, and over the Plan period may actually be higher than the allowance made.

2.82 Housing targets and 5-year Housing Land Supply

2.83 One of the things that local authorities should be able to demonstrate is that the sites in its housing land supply are deliverable (NPPF, para 47). This report sets out a position on housing land supply, which will enable the Council to demonstrate a proper supply of housing land through the Plan period.

2.84 In order to retain control over the location and scale of new housing development, it is important to be able to demonstrate a rolling 5-year supply of housing land that is available, suitable and achievable (NPPF, para 47, and footnote 11).

2.85 Officers are recommending that a “stepped” approach to the housing target is adopted; ie. that a lower target is set for the first five years, with higher targets for the following 10 years to make good the total housing requirement for the Plan period.

2.86 This is for two main reasons:

- There are significant infrastructure requirements that need to be delivered to support new development. If the Council were required to allocate more sites to cover average requirement for the first five-year period, this might undermine the delivery of that infrastructure, and therefore the wider Local Plan strategy; and
- Thanet has an emergent development market, but there is a real possibility that driving high levels of requirement in the early years might undermine the viability of some sites, or result in lowered viability, which again could affect the delivery of services and infrastructure, as well as affordable housing.

2.87 It should, though, be noted, that the draft Local Plan does not seek to limit housing development in the first five years. If new housing development does come forward in line with the draft Plan during that period, that would help to accelerate housing delivery in the district.

- 2.88 Taking a “stepped approach” to the housing target means that the Council can demonstrate a 5-year housing land supply, and seek to ensure the delivery of sustainable development, supported by services and infrastructure. There has been a shortfall in delivery over the early years of the formal Plan period.
- 2.89 There are two main methodologies for meeting shortfalls in previous years:
- “Liverpool” – meeting the shortfall over the remainder of the Plan period; or
 - “Sedgefield” – meeting any shortfall over the current five year period.
- 2.90 Bearing in mind the infrastructure and market issues raised above, it is officers’ recommendation that the Council adopt the “Liverpool” method for housing targets and delivery, for the reasons set out above.
- 2.91 Although there have been variable levels of completions in recent years, the Council has consistently delivered against adopted Plan targets over the long-term. In addition, the Council is seeking to work with the market to encourage higher rates of house-building, and recently achieved accreditation to the Housing Business Ready Programme, run by the Housing & Finance Institute (HFI).
- 2.92 The recent new involvement of the Homes & Communities Agency (HCA) in development in the district, and their purchase of sites for development, is also an indicator of commitment to delivery in the area.

2.93 Residual housing requirements

(Base-date 31st March 2016 – figures may change as a result of current monitoring work, but not affecting the baseline requirement to be met in the draft Plan)

Component of supply	No. of units	Residual requirement
Requirement	17140	17140
Completions 2011-16	1555	15585
Extant planning permissions as at 31/03/16	3017	12568
Windfalls	2700	9868
Empty Homes	540	9328
Allocations (Publication Plan)	9328	0

2.94 New Housing sites

- 2.95 A number of new site options have been assessed through the different stages of the draft Local Plan, and these have also been subject to Sustainability Appraisal (SA).
- 2.96 As mentioned above, the early stages of SA clearly indicated that a strategy of urban extensions was the preferable strategy in terms of the SA objectives. For this stage of the draft Plan, some additional work was undertaken by the SA advisors, which indicates that, with some key elements addressed, a new settlement in the district could be acceptable in terms of the SA objectives.
- 2.97 On this basis, the SA concludes that either can be a suitable strategy, subject to those conditions. The SA also indicates that, of all the land proposals that could be

considered as new settlements, the former Airport site would be the most sustainable site.

2.98 It is not recommended to remove any of the sites identified for housing in the draft Local Plan (Preferred Option and Proposed Revisions), for a number of reasons:

- (1) They are consistent with the urban fringe option identified as being the most sustainable through the SA process; and
- (2) They help to deliver key pieces of infrastructure; notably the proposed Inner Circuit road scheme.

2.99 However, there is one site that needs to be deleted from the draft Plan. This is the draft allocation at the Gas Depot site in Northdown Road, St.Peters. An application was submitted to the Council in March 2016 for the development of the site, together with adjacent land, which is located in the Green Wedge between Margate and Broadstairs. The application documents suggested that the Gas Depot site is not viable for development in its own right, and subsequently the application was refused primarily because of the impact of the Green Wedge, and is currently the subject of an Appeal. However, given the stated viability position, it is proposed to delete the allocation of this site from the draft Local Plan.

2.100 Members will be aware that a Planning Appeal (Ref: APP/Z2260/W/16/3151686) was allowed at Westwood Lodge in November 2016, despite the fact that it is located in the Green Wedge between Margate and Broadstairs. The 156 new dwellings approved as part of this Appeal can be included within the housing land supply for the district. However, the Appeal means that the site, once developed, will make no longer make a contribution to the Green Wedge. Officers' recommendation, therefore, is that the site is removed from the Green Wedge policy area, and included within the urban boundary.

2.101 Ancillary residential accommodation

2.102 The SHMA identifies a need for additional accommodation for older people through the plan period. There has also been an increase in interest in such accommodation in general (which could be to support independent living for less able family members or for younger people).

2.103 Residential annexes are a common form of development that are generally proposed in order to allow relatives to live with their family with a degree of independence. The benefits of this include:

- Allows family members to provide the care and support required;
- Reduces the stress and impact on local services, ie nursing homes, home visits from care professionals and so on;
- Cost effective and affordable solution to supported living;
- Provides a measure of independence, while still being close to support; and
- Can provide accommodation for family members unable to purchase a house through the open market.

2.104 Housing Omission sites

2.105 At the last consultation, the Council received a number of proposals for new sites that had not been allocated in the draft Local Plan. Some of these sites had been

previously considered and not allocated, and some are new sites. The new sites have all been subject to the same assessment as sites submitted earlier in the “call for sites” process.

2.106 Two of the proposed sites are considered suitable for allocation in the draft Local Plan, in that they are consistent with the selection criteria for the Local Plan process and the principles set out in the Sustainability Appraisal. These are:

1. Land at Shottendane Farm, Shottendane Road, Margate (8 dwellings); and
2. Site known as Lanthorne Court, Broadstairs (up to 56 dwellings).

2.107 Future of the Airport site

2.108 Since the last consultation, RiverOak (now RiverOak Strategic Partners), have indicated their intention to proceed with an application for a Development Consent Order (DCO), in order to have the Airport identified as a Nationally Significant Infrastructure Project.

2.109 The AviaSolutions report (https://www.thanet.gov.uk/media/3500741/Final-Report-for-TDC-Manston-Airport-Viability-Oct2017_2.pdf), published in 2016, 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”.

2.110 This conclusion is based on an assessment of future air traffic demand. Even applying assumptions favourable to an Airport use at Manston, the report concluded that it is most unlikely that Manston would attract private investors, nor represent a viable investment opportunity in both the longer-term – after 2040 – and certainly not during the Local Plan period.

2.111 There has been some criticism of AviaSolutions’ report. However, the report has been prepared by aviation consultants with a detailed knowledge of the industry, reflecting the knowledge of 15 years’ advisory experience in the sector. AviaSolutions is currently working on due diligence projects for Infrastructure Funds/Private Equity with regards to investment in UK regional airports and cargo airlines, where their commercial advice has to be evidence-based and has to consider financial and business risks. Over the last 15 years their clients’ have included a range of major airport operators and airlines, as well as government departments (UK, EU and non-EU), as well as many privately owned airports.

2.112 AviaSolutions have reviewed the submissions made by RSP (<https://www.thanet.gov.uk/media/4062746/AviaSolutions-Analysis-of-Manston-Airport-Report-by-Azimuth-Northpoint-2017a.pdf>) as part of the Local Plan process, and their conclusion is that, the RSP submission does not put forward “a sufficiently credible case, nor provides the evidence, for AviaSolutions to change its views on the financial viability of Manston Airport”.

2.113 AviaSolutions concur with the view put forward by Azimuth Associates that there may be sufficient local (catchment) demand to support a minor low-cost airline operation base, which could amount to c. 1.5 million annual passengers with some additional non-based services (but see comments below about passenger operations).

2.114 However, there are significant areas of divergence between the two assessments. In particular, Avia draw attention to the following key areas:

- Methodology – Avia has noted that the representations on behalf of RSP do not consider any of the risk associated with their forecast;

- Demand – Avia do not believe that the freighter demand exists for the projections set out for Manston in the RSP submissions. In particular, Avia advise that the submissions ignore the dynamics of the UK air freight market and the key role of belly-hold capacity in meeting UK freight demand. The RSP submissions also appear to assume that all additional freight demand would come to Manston in preference to other Airports with mature, established and heavily invested freight operations;
- Passenger operations - AviaSolutions' view on passenger demand is that there may sufficient local catchment demand to attract some interest from low-cost carriers (possibly as much as 2 based aircraft). However, because of the arrangements sought by low-cost operators, there would be insufficient revenue arising from such an operation to make it financially viable. This does not address the capital or running costs associated with such an operation – Avia estimate a capital cost of £27m to bring the Airport back into commercial use (including a new terminal building), or the core daily cost of operations associated with maintenance, air traffic control, fire and rescue, and site security;
- Benchmark Airports – for various reasons of location, scale, population and economic activity in the localities, the benchmark airports proposed by RSP are not considered appropriate comparators to Manston; and
- Cross-channel freight operations – RSP submissions do not give a full picture of the cross-channel freight market, and are therefore misleading in terms of the implications for air freight.

- 2.115 Para 33 of the NPPF indicates that “When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation”. However, the Airport is now closed and the evidence on this matter provided by AviaSolutions indicates 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.
- 2.116 The available evidence for an airport operation at Manston does not meet the threshold set out in the National Planning Policy Framework (para 22), which states that sites should not be protected “for employment use where there is no reasonable prospect of a site being used for that purpose”. Although the Airport site is not a typical employment site, the broad principle of deliverability of development proposals is applied through the NPPF; in particular paragraph 182, which addresses the requirement for Plan to be “sound”. Para 182 advises that one of the key elements of “soundness” is that Plan should be “effective”; that is, “the plan should be deliverable over its period”. The NPPF (para 22) goes on to say that proposals for alternative uses should be considered, where this is not the case.
- 2.117 Following the evidence and Government guidance, there is insufficient justification to retain the Airport designation during the period of the Local Plan.
- 2.118 The site contains a significant element of previously-developed land, and the NPPF (para 111) indicates that planning policies “should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value”.
- 2.119 As the Council prepares revisions to the draft Local Plan, an Inspector has dismissed Appeals relating to a number of buildings at the Airport site. The Inspector concluded

“...until a new policy framework exists at the airport, I find that the evidence at the Inquiry did not demonstrate that the likelihood of the airport reopening was so slim that the conflict with Policy EC4 (*ie. in the adopted Local Plan 2006, relating to the airside development site*) should be disregarded” (para 33), and that “the appeal schemes would conflict with Policy EC4 of the Local Plan” (para 52).

- 2.120 However, he also states that “it is difficult to predict conclusively whether the airport will reopen or not”, and that “it must be stressed that it is not the purpose of this inquiry to judge the merits or otherwise of RSP’s project” (para 31). He also recognises the role of the Local Plan process (para 22) and the DCO process (para 31) in considering the future of the Airport.
- 2.121 This Appeal cannot be seen as determining the future of the Airport site in the long term. That is a matter for the Local Plan and DCO processes.
- 2.122 The key point is that what the Local Plan says about the Airport must be driven by evidence. The primary evidence that the Council has is the independent assessment by Avia Solutions.
- 2.123 At the Proposed Revisions consultation, the site was proposed for mixed-use development, including 2,500 dwellings and 85,000sqm of business space. There are also other implications to be considered if the Airport site were not allocated for mixed-use development.
- 2.124 Firstly, it creates uncertainty over the soundness of the draft Plan, as the Council would not be following the evidence regarding the viability of the Airport.
- 2.125 Second, the 2,500 dwellings allocated in the Proposed Revisions would have to be re-allocated elsewhere. The Council cannot simply remove the allocation without meeting the overall housing requirement for the district. This would require reviewing a large proportion of the evidence base to assess which option, if any, would be suitable.
- 2.126 Third, RSP have indicated that their project could create 30,000 jobs. This would be likely to result in additional housing being required in East Kent to support the growth in the workforce. This has not yet been factored into the draft Plan, and RSP have been advised that they need to consider those potential impacts as part of the DCO process.
- 2.127 This would also result in an additional requirement for transport assessment, Sustainability Appraisal work, and viability advice, which would inevitably delay the draft Plan, with all the attendant risks that creates.
- 2.128 The Department for Communities & Local Government (DCLG) has advised that the draft Local Plan should not be delayed to await the result of the DCO process. The Council should therefore progress with the draft Local Plan.
- 2.129 However, it should be noted that if a DCO is granted with compulsory acquisition powers, this would effectively over-ride the Local Plan. In that event, the Council would need to review the affected parts of the Plan. In other words, to progress the draft Local Plan on the basis set out in this report would not prejudice the DCO process or its outcomes.
- 2.130 The recommendation to Members is therefore to continue the proposal for mixed uses on the site as part of the draft Local Plan.

2.131 Employment Land

- 2.132 A number of responses were received indicating that the levels of employment land set out in the draft Local Plan were too high. Although the over-supply of employment land in Thanet is less than that in Canterbury or Dover, a review of employment sites has been carried out. As a result, the draft Local Plan proposing the removal of over 30 ha of older, less suitable, employment land for use as housing.
- 2.133 The Plan now proposes 56ha of employment land, in part reflecting the Eurokent Appeal decision. Up to 8.5ha has been added in to reflect the allocation at the former Airport site at Manston. This allocation presents a significant opportunity to accommodate advanced manufacturing companies therefore directly facilitating delivery of Thanet's Economic Growth Strategy whilst still reducing the overall employment land surplus.
- 2.134 This also means that additional previously-developed or allocated land is now identified for housing purposes, reducing the pressure on urban-edge greenfield land elsewhere.
- 2.135 However, it should be noted that there is still sufficient land allocated within the draft Local Plan to meet the projected job creation over the Plan period. It will not therefore inhibit the Council's adopted Economic Growth Strategy or the ability of the Local Plan to support its implementation. Adequate land has been identified to accommodate all sectors of the economy particularly the anticipated growth sectors.

2.136 Employment land omission sites

- 2.137 As with housing sites, a number of sites were put forward for employment uses. However, as mentioned above, there is a significant supply of employment land already existing in the district that more than meets the requirements for the Plan period.

2.138 Proposed changes to draft Local Plan

- 2.139 Officers are not recommending significant changes to the draft Local Plan at this stage, in response to comments made at the last consultation. The recommendation is to proceed with the draft Local Plan as published in January 2015, and as modified by the Proposed Revisions to the draft Plan published in January 2017, and the changes recommended in this report.
- 2.140 The proposed changes for Publication relating to the main issues raised at the last consultation are set out at Annex 4. These changes also address some of the main issues arising from the previous Preferred Options consultation (Annex 5), and changes to Government guidance. These include:
1. The identification of a number of sites as Local Green Space (as set out in this report);
 2. The identification of Landscape Character Areas, based on the recent Landscape Character Assessment, with the Landscape Character Assessment to be published with the intention of adopting it as a Supplementary Planning Document (SPD);

3. New general housing policy to reduce the repetition of key policy requirements in housing allocation policies;
4. New policy to support the provision of ancillary accommodation for family members, subject to various criteria;
5. A Supplementary Planning Document (SPD) for the Westwood retail area, detailing pedestrian connectivity and the goal of transforming Westwood into a cohesive town centre;
6. Ensuring the draft Local Plan policies are consistent with Natural England's advice regarding the coastal international wildlife sites;
7. A policy for the protection of allotments;
8. Policy support for new education and health facilities at key locations in the district;
9. Continuing the policy from the adopted Local Plan to safeguard land for grow-on space for the QEQM hospital;
10. Updating the evidence and policies relating to the National Technical Standards;
11. Remove the Westwood Lodge site from the Green Wedge policy area and include it within the urban boundary; and
12. Updating the Plan to recognise the changes in the status of some housing sites, including the allocation of two additional sites – Shottendane Farm, Margate (8 units); and Lanthorne Court, Broadstairs (up to 56 units).

2.141 There are also some outstanding changes that need to be made to the Plan in relation to comments made at the Preferred Option stage, which have been previously considered by Members. Some of those changes have been overtaken by events, but the revisions to the draft Plan include the changes agreed at that stage where still relevant.

2.142 Infrastructure provision & the Infrastructure Delivery Plan (IDP)

2.143 As mentioned above, many correspondents raised objections to the level of development because of concerns about the level of infrastructure and service provision, particularly in the context of perceived problems with the existing infrastructure.

2.144 There is no doubt that this is a critical issue in relation to new development. Members will be aware that the District Council is directly responsible for only a few areas of this infrastructure – affordable housing; open space provision; Habitat Regulations mitigation. Most of the key infrastructure is planned or delivered by other public authorities (such as Kent County Council, Clinical Commissioning Group) or by private utility companies such as Southern Water or Scotia Gas Networks. Much of the required infrastructure is to be funded directly by developers.

2.145 Whether the infrastructure is physical (utilities, roads, etc) or social (education; health and so on), it is vital that the Council and its partners work together to ensure that such infrastructure is delivered alongside development in a timely manner. The Council wishes to ensure that all partners are committed to infrastructure provision

and is seeking “sign-off” from all the relevant funders/providers, as part of the IDP process.

- 2.146 The draft Infrastructure Delivery Plan (IDP) should be regarded as a working document, (<https://consult.thanet.gov.uk/consult.ti/TLPPOR/consultationHome>, listed under Consultation Documents) being used to monitor progress on delivery, and is being updated in the light of new information from partner organisations and key delivery agencies. It is proposed that the latest version of the draft IDP is made available for people to view during the Publication period, but with the caveat that it is a work in progress, which requires the cooperation and input of numerous other bodies.

2.147 Publication of the draft Plan

- 2.148 At this stage of the plan process, there is an opportunity for people to make comments in relation to the “soundness” of the Local Plan. The NPPF defines “soundness” considerations as:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 2.149 The Council would also be publishing the Sustainability Appraisal of the draft Plan, on which people will be able to comment. Other studies, supporting documents and other key documents such as the draft Infrastructure Delivery Plan would be available for people to view and use to inform their comments on the draft Plan.

2.150 Weight to be given to draft Local Plan

- 2.151 As the draft Local Plan proceeds towards Examination, it gradually accrues more weight in development decisions, in accordance with para 216 of the National Planning Policy Framework.

- 2.152 On this basis, the draft Local Plan will be accorded additional weight at Publication stage; and at the point when the Plan is submitted, significant weight can be afforded to the draft policies, subject to other material considerations and the level of outstanding objections to individual policies.

2.153 Other documents to be published

- 2.154 KCC and TDC are preparing a Draft Transport Strategy for the district that seeks to address in part transport issues arising from the proposals in the draft Local Plan. A copy of the draft Transport Strategy is attached at Annex 6.

- 2.155 The draft Transport Strategy was considered by KCC’s Environment & Transport Cabinet Committee on 30 November 2017. The principles set out in the draft Strategy

were endorsed by the Committee, and the proposal to progress consultation on the draft Strategy as part of the Local Plan process was supported.

- 2.156 The Transport Strategy has a clear and important relationship with the draft Local Plan, and there is considerable value in consulting on this in parallel with Local plan publication.
- 2.157 It will include the provisions made in both stages of the Local Plan as published so far:

Preferred Option Plan

1. Policy SP13 (Manston Green) – requires Transport Assessment (TA) and provision of/contributions to key transport infrastructure
2. Policy SP14 (Birchington) – requires TA and provision of/contributions to key transport infrastructure
3. Policy SP15 (Westgate) – requires TA and provision of/contributions to key transport infrastructure
4. Policy SP16 (Westwood) – requires TA and provision of/contributions to key transport infrastructure
5. Policy SP34 – Safe and Sustainable Travel
6. Policy SP36 – Development and Transport infrastructure provision

Proposed Revisions

1. Policy SP05 revised (Airport site) – requires TA and provision of/contributions to key transport infrastructure
2. Section 5 (Manston Court Road/Haine Road) – requires provision/contributions to key transport infrastructure (part of Inner Circuit)
3. Section 7 (Parkway station)
4. Section 8 (Strategic routes) – Inner Circuit
5. Section 9 (implementation policy) – requirement for new development to meet its infrastructure requirements
6. Section 10 (Manston Road/Shottendane Road) – requires provision/contributions to key transport infrastructure (part of Inner Circuit)

- 2.158 The draft Transport Strategy will also include measures relating to car parking; new/enhanced bus and rail services; and new cycling/walking provision.

2.159 Options

- 2.160 The Council's options in terms of the Publication stage are set out at Section 3.

2.161 Next steps

- 2.162 Once the 6-week Publication period is completed (expected to be between January and March 2018), the draft Local Plan will be submitted to the Planning Inspectorate (PINS) for independent Examination, together with the evidence base documents,

and the representations received at Publication stage. This is anticipated to be in July 2018. It should be noted that only people making comments at this stage of the Plan process will have the opportunity to participate in the Examination process.

2.163 Amendments to the Local Development Scheme

2.164 The Council reviewed the LDS in 2015, but it requires updating.

2.165 If Publication goes ahead in January, as proposed, it is anticipated that the programme will be as follows:

- Publication of Submission version (full Local Plan) for a period of 6 weeks – mid-January 2018 (exact date tbc)
- Submission to Planning Inspectorate - March 2018
- Examination - June 2018

2.166 There may be other, minor consequential changes to the LDS. Cabinet has agreed the amendments to the LDS (meeting on 25th October 2017).

2.167 Consideration by Overview & Scrutiny Panel

2.168 A series of briefings have been given to an Overview and Scrutiny Working Group consisting of all OSP members regarding the draft Local Plan and some of the key issues facing the Council in preparing the draft Plan. Officers gave presentations and members had the opportunity to ask questions or make specific points about the issues. No specific recommendations were made by the Working Group to this Panel meeting.

3.0 Options

3.1 in considering this report, there are 3 options:

- (1) To publish the draft Local Plan - it is recommended that Cabinet/Council choose this option, since it responds to Government guidance, the developing evidence base, and accords with legal advice. It also provides local communities and other stakeholders with the opportunity to comment further on key issues affecting the Local Plan;
- (2) To publish the draft Local Plan, but in an amended form – there may be some changes that Members wish to consider before the draft Plan changes are published. However, any changes must follow Government guidance and be based on evidence. If changes are made that do not follow evidence and Government guidance, this potentially puts the Council at serious risk of the draft Plan being found “unsound”.

This not only could delay the Plan, and risk intervention by the Department for Communities & Local Government, but it is likely to lead to an increase in Appeals on unallocated development sites, which might be approved against the Council's position and result in costs being awarded against the Council. It could also put at risk the provision of strategic infrastructure that is needed to support new development. This risk is greatly exacerbated by the implications of the DCLG consultation on new housing methodology set out in the main body of this report, in terms of potential delay to the draft Plan and additional costs to be borne before the draft Plan reaches Submission stage in the review of evidence (which could

be in excess of £75,000). Members will also be aware that the London Plan is currently being reviewed, and that there are questions about how London will meet its own housing requirements. It is anticipated that there will be consultation on a draft Plan for London will take place in Autumn this year, and it is therefore important to progress the draft Local Plan in an expeditious manner;

- (3) Not to publish the amended draft Local Plan – the publication of these matters for comment is the next step in the Local Plan process. If the Council does not demonstrate that it is making progress with its Local Plan, there is a risk that the Department for Communities & Local Government could intervene in the making of the Plan. If the Council wishes to retain control of the Local Plan process, it must show that it is making significant progress in dealing with key issues and moving towards a new Local Plan. At this critical stage of the Local Plan process, the risk of CLG intervention increases.

This delay to the Plan risks intervention from DCLG, but it is also likely to lead to an increase in Appeals on unallocated development sites, which might be approved against the Council's position and result in costs being awarded against the Council. It could also put at risk the provision of strategic infrastructure that is needed to support new development. This risk is greatly exacerbated by the implications of the DCLG consultation on new housing methodology set out in the main body of this report, in terms of potential delay to the draft Plan and additional costs to be borne before the draft Plan reaches Submission stage in the review of evidence (which could be in excess of £75,000). Members will also be aware that the London Plan is currently being reviewed, and that there are questions about how London will meet its own housing requirements. It is anticipated that there will be consultation on a draft Plan for London will take place in Autumn this year, and it is therefore important to progress the draft Local Plan in an expeditious manner.

Option 1 is recommended.

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Reporting to:	Helen Havercroft, Head of Growth & Development

Annex List

Annex 1	Main issues from previous consultation and proposed responses
Annex 2	Sustainability Assessment of Proposed Changes
Annex 3	Summary of Local Green Space Assessments
Annex 4	Schedule of Proposed Changes for Pre-Submission Publication
Annex 5	Preferred Option Plan main issues and proposed responses
Annex 6	Draft Thanet Transport Strategy

Background Papers

Title	Details of where to access copy
National Planning Policy Framework	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
Planning Practice Guidance	http://planningguidance.communities.gov.uk/blog/guidance/
DCLG consultation on housing methodology	https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals
Strategic Housing Market Assessment (SHMA) – update report	https://www.thanet.gov.uk/media/3560943/Updated-Assessment-of-Objectively-Assessed-Housing-Need-Draft-0209.pdf
Retail Study Update 2016	https://www.thanet.gov.uk/media/3556051/FINAL-Thanet-Retail-Study-Update-2016.PDF
Airport Viability Study and Assessment of Local Plan Representations	https://www.thanet.gov.uk/your-services/planning-policy/evidence-base/airport-viability-reports/
Economic Growth Strategy	https://www.thanet.gov.uk/media/3656760/Thanet-Economic-Growth-Strategy.pdf
Thanet Landscape Character Assessment	https://www.thanet.gov.uk/your-services/planning-policy/evidence-base/environment-and-quality-of-life/

Corporate Consultation

Finance	Matt Sanham, Corporate Finance Manager
Legal	Tim Howes, Director of Corporate Governance & Monitoring officer
Equalities	Calum Liddle, Customer Contact & Engagement Officer

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.	<p>There is currently a DCO process underway which provides the framework for the consideration of national infrastructure.</p> <p>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.)</p> <p>Advice from Avia is that it is still too early to assess the impact of Brexit as an agreement has not been reached.</p>	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/HAINES 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/HAIN ROAD		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
<p>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:</p> <ul style="list-style-type: none"> • 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’. 	<p>Addressed under Policy GI03 – Protected Species and Other Significant Species and GI06 – Landscaping and Green Infrastructure</p>	<p>No change</p>
<p>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’.</p> <p>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’.</p>	<p>Noted. This should apply to other potential development sites so should be included in new General Housing Policy.</p>	<p>Include suggested wording in new General Housing policy.</p>

SECTION – 5 – LAND AT MANSTON COURT ROAD/HAINES 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
<p>Impact of roads on other parts of the network:</p> <ul style="list-style-type: none"> • 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 	<p>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.</p> <p>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.</p> <p>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.</p> <p>It is not believed that the road improvements will have more than a marginal effect on Brenley Corner.</p>	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
<p>road from the A28 (east of St James Terrace, Birchington) to Park Road (near North Lodge, Quex Park)</p> <ul style="list-style-type: none"> • Should include new road at “Manston Green” • Also need improvements to Nash Road and A28 between A299 and Birchington to dual carriageway standard 		
<p>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)</p>	<p>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.</p>	<p>If detailed route designs are available, amend draft Plan to indicate such routes.</p>
<p>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</p>	<p>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.</p> <p>The Council, with KCC, are working with developers to ensure that the phasing of development is consistent with the provision of infrastructure.</p>	<p>No change</p>
<p>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</p>	<p>See other responses in relation to the new road proposals.</p> <p>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.</p> <p>This issue of road maintenance is acknowledged, but it does not fall within the scope of the Local Plan, unless it is addressed by</p>	<p>No change.</p>

SECTION 8 – Strategic Routes policy		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
	<p>the implementation of one of the identified road schemes.</p> <p>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.</p> <p>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.</p>	
If there was less housing, not so many new roads needed/roads are just a reaction to development. New housing sites to support roads <u>or</u> roads are just a reaction to development	<p>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.</p> <p>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.</p>	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.
<p>Need to be aware of:</p> <ul style="list-style-type: none"> • 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?	<p>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.</p> <p>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.</p> <p>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.</p>	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.	
<p>Need to work with:</p> <ul style="list-style-type: none"> • 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 	<p>The Council is aware of the requests of the various bodies and is aiming to address these through the IDP process, subject to viability.</p> <p>It is also the intention to carry forward the allocation in the adopted Local Plan to allow for possible expansion of facilities at QEQM.</p>	Amend the draft Local Plan to include a policy for expansion of QEQM (see adopted Policy CF4)
<p>Other matters need to be addressed:</p> <ul style="list-style-type: none"> • Strategic Route Network impacts • identified needs of villages • need to attract business to the area should be a priority • SPA mitigation measures 	<p>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.</p> <p>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.</p> <p>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.</p> <p>SPA mitigation measures are already included in the draft Local Plan (draft Policy SP25) and through the Strategic Access, Management & Monitoring (SAMM) strategy.</p>	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.
<p>Water efficiency should also include:</p> <ul style="list-style-type: none"> • 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
<p>New sites proposed for residential development (some have been submitted previously but not allocated):</p> <ul style="list-style-type: none"> • 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, 	<p>These sites are currently being assessed under the Strategic Housing Land Allocations Assessment process.</p>	<p>Include any new sites suitable for allocation in Appendix B to meet housing target requirement.</p>

PROPOSED NEW SITES FOR DEVELOPMENT		
Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
<p>Monkton</p> <ul style="list-style-type: none"> • 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

Thanet District Council

Thanet Local Plan

Sustainability Appraisal Update
Report

REP/60167524/0001

Issue | October 2017

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 60167524

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Appendix A

SA Framework

Appendix B

Policy Appraisal Updates

1 Introduction

1.1 Background to the sustainability appraisal

The sustainability appraisal (SA) of the Thanet District Council (TDC) Local Plan has been an iterative process that has seen all emerging thematic options and policies appraised against a sustainability framework developed from analysing the environmental, social and economic baseline of Thanet as well as the plans, programmes and strategies that may influence the Local Plan. Various SA reports have been published, which have accompanied the Issues and Options Report (June 2013), Preferred Options Report (January 2015) and Revised Preferred Options Report (December 2016) for public consultation.

The SA process has been undertaken in compliance with the SEA Directive¹ and the requirements of the Planning and Compulsory Purchase Act 2004.

1.2 Purpose of this report

This report provides an update to the SA based on material changes that have happened since the publication of the Revised Preferred Options Local Plan in December 2016. There are various changes that could affect the finding of the SA namely:

- Revised baseline information;
- New or revised plans, programmes and strategies;
- A change in the key sustainability issues affecting Thanet (primarily from the review of baseline and plans programmes and strategies); and
- New or revised local plan policies

As a result of publishing the Revised Preferred Options Local Plan and the consultations received, TDC have made a number of changes to policies where appropriate, removed policies that were not considered necessary, and added policies where this strengthened the policy framework. This SA update report therefore provides an opportunity to ensure that the SA framework and rationale behind it is still valid, whilst ensuring that policy changes have been appraised to meet legal compliance and to inform the decision making process.

For ease of reference, this document only focuses on those policies that have been amended and has only considered new or replacement plans programmes and strategies as part of the context review. However for completeness, full baseline information has been provided including recent amendments.

This report should therefore be read in conjunction with the SA of the Revised Preferred Options Local Plan.

1.3 Approach

In order to facilitate this update the following staged approach has been implemented.

1. **Context Review Update** – based on discussions with TDC, a list of new or revised context documents was compiled and agreed. The list mainly reported changes to documents at the local and county levels, but all spatial contexts were reviewed for relevance. The findings of the revisions to the context review are reported in section 2.
2. **Baseline Update** – Since the last major review of the SA baseline information, further information has become available within the public domain. Most notably, all 2011 Census data sets have now been published within the public domain. A comprehensive review of baseline information has been undertaken and is provided in section 3.
3. **Key Sustainability Issues Update** – Based on the context and baseline reviews, it was necessary to examine whether any changes to key sustainability issues affecting Thanet were evident, or whether the existing issues identified in previous iterations of the SA remained valid. This is an important aspect of the SA as the key sustainability issues set the basis for establishing the objectives selected for the SA framework. Reporting on current key sustainability indicators is presented in section 4.
4. **Policy Appraisal Update** – In light of the recent changes and additions to local plan policies, revised policy appraisals were undertaken where deemed appropriate. The policies were screened to determine whether certain policies were not changed, or had only minor text changes that did not affect the policy intention. In this case, no further appraisal was undertaken and the existing appraisal matrix from the SA of the Revised Preferred Options was deemed valid. Where reappraisal was required, this has been summarised in section 5 **Error! Reference source not found.** and reported in full in Appendix B.

1.4 Next Steps

Whilst the SA update report is primarily for informing the 1st Cabinet meeting in October 2017, the content of this report will be included in the final SA report that will be published alongside the Publication Version Local Plan in January 2018. This version of the SA report will be the Environmental Report required under the SEA Directive. This version of the report will inform the 2nd Cabinet meeting during December 2017, in the decision to approve the Publication Version of the Local Plan.

¹ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment

2 Context Review Update

2.1 Introduction

The preparation of the emerging Local Plan and the SA have been continually influenced by many different plans and programmes at different spatial scales. Therefore, it has been necessary to ensure that the documents reviewed as part of the SA process are up to date. A review has been undertaken to identify new or revised relevant international, national, regional and local, policy guidance, plans and strategies. This ensures that:

- the Local Plan and the SA framework are in line with the requirements of current other relevant plans and policies;
- that inconsistencies or constraints are suitably dealt with;
- sustainability objectives, key targets and indicators are reflected in the SA; and,
- relevant baseline data is accounted for.

2.2 Revisions to the context review

The 2009 Core Strategy Scoping Report identified a substantial list of PPPs (Policies, Plans and Programmes) relevant for the Thanet district. This list was comprehensively reviewed, updated and rationalised by removing redundant or irrelevant policies, plans and programmes, so as to focus on those that are key and most recent and relevant.

New or revised context documents reviewed as part of this update are summarised in Table 1 below. The identification of relevant PPPs is an on-going process and the list will be updated once new PPPs become available and will be included in any subsequent SA Reports.

Table 1: Revised or additional context documents.

Plans, Programmes, Strategies and Objectives	New or replacement document	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
International					
No replacement or new documents were reviewed at the international level.					
National					
Marine Plan Areas in England 2014	New	Map identifying the different Marine Areas around the UK.	N/A	The Local Plan should include these marine areas when preparing natural environment and biodiversity objectives.	The SA objectives should consider these marine areas.

2.3 Review outcomes

The updated review process provided additional sources of context information namely:

- Consideration of the impact on marine areas as a result of the Local Plan policies;
- How SA indicators might be influenced by marine planning objectives
- How the security of water supply can be improved.
- The need for consistency with neighbouring authorities.
- The need for considering and increasing pitches for the travelling community.
- The renewed need for a greater number and standard of affordable homes in Thanet.
- That policies do not prejudice the ability of neighbourhood planning.

These considerations should be cross-checked against the current key sustainability issues (reported in section 4) to ensure that they are appropriately represented in the SA framework.

Plans, Programmes, Strategies and Objectives	New or replacement document	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
Sustainability Appraisal Scoping Report: North East Inshore and Offshore; North West Inshore and Offshore; South East Inshore; South West Inshore and Offshore Marine Plans July 2016	New	The report is the first output of an SEA which provides highly comprehensive baseline environmental, social, and economic information. The data will be used to inform the development of the UK Marine Plan which will govern the implementation of the UK Marine Policy Statement.	The report provides scoping methodologies and findings for Inshore and Offshore areas in the North East, North West and South West, and Inshore areas in the South East. The topics covered are: Cultural heritage Geology, substrates and coastal processes Seascape and landscape Water Air quality Climate Communities, health and wellbeing Economy Biodiversity, habitats, flora and fauna	This report has been used to inform the UK Marine Plan. Please refer to the document entitled ‘South east marine plan area’ for implications of this report on the Local Plan.	SA objectives should consider the outputs of this scoping report as a guide for topics that should be considered in the SA.
Regional					
South east marine plan area February 2017	New	The document applies the findings from the ‘Sustainability Appraisal Scoping Report: North East Inshore and Offshore, North West Inshore and Offshore, South East Inshore, and South West Inshore and Offshore Marine Plans’ document and provides information pertaining to the implementation of the UK Marine Plan in the South East area. The objectives of the UK Marine Plan are: Achieve a sustainable marine economy Strong, healthy and just society Living within environmental limits Promoting good governance Using sound science responsibly	The document refers to a list of issues with implementing the UK Marine Plan. The document also points of an online database to aid marine policy and spatial planning, named the Marine Information System.	The Local Plan should use the tools and evidence available in the report to inform marine policy and spatial planning decisions. The Local Plan should also consider any issues raised by the document which related to the local area.	The SA should take into account the issues raised in the document, and should also refer to the informing document, ‘Sustainability Appraisal Scoping Report: North East Inshore and Offshore, North West Inshore and Offshore, South East Inshore, and South West Inshore and Offshore Marine Plans’.
Southern Water Resources Management Plan 2010-2035, Main Report October 2009	Replacement - Southern Water – Strategic Direction Statement (December 2007, updated March 2011) and Water Resource Management Plan	<ul style="list-style-type: none">•To ensure that there is sufficient security of water supplies to meet the anticipated demands of all its customers over the next 25-year planning period from 2010 to 2035. Including for new customers from new houses and considering climatic variability from climate change.•To maintain high levels of environmental protection•To reduce energy use	<ul style="list-style-type: none">•To ensure that 1.01 Ml/d is saved through water efficiency activity each year in AMP5 (2010-11 to 2014-15) for household and non-household activity.	Local Plan policies should consider the security of water supplies and the efficiency of use.	SA objectives should consider water supply and the efficient use of water.

Plans, Programmes, Strategies and Objectives	New or replacement document	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
South east marine plan area Opportunities and Challenges	New	<ul style="list-style-type: none">•To protect diverse marine habitats including iconic geology.	<ul style="list-style-type: none">•Restoration of native oyster that historically covered large areas for economic gains•Aquaculture and fisheries enhancement of water cleaning potential•Largest no-take zone in England (Medway) will support fish nursery area enhancement benefiting both ecology and economy•Conservation of red-throated diver, an area of important habitat and prey species, which winters in the outer Thames•Use of low fencing and direct recharge from maintenance dredging in estuaries to support saltmarsh restoration projects, assisting appropriate disposal to enhancing ecosystem services including flood defence,	The Local Plan should incorporate the opportunities presented in the SE Marine Plan	SA framework to reflect SE Marine plan objectives when setting indicators
County					
Canterbury District Local Plan July 2017	New	<ul style="list-style-type: none">•To strengthen and broaden the local economy•To provide sufficient housing to meet local housing need and support economic growth•To protect the built and natural environment•To develop sustainable communities, and seek to ensure that adequate community facilities are provided•Protect sensitive landscape and wildlife areas, and other key environmental assets such as World Heritage Site, The Area of Outstanding Natural Beauty nd Conservation Areas.•Support the growth of the Universities and Colleges.	The Canterbury District Local Plan targets include: <ul style="list-style-type: none">•Guidelines on land allocation of development requirements between 2011-2031 for Housing, Employment land, and retail.•30% affordable housing on all residential developments consisting of 11 or more units.•Continuing the momentum of developing Canterbury as a ‘Knowledge City’ in terms of its education sector and private sector based businesses.•Ensure air quality within the District remains at an acceptable limit.•Raising the quality of life of the district’s residents and visitors.•Provide transport that properly regards people with disabilities and does not limit their travel options.	Ensure Local Plan integrates key objectives and remains consistent and in line with the Canterbury District Local Plan.	Ensure objectives are aligned with SA and considers the targets outlined in the Canterbury District Local Plan.
East Kent Gypsy and Traveller Accommodation Assessment Report (2007-2012) July 2007	New	<ul style="list-style-type: none">•Increase the number of available pitches for Gypsy and Traveller Accommodation•Examine the communication between County Council Gypsy and Traveller Unit and agencies.•To appoint a Gypsy and Traveller Liaison Officer in Canterbury.	<ul style="list-style-type: none">•19 more pitches required throughout Canterbury, Dover, Shepway and Thanet by 2017•Incorporate the accommodation of travelling showpeople in the provision of pitches and communication channels.	Ensure Local Plan integrates the requirement for more pitches and the need for coherent communication channels.	The SA framework should include objectives that seek to accommodate Gypsy and Travellers.
Kent Environment Strategy March 2016	Replacement - Growing the Garden of England: A strategy for environment and economy in Kent – July 2011	The Kent Environment Strategy is a 5 year strategy organised into three themes based on 10 priorities representing the major challenges and opportunities for Kent over the next 10 to 20 years. Each theme has a 20-year vision, supported by high-level targets. The three themes are: 1.Building the foundations for delivery 2.Making best use of existing resources, avoiding or minimising negative impacts 3.Toward a sustainable future	<ul style="list-style-type: none">•Reduce emissions across the county by 34% by 2020 from 2012 baseline•More than 15% of energy generated in Kent will be from renewable sources by 20202 from a 2012 baseline•Reduced water use from 160 to 140 litres per person per day•Reduce the number of properties at risk from flooding•28 Kent and Medway water bodies will be at good status by 2021•A minimum of 65% of local wildlife sites will be in positive management and 95% of SSSIs will be in favourable recovery by 2020	Ensure Local Plan integrates the targets set from the Kent Environment Strategy and assimilates its priorities when producing the local plan.	The SA objectives could include an objective on considering each theme outlined in the Kent Environment Strategy.

Plans, Programmes, Strategies and Objectives	New or replacement document	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
			<ul style="list-style-type: none">•Status of bird and butterfly species in Kent and Medway are quantified•Completed a natural capital assessment for Kent by 2017•Heritage assets at risk quantified and identified•Public sector services will have reviewed climate risk assessments and have developed actions as appropriate by 2018•Emergency plans reviewed and guidance developed for key animal and plant health risks e.g. Ash Dieback•Work to increase the number of jobs in the low carbon and environmental goods and services sector by 10% by 2020•Support 500 businesses to increase resilience and build innovation in LCEGS by 2020•Decrease the number of days of moderate or higher air pollution and the concentration of pollutants•Work to reduce the noise exposure from road, rail and other transport•Send no more than 5% waste to landfill by 2020•Reduce household waste by 10% by 2020		
Kent Minerals and Waste Local Plan 2013-2030 July 2016	New	<ul style="list-style-type: none">•Safeguarded wharves and rail depots•Safeguarding other mineral plant infrastructure•Secondary and Recycled aggregates•Waste reduction•Safeguarding of existing waste management facilities•Safeguarding mineral resources•Safeguarding minerals management, transportation production and waste management facilities•Prior extraction of minerals in advance of surface development•Ancillary development Incidental minerals extraction	<ul style="list-style-type: none">•100% refusal for applications with an objection from the County Council•Supplementary Planning Document (SPD) adopted by end of 2016•100% of applications meeting all policy criteria granted planning permission.	The Local Plan should consider how the problems facing minerals and waste can be accomplished.	The SA framework should include objectives that align with the Kent Minerals and Waste Local plan.
Kent Country Parks Strategy 2017-2021, Consultation Draft June 2017	New	<ul style="list-style-type: none">•Provide a network of high quality and biodiverse country parks•Increase visitor numbers to the country parks particularly at off peak times and among under-represented groups•Ensure the service is as financially self-sustaining as possible	<ul style="list-style-type: none">•To ensure that the biodiversity, heritage and landscape values of the sites are maintained or enhanced•To support Kent’s Environment Strategy•To ensure work with nurseries, schools, colleges and adult education providers to provide opportunities to increase awareness, enjoyment and engagement with the environment•To work with public health, clinical commission groups, and NHS providers to ensure the parks maximise their potential to improve health, wellbeing and quality of life•Ensure that the parks are enjoyed by all sectors of the community, regardless of age, health, race, religion, disability or gender•To increase visitor numbers outside of peak times•To provide high quality volunteering opportunities	The objectives and aims need to be addressed in the Local Plan for the provision of high quality Country Parks in Kent	The SA objectives should reflect the need to promote better public health derived from Country Parks and ensure quality and visitors to Country Parks are considered.

Plans, Programmes, Strategies and Objectives	New or replacement document	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
			<ul style="list-style-type: none"> •To increase the percentage of the service's budget generated from income generation activities •To ensure the portfolio of the country parks and countryside sites is managed to maximise the delivery of strategic aims. 		
Biodiversity Action for Kent's wildlife	Replacement - The Kent Biodiversity Action Plan 1997	The aim of the action plan is to conserve and enhance biological diversity in Kent and to contribute to the conservation of national and global biodiversity.	<ul style="list-style-type: none"> •To maintain and, where practicable, to enhance: the overall populations and natural ranges of native species and the quality and range of wildlife habitats and ecosystems; · internationally and nationally important and threatened species, habitats and ecosystems; Species, habitats and natural and managed ecosystems that are characteristic of Kent; The biodiversity of natural and semi-natural habitats, where this has diminished over 3 recent decades. •To increase public awareness of, and involvement in, conserving biodiversity. •To identify priorities for habitat and species conservation in Kent and set realistic targets and timescales for these. 	Ensure Local Plan integrates the protection of biodiversity by conservation and enhancement of priority habitats and species.	The SA objectives should align with the Kent BAP and promote the conservation of protected habitats and species.
Sub County					
No replacement or new documents were reviewed at the sub-county level.					
Local					
Economic Growth Strategy for Thanet November 2016	New	<ul style="list-style-type: none"> •Working with businesses, schools and FE/HE providers to improve workforce skills •Developing and implementing measures to support new and small businesses in the District, particularly the provision of managed workspace and focused business support •Ensuring major employment sites in Thanet are managed and promoted effectively •Working with local partners to ensure that the visitor economy continues to evolve, reflecting fast-changing patterns of demand 	<ul style="list-style-type: none"> •For skills levels in Thanet to be on par with Kent as a whole •To increase GVA per job by 3.5% per annum by 2031 	The themes of the Economic Growth Strategy for Thanet should be carried forward into the Local Plan, with particular consideration to the high targets.	The SA framework should include objectives relating to the enhancement of workforce skills and the increased of GVA per job.
Housing Strategy 2012-2016	Replacement - Thanet District Council Housing Strategy 2006 - 10	<ul style="list-style-type: none"> •Deliver a range of homes to meet the local housing need which residents can afford •Make better use of existing housing stock across all tenures and improve housing conditions •Enable vulnerable people access to good quality housing and to live independently •Provide an accessible housing options service for Thanet residents •Deliver housing in support of our regeneration and economic development objectives 	<ul style="list-style-type: none"> •Deliver 280 new affordable homes for rent and low cost home ownership by 2016 •Bring 290 empty homes back into use •Review the provision of accommodation for vulnerable groups in the district in conjunction with our statutory partners and stakeholders •Allocate social homes to those in most housing need •Prevent and reduce homelessness •Reduce the use of temporary accommodation •Ensure the housing objectives link in with the wider strategic objectives for regeneration and economic development 	The Local Plan should consider the development of affordable homes and the improvement of housing conditions in Thanet.	The SA framework should include objectives that address housing issues including homelessness.

Plans, Programmes, Strategies and Objectives	New or replacement document	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
Herne Bay Area Action Plan April 2010	New	<ul style="list-style-type: none">•To deliver the redevelopment of Key Opportunity Sites as catalysts for the regeneration of Herne Bay•To create a thriving and commercially successful town centre for the benefit of the town’s residents and visitors•To provide improved recreational, leisure and community facilities in the town centre for residents and visitors.•To enhance Herne Bay’s Conservation Area and streetscapes through design and comprehensive high-quality public realm improvements•To create an attractive sense of place with clear pedestrian and cycle routes linking the seafront shopping streets and park•To complete the national cycle route that runs along the town’s seafront and an extension of the High School•To revive the town’s Memorial Park with an attractive range of facilities and high-quality landscaping•To protect current overall levels of weekday parking facilities, to investigate increasing parking availability on Saturdays and to improve vehicular movement through the town•To improve the vibrancy and attractiveness of Herne Bay as a seaside tourist destination, including the delivery of a revived and thriving pier•To protect the integrity of nearby European designated offshore marine sites	<ul style="list-style-type: none">•To appoint a development partner for the Central Development Area, Beach Street and Bus Depot and for planning approvals to be secured•Planning approvals for a range of new retail and commercial units within the town centre to be completed•Planning approval for expansion of Herons Leisure Centre to be completed•Delivery of new co-ordinated high quality street furniture, surface materials and additional tree planting•Implementation of planning conditions for appropriate alterations and improvements to the built fabric of the town centre•Provision of additional cycling routes•Improvements to pedestrian routes including surface treatments and signage•Completion of national cycle route along the seafront•Completion of cycle route from the seafront to Herne Bay High School•Delivery of additional facilities and improvements to the landscape of the park•Relocation of the Kings Road market to an on-street location• Production of initial scoping study of potential for linked developments, facilities and attractions along Herne Bay seafront•Production of report of potential new leisure uses for the Pier•Delivery of additiponal activities, linked developments, facilities and attractions along the seafront including the Pier•Protection of protected marine environments]•Regular condition assessments of wildlife sites, bird habitats and inter-tidal conditions	Ensure that Local Plan aligns with Herne Bay Area Action Plan	The SA should consider the objectives and targets set by the Herne Bay Area Action Plan
Thanet Neighbourhood Planning	New	<p>Local community influence on local developments under the Localism Act 2011, which produces Neighbourhood Plans for local areas.</p> <p>The key aim is to guide the future development and growth of an area through planning policies and proposals. In Thanet District Council, there are six neighbourhood plans including:</p> <ul style="list-style-type: none">•Birchington•Broadstairs and St Peters•Cliffsend•Margate•Ramsgate•Westgate-on-sea	Integrated community engagement within planning policy and Local Plan. To increase local community responses and increase engagement on development projects.	Ensure consideration of neighbourhood policies and alignment with Local Plan.	Ensure local community engagement and neighbourhood plans are considered in the SA.
Thanet Corporate Plan 2015 to 2019	Replacement - Thanet Council’s	<ul style="list-style-type: none">•For Thanet to be a clean and welcoming place, encouraging residents and visitors to take pride in its environment.	<ul style="list-style-type: none">•Targeting resources to deliver the right services, in the right way, to improve customer experience, whether delivered directly, in partnership or commissioned externally	Ensure Local Plan Policies consider and contribute to objectives of Corporate plan, economic Growth and social wellbeing.	SA Objectives to include economy related objectives and indicators.

Plans, Programmes, Strategies and Objectives	New or replacement document	Key objectives relevant to Local Plan and SA	Key targets and indicators relevant to Local Plan and SA	Implications for the Local Plan	Implications for SA
	Corporate Plan 2012-2016	<ul style="list-style-type: none">•To introduce a balanced approach of education and enforcement to ensure our district is respected and enjoyed by all.•Recycling to be at the heart of the collection services and develop new recycling and waste solutions for our towns and villages.•Continue to develop strategic partnerships to improve the health and wellbeing of our residents.• Ensure that we have the right housing provision for those most in need of our help.•Work with partners in education and industry to support young people in developing the skills they need to be a part of a highly skilled workforce.	<ul style="list-style-type: none">•Ensuring that we operate in an open, honest and accountable manner – expecting the same standards of partners and stakeholders Delivering services in the most cost effective way <ul style="list-style-type: none">•Ensuring achievement of stable and sustainable budget, capable of withstanding economic pressures•Recruiting and retaining skilled, committed and motivated people•Setting high performance standards and actively supporting staff to reach them•Being forward thinking, innovative employer, encouraging new ways of working•Listening to the needs of the community and using this information to continue improving our services•Providing clear, meaningful and timely communications•Keeping residents and stakeholders informed about plans and work programmes in a way which is easy to access and understand.		

3 Baseline Update

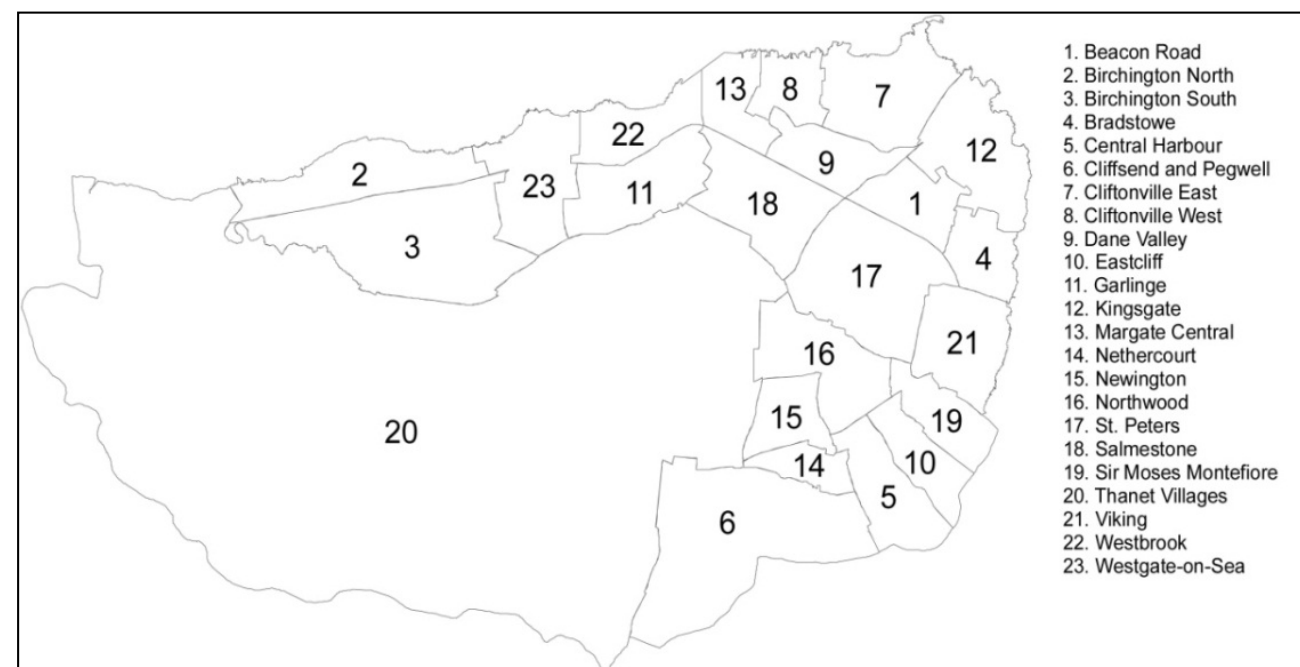
3.1 Scope and Purpose of the Baseline

The Environmental Assessment of Plans and Programmes Regulations 2004 require a discussion of the ‘relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme’ (Annex 1 (b)). In the case of SA, the baseline and identification of key issues must also consider social and economic aspects in addition to the environmental issues specified in the SEA Directive. The baseline review provides the basis for predicting and monitoring the effects of the Local Plan policies.

3.2 Updating the Baseline

A review of the Thanet baseline has been undertaken and is presented below, making comparisons on topics such as housing, employment, education and cultural heritage between Thanet, Kent, the South East and England. In order to make comparisons between the different areas within Thanet, Wards, which are electoral districts that form part of the UK administrative hierarchy, have been utilised. The different Wards of Thanet are shown in Figure 1.

Figure 1: Thanet District Electoral Wards



² <http://www.neighbourhood.statistics.gov.uk>

³ <http://www.nomisweb.co.uk>

3.3 Geography and Situation

The District of Thanet is located on the east coast of England and on the north eastern tip of Kent. Bounded by the English Channel to the north, east and south, the District is predominantly coastal. The District is bordered by the City of Canterbury District to the west, and the Dover District to the south.

Thanet comprises three main urban areas: Margate, Broadstairs and Ramsgate, all located on the coast. Interspersed between these are a number of villages and hamlets. As a consequence of the position of the three towns, almost the entire coastal area accommodates substantial built development. From Birchington, via Westgate-on-Sea, Margate, Cliftonville, Kingsgate to Ramsgate there is limited unused seafront.

The key transport networks into the area include the duelled A299 Thanet Way, which connects to the M2, the A28 Canterbury Road which links with the city of Canterbury and the A256 which serves as the link to District of Dover. Kent's international airport, formerly RAF Manston, is a hub for international travel.

3.4 Demographics

Thanet's population has gradually increased in recent years with a net in-migration offsetting a negative natural change (births to deaths). In 2017, the population was estimated at 142,240 with 68,720 males and 73,520 females². Of these, around 82,100 are aged 16-64 (the approximate working age of the population).

The population of children and young people for the under 10s remains lower than the England average for both sexes. There has been a decrease in the population of persons aged 10-19 compared to the England average, with both sexes in this age range now lower than the England average. Thanet's population exhibits a considerable smaller proportion of under 50s compared to the England profile. As a popular coastal location, Thanet attracts an older population of individuals close to or of retirement age. 22% of Thanet's population are of, retirement age (over 64 years), with this demographic the only population group in Thanet above the England average³. The related effect of high numbers of elderly residents is a low proportion of people of working age, between 16 and 64, and a lower than average percentage of residents aged between 0 and 15⁴. This demographic skew towards an older population has been a characteristic of the area since at least the 1991 census.

3.4.1 Population projection

Population projections from the Office for National Statistics (ONS) show an overall rise in population over the next five years, with the largest percentage rise occurring in the 65+ age group. This is predicted to increase by 10% by 2022, however this growth rate is falling compared to statistics produced for the years 2010-2015, which showed an increase in this age range of 12%. The overall population projected increase for Thanet for 2022 is 4.8%, up from 3.3% in 2015, and would result in

⁴ Thanet Local Plan Background Paper: Housing.

the size of population just over 149,000, up from 140,000 in 2015. This will have an impact on health services as people over 60 will generally have greater health needs and service usage.

The expected population growth in persons aged over 65 is expected to place increased demand on local health services. Thanet’s seaside location and relatively low property prices attract high numbers of unemployed and asylum seekers to the District. These dependent and vulnerable groups have led to, especially in the more deprived areas, a highly transient population abundant with people with support needs.

ONS figures show that the population of Thanet is predominantly white, although there are increasing concentrations of people from different Black and Minority BME backgrounds.

Table 2: Population by ethnicity for Thanet in 2011.

	Thanet		England	
	Number	%	Number	%
All people	134,186	100%	53,012,456	100%
White	128,194	95.5%	45,281,142	85.4%
BME	5,992	4.5%	7,731,314	15%

Source: 2011 Census Table KS201EW

Thanet has a number of ethnic minority populations. National census data from 2011 shows the largest of which ‘White other’ makes up 4.2%⁵. More detailed figures of ethnicity breakdown showing ‘white: other Eastern European’ to be the largest ethnic minority with 0.85% of the total population. Thanet’s ethnic minorities are not evenly distributed across the District, but rather concentrated in the wards that are the most socially and economically deprived. One such group categorised as ‘white: other white’ have high representations in Cliftonville West (18.2%) and Margate Central (8%) and. This clustering of ethnic minority populations is likely to be a result of net in-migration from EU countries into the more socially and economically deprived areas of Thanet.

3.4.2 Economic Trends and Performance

In 2017, Thanet was ranked the 28th most deprived area out of a total of 326 districts in England⁶. Between 2004 and 2015, Thanet saw a 12.8% increase in the number of active enterprises, compared to an 18.5% increase in the number of businesses in Kent, and a 24.5% increase across the whole of England.

In 2015⁷ 3,935 VAT companies were registered in Thanet across a number of industries including Wholesale and Retail (495 companies), Construction (580 companies), Hotels and Restaurants (395 companies) and Manufacturing (210 companies). Overall for Thanet the number of business ‘births’ have increased 3.8% from 2014-2015, although the percentage growth is considerably less than on

⁵ http://www.kent.gov.uk/your_council/kent_facts_and_figures/equalities_and_diversity/ethnic_profile.aspx
⁶ <http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/area-profiles>
⁷ https://www.kent.gov.uk/_data/assets/pdf_file/0007/8179/Business-demography.pdf
⁸ <https://shareweb.kent.gov.uk/Documents/facts-and-figures/Economy/Business-Demography-2011.pdf>

average across Kent, (8.5%), and in Great Britain as a whole (9.3%)⁸. Despite a lower number of business ‘births’, the number of business ‘deaths’ in Thanet has fallen by 7.8% between 2014 and 2015. Over the same period, there was a 1.8% increase in business closures in Kent, and a 3.3% increase across the whole of England. Significantly, there has been a 24.5% reduction of business closures in Thanet over the 11-year period between 2004 and 2015³.

Thanet’s unemployment rate has been falling steadily since a high in 2012 of 6.1%. Unemployment in Thanet currently stands at 3.3%, more than double the 1.6% unemployment rate for Kent, and just less than double the average unemployment rate across England (1.8%). According to 2011 Business Register and Employment Survey (BRES) data Thanet’s employment growth in 2011 was -2.36%. The South East figure was -1.06% and England’s figure was -0.25%. The whole country saw negative growth for a number of years after the recession, and this contributed to the negative growth observed in Thanet between 2011 and 2012. Table 7 shows that a number of key economic indicators have recovered between 2012 and 2017, with unemployment rates up 4.5% on 2012 values, and the proportion of working age residents claiming out of work benefits down 4.1%.

Table 3: Thanet Key Economic Indicators

Thanet Economic Indicators.	2012	2013	2014	2015	2016	2017
% 16-64 claiming out of work benefits	17.3	17.8	7.1	16.3	14.6	13.2
Unemployment rate (%)	5.6	6.1	2.0	4.4	3.1	3.3
Median Gross weekly Workplace earnings (£)	392.1	383.3	528.1	391.0	411	414.5
Median Gross Weekly Resident Earnings (£)	412.5	414.6	550.8	450.4	438	462.5
Employment Rate (%)	70.5	63.6	77.4	62.4	71.9	75.0
T5 year % change in employees	3.3	2.1	7.8	-2.0	-0.6	1.9
Stock of businesses	3,560	3,580	3,610	3,655	3,775	3,935
3-year Business Survival Rate (%)	60.4	59.5	64.4	54.5	58.8	59.0
GVA per Head (£)	13,239	15,073	26,886	14,651	14,641	15,021
% Employees in the Knowledge Economy	9.4	10.7	18.5	9.5	9.4	10.2
% NVQ4+	24.5	30.6	33.8	22.1	22.7	30.0

Source: Kent Economic Indicators 2017

Since 2001 Thanet’s GVA (Gross Value Added) increased from £9,405 per capita to £15,021 (59.7% increases). However, the Thanet figures are still significantly lower than the Kent average, which in 2017 stood at 21,636⁹.

Tourism is an important sector in Thanet’s economic performance supporting 17% of the workforce and attracting a direct visitor spend of £250 million in 2015 [ref 9 old, use: http://www.visitkentbusiness.co.uk/library/Thanet_dashboard_2017_final_V3.pdf]¹⁰. Tourism and the

⁹ <http://thanet.gov.uk/publications/planning-policy/thanet-local-plan-monitoring-report-april-2011-to-march-2012/economic-development-and-regeneration/>
¹⁰ www.Thisiskent.co.uk

green sector (e.g. renewable energy) are growing and comprise a larger proportion of total businesses in comparison to the South East region and England.

Public Services, including education and health are among the largest employers in the district, cumulatively accounting for 30.6% of the workforce^{Error! Bookmark not defined.}. Retail accounts for 14.1% of total employment in the area, making it an important industry for income security. The proportion of people that are home working is relatively high in the District. Skilled trades and caring, leisure and other service occupations are dominant, and Thanet has fewer professional and managerial occupations than the South East and also England although the number of people employed in these occupations has been rising for the last few years.

3.4.3 Employment

Thanet's history of economic problems is reflected in a persistently high unemployment rate, which has consistently been above regional and national averages. During the growth period between 1995 and 2007 the unemployment numbers decreased, and at a slightly faster rate than national rates and by 2007 the gap between the unemployment rate in Thanet and that in Kent (and England) was the smallest it had been for a decade. However, following the 'credit crunch' in 2007 and the subsequent economic recession that struck the national economy in late 2008, progress made in closing the gap with national economic performance achieved over the previous decade was reversed. Thanet was hit particularly hard with unemployment increasing faster than regional and national rates. In February 2012, unemployment levels were at almost three times that of the south east and twice the national average. In September 2017, unemployment stood at 3.4% in Thanet, compared to 1.7% in Kent and 1.9% across the whole of Great Britain. Unemployment rates in Thanet have risen 2.4% since August 2016, with the largest unemployment levels found among the 18-24 year age group (5.5%). In comparison, unemployment for those between 50 and 64 years stands at 2.7%¹¹.

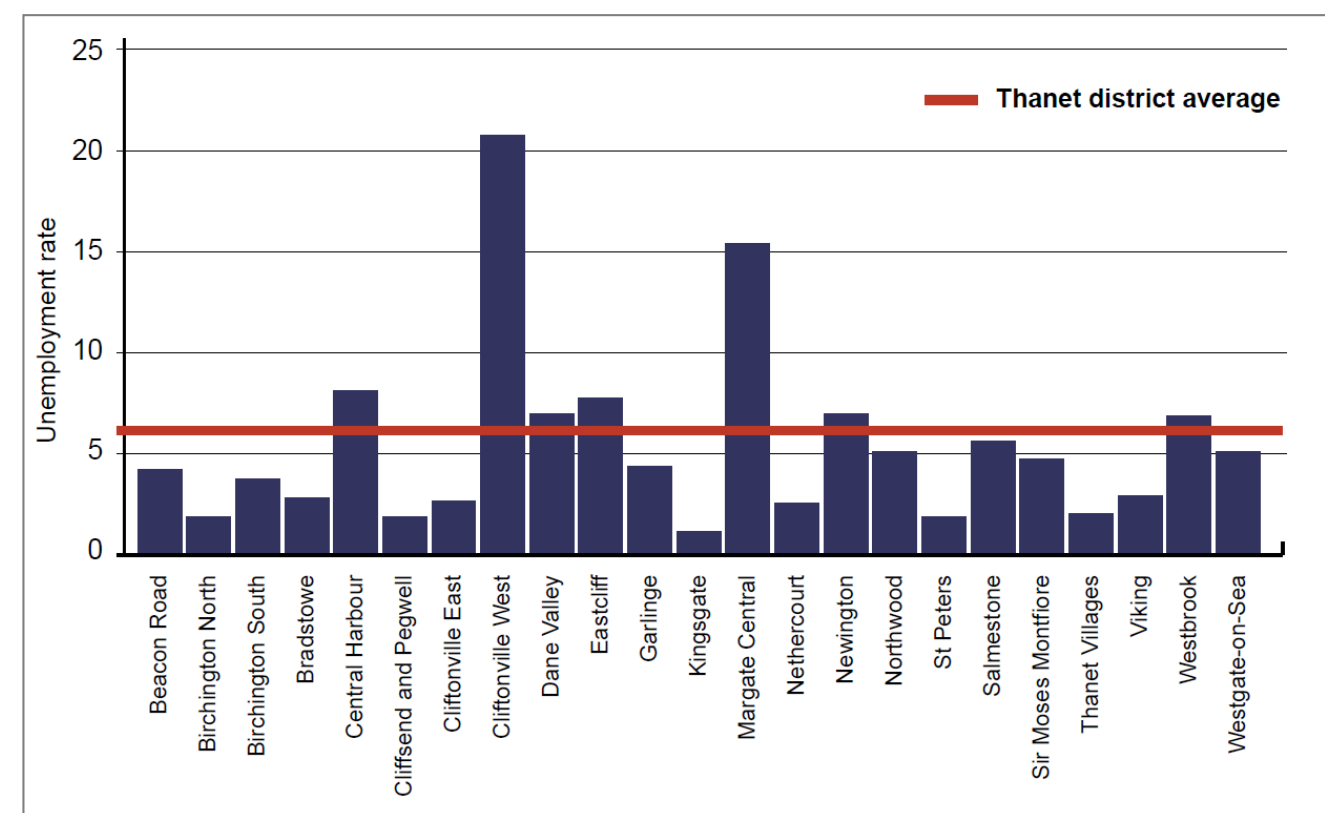
A clear disparity in the employment rates and types can be seen between the different Thanet Wards, and is shown in Figure 5. Comparing the deprived area of Cliftonville West against the relatively affluent Thanet Villages, for example, shows that Thanet Villages have a substantially higher economically active population (76.8%) compared to Cliftonville West (64.7%). This social gap is highlighted further when comparing employment by occupation that shows the Thanet Villages having 16.9% working as managers and senior officials, and 11% working as professionals compared to 12.2% and 6.9% respectively for Cliftonville West¹². The differences in employment trends are not restricted to comparisons between rural and urban wards. Comparing Cliftonville West against Eastcliff, another predominantly urban ward close to Ramsgate, shows that Cliftonville West has 5.2% less economically active people than Eastcliff¹³.

Around a quarter of all enterprises in the area have turnover below the VAT threshold – this includes a significant number of self-employed people. Nationally over 30% of employees work for a business that employs 200 or more workers. In the Thanet area it is less than 20%. By contrast, over a quarter of people work in a firm employing fewer than 10 people, nationally it is one fifth.

The differences in employment trends are not restricted to comparisons between rural and urban wards. Comparing Cliftonville West against Eastcliff, another predominantly urban ward close to Ramsgate, shows that Cliftonville West has 7.8% less economically active people than Eastcliff³.

Note: Official figures such as the official labour market statistics (Nomis) are based on the idea of a 'working age'. For most figures the age bracket 16-64 has been used to measure this, but changes to retirement age make this an estimate rather than exact number for 'working-age'. The following chart shows Job Seeker Allowance (JSA) claimant rates since November 2007. The rates for the two wards have not reduced in line with the district and national rates.

Figure 2: Thanet Ward Unemployment Rates.

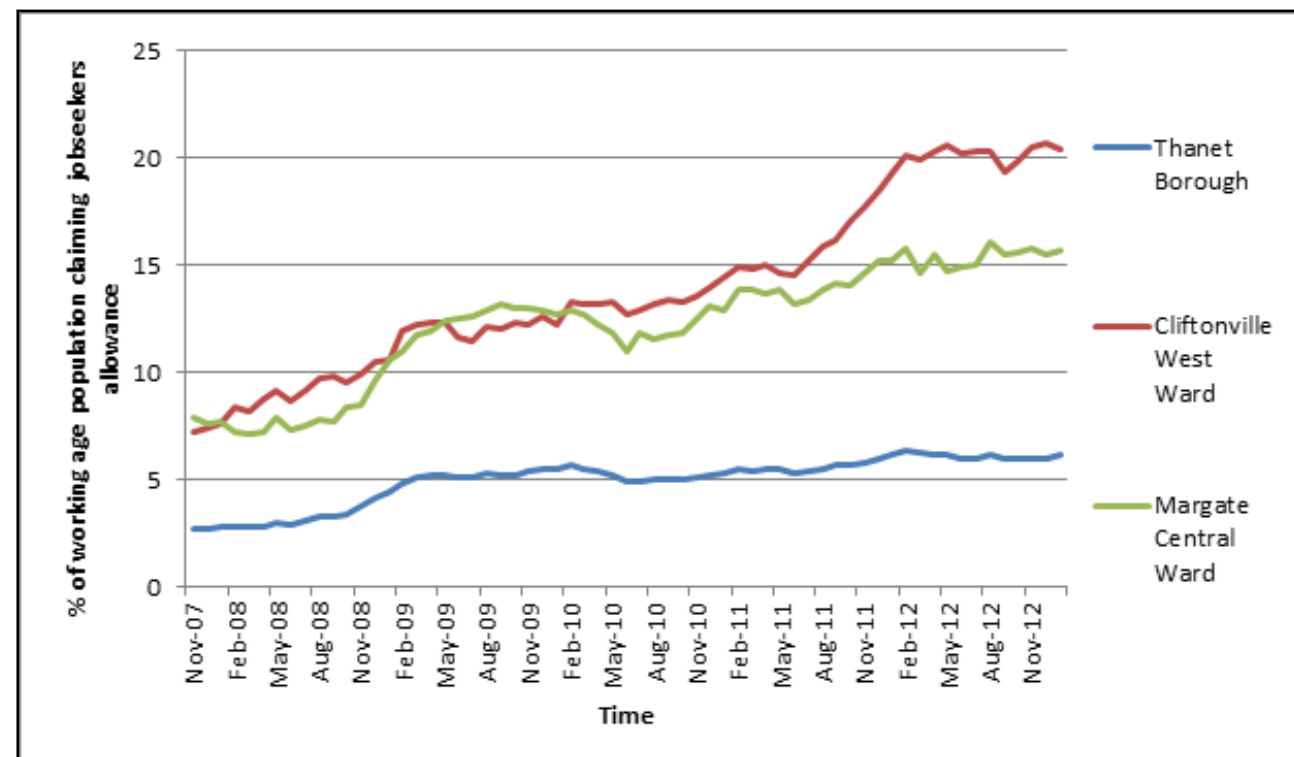


Source: [nomisweb.co.uk](https://www.nomisweb.co.uk)

¹¹ https://www.kent.gov.uk/data/assets/pdf_file/0019/8182/District-unemployment-bulletin.pdf September 2017

¹² NOMISweb <https://www.nomisweb.co.uk/>

Figure 3: Percentage of Working Age Residents claiming job seekers allowance from 2007 to 2013.



Source: nomisweb.co.uk

Since 2007, the percentage of the working age population claiming Jobseeker's Allowance has increased from 2.7% in November 2007 to 6.1% in January 2013. At a ward level this trend is also evident. However, in the last 18 months Cliftonville West Ward has experienced even greater increases than the District as whole or other similar wards such as Margate Central with approximately 1 in 5 people of working age claiming the Jobseeker's Allowance.

3.5 Employment Space and Land Provision

The estimated stock of employment premises shows that the number of premises in Thanet is spread evenly across the three main employment uses, namely offices, factories and warehouses, at approximately 500 premises each. These amounts compare reasonably well with the rest of the districts in the East Kent Area, being greater than the amounts in Dover and Shepway, and not significantly less than that of Canterbury and Ashford. However, in terms of the number of office premises, the majority of other districts in Kent have a greater number of offices than the other employment generating uses, with only Gravesham having a lower stock of office premises, in Kent, than Thanet.

Thanet contributes much more significantly with industrial stock than office stock, in terms of overall floorspace, being close to the median of all south east districts. Other than new retail developments which have taken place across East Kent, there has been little new commercial development, when

compared to the rest of the south-east. In terms of the amount of floorspace available in the district, in April 2008 there was approximately:

- 100,000 m² office floorspace,
- 335,000 m² of factories and
- 155,000 m² warehousing space.

The total amount of employment floorspace is the second lowest out of the East-Kent Districts, with only Shepway having less. Like the overall stock, the amount of Office floorspace in Thanet is lower than the other districts, with office accounting for only 17% of the stock in the district. Factories account for 56% of the stock, whilst warehouses account for 26% of the stock¹³. The Kent County Council Business Intelligence Statistical Bulletin (December 2016), based upon Valuation Office Agency data indicated that there are 1,014,000 square metres of business floorspace (note this includes retail, office, industrial and other space).

In terms of changes to stock of employment premises, figures taken from the Thanet Employment Land Review 2010 suggest there was an increase of 17,000m² between 2005 and 2008, which is equivalent to 3% of the stock. This is the highest overall increase compared to other districts in East Kent. The largest gain in Thanet was in Office space adding 15,000 m² to its stock, a similar amount to Ashford. A decrease was seen in the amount of factory floorspace across all Districts with the exception of Dover. Thanet saw a loss of 5,000 m², less than Ashford and Canterbury, but more than Shepway. Due to the lack of new development, supply tends to be dominated by poorer, second hand buildings, rather than new or refurbished accommodation. Land values remain depressed in East Kent peripheral locations, whilst values in more active commercial locations have improved. The depressed values are primarily a result of an over-supply of land, and poor infrastructure. The average value for industrial land in 2006, in Dover was £180,000 and Thanet £150,000 per acre.

Vacancy levels provide an indication of the balance between supply and demand for employment premises. Consultation with TDC has revealed that vacancies are limited, particularly since the demolition of Grupo Antolin. The quality of the majority of the property is however quite poor and this will certainly pose a challenge for attracting inward investors to the area particularly given the competition from the rest of the wider Kent area.

Employment land allocations established over previous Local Plan periods have remained vacant, and there is strong competition from elsewhere in Kent, Thanet has a significant amount of land available in public ownership that is serviced and available for development. Thanet District Council is currently reviewing its strategic site allocations within the Employment Land Review which is being carried out as part of the Local Plan process.

Thanet has a significant amount of land available for development. The Employment Land Review (May 2010) identified approximately 87ha on allocated and retained sites although over half of this didn't have planning permission at the time.

The TDC AMR 2016 shows that between 1998 - 2013/14, 44.73 hectares were developed (38% land take-up). The target of 75% take-up (86.4 hectares by 2011) has not been met but monitoring will continue until an alternative target is set via the Local Plan process.

¹³ Thanet Employment Land Review 2010

In 2015/16, floorspace totalling 12,296m² was developed for employment purposes (excluding A2 use). The target for the amount of floorspace developed for employment by type on all sites in the District was not met in 2015/16 (the target was 19,750 m² per annum A2-B8 floorspace on allocated sites).

3.6 Education and Skills

In 2011, 8% of people in Thanet aged 16-64 had no qualifications compared to a regional average of 7.9 and national average of 10.6% and whilst 29% of residents have a qualification at NVQ4 or higher, this is still significantly lower than the regional 36.9% and the national average of 32.9 %³.

GCSE results for 2011 show 69.1% of pupils obtained 5+GCSEs at Grade A-C, which compared poorly in relation to other Kent districts including Dover 74.2% and Canterbury 77.1%

The distribution of residents in possession of qualifications is uneven across the District. Within the Ward of Newington, 53.5 % of people are without a qualification or level of qualification is not known. This is the worst in Thanet, 17.7% worse than the national average and 17.4% worse than the nearby Bradstowe Ward. Margate Central and Sir Moses Montefiore also have far fewer residents with higher qualifications, 9.0% and 9.5% respectively, than both the National average (20.4%) and that of Bradstowe (20.5%).

3.7 Transport

3.7.1 Existing Transport Network

Thanet has long been perceived as isolated from London, the M25 and access to other parts of the country. The District and County Councils, Government and European agencies have realised that considerable investment would be needed to overcome this perception. In recent years a number of transport connections have improved significantly. Thanet is connected to the UK motorway network via the A299 Thanet Way (a dual carriageway), which links the District to the M2. The A254 (Ramsgate Road) and A255 (St Peters Road) connect Margate to Ramsgate and Broadstairs. The recently completed East Kent Access Road (A256) provides a fast connection to the A20/M20 at Dover and to the Port of Dover and Channel Tunnel. The Access Road also links Thanet with other major economic assets such as Manston, Kent's International Airport (6 miles from Margate), the Port of Ramsgate and Discovery Park to the UK's main arterial road network in less than 60 minutes. Additionally, the introduction of High Speed 1 rail services in 2009 has reduced commuting from central London to Ramsgate to 76 minutes and Margate to 88 minutes.

Whilst the district does have a number of good transport links it is still on the periphery of Kent and the South-East, and in particular its proximity to London is poor compared to the rest of the south-east.

3.7.2 By Air

Thanet's Manston Airport is currently closed after passenger and freight operations ceased in May 2014. At the time of publishing a Masterplan for the airport in 2009, Manston Airport predominantly

handled freight, catering for around 32,000 tonnes a year, which was forecast to grow to 400,000 tonnes by 2033[1].

In addition to freight cargo, the airport operated a number of chartered passenger services to selected destinations. It has a runway capable of handling fully laden Boeing 747s. In 2011 figures indicate that it handled 37,000 passengers and 27,000 tonnes of freight per annum. Dutch airline KLM operated a shuttle service to Schipol Airport in Amsterdam where a significant number of onward connections can be accessed by UK customers. A Masterplan for the Airport produced in 2009 estimated a significant increase in passenger and freight numbers for the airport to 2033 along with details of future airport expansion such as a new terminal building. The ambitions of the Masterplan were never realised and the airport was sold. Manston airport was subsequently purchased for redevelopment by Stone Hill Park Limited. Stone Hill Park Limited has lodged a planning application with TDC to construct a mixed development of residential and business units on the site of the former airport. RiverOak Strategic Partners wish to acquire the Manston site and re-establish airport operations. A Development Consent Order process is underway. The RSP proposals would be freight focussed but would also offer passenger services along with ancillary businesses.

Lydd Airport near Ashford is easily accessed from Thanet. The Airport has planning permission to extend its runway as well as a new terminal building capable of processing 50,000 passengers per year. The proposed developments may have knock on effects and implications for the Thanet district in terms of economic regeneration, infrastructure improvements and traffic.

3.7.3 Private Transport

Although there is some peak hour congestion, Thanet generally enjoys comparatively free-flowing traffic conditions despite over half (55.8%) of work journeys being made by car. Access to private transport is an indicator of the social disparity within Thanet, and within some of its Wards, such as Margate Central, the proportion of households without a car or van are significantly higher (52.94%) than both the national and Thanet averages at 25.8% and 29.8% respectively. It is expected that the extensive network of bus services in the area is a result of the low car ownership rather than a positive encouraging factor to low private car ownership.

3.7.4 Public Transport

Thanet's bus service provider is Stagecoach. Bus usage nationally, which was declining, has now started to grow. Closer examination reveals that growth in London and the other metropolitan areas disguises a drop elsewhere. Bus use in Thanet, however, remains relatively high (10% of trips in 1998) with an annual growth of around 2% year on year¹⁴.

3.7.5 Community Transport

Thanet Community Transport Association provides accessible minibuses for residents who are unable to use other public transport. This is a door-to-door dial-a-ride service timetabled to operate to/from selected destinations each day.

¹⁴ Thanet District Transport Plan 2005-2011, Thanet District Council

3.7.6 By Rail

Within Thanet District, the rail network connects the main centres of population via seven stations. These provide links within Thanet, to other major centres in East Kent as well as to London and beyond. The principal stations are Ramsgate, Broadstairs and Margate, with routes in three directions:

- London via Faversham and Chatham;
- London via Canterbury and Ashford; and
- Dover and Folkestone via Sandwich.

In addition, the introduction of the High Speed Domestic Rail Service at the end of 2009 has reduced the travel time to London St Pancras from Ramsgate via Ashford to 76 minutes. For purposes of comparison, the mainline journey time to London Victoria is around 2 hours and to London Charing Cross up to 2 hours and 30 minutes.

Limited facilities currently exist for the carriage of cycles, although the recently introduced Class 375 units do have wheelchair spaces, which can be used for cycles. The Channel Tunnel Rail Link has benefited the UK as a whole but has led to substantial job losses in the in the cross channel ferry industry.

Kent County Council is continuing to promote the building of a new ‘parkway’ railway station in Thanet, located on the Ashford International to Ramsgate line, and just to the west of the village of Cliffsend.

3.7.7 By Sea

Ramsgate Port handles freight traffic and has passenger ferry capacity. The Port is operated by Thanet District Council. Ramsgate Marina also enables private vessels to be moored.

3.7.8 Pedestrians

Thanet has a road network which mostly accommodates footways on both sides, not only in the main towns and seaside villages but also along the distributor routes connecting them. Public Rights of Way network offers walkers (and sometimes horse riders and cyclists) a good connection across open countryside to the coast, rural settlements and end destinations, with some circular walks offering superb views of both coast and countryside combined. The Thanet Coastal Path follows the longest stretch of chalk coastline in the country, the route having been set up in the 1990s.

In February, 2005 Thanet District Council published its Walking Strategy ‘Feet First’. This is intended to compliment Kent County Council’s ‘Walking Strategy for Kent’ published in 2001. It includes an agreed network of multi-purpose walking routes to be developed and on which work has now commenced.

3.7.9 Cycling

Three quarters of journeys to work in Thanet are of less than three miles. Whilst cycling is usually quicker over this distance than either car or public transport, in 1998 just 3% of journeys to work in

Thanet were made by bike. As part of the existing Thanet Cycling Plan (December 2003), TDC aim to increase this percentage substantially.

3.7.10 Commuting

With regards to people commuting into the district to work, this is the lowest in Kent, with 87% of people working in the District also living there. This indicates that Thanet has a small employment catchment and cannot attract a large number of people from outside the district to work there, demonstrating the relative lack of employment opportunities. In contrast only 38% of people who work in Dartford also live there. More people therefore travel out of the district to work, than those that travel to work in Thanet. The total number of people working in Thanet District is 40,694 (2001). This net out-commuting suggests that there are insufficient jobs to meet the needs of the local population, let alone attract employees from outside of the District. Table 8 summarises the amount of commuting out of the district.

Table 4: Commuters out of Thanet

Destination	Number	Percentage
Within Thanet	36,812	74%
Dover	4218	9%
Canterbury	3673	7.4%
Greater London	1293	2.4%
Inner London	847	1.6%
Shepway	435	0.9%
Swale	449	0.9%
Ashford	403	0.9%
Maidstone	379	0.8%
Other in Kent	334	0.6%
Outer London	331	0.6%
Medway	272	0.5%
Other outside Kent	189	0.4%

(Source: TDC Employment Land Review May 2010)

Approximately 30% of people living in the District commute out of Thanet to work. Out-commuting levels are the greatest to Dover and Canterbury, with a significant number also commuting to London.

Thanet District Council are currently preparing their transport strategy and associated transport plans with a horizon period up to 2031, and is consistent with the emerging Local Plan, hence the previous Transport Plan 2005-2011 represents most recent data in most cases.

3.8 Deprivation

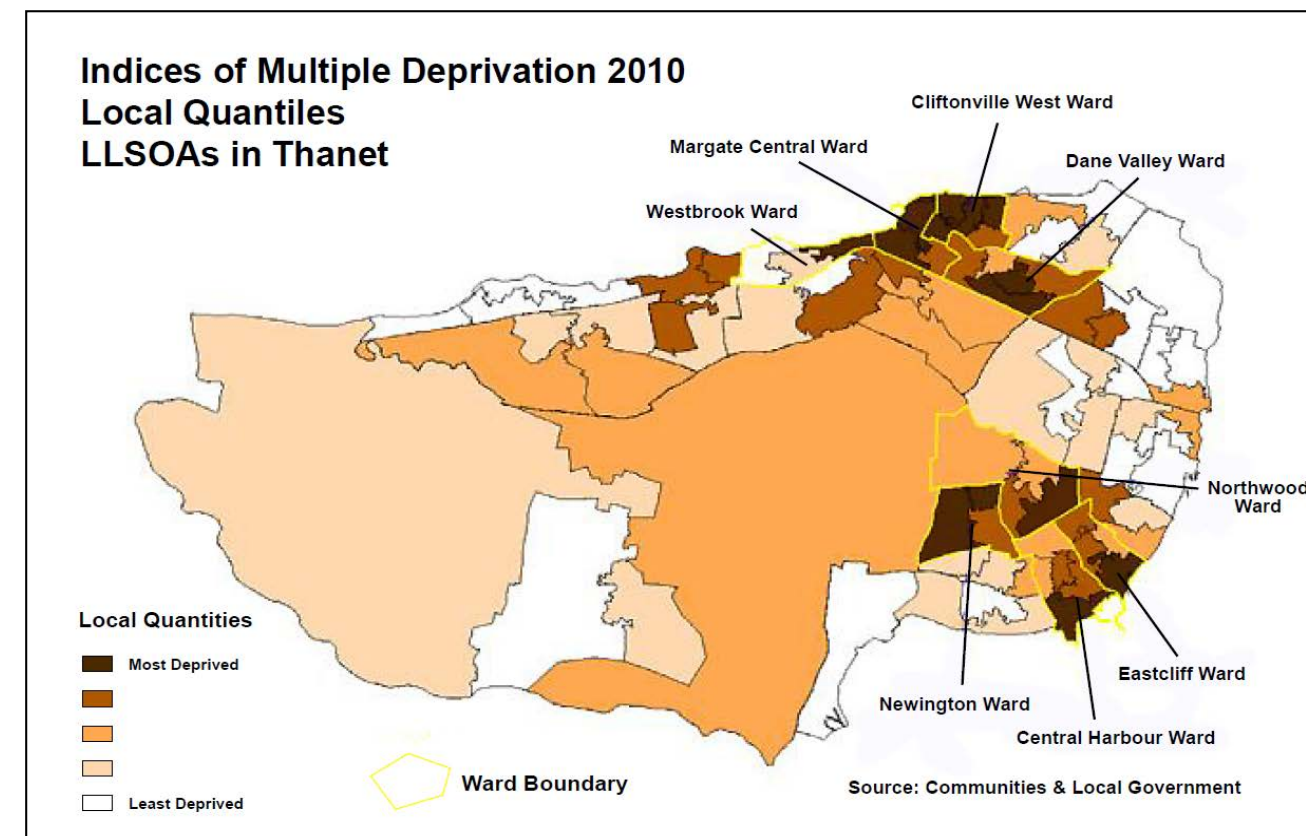
The area of the Coastal South East is identified as having economic underperformance as a result of its relative remoteness, isolation, deprivation, ageing population, transient population, poor quality housing and limited agglomeration advantages resulting from a restricted (180°) hinterland.

Thanet's long-term economic and social problems have resulted in high levels of deprivation shown in high unemployment and low levels of education. The 2010 Indices of Multiple Deprivation consist of seven domains of relative deprivation and are constructed using 36 variables. These domains are:

- Income
- Barriers to housing
- Health and disability
- Crime
- Education
- Living environment
- Employment

These indices show that compared to other English districts Thanet had become relatively more disadvantaged since the 2007 data release and remained in England's 20% most deprived districts. Thanet is the 65th most deprived local authority district in England (out of 354), moving it within England's top 20% deprived. It is the 2nd most deprived local authority district in the South East Region (out of 67) and is the most deprived district in Kent. Thirteen of Thanet's wards (57%) rank within the 20% most deprived in Kent and includes the most disadvantaged Lower Super Output Area (LSOA) in Kent, Margate Central ward, closely followed by Cliftonville West and then Newington¹⁵.

Figure 4: Indices of Multiple Deprivation for Thanet.



Source: Thanet Commissioning Plan 2012-2014: (taken from Kent public health observatory website).

Levels of car/van ownership are a key indicator of deprivation. Approximately 30% of the district's population live in households with no cars/vans compared to just 20% for the whole KCC area¹⁶. However, the percentage of households with access to one car/van is similar to the average for the KCC area showing that few households have second and third cars. This has implications for accessibility for particular groups as when the car is being used (for example during the working day) other household members (often women and children) do not have access to the car and must rely on public transport. Likewise, where households have no car/van reliance on other forms of transport is high.

Thanet's coastal towns have also been subjected to a wider trend of declining seaside resorts. In the 2008 report "England's seaside towns – a benchmarking study", Thanet was reported as amongst the weakest economies of 37 seaside towns and as the most disadvantaged of those with populations over 100,000 people. Consequently, wages in the district are lower than the rest of Kent with a median weekly full time wage being £412.50 in 2011 compared to £546.20 in Kent and £554.40 for the South East region. However, a number of regeneration strategies and policies are in place to reverse this decline, including the Economic Growth Strategy for Thanet (November 2016).

¹⁵ <https://shareweb.kent.gov.uk/Documents/facts-and-figures/Deprivation/id2010-kent-ward-level.pdf>

¹⁶ <https://shareweb.kent.gov.uk/Documents/facts-and-figures/Population-and-Census/2011%20Census/2011-census-car-availability.pdf>

3.9 Housing

Approximately 5% of Thanet’s population live in the District’s rural settlements. The remaining 95% reside in the coastal urban belt including the towns of Margate, Broadstairs, Birchington and Ramsgate. Forecast demand for housing from 2011 to 2031 is 3,714 (zero net migration) and 11,648 (short term migration)¹⁷.

3.9.1 House Tenure and Type

Based on Office of National Statistics data (2011 Census) of the 59,513 households in Thanet District 62% are owned. Of the remaining 12.6% of the households are socially rented and 25% are privately rented or rent free households. When this is compared to the 2001 Census data, it is apparent that there has been a noticeable change in the type of tenure. For example, in 2001 70% of households were in private ownership therefore there is a current trend of people moving away from private ownership and/or delaying moving on to the housing ladder. The percentage mix of dwellings in Thanet District is set out below based on data from the 2011 census:

- Detached homes (19.6%)
- Semi-detached homes (28.1%)
- Terraced homes (22.7%)
- Purpose built flats (17.5%)
- Flats in converted buildings (9%)
- Flats in commercial buildings (1.6%)
- Caravans and other mobile temporary structures (1.4%)

(Note: due to rounding, the % values do not equal 100%).

Again, there has been a noticeable shift in the mix of housing since the previous with a greater proportion of the housing mix being flats rather than houses and bungalows. This is partially a factor of the housing market which has seen investors looking towards flats and apartments as preferred investments during the last decade.

3.9.2 Household size

Data collated by the Office of National Statistics illustrates numbers of people living in households in Thanet District and these are illustrated in Table 9. Of the households in the District 70% are one or two person households.

The 2011 Census reaffirmed that there is a substantial supply of smaller dwellings in Thanet. It shows that in occupied dwellings, Thanet has the highest proportion of both 1 and 2 bedroom homes compared with neighbouring districts and Kent as a whole.

¹⁷ Thanet District Council – Housing Topic Paper 2013 (Local Plan evidence base).

Table 5: Comparison of Household size.

Household Size	Thanet	South East	England
All Household Spaces (With At Least One Usual Resident)	59513	3555463	22063368
1 Person in Household	20646	1023154	6666493
2 People in Household	20566	1247950	7544404
3 People in Household	8516	551773	3437917
4 People in Household	6281	492843	2866800
5 People in Household	2312	167581	1028477
6 People in Household	861	53824	369186
7 People in Household	204	11742	88823
8 or More People in Household	127	6596	61268

3.9.3 Housing Market

The housing market has undergone a number of changes over the last decade and beyond. This is clearly illustrated by Figure 8 below which shows a general trend of increasing numbers of sales which peaked in 2007 and then slumped significantly to below the 1996 level where it has remained.

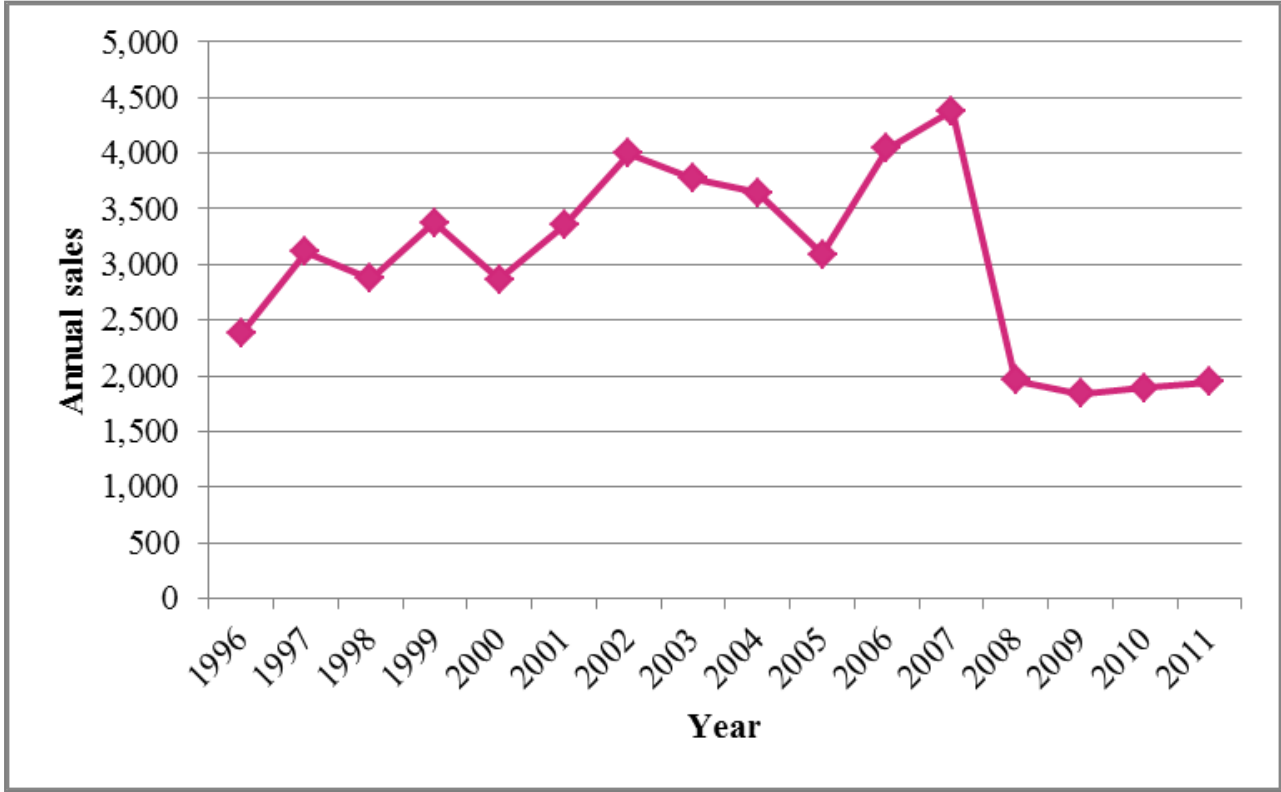
3.9.4 Housing Condition

The percentage of local authority dwellings that fall below the ‘Decent Homes’ standard has been falling over the last decade. Since 2010 none of TDC’s dwellings are below this standard. There is no data on private dwellings to compare. However, there is evidence that the energy efficiency of private sector housing is increasing (from an averages score of 40 in 2001 to 55 in April 2011; Source CLG 2013).

The Private Sector Housing Strategy 2007-2011 refers to a housing condition survey from 2002. It showed:

- 16.2% are privately rented in Thanet. This is a very high percentage compared to 8% in the South East and 8.9% in England as a whole;
- 70.7% are owner occupied which quite closely mirrors the situation in England but is slightly less than the South East at 77%;
- 7.3% are owned by Housing Associations, which is higher than England at 4.6% and the South East at 6%; and
- 935 properties are long term empty. There are approximately 2489 vacant dwellings altogether. (HIP return as at 31st March 2007.

Figure 5: Number of house sales per year within Thanet District.

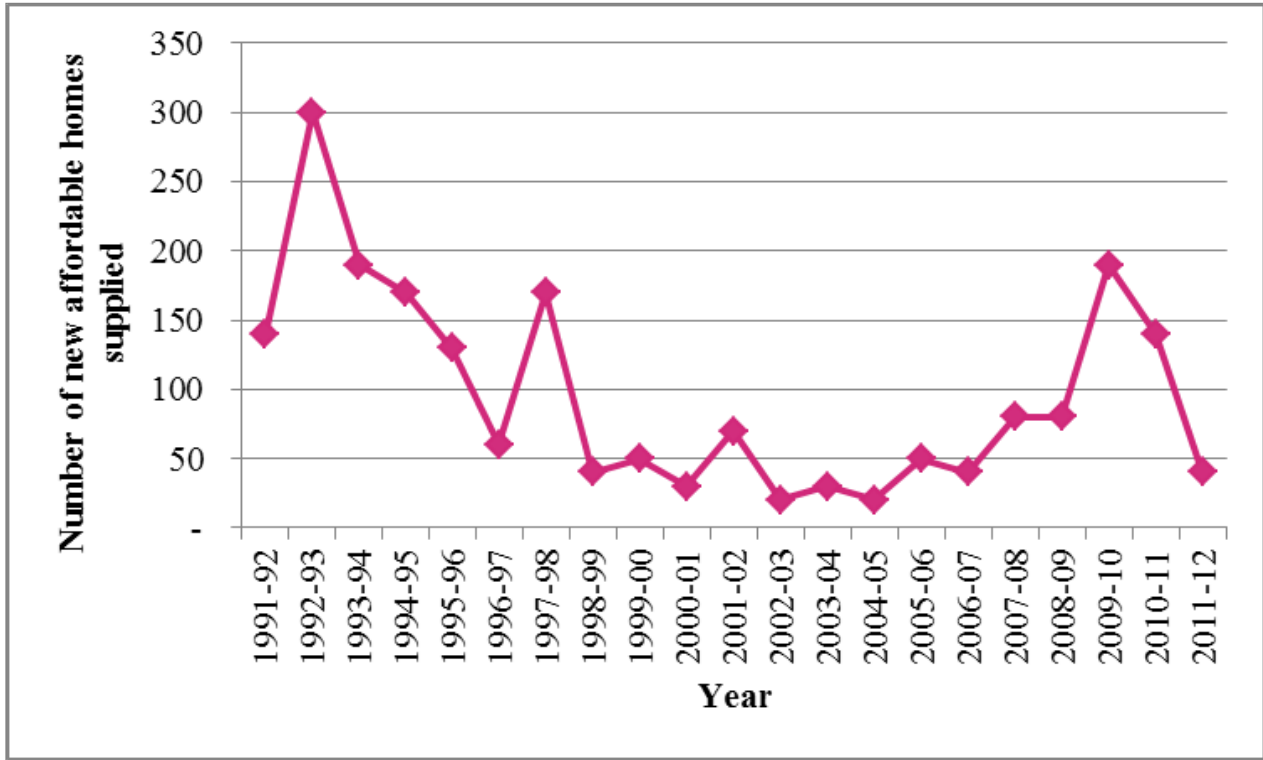


Source: CLG Statistics 2013

3.9.5 Affordability

The number of new affordable homes provided each year in the District are illustrated in Figure 9. The trend has varied significantly since 1991 and is driven by factors such as the availability of residential developments to provide affordable homes. This variability continues in the latest figures from the Homes and Communities Agency, with 110 affordable housing additions being completed in Thanet in 2012-13, 81 in 2013-14, 132 in 2014-15 and 19 in 2015-16.

Figure 6: Additional affordable homes provided in Thanet each year.



3.9.6 Source: CLG Housing Statistics 2013.Existing Need

As part of the evidence base for the Local Plan, TDC commissioned forecasts of the possible future demand for housing based on population and economic changes over the life of the plan. As part of this forecast, a number of scenarios have been developed based on growth from Thanet’s 2011 housing stock. Scenarios have been developed to reflect the degree of uncertainty regarding the existing and future needs because these, to a certain extent, are beyond the control of the Local Plan. However, it is able to influence and support growth hence why this data is included in this SA Report.

Table 6: Indicative forecast for net new dwellings over the life of the Plan.

Scenario	Implied net dwellings 2011-2031 (and implied annual average)
1 Economic Baseline	9,639 (482)
2 Economic Lower Growth	7,600 (380)
3 Economic Higher Growth	11,791 (590)
4 Zero Migration	3,714 (186)
5 Migration Trend	11,648 (582)

Source: Thanet District Council, Housing Topic Paper (May 2013)

3.9.7 Homelessness

The most visible form of homelessness is rough sleeping. However, it can also be hidden from view in the form of sofa surfing or squatting, and there are also those who are homeless living in hostels, night shelters and temporary accommodation. The 2016 Rough Sleeping Rate (per 1,000 households) for Thanet is 0.52%¹⁸, compared to 0.18 for England, 0.27 for London and 0.16 for the rest of England¹⁹.

3.10 Health

In general, the health of people living in Thanet is worse than the average for England. The comparatively poor health of people within Thanet cannot just be attributed to the number of older residents with 23.36% of people suffering an illness that limits their day-to-day activities²⁰. This is higher than the average for the South East region at 15.71% and 17.64% in England and Wales.

Life expectancy for both men and women is lower than the average for England. The life expectancy for males is 77.6 compared to the southeast average of 80.5 and the national average of 79.5 and the life expectancy for women is 82.5 compared to a regional average of 84.0 and a national average of 83.2²¹. Those people considered to be in very good health in Thanet is 40.7% compared to national average of 47.1%. The latest statistics from the Thanet Clinical Commissioning Group Annual Report and Accounts 2016/17 show that the life expectancy of Thanet residents is the lowest in Kent at 80.3 years.

Health inequalities in Thanet are a serious concern. Within Thanet there are significant variances with a gap of 17.1 years between Margate Central ward (73.5yrs) and Kingsgate ward (90.6yrs). Life expectancy is 9.3 years lower for men and 6.9 years lower for women in the most deprived areas of Thanet than in the least deprived areas.

The health of Thanet's residents shows geographical trends with 2% of people in Cliftonville West being defined as having 'Very bad health' compared to just 1.7% of those in Thanet, 1.0% in the South East and 1.2% National averages. Those people with a limiting long-term illness are highest in Westgate-on-Sea with more than 1 in 4 people suffering (27.89%) compared to Thanet Villages which at 19.01% is the lowest in the district but still higher than the Kent and Medway Health Authority (17.01%), South East (15.47%) and National (17.93%) averages.

Although the early death rate from cancer has improved over the last ten years, it has remained higher than the England average. Smoking kills over 300 people per year in Thanet. The rate of smoking related deaths is 326 per 100,000 population, worse than the average for England. This represents 302 deaths per year. The rate of alcohol-related harm hospital stays is 590 per 100,000 population, better than the average for England. This represents 809 stays per year.

¹⁸ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness#detailed-local-authority-level-responses>

¹⁹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/585713/Rough_Sleeping_Autumn_2016_Statistical_Release.pdf

²⁰ Office of National Statistics, Long-term health problem or disability 2011.

²¹ <http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/area-profiles>

3.11 Community Involvement and Cohesion

The Thanet District Council Election in May 2015 had a turnout of 71%. This is a substantial increase compared to the turnout to the TDC Election in 2011 which was 42%²².

The components of population change based on the 2011 census estimate a net migration for Thanet of 270 which represents a population increase of 0.2% similar to the increase for Kent^{Error! Bookmark not defined.}. Thanet has high number of migrants, asylum seekers and unemployed. These groups could be seen as a highly transient population which could potentially impede upon social cohesion and the sense of community.

As part of Thanet District Council's attempts to improve community involvement and cohesion, and as part of the requirements set by Central Government, Thanet has a Statement of Community Involvement which describes and sets out actions to improve Thanet's sense of community with strong emphasis on consultation and public involvement. Each year Thanet's Community Safety Partnership produces a Community Safety Plan, detailing current priorities.

3.12 Crime and Safety

In the year ending March 2017, the crime rate in Thanet (98.31%) was higher than the average crime rate for the Kent Force Area (73.05%), with the highest recorded crimes in 2016/2017 being violence and sexual offences, followed by anti-social behaviour. However crime has reduced within the district by 22% since 2006, resulting in nearly 3,000 less crimes being committed. Anti-social behaviour continues to be a big issue for residents with more than 8,000 incidents reported to both the police and TDC every year²³.

Latest information from Police.UK shows that in March 2017 the crime rate in Thanet was 23.97 per 1,000 population compared to 18.92 in Kent force area. For the 12-month period ending September 2012, Thanet had marginally above the national highest rates of crime in Kent, peaking between July and September at 76.1 per 1000 residents compared to an average of 57.7 per 1,000 for the Kent force and an average for England and Wales of 66.86. From September 2009 to September 2012 the quarterly reported crime rate in Thanet fell only marginally from 20.74 to 20.35 per 1000 residents²⁴.

The most recent available data concerning Fire and Rescue Services is for 2006 and indicates the Kent Fire service responded to 1,641 incidents including 267 primary fires (i.e. dwelling, non-derelict buildings, road vehicles and other outdoor buildings). This constitutes a reduction from the previous year²⁸. The Kent Fire & Rescue Service website indicates that so far in 2017, 12,378 incidents have been attended.

²² <https://democracy.thanet.gov.uk/mgManageElectionResults.aspx?bcr=1>

²³ Thanet District Council Corporate Plan 2012-2016

²⁴ www.police.co.uk

3.13 Biodiversity and Green Spaces

A Biodiversity Action Plan (BAP) exists for the Kent Area. BAPs were created as the UK Government's response to the Convention on Biological Diversity signed in 1992. The documents describe the UK's biological resources and commit to detailed plans for the protection of these resources. These plans have been separated into Habitat Action Plans (HAPs) and Species Action Plans (SAPs).

Under the Habitats Directive (92/43/EEC) Article 6 any plan or project likely to have a significant effect on an area of conservation, especially where that area is of international importance, shall be subject to an assessment of any likely adverse effect in view of the site's conservation objectives. In the instance of the Local Plan, due to the number of internationally designated sites and the District wide scope, an assessment under the Habitats Directive may be required.

TDC Annual Monitoring Report (AMR) data for 2015-2016 shows there has been no change in areas designated for their intrinsic environmental value at international or national level of significance. However, at regional level the Cliftonville Grassland site at Foreness Point has been designated a Kent Local Wildlife Site by the Kent Wildlife Trust. This represents an increase in the areas of biodiversity importance that are protected under local plan saved policy NC3. Maintenance continues at the new site of local significance that was designated during the last reporting year namely, Cliftonville Grassland, Foreness Point.

The Dane Valley Woods, Windmill Community Allotment Project, Friends of Mockett's Wood, Friends of Montefiore Woodland and Friends of Ellington Park voluntary groups continue to provide areas for biodiversity to flourish.

The Sandwich Bay Bird Observatory Trust continue to count Turnstones and have found a continued decline in numbers and this corresponds with the national decline. The Thanet Coast Project has held a number of education events during March 2016 in order to raise awareness of new measures to reduce disturbance to bird life on the Pegwell Bay mudflats. The Strategic Access Management and Monitoring Plan (SAMM) provides a strategy to mitigate the potential in-combination impacts of new housing development and resulting recreational pressure on the Thanet Coast and Sandwich Bay SPA. Thanet District Council is now collecting a tariff from development based on the SAMM which will contribute to a targeted campaign to raise awareness in the future.

Thanet has number of local, national and international protected areas for conservation and habitat protection. These environmentally designated areas are concentrated along the 32km of attractive chalk cliff and sandy beach coastline and include internationally important feedings grounds for birds and rare chalk reef and cave habitats. Details of the designations are given below.

3.13.1 Thanet Coast and Sandwich Bay Ramsar Site

This is a coastal site, consisting of a long rocky shore, adjoining estuary, dune, maritime grassland, saltmarsh, and grazing marsh. The site supports internationally important numbers of wintering turnstone *Arenaria interpres*, nationally important numbers of a breeding seabird, and four waders:

ringed plover, golden plover, grey plover, and sanderling. Large numbers of migratory birds use the site for staging. Large numbers of nationally scarce invertebrate species occur at the site. Human activities include recreation, bait collection, agriculture, livestock grazing, fishing, and hunting²⁵.

3.13.2 Sandwich Bay Special Area of Conservation (SAC)

The site is designated primarily for its sand dune habitats (~35% of total area) the area also includes improved grassland (10%) and salt marshes (15%). The habitats that are the primary reason for the sites designation are; Embryonic Shifting dunes where the dominate species is *Elytrigia juncea*; Shifting dunes along the shoreline with *Ammophila arenaria*; Fixed coastal dunes with herbaceous vegetation; and Dunes with *Salix repens* ssp. *argentea* (*Salicion arenariae*)²⁶.

3.13.3 Thanet Coast SAC

This site; the longest continuous stretch of coastal chalk in the UK, is designated primarily for the reef habitats that support unusual communities, and the second most extensive representation of chalk caves in the UK on the extreme south-east coast of England.

The site represents 20% of the UK resource of reefs and 12% of the EU resource. This site contains an example of reefs on soft chalk along the shore. Thanet has sublittoral chalk platforms that extend into the littoral and form chalk cliffs. The sublittoral chalk reefs within the site are comparatively impoverished, owing to the harsh environmental conditions in the extreme southern area of the North Sea, but they are an unusual feature because of the scarcity of hard substrates in the area. Species present include an unusually rich littoral algal flora, essentially of chalk-boring algae, which may extend above high water mark into the splash zone in wave-exposed areas. Thanet remains the sole known location for some algal species.

The site is bordered by about 23 km of chalk cliffs with many caves and stack and arch formations. Partially submerged caves around Thanet vary considerably in depth, height and aspect and hence in the algal communities present. The caves support very specialised algal and lichen communities containing species such as *Pseudendoclonium submarinum* and *Lyngbya* spp., some of which were first described from Thanet and have never been recorded elsewhere.

3.13.4 Thanet Coast and Sandwich Bay Special Protection Area (SPA)

Approximately 83% of the area is classed in terms of habitat as tidal rivers, estuaries, mud flats whilst 10% of the area comprises improved grassland²⁷. The area also consists of tunnels, caves, intertidal rock, and open coastline including bays, pools and rocky reefs. The SPA designation is supported by a number of breeding bird populations included *Sterna abifrons* (0.3% of the GB breeding population), *Pluvialis apricaria* (0.2% of the GB population) and *Arenaria interpres* (1.4% of the GB population)²⁸.

²⁵ http://www.ramsar.org/profile/profiles_uk.htm

²⁶ Joint Nature Conservation Committee, <http://www.jncc.gov.uk>

²⁷ Isle of Grain to South Foreland Shoreline Management Plan (SMP) Review: Appendix J – Habitats Regulations Assessment

²⁸ JNCC, 2016

3.13.5 Sandwich and Pegwell Bay National Nature Reserve (NNR)

One of only 88 national nature reserves not managed by Natural England, the Sandwich and Pegwell Bay NNR is maintained by Kent Wildlife Trust. The reserve is a mixture of natural, semi-natural and artificial habitats. Natural habitats include; eroding chalk cliffs and wave cut platforms to the north of Pegwell Bay, inter tidal mudflats, developing beaches, sand dunes and salt marsh. Semi-natural habitats include ancient dune pasture and coastal scrubland while the re-created grassland of the Pegwell Bay Country Park, along with ponds, dykes and ditches are artificial habitats. The intertidal mudflats support nationally and internationally important numbers of waders and wildfowl²⁹.

3.13.6 Thanet Coast SSSI

This site, extending almost uninterrupted from Swalecliffe to Ramsgate comprises mainly of unstable cliff and foreshore, with smaller areas of salt marsh, coastal lagoons, coastal gill woodland and cliff-top grasslands. Noted for its bird populations, the area supports internationally and nationally important numbers of wintering birds. Sanderlings *Calidris alba* and ringed plovers *Charadrius hiaticula* and grey plovers *Pluvialis squatarola* are present in national important numbers.

Associated with various constituent habitats of the site are outstanding assemblages of both terrestrial and marine plant species, including communities of marine algae that are of limited occurrence elsewhere in the British Isles. Invertebrates are also of interest and there are recent records of three nationally rare and one nationally scarce species³⁰.

Approximately 78.10% of the SSSI area has been classified as ‘favourable’ and 21.90% has been classified as ‘unfavourable - recovering’ in a Natural England recent assessment.

3.13.7 Sandwich Bay to Hacklinge Marshes SSSI

This site contains the most important sand dune system and sandy coastal grassland in South East England and also includes a wide range of other habitats such as mudflats, saltmarsh, chalk cliffs, freshwater grazing marsh, scrub and woodland. Associated with the various constituent habitats of the site are outstanding assemblages of both terrestrial and marine plants with over 30 nationally rare and nationally scarce species, having been recorded. Invertebrates are also of interest with recent records including 19 nationally rare and 149 nationally scarce species. These areas provide an important landfall for migrating birds and also support large wintering populations of waders, some of which regularly reach levels of national importance. The cliffs at Pegwell Bay are also of geological interest.

50.35% of the SSSI area has been classified as ‘favourable’ and 46.13% has been classified as unfavourable - recovering’ in a recent Natural England assessment.

3.13.8 Local Wildlife Sites

As well as the statutorily designated sites, Thanet also has eight Local Wildlife Sites (LWS) that are designated and maintained by the Kent Wildlife Trust. A description of each is given below:

²⁹ Kent Wildlife Trust

3.13.9 Monkton Chalk Pit

Large, deep chalk pit, disused for many years, now managed as a nature reserve by the Thanet Countryside Trust and very important in terms of wildlife in the Thanet area.

3.13.10 St Peter’s Churchyard, Broadstairs

A large churchyard lined with mature sycamore, beech, ash and line trees. Most of the area is generally unmanaged and has developed into a wilderness of secondary woodland with patches of open, rank grassland and scrub.

3.13.11 Golf Course Roughs, Kingsgate

The roughs of North Foreland Golf Course comprise an area of considerable interest. They include unimproved and semi-improved chalk grassland, and the importance of the site is enhanced by its proximity to the coastal areas at North Foreland and Foreness, which form part of the Thanet Coast SSSI.

3.13.12 Woods and Grassland, Minster Marshes

A small mosaic of habitats close to Minster railway station included:

- areas of rough grassland with ant hills and a wide range of common herbs and grasses;
- scrubby areas close to the railway line with heavily silted ponds;
- a small copse with mixed broadleaved trees comprising ash, alder, hawthorn and willow; and
- a large, heavily silted pond occurs on the western margin of the copse, with large alder coppice stools and much sallow.

3.13.13 St Nicholas Wade Churchyard

Chest tombs and headstones within the churchyard are set amid grassland. The grassland is generally well managed but herb-rich, with an area of ranker grassland containing nettle (*Urtica dioica*) and elder scrub present in the southern corner.

3.13.14 St Mary Magdalene Churchyard

This churchyard contains semi-improved grassland which is managed in the main area in front of the church entrance but is rank and unmanaged in the rest of the yard. Where the grassland is managed it supports a number of common meadow plants such as hardhead (*Centaurea nigra*), and oxeye daisy (*Leucanthemum vulgare*).

3.13.15 Ramsgate Cemetery

A very large cemetery, together with its equally large adjacent extension, contains a large expanse of well-managed short grassland which varies from being calcareous at the southern end to neutral

³⁰ Natural England <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1003560>

towards the north. It probably represents on the largest areas of semi-improved grassland outside SSSIs in the Thanet District. The cemetery covers an area of approximately 13.5ha.

3.13.16 Cliftonville Grasslands

This is an area of chalk grassland, with a high amenity value, adjacent to the cliffs of Botany Bay in Margate. The area is split by a hard surfaced path, which separates the main area and a narrower cliff-top section. There is a waste water treatment works located near to the site, though this is not included within the designation.

The cliff edge section of the site is one of low maintenance that has developed a very vigorous and course community of plants, which whilst not specifically of interest, provide suitable habitat for butterflies, hoverflies and bees. The nationally scarce solitary bee (*Nomada fucata*) has been recorded on site.

The inner section of the site, to the south of the hard path, retains a plant community much like the cliff edge section, but the majority of the area is managed by hay cut and clear each autumn. This has resulted in a fine grass sward with a good variety of plant species.

Bird activity recorded at the site includes house sparrow, meadow pipit, skylark, linnet, goldfinch and turnstones.

3.13.17 Green Spaces and Corridors

With the exception of inter-tidal habitats, only some 4% of the Districts land area is comprised of semi-natural habitats. This does not compare well with other districts in Kent. This is due to the very high quality of agricultural land in the area which has meant that historically the island has been very intensively farmed leading to the low level of natural habitats³¹. An Open Space Audit undertaken in 2005 describes the quantity, quality and access to natural and semi natural space provision in the area. The objective of this study was to identify local needs for provision, and opportunities for enhancement, development or replacement of current facilities.

There is an existing level of provision of 0.95 ha per 1,000 population. Comparison with English Nature Standards shows this equates to 1.05ha below the recommended provision. The recommended minimum standard of future provision for Natural/Semi-Natural Greenspace is 2ha per 1000 population. This could potentially be achieved with the provision of new community woodlands and by transferring other space within parks and Informal Recreation areas to natural and semi natural Greenspace.

Quality of provision was rated as ‘good’ by local residents (26.67%). According to the survey that the majority of Thanet residents walk to natural Greenspace facilities, with an average distance travelled to access natural green space of 2.25 kilometres. This meets recommended provision for access applied by Natural England.

³¹ TDC: PPG17 Open Spaces, Indoor Sports and Recreation Assessment (2005)

³² Rising to the challenge: The impact of climate change in the South East: Technical Report, UKCIP, 1999

The Green Corridors provide opportunities in Thanet to link both rural and urban communities together. Linear green space in Thanet plays an important role as wildlife corridors in addition to their wider amenity green space role and natural and semi natural open space.

The audit undertaken has revealed that there are two Green Corridors within Thanet, although these have not been formally designated.

Development and enhancement of Green Corridors will not only benefit biodiversity, but can also contribute to improving the health of Thanet’s community and workforce. This could occur through the indirect promotion of cycling and walking due to an increased aesthetic value, within the District.

Roadside Nature Reserves can link existing wildlife areas, helping to reconnect and restore landscape so that wildlife is no longer struggling to survive in isolation. There are four Roadside Nature Reserves within Thanet, which have been identified for their habitats and connections to areas of rich biodiversity and include important features such as calcareous grassland, lizard orchids and diverse populations of butterflies and dragon flies.

3.13.18 Biodiversity Opportunity Areas (BOAs)

All nine counties in the South East have undertaken a mapping exercise on behalf of the South East Biodiversity Forum (SEEBF) identifying areas of greatest biodiversity opportunity. The BOAs were mapped to provide targets to facilitate the delivery of landscape scale habitat re-creation, restoration and to connect up designated sites and priority or Biodiversity Action Plan habitats.

Kent contains sixteen Biodiversity Opportunity Areas, covering 40% of land and intertidal habitats, two of which run through the Thanet District. These are; Thanet Cliffs and Shore BOA, and Lower Stour Wetlands BOA.

3.14 Climatic Factors

The East of England typically experiences long summers, mild winters and a long growing season. Rainfall tends to be linked to topography (with areas at higher elevation experiencing more rainfall) and droughts can be common in low lying areas of the region. Thanet being in the South East of England Region, experiences a similar climate although is likely to also experience some variation in short term weather pattern.

3.14.1 Climate Change

Rising to the challenge: the impacts of climate change in the South East: Technical Report³² produced for the UK Climate Impacts Programme (UKCIP) identifies the changes in climate that will be evident in the South East by the 2080’s³³. These include:

- it will be warmer all year round, with most of the warming in summer and autumn;
- winters will be wetter, and summers will be drier;
- it will be sunnier in the summer, and this, with the higher temperatures, will mean a large increase in summer evaporation;

³³ Although this study was written in 1999, UKCIP considers its content to still be relevant.

- it will be windier, with an increased risk of severe storms; and
- the sea level in the English Channel will be 54 centimetres above its present level.

The impact of this change in climate will be water shortages during periods of high demand that will threaten and dry out wetland habitats and lead to increased pollution as river flows diminish. There is also likely to be more damage from flooding and floodplains may become more dangerous places to live, and coasts and lower river reaches are expected to face a higher frequency of storm surge tides. Erosion is set to increase which in Thanet may have serious impacts on the Cliff features that hold environmental designations.

The report does however highlight potential advantages for the region with the changing climate with opportunities for farmers, for example, to grow navy beans, soya and sunflowers in many places. The tourism and recreation industries could benefit considerably from warmer conditions with increasing visitor numbers as traditional European destinations become too hot.

The key cause of anthropogenic climate change is widely acknowledged to be the release of greenhouse gases into the atmosphere from the combustion of fossil fuels.

The UK Government has set a framework for CO₂ reduction up to 2050 through The Climate Change Act 2008. This legislation sets targets for greenhouse gas emission reductions through action in the UK and abroad of at least 80% by 2050, and reductions in CO₂ emissions of at least 34% by 2020, 50% by 2023, 60% by 2030 and 80% by 2050 against a 1990 baseline.

TDC began monitoring district GHG emissions from 2008-2009, which acts as baseline for subsequent GHG reporting. For 2016-2017 Thanet's total net emissions were calculated to 3,364 (tonnes of CO₂e), which equates to a 23.5% net decrease compared to the baseline.³⁴

TDC has begun to look into climate change adaptation and mitigation opportunities for Thanet. The District Council developed a Climate Change Strategy and Action Plan for Thanet for 2009-2011. To drive forward its commitments to meeting targets and delivering actions outlined in this plan, TDC developed a 'Going Green Group'. Thanet is seeking to develop a new Climate Change Strategy as part of the new Local Plan and associated development and planning policies to ensure development can contribute to reducing GHG emissions in line with government targets and minimising vulnerability and providing resilience to the impacts of climate change (see Climate Change Topic Paper, May 2013 and the Draft Thanet Local Plan to 2031 Preferred Options Consultation, January 2015).

TDC has adopted the Kent Environment Strategy (March 2016) and is a member of the Kent Climate Change Network which through sharing best practice and raising awareness is committed to the reduction of emissions and preparing for climate change.

3.14.2 Energy and Renewable Sources

The development of low carbon and renewable energy sources is a crucial part of the UK's strategy to minimise the future consequences of climate change. A review of Renewable Energy provision and opportunities across the region was undertaken by Kent County Council in 2011. As a result, AECOM were commissioned to assess availability of renewable resources in the county and wider associated

social and economic benefits. The AECOM study; Renewable Energy for Kent, April 2012, was used to underpin the development of the Kent Renewable Energy Action Plan (August 2013).

In addition, plans are in place to redevelop a derelict brownfield power station site at Richborough, as a new hub for green energy production for Kent. This will provide a significant opportunity for Thanet to meet its climate change and greenhouse gas emissions targets. Thanet District Council has developed an indicator as part of its AMR to monitor the number of permissions granted for renewable energy generation. The latest available AMR for 2015-2016 states that during the current reporting year, no solar parks were granted planning permission. A target for permissions granted for renewable energy generation is not as yet established.

3.14.3 Air Quality

Thanet generally has good air quality. However, there are two busy junctions which show levels of nitrogen dioxide above the recommended health objective. In both cases the main source of pollution is from road transport. To help tackle the problem TDC decided to declare an urban wide Air Quality Management Area (AQMA) on 17th November 2011 which encompasses the two exceedance areas at The Square, Birchington-on-sea and High Street St Lawrence, Ramsgate. The decision to replace the existing AQMAs with one wider urban AQMA was taken to enable a more strategic approach to action planning and effective management and integration of air quality considerations into transport planning and development control.

Thanet District Council operates two automatic monitoring stations situated at roadside locations at Boundary Road, Ramsgate, and The Square, Birchington. Both sites measure nitrogen dioxide and PM₁₀ and are next to main roads, within the Thanet Urban AQMA boundary. Both automatic monitoring stations measured concentrations of pollutants below the relevant objectives between 2013-2016. Thanet District Council also operates 23 passive monitoring sites using diffusion tubes. Seven of these sites are classified as kirbside, five as urban background and 11 as roadside. Three passive monitoring sites exceeded the annual mean objective for NO₂ in 2016 (40µg/m³). These sites were located at The Square in Birchington, Highstreet, St Lawrence and 9 High Street, St Lawrence³⁵. All three of these passive monitoring sites are located within the Thanet Urban AQMA.

3.14.4 Flood Risk

Thanet's Strategic Flood Risk Assessment (SRFA 2009) details flood risk information across the district and particularly the extensive coastline, as well as site-specific levels to inform the Sequential Test and the site allocation process. Key information from this report is summarised as follows:

- Tidal flooding poses the greatest risk to the Thanet;
- River Stour – within the Stour valley, the tidal extent of the river provides a greater risk than a fluvial flood event – the combined fluvial and tidal flood zone should be used to determine greatest level of risk;
- Wantsum Channel is at risk from fluvial and tidal flooding;
- Groundwater flooding is not considered to be an issue of strategic concern;

³⁴ thanet.gov.uk

³⁵ https://www.thanet.gov.uk/media/3979260/ASR_Thanet_2017_v1.pdf

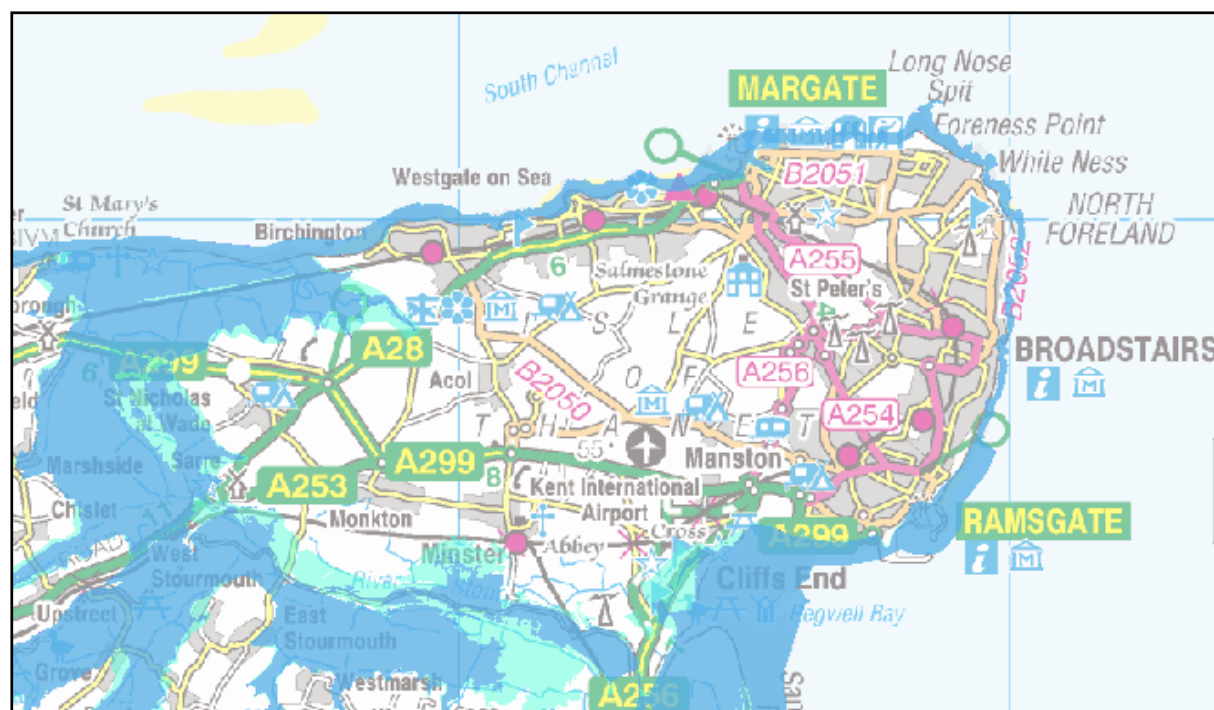
- Areas of residual flood risk have been identified as Margate Old Town, Dreamland, Birchington (Minnis Bay); and
- Groundwater flood risk is not a significant problem – although the district predominately overlies a chalk aquifer, ground elevations are generally high so water table is at significant depths from the surface.

Surface water flooding is localised and site specific so not assessed at a strategic level (but is detailed in the Thanet Stage 1 Surface Water Management Plan (SWMP), May 2013). The SWMP identifies historic flooding incidents, and identifies the causes of this as surface water, sewer, tidal or blocked drains or gullies. An Action Plan is included within the SWMP, which highlights areas where action is needed, and the type of action that is considered necessary.

3.14.5 Fluvial Flooding

The River Great Stour's floodplain forms the western boundary of the district. This floodplain occupies the Wantsum Channel, which is a broad low lying feature which separates the Isle of Thanet from the rest of Kent. Historically this was a tidal channel that totally separated the Isle of Thanet from mainland Kent. However, it is no longer flooded as part of daily tidal cycles due to the protection from sea defences along its boundaries. Despite this there remains a tidal flood risk and modelling which has led the Environment Agency to define the Wantsum Channel as being of Fluvial/ Tidal flood Zone 3. Figure 10 shows the flood risk to Thanet. It can be seen that the original channel creating the Isle of Thanet is a significant flood risk as well as the coastal stretches³⁶.

Figure 7: Risk from river and sea flooding assuming no defences (blue indicates flooding and turquoise the extent of extreme flooding).



³⁶http://maps.environmentagency.gov.uk/wiyby/wiybyController?x=531500.0&y=181500.0&topic=floodmap&ep=map&scale=3&location=London,%20City%20of%20London&lang=_e&layerGroups=default&textonly=off

Source: Environment Agency

The SFRA also provides the results of modelling of sensitivity to climate change in the coastal domain and as well as the predicted impacts to flood zones 2 and 3 for the year 2026, 2080 and 2115 for each of the key urban areas (KUAs). The SFRA addresses Flood Risk for PAS (Protected Areas of Search) as well as 'Potential Development Sites' which were identified in the R25 Land Survey and H1 Site Survey, undertaken by Entec in 2008. There is no available data to indicate the number of dwellings that are at risk of flooding and no data available to show how many new developments incorporate Sustainable Drainage Systems.

Since the publication of the SFRA, work has been completed on flood defences along Margate seafront which will increase the standard of flood protection from approximately 1 in 20 to 1 in 200 for the Old Town Flood Compartment. However, this will not change the flood risk zones provided by the Environment Agency as these are based on a hypothetical situation where no flood defences exist³⁷. Although the new flood defences have increased the standard of flood protection, it would still be necessary for a flood risk assessment to be provided for proposals within the flood risk area as there would still be a risk of residual flooding resulting from a breach of the flood defences. An addendum will be included in the SFRA to reflect the changes from the new defences.

3.14.6 Water Quality and Water Resources

Southern Water supplies water and wastewater services to Thanet. When planning new development and growth it is important to consider both local and strategic wastewater infrastructure. Local infrastructure generally comprises local sewers which are funded by the development whereas strategic infrastructure encompasses trunk sewers, pumping stations and wastewater treatment works and is normally funded by the water company. Capacity in the sewerage system is finite and the spare capacity available (headroom) varies from location to location.

Nearly 70% of Thanet's water is taken from underground aquifers, 23% from rivers and 7% from storage reservoirs³⁸. The Stour Catchment Abstraction Management Strategy (2003) assesses the water availability for each river stretch and groundwater aquifer. Thanet's main water resource is abstraction from the chalk aquifer. The Stour CAMS identifies Thanet's water availability status as over-abstracted. However, the update of October 2006 states that the current abstractions should not have a detrimental impact on the nearby European Marine Sites.

³⁷ Thanet District Council: Water Cycle Topic Paper, May 2013

³⁸ Thanet District Council: Water Cycle Topic Paper, May 2013

A River Basin Management Plan for the South East River Basin District (2009) was produced under the Water Framework Directive. It identified the pressures facing the water environment, which prevent a ‘good’ status³⁹ being achieved. These issues included:

- Point source pollution from sewage treatment works;
- The physical modification of water bodies;
- Diffuse pollution from agricultural activities;
- Diffuse pollution from urban sources;
- Water abstraction;
- Flood protection/coastal erosion;
- Physical modification – urbanisation;
- Physical modification – wider environment; and
- Physical modification – land drainage.

The Water Framework Directive requires special protection for areas identified under other EU Directive and waters used for the abstraction of drinking water. The River Basin Management Plan describes the objectives for each protected area and assesses compliance with them. It also describes the actions needed to achieve and maintain compliance. Thanet has a number of protected areas as listed in Figure 11.

A consultation on updates to River Basin Management Plans was held between 10 October 2014 and 10 April 2015. All updated River Basin Management Plans were updated and published in December 2015.

The December 2015 South East river basic district – River Basin Management Plan identifies pollution from waste water, physical modifications and pollution from rural areas as the three most significant water management issues preventing waters in the South East river basin district reaching good status. In terms of pollution from waste water, the water industry is identified as the greatest contributor to this impact. With respect to physical modifications, the following sectors are found to be key contributors; local and central government, agriculture and rural land management and urban and transport. In terms of pollution from rural areas, the agriculture and rural land management sector is identified as the greatest contributor to this impact.

3.14.7 Coastal Waters

Thanet has 13 beaches which have been designated as ‘Bathing Waters’ and are independently tested weekly from May to September by the Environment Agency. Sea Waters are tested for bacteria, and beaches are assessed for cleanliness, dog control, wheel chair access, provision of facilities and provision of life saving equipment to meet EC bathing water standards. A Blue Flag award is given to areas that meet those standards. Water quality has overall improved since 1993, however in 2010 fewer coastal waters were recorded as being excellent than in previous year.

³⁹ WFD Good status: ‘Slight change from natural conditions as a result of human activity. No restriction on the beneficial uses of the water body. No impact on amenity or fisheries. Protects all but the most sensitive wildlife’ (Part 1: South East river basin district - River basin management plan, December 2015)

Table 7: Thanet water quality⁴⁰

Bathing Water		2013p	2014p	2015	2016
Birchington, Minnis Bay		***	***	***	***
Broadstairs, Botany Bay		***	***	***	***
Broadstairs, Joss Bay		***	***	***	***
Broadstairs, Stone Bay		***	***	***	***
Broadstairs, Viking Bay		*	*	*	*
Margate, Fulsam Rock		**	***	**	**
Margate, The Bay		**	**	**	**
Margate, Walpole Bay		-	-	-	-
Margate, Westbrook Bay		***	**	**	**
Ramsgate Western Undercliffe		***	***	***	***
Ramsgate, Ramsgate Sands		**	***	***	**
Westgate, St Mildred's Bay		***	***	***	***
Westgate, West Bay		***	***	***	***

- *** Excellent
- ** Good
- * Sufficient
- Poor

3.15 Cultural Heritage and Material Assets

There is an extensive and rich variety of building forms, character and heritage within the built-up area of Thanet. The urban areas range from the ‘urban village’, such as Pegwell and St Peter’s, to the modern shopping centre and bright lights of Margate, the wooded areas and special atmosphere of Broadstairs to the historic harbour, lively marina and cross-Channel port of Ramsgate. There is also a diversity of heritage throughout Thanet’s villages⁴¹.

Thanet has 22 conservation areas, 13 scheduled monuments and one registered park and garden as well as around 2,500 Listed Buildings⁴² and a number of archaeological sites dating back to pre-historic times. The District also has associations with important historical figures including JMW Turner, AW Pugin, Sir Moses Montefiore, Charles Dickens, Karl Marx and Vincent Van Gogh.

TDC has adopted a Statement of Community Involvement, which sets out TDC’s commitment to community involvement in all aspects of town planning, including matters pertaining to Thanet Conservation Areas.

⁴⁰ From 2015 there are new, tighter standards. A classification tagged with this symbol (p) indicates the class that the bathing water would have achieved if the new bathing water quality standards had been in force.
⁴¹ Thanet District Adopted Local Plan (2006): Saved Heritage Policies
⁴² Thanet District Council website: ‘How do I find out if a building is listed?’

TDC are currently preparing a Heritage Strategy which will form evidence to support the emerging Local Plan.

3.16 Landscape and Townscape

A Landscape Assessment Survey undertaken by the District Council in 1991 described a gently undulating landscape with few dominant natural features, shaped largely by arable farming, combined with a historical lack of tree cover. However, areas of high landscape value do exist such as the Pegwell Bay and Former Wantsum Channel where uninterrupted long views of the sea and marshes along the undeveloped coastline exist¹¹.

As part of the current (2006) Countryside & Coast Local Plan Saved Policies that detail conservation of the Townscape and Landscape character of Thanet, TDC has identified six landscape character areas;

- Pegwell Bay;
- The Former Wantsum Channel;
- The Former Wantsum North Shore;
- The Central Chalk Plateau;
- Quex Park; and
- The Urban Coast.

Thanet district also includes three Regionally Important Geological Sites. These are located at Monkton Nature Reserve, Pegwell Bay and St Peters Quarry.

In previous Local Plans, TDC has sought to protect these important landscapes. The protection of Thanet's important landscapes is to be continued in the emerging Local Plan. To gain a more up to date picture of Thanet's Landscape Character Areas, site surveys were carried out in 2012⁴³ and compared with the 1993 Preliminary Report of the Isle of Thanet Landscape Assessment Survey that reported the findings of the 1991 study to identify any views that may have changed. Of the 22 views surveyed, 14 were considered not to have changed since the 1993 report.

In summary:

- Two views were considered to have improved as the cooling towers at Richborough district Power Station have been demolished so no longer form part of the landscape;
- One view was considered to be more built up as Thanet Earth is now visible;
- The 2006 Thanet Local Plan allocated a site for residential development of 100 new dwellings in Minster within the Wantsum Channel North Shore landscape character area. The development has been completed and is visible from one view visited in the 2012 survey; however, it is well screened and has not made a significant visual impact; and
- In recent years, the Kentish Flats and Thanet offshore wind farms have been constructed, providing a new feature to the landscape.

Subsequent to the issue of the 2012 Thanet Landscape Character Areas topic paper, a Scoping Opinion was issued by the Planning Inspectorate for a proposed extension to the Thanet Offshore Wind Farm

off the Kent Coast (February 2017), and an extension of the Kentish Flats Offshore Wind Farm was granted in February 2013.

The former Manston Airport site is currently subject to a planning application for a mixed use development. In addition, a Scoping Opinion was issued in August 2016 by the Planning Inspectorate pertaining to this site for a proposal to redevelop and reopen the airport as a new freight and cargo hub for the South East.

3.17 Waste

During 2013/14 a total of 696,816 tonnes of Municipal Solid Waste (MSW) (now Local Authority Collected Waste) was generated in Kent, the majority of which was recycled and composted (combined total of 46%), and sent for energy recovery (37%). According to the 10th Annual Minerals and Waste Monitoring Report (February 2015), there was a minor increase in the arisings of MSW (1.28%) in 2013/14 for the first time in recent years, in contrast to the downward trend since 2009/10. Diversion of MSW from landfill has continued to increase, reaching its highest level to date at 82.5% of all MSW.

In terms of Kent's MSW, only 14.5% of Kent's MSW arisings were managed outside of the county in 2013/14. All of Kent's energy recovery is managed in Kent and high proportions of green waste and landfill waste are managed within the county, 99.6% and 71% respectively.

The environmental issues raised by the treatment and disposal of waste are matters of great public concern and waste management can have various unsustainable impacts (e.g. aquifer damage, atmospheric emissions and energy use).

The Annual Monitoring Report for South East England 2008-09 compares the percentage of MSW sent for reuse, recycling or composting from all local authorities in the region. The average for Kent is slightly above the regional average, but there are marked variations between district councils. However this report describes Thanet as being one of the lower performing authorities in terms of recycling/composting.

The Kent Minerals and Waste Local Plan 2013-2030 was adopted in July 2016. The Joint Municipal Waste Management Strategy (also known as; Kent Waste Strategy) sets out how the Kent Resource Partnership intends to manage household waste. The strategy was refreshed in 2012/13.

⁴³ Landscape Character Area Topic Paper - August 2012

4 Key Sustainability Issues

4.1 Review of key sustainability issues

The sustainability issues identify positive or negative issues for Thanet relevant to the Local Plan that has the capacity to influence, optimising enhancement opportunities and minimising detrimental impacts associated with the Local Plan. The development of key sustainability issues has been informed by the review of context documents and the identification of baseline information, and as such, the information presented below in Table 8.

Although slight changes were made to the key sustainability issues as a result of this SA update, no changes were deemed necessary to the SA framework, which means that the SA objectives and decision making criteria (Appendix A) employed in previous iterations of the SA are deemed still to be relevant and were used in this appraisal process.

Table 8: Key sustainability issues

Key Sustainability Issue	Sub Issue	Description	Validation	Source
ECONOMY	Economic Development	Support for industrial and employment development at key sites within the District.	Existing evidence suggests that Thanet is a net exporter of labour with a workplace ratio of 1.19. Bearing in mind the limitations of the data, further analysis suggests that the workplace ratio could be closer to 1.10. Currently Thanet has significant out migration of the 16-39 age groups. Our forecasts promisingly suggest that more roles are likely to be created which align with the occupation profile of this younger age group which help to reduce the level of out-migration. Economic development at business Parks such as Manston Park, Eurokent and Thanet Reach along with economic development at employment sites adjacent to the Sandwich corridor expected to be available as services employment land within the Local Plan. The main demand and growth is coming out of the local market, and therefore should be supported. There is insufficient supply of property to meet this demand. Relatively little interest from companies wishing to relocate to Thanet, or large inward investors. Priority should be given to allocating land for delivering economic development, protecting sites for industrial and commercial uses where there is a good prospect of employment use, consider upgrading or improving existing sites and working to overcome barriers to delivering sites, including identifying infrastructure planned and necessary to support economic growth. In particular relation to employment land provision, sufficient employment land must be provided through the redevelopment of brownfield land and refurbishment of existing stock, to provide new and flexible employment space.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan Employment Land Review Experian Economic and Employment Assessment – Thanet District Council, 2012
		Create and maintain local employment opportunities centred on fairly paid jobs.	Thanet has relatively high levels of unemployment, and social and economic deprivation. Thanet’s history of economic problems is reflected in a persistently high unemployment rate. Total, unemployment rates increased since 2009, and peaked at 6.4% in February 2012. Figures for 2012 show unemployment to have slightly decreased to 5.6%. There is a significant and increasing gap between the rates of unemployment in Thanet compared to Kent (3.2%), the South East (2.4%) and National (3.75%) ⁴⁴ averages remains. There are fewer people with professional jobs in Thanet than in Kent and England. Skilled trades, caring, leisure and customer service, and other service occupations are more dominant in Thanet than in Kent and South east.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan Local Futures 2004 Draft Employment Topic Paper
		Development of grant funding packages for firms investing in Thanet.	Thanet is part of the Grow East Kent initiative which includes funding for existing and new start businesses as well as businesses looking to move to area. Thanet is also part of the East Kent Priority Area for Regeneration	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan

⁴⁴ Thanet District Council Local Plan 2006

Key Sustainability Issue	Sub Issue	Description	Validation	Source
		Ensuring that the strategic future of retail centres supports commercial diversification and capital investment as well as providing a strong revenue stream for Thanet District Council.	<p>Thanet retail centres are considered unattractive investment areas for major retailers due to relative isolation, limited catchment and the current high dependence on larger retail centres outside the Thanet region. However major changes have occurred since 2000 to the provision of retail floor space in Kent and this has had an impact on expenditure spent outside the Thanet region.</p> <p>Of the traditional centres. Ramsgate has the largest turnover at £67million</p>	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
		Supporting regeneration of key areas within the District.	South East Local Economic Partnership (SE LEP) implemented in April 2011 to promote strategic economic priorities and make investments activities to drive growth and local jobs. Investment from the Governments Growing Places Fund includes first round projects across Kent and in Thanet such as 'Live Margate, Kent	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
	Economic Structure	Ensuring that improving economic prosperity provides benefits to the whole of Thanet focussing regeneration on key wards.	<p>Kent County Council's 'Grow for it East Kent' scheme which is aiming to attract new businesses to locate within the sub-region as well as supporting the start up and growth of indigenous and pre-existing businesses. It is doing this by promoting the area to businesses and also providing support to new businesses and funding to support businesses looking to locate in East Kent.</p> <p>The Thanet Local Plan identifies four key areas in need of special attention: Margate Old Town Area, King Street in Ramsgate, Upper High Street in Ramsgate and Cliftonville West.</p> <p>Thanet has poor housing stock with a high proportion of semi-derelict, vacant or homes in a state of poor repair. In addition there are a high proportion of multiple occupation premises which leads to pressure on parking, nuisance, noise and visual deterioration of houses and gardens.</p>	<p>Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan</p> <p>Experian Economic and Employment Assessment – Thanet District Council, 2012</p>
		Ensuring that existing building stock (particularly redundant buildings) is brought into use for employment where appropriate.	<p>Create and maintain local employment opportunities centred on fairly paid jobs.</p> <p>There is also a dominance of employment in the public sector and whilst this has an important role to play in any economy, it is not a strong driver of growth and wealth creation. With over a third of employees working in the public sector there is a need to balance this to ensure that there is scope for the economy to grow</p> <p>At 1st April 2011 there were 3,456 empty homes in Thanet. (Source Research & Evaluation Statistical Bulletin "Vacant and empty dwellings - Annual 2010/11" Kent County Council)</p>	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
		The protection and enhancement of natural assets including Blue Flag status of beaches in support of tourist economy.	<p>Tourism provides a significant contribution to the Thanet local economy and so efforts to maintain natural assets and improve its desirability as a coastal destination are required to strengthen and support future economic growth.</p> <p>Visit Kent data for 2009 indicates that there were 57 million visitors to Kent, with an economic impact of £3.2 billion as well as supporting an estimated 63,000 jobs.</p>	<p>Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan</p> <p>Town Centre Retail, Leisure, Tourism and Culture Assessment, 2012</p>
		The protection and enhancement of historic assets.	Scheduled monuments in Thanet include Anglo Saxon Cemeteries and remains at Monkton and Dane Valley, Salinestone Grange, Quex Park Settlements, and various ring ditches and enclosures. There are also significant amounts of listed buildings and conservation areas throughout the district.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan

Key Sustainability Issue	Sub Issue	Description	Validation	Source
	Economic Connectivity	The development of key transport gateways to the region including the development of Kent International Airport.	<p>Thanet has often been perceived to be peripheral although in reality transport infrastructure is extremely good with excellent road access to the M2 and M25 along with the new East Kent Access links to the south. The port and airport are important links to the continent and beyond and the High Speed rail link has greatly decreased commuting times to London.</p> <p>Whilst the district does have a number of good transport links it is still on the periphery of Kent and the South-East, and in particular its proximity to London is poor compared to the rest of the south-east.</p> <p>Kent International airport has a potential capacity of 1,000 million passengers per annum with 250,000 tonnes freight per annum. The Airport Masterplan developed in 2009 which estimated a significant increase in passenger (4.7 million passengers per annum) and freight (400,000 tonnes of freight) numbers for the airport to 2033 along with details of future airport expansion such as a new terminal building. To date The airport is currently up for sale and the estimates for growth proposed in the Masterplan have not been achieved. In addition, given the uncertainty regarding the government’s position on aviation within the South East, the future of the airport is uncertain. However, it remains an important economic asset and opportunity to encourage growth in Thanet.</p> <p>Facilitating further growth at the Airport and Ramsgate Port could unlock further opportunities. Current export levels from Thanet are low and therefore there could be growth potential in this area given the close proximity of Thanet to Europe coupled with transport links. There is also the potential for growth given knock on effects from the airport in terms of the supply chain.</p>	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan Employment Land Review
		Mobility and access to employment opportunities through provision of sustainable public modes of transport.	<p>Compared to a national average of 25.8% the proportion of Thanet households not in possession of a car or van is 29.8%, the 5th highest in the region. In some of the more deprived wards this is almost double this such as Margate Central (52.4%).</p> <p>Of the working age population 40% travel by private, car, van or motorbike to work. 6% travel by public transport, 9% walk or cycle and 3% work from home. These percentages are all lower than the regional and national (England) averages.</p>	Census 2011.
		Links to opportunities associated with sub-regional growth and development including major economic opportunities.	<p>Thanet has an Airport of regional significance at Manston with a potential capacity of one million passengers per annum with 250,000 tonnes freight per annum.</p> <p>The 2009 Masterplan which estimated a significant increase in passenger and freight numbers for the airport to 2033 along with details of future airport expansion such as a new terminal building. The airport is currently up for sale and the estimates for growth proposed in the Masterplan have not been achieved. In addition, given the uncertainty regarding the government’s position on aviation within the South East, the future of the airport is uncertain. However, it remains an important economic asset and opportunity to encourage growth in Thanet.</p>	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
SOCIAL	Safety	Initiatives leading to greater public safety including appropriate strategies for intervention (Community Wardens, Police Community Support and Secured by Design).	<p>Approximately 91% of the Thanet population feel safe in their homes – the main focus of interest is in Margate Central Ward and Cliftonville West Ward. Local analysis has shown that the streets of Thanet are extremely safe – large areas of Thanet have had no reported crime in two years with only nine of 446 output areas reporting one crime per month.</p> <p>All three town centres are awarded the National ‘Safer Shopping Award’ with shoplifting and commercial burglary falling year on year.</p>	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan Thanet Crime and Disorder Police Audit 2005-2008

Key Sustainability Issue	Sub Issue	Description	Validation	Source
	Housing	Responding the needs and requirements of the current and future housing market. Support the viability of existing residential developments now and in the future.	Over the last decade the housing market and mix of tenure has changed due to the recession and the impacts this has had on house prices. The proportion of households that are rented instead of owned or mortgaged has increased. Likewise, the annual number of housing sales has fallen to a level lower than 1996. This means that because there is currently less demand for housing the potential future requirements may be less than previously anticipated. However, given the long timeframe over which the Local Plan will operate (to 2031) it is quite likely that the housing market will have changed again. Therefore the Local Plan needs to consider how it can allow flexibility to address potential changes in the future and this flexibility is something that the SA will also consider during the assessment of options and alternatives. The Thanet Private Sector Housing Strategy indicates that the standard of the existing stock is an issue, with the private rented sector being poor in some areas, particularly in Cliftonville. Further demand for appropriate pitches for the travelling community	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan Urban Housing Capacity Study (Kent District council) 2002 Local Housing Needs Study Strategic Housing Land Availability Assessment Strategic Housing Market Assessment East Kent Gypsy and Traveller Accommodation Assessment Report (2007-2012)
	Mobility	Access to key services and employment opportunities through public transport provision.	The Channel Tunnel Rail Link has benefited the UK as a whole but has led to substantial job losses in the in the cross channel ferry industry. Transport links in Thanet have been historically poor however in recent years a number of transport connections have improved significantly. The recently completed East Kent Access Road (A256) provides a fast connection to the A20/M20 at Dover and to the Port of Dover and Channel Tunnel. The Access Road also links Thanet with other major economic assets such as Manston, Kent’s International Airport, the Port of Ramsgate and Discovery Park to the UK’s main arterial road network in less than 60 minutes. Additionally, the introduction of High Speed 1 rail services in 2009 has reduced commuting from central London to Ramsgate to 76 minutes and Margate to 88 minutes. The local population is well served with public transport connections. Access throughout the district is possible via the Thanet Loop bus service. This covers Margate - Broadstairs - Ramsgate – Margate i.e. all towns/centres of commercial activity	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
	Deprivation	Levels of economic disparity within the region and need to maximise opportunities for all sectors of society. Access to employment opportunities identified as an issue in limiting the realisation of Thanet’s potential.	The 2010 Office of National Statistics Indices of Deprivation indicates that Thanet is ranked the most deprived District in Kent and 65 th in England (out of 354), moving it within England’s top 20% deprived Districts in England in all 6 deprivation categories (employment, health deprivation, disability, educational skills and training, housing, geographical access to services and income). Per ward Margate is ranked the most deprived Ward Thanet is within the top 20% most deprived areas of Kent. 15.2% of the District’s population are separated or divorced in comparison to the England and Wales average being 11.7% - this is the highest rate in Kent.	Thanet DC Corporate Themes, Plans, Policies and Programmes Thanet Local Plan
	Health	Maintenance of high levels of healthcare provision including dependent sectors of the community. Population demand on healthcare and support services (PCT initiatives).	The poor health of Thanet cannot just be attributed to the number of older residents of people suffering a limiting long term illness. This ranks highest in the region (of 67) and is 37 th of the 376 Districts in England and Wales.	Census 2011.

Key Sustainability Issue	Sub Issue	Description	Validation	Source
	Education and Skills	Access to skills development for all sectors of society. Particular demand associated with transient and dependent sectors of society.	<p>39% of East Kent’s children’s homes providing care for socially excluded children are located in Thanet. A large proportion of children remain in the area through to adulthood compounding a dependency culture.</p> <p>Within Thanet 15.9% of 16-60 year olds have low or very low literacy (15% nationally) and 35.1% have low or very low numeracy (33% nationally)</p> <p>It is well evidenced that the district has a number of skills gaps. Thanet’s qualification profile is skewed towards NVQ1, 2 and 3, with all three above the county, region and UK. Promisingly it has proportionally fewer individuals with no qualifications (8.6%) this is compared to Kent at 11.4 per cent and the UK as a whole 12.2 per cent. However in terms of NVQ level 4, which is equivalent to degree level qualification, the district has proportionally far fewer residents that hold this qualification than the county, region and UK. In the South East over a third (39.7 per cent) are NVQ level 4 or above compared to 31.4 per cent in Thanet.</p>	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement Experian Economic and Employment Assessment – Thanet District Council, 2012
ENVIRONMENT	Perceptions and Image	Need to maintain the appearance, vitality and safety of the street scene within Thanet particularly associated with town centres and coastal areas.	With their competing catchment areas Thanet’s towns have struggled to retain a vital commercial core and have lost many visitor attractions resulting in the stock of guest house and hotels being reduced and converted to private residential multiple user accommodation. However, this is starting to change particularly within Old Town in Margate and Marina in Ramsgate, but in some areas of public realm the main high streets are of a poor standard.	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement NLP Report
	Biodiversity	Protection of designated sites including; SSSIs, SPA and Ramsar site.	The Thanet coast is protected by a number of international and national conservation and biodiversity designations. These include Special Protected Areas, a Ramsar Site and Sites of Special Scientific Interest. A full list of designations made on biodiversity grounds are given in Appendix C. Threats to rare species of birds and the Chalk Reefs are a particular concern.	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement, Kent Biodiversity Action Plan.
	Development Pressure	Threat to areas of high wildlife, conservation and biodiversity importance from economic and social development	<p>Development within the Thanet District presents areas of conservation and wildlife importance at threat. This is particularly evident in areas of ‘coastal squeeze’ where space for development is at a premium. Also the need for open space for recreational needs places additional pressures on designated areas.</p> <p>The impact of changes to air quality resulting from this development should also be considered.</p> <p>Where possible opportunities to link and extend wildlife habitats to reduce the impact of inappropriate development should be supported. In doing so it is important to make provisions for general green space and green infrastructure in association with development needs</p>	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement, Kent Biodiversity Action Plan.
	Coastal Management	The coastal areas of Thanet have a high conservation and landscape value and should be afforded appropriate protection.	<p>The chalk reefs in themselves justify the need to afford significant management in the protection of the coastal area. In particular threats include; increasing pressure on coastal resources from recreational use, the potential impact of coastal flood defence construction, the impact of coastal erosion, impact from urbanisation and the threat to species of regional, national and international importance, such as the turnstone.</p> <p>Groundwater Source Protection Zones exist across the district.</p>	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement, Kent Biodiversity Action Plan.
	Water Quality	Risk to water quality	The whole of the Thanet area is classified as a Nitrate Vulnerable Zone. Furthermore nutrient runoffs may impact on inter tidal chalk reefs.	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement, Kent Biodiversity Action Plan. Environment Agency mapping

Key Sustainability Issue	Sub Issue	Description	Validation	Source
	Climate Change and Flood Risk	Nation need to consider impacts associated with climate change and particular imperative within coastal locale. Risk of flooding must be considered in Local Plan development.	Thanet has a key advantage as flood risk does not pose a constraint to identifying sufficient housing site, commercial or industrial site opportunities.	Thanet DC Corporate Themes, Plans, Policies and Programmes review and baseline, South East Regional Integrated Regional Framework, Thanet Statement of Community Involvement, Kent Biodiversity Action Plan, Environment Agency

5 Policy Appraisal Summary

5.1 Policy screening

This section of the SA update report presents the new or updated appraisals for those policies that have been amended or produced as a result of consultation on the Revised Preferred Option and continued stakeholder involvement. Table 1 provides a summary of the changes to each policy, explaining whether these amendments are changes in the policy text, or the as a result of the addition or deletion of individual policies.

Table 9: Review of policy screening.

Original policy number	Updated policy number	Original policy name	Is further assessment required?	Justification
SP01	SP01	NPPF presumption in favour of sustainable development	No	No change.
Strategic Priorities 1-5	Strategic Priorities 1-5	Strategic Priorities and Objectives	No	Minor changes.
SP02	SP02	Economic Growth	Yes	Update appraisal with changes made to the policy.
SP03	SP03	Land Allocated for Economic Development	Yes	Update appraisal with changes made to the policy.
SP04	SP04	Manston Business Park	No	No change.
SP05	SP05	Manston Airport	Yes	Policy was re-written.
SP06	SP06	Thanet's Town Centres	No	No change.
SP07	SP07	Westwood	Yes	Update appraisal with changes made to the policy.
SP08	SP08	Margate	No	Update appraisal with changes made to the policy.
SP09	SP09	Ramsgate	Yes	Update appraisal with changes made to the policy.
SP10	SP10	Broadstairs	Yes	Update appraisal with changes made to the policy.
SP11	SP11	Housing Provision	Yes	Update appraisal with changes made to the policy.
SP12	N/A	Strategic Housing Site Allocations	No	Deleted.
N/A	SP12	General Housing Policy	Yes	New policy.
SP13	SP13	Strategic Housing Sites - Manston Green	Yes	Update appraisal with changes made to the policy.

Original policy number	Updated policy number	Original policy name	Is further assessment required?	Justification
SP14	SP14	Strategic Housing Sites at Birchington	Yes	Update appraisal with changes made to the policy.
SP15	SP15	Strategic Housing Sites at Westgate-on-Sea	Yes	Update appraisal with changes made to the policy.
SP16	SP16	Westwood Strategic Housing Sites	Yes	Update appraisal with changes made to the policy.
SP17	SP17	Land Fronting Nash and Haine Roads	No	Minor changes.
New Policy 01	SP18	Land at Manston Court Road/Haine Road	Yes	Policy was re-written.
SP18	SP19	Type and Size of Dwellings	No	No change.
SP19	SP20	Affordable Housing	Yes	Update appraisal with changes made to the policy.
SP20	SP21	Development in the Countryside	No	Minor changes.
SP21	SP22	Safeguarding the Identity of Thanet's Settlements	No	Minor changes.
SP22	SP23	Landscape character areas	Yes	Policy was re-written and renamed to reflect new study.
SP23	SP24	Green Infrastructure	Yes	Update appraisal with changes made to the policy.
N/A	SP26	Strategic Access Management and Monitoring Plan (SAMM)	Yes	New policy.
N/A	SP27	Biodiversity and Geodiversity Assets	Yes	New policy. Policy moved from chapter 12 GI03 and reworded
SP24	SP28	Biodiversity Opportunity Areas	Yes	Update appraisal with changes made to the policy.
SP25	SP25	Protection of European, SSSI and National Nature Reserves	Yes	Policy was re-written to only apply to International and European sites, National designations covered by GI01
SP26	SP29	Protection of Open Space	No	Minor changes.
N/A	SP30	Local Green Space	Yes	New policy.
SP27	SP31	Provision of Accessible nature and Semi Natural Green Space, Parks Gardens and Recreation Grounds	Yes	Update appraisal with changes made to the policy.
N/A	SP32	Allotments	Yes	New policy.

Original policy number	Updated policy number	Original policy name	Is further assessment required?	Justification
SP28	SP33	Quality Development	No	Minor changes.
SP29	SP34	Conservation and Enhancement of Thanet’s Historic Environment	Yes	Update appraisal with changes made to the policy.
SP30	SP35	Climate Change	Yes	Update appraisal with changes made to the policy.
SP31	SP36	Healthy and Inclusive Communities	No	Minor changes.
N/A	SP37	QEQM Hospital Margate	Yes	New policy.
N/A	SP38	Westwood Medical Centre	Yes	New policy.
SP32	SP39	Community Infrastructure	No	No Change
SP33	SP40	Expansion of Primary and Secondary Schools	No	Minor changes.
SP34	SP41	Safe and Sustainable Travel	No	No change.
SP35	SP42	Accessible Location	No	No change.
SP36	SP42	Transport Infrastructure	No	No change.
SP37	SP43	Connectivity	No	No change.
SP38		Strategic Road Network	No	No Change
New Strategic Routes Policy	SP45	Strategic Routes	No	No change.
SP39	SP44	New Rail Station	Yes	Policy was re-written.
E01	E01	Retention of existing employment sites	No	Minor changes.
E02	E02	Home working	No	No change.
E03	E03	Digital Infrastructure	No	No change.
E04	E04	Primary and Secondary Frontages	No	No change.
E05	E05	Sequential and Impact Test	No	No change.
E06	E06	District and Local Centres	No	No change.
E07	E07	Serviced Tourist Accommodation	Yes	Update appraisal with changes made to the policy.
E08	E08	Self-Catering Tourist Accommodation	No	Minor changes.
E09	E09	Protection of Existing Tourist Accommodation	No	Minor changes.
E10	E10	Major Holiday Beaches	No	No change.

Original policy number	Updated policy number	Original policy name	Is further assessment required?	Justification
E11	E11	Intermediate Beaches	No	No change.
E12	E12	Undeveloped Beaches	No	No change.
E13	E13	Language Schools	No	No change.
E14	E14	Quex Park	Yes	Update appraisal with changes made to the policy.
E15	E15	New build development for economic development purposes in the rural area	Yes	Update appraisal with changes made to the policy.
E16	E16	Conversion of rural buildings for economic development purposes	No	No change.
E17	E17	Farm Diversification	No	No change.
E18	E18	Best and Most Versatile Agricultural Land	No	No change.
E19	E19	Agricultural Related Development	No	No change.
H01	H01	Housing Development	No	Minor changes.
N/A	H02	Additional Site – Land at Manston Road/Shottendance Road, Margate	Yes	New policy, to be grouped with H03 to H09 for appraisal.
H02A	H03	Land on west side of Old Haine Road, Ramsgate	Yes	Update appraisal with changes made to the policy.
H02B	H04	Land fronting Nash Road and Manston Road	Yes	Update appraisal with changes made to the policy.
H02C	H05	Land fronting Park Lane, Birchington	Yes	Update appraisal with changes made to the policy.
H02D	H06	Land south of Brooke Avenue Garlinge	Yes	Update appraisal with changes made to the policy.
H02E	H07	Land at Haine Road and Spratling Street, Ramsgate	Yes	Update appraisal with changes made to the policy.
H02F	H08	Land south of Canterbury Road East, Ramsgate	Yes	Update appraisal with changes made to the policy as covered by new policy on Technical Standards.
H02G	H09	Land at Melbourne Avenue, Ramsgate	Yes	Update appraisal with changes made to the policy.
H03	H010	Cliftonville West and Margate central	No	No change.
H04	H011	Housing at Rural Settlements	No	Minor changes.
H04A	H012	Land at Tothill Street, Minster	No	No change.

Original policy number	Updated policy number	Original policy name	Is further assessment required?	Justification
H04B	H013	Land at Manor Road, St Nicholas at Wade	No	No change.
H04C	H014	Land at 71-75 Monkton Street, Monkton	No	No change.
H04D	H015	Land at Walter’s Hall Farm, Monkton	No	No change.
H04E	H016	Land south side of A253, Cliffsend	No	No change.
H04F	H017	Land north of Cottington Road, Cliffsend	No	No change.
H04G	H018	Land south side of Cottington Road, Cliffsend	No	No change.
H05	H019	Rural Housing Need	No	Minor changes.
H06	H020	New agricultural dwellings	No	Minor changes.
H07	H021	Care and Supported Housing	No	No change.
H08	N/A	Accessible Homes	No	Deleted
H09	H023	Non self-contained residential accommodation	No	No change.
H10	H024	Accommodation for Gypsy and Travelling Communities	No	No change.
H11	H025	Residential use of empty property	No	No change.
H12	H026	Retention of existing housing stock	No	Minor changes.
N/A	H026	Ancillary accommodation for a family member	Yes	New policy.
N/A	GI01	Protection of Nationally Designated Sites (SSSI) and Marine Conservation Zones (MCZ)	Yes	New policy.
GI01	GI02	Locally Designated Wildlife Sites	No	No change.
GI02	GI03	Regionally Important Geological Sites (RIGS)	No	No change.
GI03	N/A	Protected Species and other significant species	No	Included in Policy SP27 Biodiversity and Geodiversity Assets.
GI04	GI04	Amenity Green Space and Equipped Play Areas	No	No change.
GI05	GI05	Protection of Playing Fields and Outdoor Sports Facilities	Yes	Update appraisal with changes made to the policy.

Original policy number	Updated policy number	Original policy name	Is further assessment required?	Justification
GI06	GI06	Landscape and Green Infrastructure	Yes	Update appraisal with changes made to the policy.
GI07	GI07	Jackey Bakers	No	No change.
QD01	QD02	General Design Principles	Yes	Update appraisal with changes made to the policy.
QD02	QD03	Living Conditions	No	No change.
N/A	QD04	Technical Standards	Yes	New policy.
N/A	QD05	Accessible and Adaptable Accommodation	Yes	New policy.
QD03	QD06	Advertisements	No	No change.
QD04	QD07	Telecommunications	No	No change.
HE01	HE01	Archaeology	No	No change.
HE02	HE02	Development in Conservation Areas	No	No change.
HE03	HE03	Local Heritage Assets	Yes	Update appraisal with changes made to the policy.
HE04	HE04	Historic Parks and Gardens	No	No change.
HE05	HE05	Works to a heritage asset to address climate change	No	No change.
CC01	CC01	Fluvial and Tidal Flooding	No	Minor changes.
CC02	CC02	Surface Water Management	Yes	Update appraisal with changes made to the policy.
CC03	CC03	Coastal Development	Yes	Update appraisal with changes made to the policy.
CC04	QD01	Sustainable Design	Yes	Policy was re-written. Previously CC04, rewritten in line with latest government guidance and best practice
CC05	CC04	Renewable energy installations	Yes	Policy was re-written.
CC06	CC05	District Heating	No	No change.
C07	CC06	Solar Parks	No	No change.
CC08	CC07	Richborough	No	Minor changes.
SE01	SE01	Potentially Polluting Development	Yes	Update appraisal with changes made to the policy.
SE02	SE02	Landfill Sites and Unstable Land	No	No change.
SE03	SE03	Contaminated Land	No	Minor change.
SE04	SE04	Ground Water Protection	No	No change.

Original policy number	Updated policy number	Original policy name	Is further assessment required?	Justification
SE05	SE05	Air Quality	Yes	Update appraisal with changes made to the policy.
SE06	SE06	Noise Pollution	No	No change.
SE07	SE07	Noise Action Plan Important Areas	No	No change.
SE08	N/A	Aircraft Noise	No	Deleted.
SE09	N/A	Aircraft Noise and Residential Development	No	Deleted.
SE10	SE08	Light Pollution	Yes	Update appraisal with changes made to the policy.
CM01	CM01	Provision of New Community Facilities	Yes	Update appraisal with changes made to the policy.
CM02	CM02	Protection of Existing Community Facilities	No	Minor change.
CM03	CM03	Expansion of Margate Cemetery	No	Minor changes.
CM04	CM04	Expansion of Minster Cemetery	No	Minor changes.
TP01	TP01	Transport assessments and Travel Plans	No	No change.
TP02	TP02	Walking	No	No change.
TP03	TP03	Cycling	No	No change.
TP04	TP04	Public Transport	No	No change.
TP05	TP05	Coach Parking	No	Minor changes.
TP06	TP06	Car Parking	No	Minor changes.
TP07	TP07	Town Centre Public Car Parks	No	No change.
TP08	TP08	Freight and Service delivery	No	No change.
TP09	TP09	Car parking provision and Westwood	No	Minor changes.
TP10	TP10	Traffic Management	No	No change.

5.2 Updated policies

Based on the information provided in Table 9, Table 10 below highlights all policies that are included within this update. Detailed appraisal matrices for each policy are included in Appendix B.

Table 10: Policies appraised as part of the SA update

Original policy number	Updated policy number	Original policy name
SP02	SP02	Economic Growth
SP03	SP03	Land Allocated for Economic Development
SP05	SP05	Manston Airport
SP07	SP07	Westwood
SP08	SP08	Margate
SP09	SP09	Ramsgate
SP10	SP10	Broadstairs
SP11	SP11	Housing Provision
N/A	SP12	General Housing Policy
SP13	SP13	Strategic Housing Sites - Manston Green
SP14	SP14	Strategic Housing Sites at Birchington
SP15	SP15	Strategic Housing Sites at Westgate-on-Sea
SP16	SP16	Westwood Strategic Housing Sites
New Policy 01	SP18	Land at Manston Court Road/Haine Road
SP19	SP20	Affordable Housing
SP22	SP23	Protection and Enhancement of Thanet’s Historic Landscape
SP23	SP24	Green Infrastructure
N/A	SP26	Strategic Access Management and Monitoring Plan (SAMM)
N/A	SP27	Biodiversity and Geodiversity Assets
SP24	SP28	Biodiversity Enhancements
SP25	SP25	Protection of European, SSSI and National Nature Reserves
N/A	SP30	Local Green Space
SP27	SP31	Provision of Accessible nature and Semi Natural Green Space, Parks Gardens and Recreation Grounds
N/A	SP32	Allotments
SP29	SP34	Conservation and Enhancement of Thanet’s Historic Environment
SP30	SP35	Climate Change
N/A	SP37	QEQM Hospital Margate
N/A	SP38	Name? (Westwood Medical Centre)
SP39	SP44	New Rail Station
E07	E07	Serviced Tourist Accommodation
E14	E14	Quex Park
E15	E15	New build development for economic development purposes in the rural area

Original policy number	Updated policy number	Original policy name
N/A	H02	Additional Site – Land at Manston Road/Shottendance Road, Margate
H02A	H03	Land on west side of Old Haine Road, Ramsgate
H02B	H04	Land fronting Nash Road and Manston Road
H02C	H05	Land fronting Park Lane, Birchington
H02D	H06	Land south of Brooke Avenue Garlinge
H02E	H07	Land at Haine Road and Spratling Street, Ramsgate
H02F	H08	Land south of Canterbury Road East, Ramsgate
H02G	H09	Land at Melbourne Avenue, Ramsgate
N/A	H027	Ancillary accommodation for a family member
N/A	GI01	Protection of Nationally Designated Sites (SSSI) and Marine Conservation Zones (MCZ)
GI05	GI05	Protection of Playing Fields and Outdoor Sports Facilities
GI06	GI06	Landscape and Green Infrastructure
QD01	QD02	General Design Principles
N/A	QD04	Technical Standards
N/A	QD05	Accessible and Adaptable Accommodation
HE03	HE03	Local Heritage Assets
CC02	CC02	Surface Water Management
CC03	CC03	Coastal Development
CC04	QD01	Sustainable Design
CC05	CC04	Renewable energy installations
SE01	SE01	Potentially Polluting Development
SE05	SE05	Air Quality
SE10	SE08	Light Pollution
CM01	CM01	Provision of New Community Facilities

5.3 Policy appraisal update

The policies screened in for re-appraisal (listed in section 5.2) were appraised using the same methodology used for previous iterations of the SA (see Appendix A). Summaries of these appraisals are provide below.

Policy SP02 – Economic Growth
The proposed policy has no significant negative effects and provides a number of opportunities yield of 5,000 jobs. Notwithstanding the above comments, any potential negative significant effects could be mitigated, either by other Local Plan policies and the site allocation assessment process. With regards to the HRA implications there are no likely significant effects. However, the policy could be

strengthened to provide provision to environmental protection with regards to supporting new developments.

Policy SP03 – Land allocated for Economic Development
The proposed policy is predicted as having the potential to result in a significant positive effect, particularly in relation to job creation and supporting economic growth and this is the main differentiator between the options. Minor negative effects could be attributed to the proposed policy, however these and the uncertain effects can be mitigated by development management policies and the site-specific assessment of effects that will be required for the allocations. One area where the no policy option performed better was in terms of its potential to have indirect benefits for housing by potentially allowing a greater area of land for housing and other types of development. With regards to the HRA there are no likely significant effects.

Policy SP05 – Manston Airport
The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District’s housing supply and improvements to community facilities, such as the provision of a new primary school. There is also potential for additional community facilities improvements, depending on further studies to be undertaken during design that will state any additional requirements as a result of development. The effects on with respect to the landscape are likely to be lesser for the development on brownfiled land, when compared to development of greenfield land. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. The site is well connected, with the policy requiring numerous efforts to link with and improve the public transport links, particularly with the major centres of Margate, Broadstairs, Ramsgate and Westwood. The outcome of the HRA has not considered this policy though this will be addressed in due course.

Policy SP07 – Westwood
The proposed policy has potential to have positive and negative effects depending on the location of development and its relationship with the receiving environment. The proposed policy would primarily deliver these benefits at the Town Centres. Where potentially adverse effects have been predicted it is anticipated that they can be mitigated either by ensuring that development management policies are provided that counter or avoid adverse effects and/or by meeting the requirements of the NPPF. With regards to the HRA there are no likely significant effects.

Policy SP08 – Margate
A no policy option would largely yield neutral impacts as there would not be a change in the status quo. By adopting the policy suitable development will be encouraged across Margate. Active support and promotion of developments will be seen to promote a contemporary seaside resort to help develop the area into a contemporary mixed use site. Employment opportunities will arise as will tourist and economic activity. Transport provisions will increase to ensure the viability of the location and facilities will grow that will be of benefit to both visitors and locals. As such the impacts of policy adoption are widely positive socio-economic factors, with local character and history preserved throughout. With regards to the HRA assessment, the adoption of the policy would result in development close to Thanet Coast and Sandwich Bay SPA. The implementation of the development management policies should be suitable to prevent incidental significant effects. In order to strengthen the position, this policy should cross-refer to Policy SP25 and the SPA mitigation strategy.

Policy SP09 – Ramsgate

A no policy option would largely yield neutral impacts as there would not be a change in the status quo. By adopting the policy active regeneration of the Ramsgate district will occur with the developments taking into consideration the local maritime heritage and ensuring character is preserved in order to create a contemporary mixed use site. Employment opportunities will arise as will tourist and economic activity with the creation of retail and tourism facilities. Transport provisions will increase notably by the support of the Ramsgate Maritime Policy which will seek to build upon the conflux of a major seaport, international airport and high speed rail location. As such the impacts of policy adoption are widely positive, with local character and history preserved throughout. However, it should be noted that policy adoption may be to the detriment of environmental assets and that housing opportunities are not overly supported within the policy due to the tourist and economic focus. With regards to the HRA assessment, the adoption of the policy would result in development close to Thanet Coast and Sandwich Bay SPA. The implementation of the development management policies should be suitable to prevent incidental significant effects. In order to strengthen the position, this policy should cross-refer to Policy SP25 and the SPA mitigation strategy.

Policy SP10 – Broadstairs

A no policy option would largely yield neutral impacts as there would not be a change in the status quo. By adopting the policy active regeneration of Broadstairs will occur with the developments promoting the creation of employment opportunities by enhancing the existing commercial, retail and tourist infrastructure. This will add future economic resilience to the area by increasing the attraction of investors and visitors. The active support of developments along promenade and beach front will enhance the tourist economy whilst creating employment opportunities. Similarly, by enhancing local character and exiting features a sense of place will be established that is attractive and in keeping with local history. Policy adoption undoubtedly meets the requirements of the SA objectives. With regards to the HRA assessment, the adoption of the policy would result in development close to Thanet Coast and Sandwich Bay SPA. The implementation of the development management policies should be suitable to prevent incidental significant effects. In order to strengthen the position, the policy should cross-refer to Policy SP25 and the SPA mitigation strategy.

Policy SP11 – Housing Provision

Areas of new build homes have the potential to create areas that may be perceived as being safer. This is often the case when brownfield or previously developed land is developed and brought back into active use. However, this was not factored into the assessment of the scenarios at this stage, given their strategic nature. The development of new homes will have no direct effect on the provision of public transport links. The increase in new homes will likely increase demand on public transport facilities indirectly by increasing the population of certain areas. The extent of the effect will depend on the provision of public transport facilities and the availability of public transport options for a given area. Gathering data on capacity of existing public transport facilities will be crucial in understanding the effects increased populations will have. Many of the potentially uncertain effects and adverse effects will be mitigated by other criteria and topic specific policies as well as the site assessment criteria used to assess and select site allocations. With regards to the HRA there are no likely significant effects.

Policy SP12 – General Housing Policy

The promotion of the proposed policy is beneficial in terms of the housing objective as it supports mix dwellings, accessible and affordable residential development. It also has a positive effect on the water, limiting the flood risk and reducing pollution by connecting to the existing sewerage system. However, the impact of this policy on public safety and on the character of an area is unclear has there if no information about the design.

Policy SP13 – Strategic Housing Sites - Manston Green

The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District’s housing supply and improvements to community facilities, such as the provision of a new primary school. There is also potential for additional community facilities improvements, depending on further studies to be undertaken during design that will state any additional requirements as a result of development. However, any new development of greenfield land is likely to have the potential for adverse effects against environmental objectives, particularly relating to landscape and ecology. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. Due to its location, the proposed policy advocates housing sites that do not currently connect well with existing urban settlements, though design of the sites can improve urban connectivity. The sites are served by public transport and available capacity on the highway network, which enables good links with the rest of the District, but particularly the major centres of Margate, Broadstairs, Ramsgate and Westwood. With regards to the HRA implications there are no likely significant effects on designated sites. This policy provides for masterplanning being informed by and addressing the implementation of Policy SP25 and the SPA mitigation strategy.

Policy SP14 – Strategic Housing Sites at Birchington

The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District’s housing supply and improvements to community facilities, such as the provision of a new primary school. There is also potential for additional community facilities improvements, depending on further studies to be undertaken during design that will state any additional requirements as a result of development. However, any new development of greenfield land is likely to have the potential for adverse effects against environmental objectives, particularly relating to landscape and ecology. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. The proposed policy advocates housing on a site that connects well with existing urban settlements, though design of the site can help maximise urban connectivity. The site is served by public transport, though available capacity on the highway network might be limited. The implementation of a new link road to serve the site is likely to help free up capacity, which will enable good links with the rest of the District, but particularly the major centres of Margate, Broadstairs, Ramsgate and Westwood. With regards to the HRA implications there are no likely significant effects on designated sites. This policy provides for masterplanning being informed by and addressing the implementation of Policy SP25 and the SPA mitigation strategy.

Policy SP15 – Strategic Housing Sites at Westgate-on-Sea

The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District’s housing supply and improvements to community facilities, such as the provision of a new primary school. There is also potential for additional community facilities improvements, depending on further studies to be undertaken during design that will state any additional requirements as a result of development. However, any new development of greenfield land is likely to have the potential for adverse effects against environmental objectives, particularly

<p>relating to landscape and ecology. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. The proposed policy advocates housing on a site that connects well with existing urban settlements, though design of the site can help maximise urban connectivity. The site is served by public transport, though available capacity on the highway network might be limited. The implementation of a new link road to serve the site is likely to help free up capacity, which will enable good links with the rest of the District, but particularly the major centres of Margate, Broadstairs, Ramsgate and Westwood. With regards to the HRA implications there are no likely significant effects on designated sites. This policy provides for masterplanning being informed by and addressing the implementation of Policy SP25 and the SPA mitigation strategy.</p>
<p>Policy SP16 – Westwood Strategic Housing Sites</p> <p>The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District’s housing supply and improvements to community facilities. There may be a need for a new off-site school, which would benefit from identification and implementation that aligns with a phasing programme for the site. There is also potential for additional community facilities improvements, depending on further studies to be undertaken during design that will state any additional requirements as a result of development. However, any new development of greenfield land is likely to have the potential for adverse effects against environmental objectives, particularly relating to landscape and ecology. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. The proposed policy advocates housing on a site that connects well with existing urban settlements, though design of the site can help maximise urban connectivity. The site is largely served by public transport, though available capacity on the highway network might be limited. The implementation of highway improvements to serve the site is likely to help free up capacity, which will enable good links with the rest of the District, but particularly the major centres of Margate, Broadstairs and Ramsgate. With regards to the HRA implications there are no likely significant effects on designated sites. This policy provides for masterplanning being informed by and addressing the implementation of Policy SP25 and the SPA mitigation strategy.</p>
<p>SP18 - Land at Manston Court Road/Haine Road (former policy number New Policy 01)</p> <p>The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District’s housing supply. Any new development of greenfield land is likely to have the potential for adverse effects against environmental objectives, particularly relating to landscape and ecology. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. The proposed policy advocates housing on a site that connects well with existing urban settlements, though design of the site can help maximise urban connectivity. The site is served by public transport, though available capacity on the highway network might be limited. The implementation of highway improvements is likely to help free up capacity, which will enable good links with the rest of the District, but particularly the major centres of Margate, Broadstairs, Ramsgate and Westwood. The outcome of the HRA has not considered this policy though this will be addressed in due course.</p>
<p>Policy SP20 – Affordable Housing (former policy number SP19)</p> <p>The proposed policy adheres to the SHMA recommendations to ensure that the make-up of the market and affordable housing types and sizes is accounted for. Similarly developments resulting in</p>

<p>a net loss will not be prohibited unless in exceptional circumstances. As such affordable housing provision is appropriately met through the adoption of the proposed policy. With regards to the HRA there are no likely significant effects.</p>
<p>Policy SP23 – Landscape Character Areas (former policy number SP22)</p> <p>The proposed policy is predicted as being likely to have positive effects on townscape and indirectly the role that areas of high value townscape has on the sense of place, people’s satisfaction with where they live and cultural heritage features within those areas. With regards to the HRA there are no likely significant effects.</p>
<p>Policy SP24 – Green Infrastructure (former policy number SP23)</p> <p>The proposed policy has the potential to positive impact on this objective by delivering new development that includes adequate open space, landscaping and provision of wildlife habitats. With regards to the HRA there are no likely significant effects.</p>
<p>Policy SP26 – Strategic Access Management and Monitoring Plan</p> <p>By conserving, enhancing and managing the biodiversity and geodiversity assets, this policy will have positive effects on the biodiversity, natural environment and community objectives. In the absence of this policy is it likely adverse effects would occur on the biodiversity; however the policy suggests that an ecological assessment will be required to assess the impact of a proposed development on species and habitats. With regards to the HRA there are no likely significant effects.</p>
<p>Policy SP28 – Biodiversity Opportunity Areas (former policy number SP24)</p> <p>The proposed policy seeks to preserve an environmental aspect and as such commonly yield positivity on similar objectives. The no policy option largely yields negative impacts as by removing protection or having no support there is the potential for unrestricted development action which could be to the detriment of environmentally sensitive parameters. Biodiversity enhancements are clearly supportive of all of the SA objectives they relate to. Whilst focusing on species and habitats, the effects of the proposed policy are more wide reaching and affect many other aspects of the natural environment. With regards to the HRA there are no likely significant effects.</p>
<p>Policy SP25 – Protection of International and European Designated Sites</p> <p>The proposed policy is largely a reflection of existing legislation and will yield the most substantial environmental protection and sustainability. The protection to the highest level of sites of international nature conservation importance will be especially beneficial to the natural environment and biodiversity objectives. The proposed policy will be restrictive to infrastructure and housing as protecting environmental assets will mean developments upon such lands will most likely be prohibited and thus restricted to other areas of Thanet. With regards to the HRA assessment this is this principle protective policy for which all developmental policies refer to. Whilst there are no likely significant effects the policy should refer to SP31, in addition to SP24, as the requirements in both policies instil the principle of enhancement and protection of the natural environment.</p>
<p>Policy SP30 – Local Green Space</p> <p>This policy will have positive effects on the biodiversity and the natural environment, public safety and redevelopment objectives. It will also contribute to creating vibrant communities. In the absence of this policy, it is likely the biodiversity would be impacted negatively, as development would occur in greenspaces without implementing measures to enhance or protect the greenspaces. It would also have a negative impact on the natural environment and the communities as the amount of greenspaces would become limited.</p>

<p>Policy SP31 – Provision of Accessible nature and Semi Natural Green Space, Parks Gardens and Recreation Grounds (former policy number SP27)</p> <p>The proposed policy seeks to promote an environmental aspect and as such commonly yield positivity on a number of the sustainability objectives. With regards to the HRA, The policy encourages the integration of green spaces with existing greenspace, green wedges and/or the wider countryside and public rights of way network.</p>
<p>Policy SP32 – Allotments</p> <p>This policy will have a positive effect on the community objective as it will protect the allotments, or relocate them if development needs to occur.</p>
<p>Policy SP34 – Conservation and Enhancement of Thanet’s Historic Environment (former policy number SP29)</p> <p>The proposed policy is predicted as being likely to have positive effects on townscape and indirectly the role that areas of high value townscape has on the sense of place, people’s satisfaction with where they live and cultural heritage features within those areas. There is also the added ability of the proposed policy to encourage the reuse of listed buildings to aid urban renaissance and also to enhance the protection of the historical and archaeologically important sites across Thanet. The policy will also have a positive effect on the protection of the historic environment. With regards to the HRA there are no likely significant effects.</p>
<p>Policy SP35 – Climate Change (former policy number SP30)</p> <p>Generally, the proposed policy seeks to protect assets through ensuring climate change resilience for new development. The proposed policy also ensures that the design of new development should consider the effects it can have on climate change issues by helping to reduce emissions. The policy will result in positive effects towards biodiversity. With regards to the HRA there are no likely significant effects.</p>
<p>Policy SP37 – QEQM Hospital Margate</p> <p>This policy will have positive effects on the provision of healthcare, including vulnerable groups, as it supports the extension to QEQM Hospital. It will also benefit the sustainability and transport objective as it will promote the green transport strategy. With regards to the HRA there are no likely significant effects.</p>
<p>Policy E38 –Westwood Medical Centre</p> <p>This policy will have positive effects on the provision of healthcare, including vulnerable groups, as it supports the provision of a new medical centre. With regards to the HRA there are no likely significant effects.</p>
<p>Policy SP44 – New Railway Station (former policy number SP39)</p> <p>The proposed policy is likely to result in significant beneficial effects, particularly in terms of contributing towards employment, economic growth (particularly the visitor economy) and providing infrastructure to support modal shift. However, without further details of the proposed policy it is not possible to assess whether it is likely to result in significantly greater benefits than the no policy option. Where potentially adverse or uncertain effects have been predicted mitigation measures can be used to ameliorate the effects. With regards to the HRA there are no likely significant effects.</p>
<p>Policy E07 – Serviced Tourist Accommodation</p>

<p>The proposed policy is likely to have a significant effect on job creation and economic growth in the tourist and visitor economy. Both the proposed policy and the no policy option are likely to have uncertain effects. This is particularly because the options do not identify in any detail where development is likely to occur. This uncertainty can be addressed during the assessment of specific site allocations. All of the other remaining negative and uncertain effects associated with the proposed policy and no policy option can potentially be mitigated either by development management policies or the NPPF requirements. With regards to the HRA there are no likely significant effects.</p>
<p>Policy E14 – Quex Park</p> <p>The proposed policy and no policy option commonly reflected one another in that the impacts were the same either as the future development specifics were unknown or that national legislation that already exists ensured that the objective would be met under either option. However under policy adoption it would be ensured that a local heritage and cultural asset would be preserved with the opportunity to increase local employment and helping develop a tourist industry within Thanet. The safeguarding of Quex Park in such a way would yield significant economic benefits which may not be attained under a no policy option as it would not be known if the facility would be retained and developed or not; under this option. With regards to the HRA there are no likely significant effects.</p>
<p>Policy E15 – New build development for economic development purposes in the rural area</p> <p>Both the proposed policy and no policy option have positive and negative effects. However, the proposed policy is more likely to result in neutral and beneficial effects than the no policy option because it would allow Thanet to gain the benefits from rural economic development, whilst avoiding many of the potential downsides (e.g. traffic impact, visual and landscape effects and adverse effects on nature conservation). All of the negative and uncertain effects associated with the proposed policy can potentially be mitigated either by development management policies or the NPPF requirements. However it may not be possible to enhance the effects of the no policy option because it has been included to reflect the sustainability issues of a ‘policy void’. With regards to the HRA there are no likely significant effects.</p>
<p>Policy H02 – Additional Site – Land at Manston Road/Shottendance Road, Margate</p> <p>Policy H03 – Land on west side of Old Haine Road, Ramsgate (former policy number H02A)</p> <p>Policy H04 – Land fronting Nash Road and Manston Road (former policy number H02B)</p> <p>Policy H05 – Land fronting Park Lane, Birchington (former policy number H02C)</p> <p>Policy H06 – Land south of Brooke Avenue Garlinge (former policy number H02D)</p> <p>Policy H07 – land at Haine Road and Spratling Street, Ramsgate (former policy number H02E)</p> <p>Policy H08 – Land south of Canterbury Road East, Ramsgate (former policy number H02F)</p> <p>Policy H09 - Land at Melbourne Avenue, Ramsgate (former policy number H02G)</p> <p>Under policy adoption there are specific requirements that developments must undertake in order to be granted permission. One concerns the management of natural conservation sites and infrastructure provisions. The policy states that developments must not conflict with another policy,</p>

resultantly all SA objectives are positively met as alternative polices all provide positive impacts to the objectives. A no policy option would largely yield neutral impacts as there would not be a change in the status quo. With regards to the HRA, polices H02, H05 and H09 need to include a cross-reference to Policy SP25 and the SPA mitigation strategy, demonstrating how these are being met in order to protect European sites from recreational space.
Policy H026 – Ancillary accommodation for a family member This proposed policy would benefit objectives relating to healthcare services and vulnerable groups. Whilst it does not directly increase access to facilities or services, it allows more vulnerable groups to live close to relatives but maintain some degree of independence.
Policy GI01 – Protection of Nationally Designated Sites (SSSI) and Marine Conservation Zones (MCZ) Adoption of the GI01 policy would undoubtedly enhance the conservation, protection, and enhancement of the designated sites of ecological and geological value (SSSI’s, MCZ’s, and NNR’s); and benefit protected, rare and scarce species. It is unclear whether the absence of the policy would significantly impact upon the area or not due to existing legislation; however, the implementation of the policy will reinforce the need for sustainable development and ecological conservation. The strategy, where harmoniously and interactively integrated with the human population, will also seek to enhance the vibrancy of the community. There are many positive impacts for the HRA and these should be considered in policy planning. With regards to the HRA there are no likely significant effects.
Policy GI05 – Protection of Playing Fields and Outdoor Sports Facilities Adoption of the proposed policy would be beneficial as it could help provide social benefits through preserving recreational facilities. Similarly the policy could preserve the associated health benefits of active recreation on the protected areas by encouraging and preserving exercise spaces. A no policy option would not actively support the aims of several objectives regularly yielding neutral impacts in comparison to the significant social benefits of the proposed policy.
Policy GI06 – Landscape and Green Infrastructure The proposed policy has the potential to positive impact on this objective by delivering new development that includes adequate open space, landscaping and provision of wildlife habitats. It will also contribute in retaining historic features.
Policy QD02 – General Design Principles (former policy number QD01) Overall the proposed policy does not affect many of the SA objectives. The policy will most likely result in permanent direct positive effects. The policy may negatively impact the residents of new accommodation developments by setting limits on their water usage. However, the internal space minimum may increase the standards of residential accommodation. The proposed policy will most likely reduce water consumption in the area and increase the sustainability of water supplies. With regards to the HRA there are no likely significant effects.
Policy QD05 – Accessible and Adaptable Accommodation Overall the proposed policy does not affect many of the SA objectives. The policy will most likely result in positive effects to residents and developers, as adaptable and accessible accommodation will provide for all demographics. The policy is mostly relevant in the long term, as the aspiration is to be a sustainable housing initiative. If the policy is not introduced, significant negative effects may

occur. Including developments which are not fit for purpose and wheelchair users without accommodation. With regards to the HRA there are no likely significant effects.
Policy HE03 – Local Heritage Assets The proposed policy will have direct and indirect effects on the character and sense of place of settlements, help to support the economy and visitor economy in particularly as visitor attractions in their own right and contribute to character of townscape. Only one significant beneficial effect was predicted on SA objective 13. Adoption of the proposed policy should be promoted as not only would it be beneficial to SA objective 13, but a succinct fully rounded heritage protection would benefit all objectives. The effects of the no policy option are uncertain because without specific policies in the Local Plan, it is not certain to what extent the NPPF on its own would protect heritage assets, whilst future developments are not yet known which could be either positive or negative in relation to many of the objectives. With regards to the HRA there are no likely significant effects.
Policy CC02 – Surface Water Management Overall the proposed policy does not affect many of the SA objectives. The proposed policy could result in the restriction of housing developments by introducing measures to combat climate change or flood risk through the implementation of sustainable drainage systems, though the positives are likely to outweigh any inhibiting of house building. However, the proposed policy will aid flood mitigation efforts but potentially at the expense of local archaeological and architectural integrity. The effects of the no policy option are negative as this would place various existing and future land uses at risk from inappropriate development. With regards to the HRA there are no likely significant effects. Approval for the design and long term maintenance of SuDS will be required prior to development being permitted.
Policy CC03 – Coastal Development Overall the proposed policy does not affect many of the SA objectives. The proposed policy could result in the restriction of housing developments by introducing measures to combat climate change, flood risk and coastal erosion through the implementation of restrictive criteria for new developments. The effects of the no policy option are negative as this would place various existing and future land uses at risk from inappropriate development within coastal areas, particularly within 40m of the coastline or cliff top. The policy will contribute positively to the coastal biodiversity. With regards to the HRA, the policy should be strengthened to include potential effects on European protected sites as a specific criteria requiring consideration. For example, stating coastal development will not adversely affect the interest features of any designated nature conservation sites.
Policy QD01 – Sustainable Design Overall the proposed policy does not affect a significant proportion of the SA objectives. The policy could result in the restriction on new buildings and housing developments by introducing measures to re-use existing buildings and designing buildings for a wide-range of possible uses. However, the proposed minimised land-use could allow for a greater number of developments and investment to be supplied to the area. The proposed policy will most likely reduce the energy consumption and related pollutants in the area and reduce strain on transport systems by the design of cycling and walking opportunities. With regards to the HRA there are no likely significant effects.
Policy CC04 – Renewable energy (former policy number CC05) The proposed policy explicitly states a presumption in favour of renewable technologies within developments, assuming that there are no detrimental impacts, including visual effects, natural

environment and biodiversity, and historic environment. This supports a range of the sustainability objectives. The no policy option will have a largely neutral effect, though could have significant adverse effects associated with the continued use of fossil fuels. With regards to the HRA there are no likely significant effects.
Policy SE01 – Potentially Polluting Development The proposed policy result in beneficial effects because it would allow the District to control polluting development through the planning system. The policy will be beneficial in terms of improving air quality and the quality of water resources, as well as benefits for biodiversity and significant heritage assets. The no policy option performs negatively against the objectives as it provides no such control. With regards to the HRA there are no likely significant effects.
Policy SE05 – Air Quality The proposed policy is more likely to result in beneficial effects than the no policy option because, by the use of criteria, it would allow the District to control polluting development through the planning system. The proposed policy would contribute towards promoting more sustainable, low emission forms of transport as well as providing beneficial effects in relation to both air quality and biodiversity. With regards to the HRA there are no likely significant effects.
Policy SE08 – Light Pollution (former policy number SE10) The policy supports objectives to conserve the character of the areas townscape and landscape as well as biodiversity and heritage assets by minimising the potential impacts of light spillage and pollution. Minimising light pollution will also contribute in conserving energy. A no policy option could lead to negative effects with respect to townscape and biodiversity.
Policy CM01 – Provision of New Community Facilities The proposed policy supports objectives to maintain and enhance existing key facilities and services, especially local services such as those in rural areas. By protecting, and allowing for enhancement of such facilities it ensures that they are still available for the most vulnerable members of society. It also promotes more sustainable modes of travel by ensuring services are available at local level and can be accessed by cycling and walking, rather than reliance on private motor vehicles. Conversely, the no policy option is likely to perform adversely against these aspects. With regards to the HRA there are no likely significant effects.

Appendix A

SA Framework

A1 Extract from Revised Preferred Options SA (December 2016) – the SA Framework

8 Thanet Local Plan Sustainability Framework

8.1 Sustainable development

A key objective of the SEA Directive is to integrate the principles of sustainable development into the plan making process. The combined SA and SEA process does this by integrating economic, social and environmental considerations into the decision making process along with other evidence.

In order to understand this, it is necessary to define ‘sustainable development’ in the context of spatial planning. There are numerous definitions describing the concept of sustainable development. The most commonly cited definition of sustainable development is: ‘*Development which meets the needs of the present without compromising the ability of future generations to meet their own needs*’ (Bruntland Commission, 1987)

8.2 Objectives and Decision Making Criteria (DMC)

8.2.1 Development

There were a number of key starting points for developing SA Objectives and DMC. These are outlined below:

8.2.1.1 Sustainability Objectives SEA Requirements

It is essential that the SA Framework includes the topics required by the SEA Directive. These are:

‘the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.’ EU Directive 2001/42/EC (Annex 1)

Table 12. The full SA objectives, indicators and supporting DMC and indicators are given in Appendix D. Following on from the assessment of issues and options, it was suggested that SA objectives 5 and 16 should be amalgamated in to one objective as they both covered the same topic sustainable public transport. As a result, objective 5 was removed, thus reducing the total number of SA objectives to 23.

The SA objectives have been grouped against the themes of economy, social and environment, to tie in with SA policy. Each objective has been numbered to assist with cross referencing. The derived objectives are set out below in the following sections.

8.2.3 Social

1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need;

8.2.1.2 UK Sustainable Development Objectives

The UK Government recognises five objectives for Sustainable Development as part of its Sustainable Development Strategy ‘Securing the Future’ (2005). Furthermore the NPPF sets out overarching principles and guidance by which the planning system can contribute to sustainability and prescribes a ‘presumption in favour of sustainable development’ The SA Framework should support and incorporate these objectives and principles

8.2.1.3 Established Objectives and Locally Relevant Issues and Parameters

The 2009 SA Scoping Report included an exercise to identify the key themes referred to within the Community Strategy and compare these against the proposed SA Objectives. In addition to the Community Strategy, the key objectives of the Integrated Regional Framework (IRF) for South East England and objectives of the Regional Spatial Strategy (RSS) were also identified and compared against the proposed SA Objectives.

Since 2009 changes to the planning system and introduction of the NPPF and Localism Act 2011 has led revocation and redundancy of the RSS and IRF. To mirror this change, SA framework objectives developed in 2009 have been reviewed and comparison made with NPPF principles to ensure alignment. This is summarised in Table 12.

8.2.2 Proposed SA Objectives and DMC

The SA Objectives are listed in

2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society;
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment;
4. To increase public safety and reduce crime and fear of crime;
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards;
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.

8.2.4 Economic

7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment;

8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas;
9. To protect and enhance the areas natural, semi-natural environments and street scene to support the tourist economy and quality of life;
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance;
11. To ensure that a sustainable pattern of development is pursued.

8.2.5 Environmental

12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings;
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards;
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles;
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air;
17. To reduce waste generation and disposal and achieve the sustainable management of waste;
18. To ensure development within the District responds to the challenges associated with climate change;
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF;
20. To conserve and enhance biodiversity;
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites;
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products;
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.

While it is acknowledged that some objectives could fit in a number of themes, it is not considered to be a barrier to the effective delivery of the appraisal process due to the following:

- The impact on each of the SA Objectives is assessed individually, and the appraisal also considers the impact on all the SA Objectives as a whole rather than by theme; and
- It must be recognised that the themes and SA Objectives are inextricably interlinked, contributing and impacting on each other.

It was important to consider the links between the SA Objectives when completing the appraisal. The links between the SA Objectives and other plan objectives are included in Table 12.

Table 12: SA Objectives Cross Referenced Against NPPF Objectives.

Objective Number / Thanet District SA Objective	NPPF Objectives
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	<p><i>NPPF – Headline principle</i></p> <p>Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.</p> <p><i>NPPF - Delivering a wide choice of high quality homes</i></p> <p>To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:</p> <ul style="list-style-type: none">• Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);• Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and• Where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	<p><i>NPPF – Headline principle</i></p> <p>Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.</p>
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	<p><i>NPPF – Headline principle</i></p> <p>Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.</p> <p><i>NPPF – Promoting sustainable transport</i></p> <p>Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p> <p><i>NPPF – Promoting healthy communities</i></p> <p>The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:</p> <ul style="list-style-type: none">• Give great weight to the need to create, expand or alter schools; and• Work with schools promoters to identify and resolve key planning issues before applications are submitted.
4. To increase public safety and reduce crime and fear of crime.	<p><i>NPPF – Requiring good design/Promoting healthy communities</i></p> <p>Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.</p>
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	<p><i>NPPF – Headline principle</i></p> <p>Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.</p>

Objective Number / Thanet District SA Objective	NPPF Objectives
6. To create a vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued	<p><i>NPPF – Headline principle</i></p> <p>Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.</p> <p><i>NPPF – Headline principle</i></p> <p>Not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives.</p> <p><i>(NPPF – Headline principle)</i></p> <p>Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.</p>
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	<p><i>NPPF – Local Plans</i></p> <p>Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:</p> <ul style="list-style-type: none">• jobs needed in the area; <p><i>NPPF – Building a strong, competitive economy</i></p> <p>In drawing up Local Plans, local planning authorities should:</p> <ul style="list-style-type: none">• Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth?
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	<p><i>NPPF – Headline principle</i></p> <p>Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities</p>
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	<p><i>NPPF – Headline principle</i></p> <p>Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.</p>
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	<p><i>NPPF – Headline principle</i></p> <p>Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.</p>
11. To ensure that a sustainable pattern of development is pursued.	<p><i>NPPF – Headline principle</i></p> <p>Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.</p>
12. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	<p><i>NPPF – Headline principle</i></p> <p>Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework.</p>
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	<p><i>NPPF – Headline principle</i></p> <p>Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.</p>

Objective Number / Thanet District SA Objective	NPPF Objectives
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	<p><i>NPPF – Conserving and enhancing the natural environment</i></p> <p>Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.</p>
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	<p><i>NPPF – Headline principle</i></p> <p>Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.</p>
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	<p><i>NPPF – Promoting sustainable transport</i></p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to</p> <ul style="list-style-type: none">• accommodate the efficient delivery of goods and supplies;• give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;• create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;• incorporate facilities for charging plug-in and other ultra-low emission vehicles; and• consider the needs of people with disabilities by all modes of transport.
17. To reduce waste generation and disposal and achieve the sustainable management of waste	<p><i>NPPF – Headline principle</i></p> <p>Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy).</p> <p><i>NPPF – Facilitating the sustainable use of minerals</i></p> <p>So far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously.</p>
18. To ensure development within the District responds to the challenges associated with climate change.	<p><i>NPPF – Headline principle</i></p> <p>Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy).</p>
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	<p><i>NPPF – Headline principle</i></p> <p>Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy).</p>
20. To conserve and enhance biodiversity.	<p><i>NPPF – Headline principle</i></p> <p>Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework.</p> <p><i>NPPF – Protecting Green Belt Land</i></p>

Objective Number / Thanet District SA Objective	NPPF Objectives
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites	<p>Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.</p> <p><i>NPPF – Conserving and enhancing the natural environment</i></p> <p>The planning system should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none">• Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; and• Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	<p>To reduce the global, social and environmental impact of consumption of resources by using sustainability produced and local products (objective 16)</p> <p>(NPPF – Headline principle)</p> <p>Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy).</p> <p>(NPPF – Facilitating the sustainable use of minerals)</p> <p>So far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously.</p>
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	<p><i>NPPF – Headline principle</i></p> <p>Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy).</p> <p>NPPF - Meeting the challenge of climate change, flooding and coastal change</p> <p>To support the move to a low carbon future, local planning authorities should:</p> <ul style="list-style-type: none">• Plan for new development in locations and ways which reduce greenhouse gas emissions;• Actively support energy efficiency improvements to existing buildings; and• When setting any local requirement for a building’s sustainability, do so in a way consistent with the Government’s zero carbon buildings policy and adopt nationally described standards.

8.3 Assessing the Local Plan

The SA Framework outlined above was the criteria used to assess the likely significant effects of the Local Plan options. A description of the potential impacts has been included and the significance of the effect determined, taking into account the magnitude of the impact and the sensitivity of the feature or receptor concerned. Where a significant effect was predicted, measures to mitigate the effects have

Table 13: Significance Criteria for Policy Option Review.

Significance of effect		Description of effect
++	Significant Positive	Likely to benefit a large area of the District and wider area and beyond or a large number of people and receptors. The effects are likely to be direct and permanent and the magnitude will be major
+	Minor Positive	The extent of predicted beneficial effects is likely to be limited to small areas within the District or small groups of people and receptors. The effects can be direct or indirect, temporary or reversible. The magnitude of the predicted effects will be minor.
0	Neutral	Neutral effects are predicted where the option being assessed is unlikely to alter the present or future baseline situation.
-	Minor Negative	Minor negative effects are likely to be limited to small areas within the district, or limited to small groups of people and receptors and or those with low sensitivity to change. The effects can be direct or indirect, temporary or reversible. The importance of the receptor that is effect is likely to be minor as is the magnitude of the predicted effect.
--	Significant Negative	Likely to affect the whole, or large areas of Thanet or the wider district area. Also applies to effects on nationally or internationally important assets. The effects are likely to be direct, irreversible and permanent and or those with high sensitivity to change. The magnitude of the predicted effects will also be major.
?	Unknown	This significance criterion is applied to effects where there is insufficient information to make a robust assessment. It is also applied to the assessment of options that can have both positive and negative effects and it is not clear whether the positive or negative effects outweigh each other.
N/A	Not Applicable	This is applied to objectives that are clearly not affected by the option or policy being assessed.

Where there is an effect could have a positive or negative effect, but the magnitude is uncertain a combination of symbols will be used (e.g. - / ? signifies a potential minor adverse effect with a significant level of uncertainty associated with the predicted effect). The full results from the assessment can be seen Appendix E.

The Local Plan that is the focus of this SA consists of overarching policies and site specific allocations for housing provision. For the housing and employment land allocations the SA objectives and assessment supporting questions do not independently provide the basis for a robust comparative SA of different sites. For this reason the criteria developed for the assessment and selection of housing sites have been reviewed and compared to the SA objectives, as previously detailed. This review highlighted how the site selection criteria relates to the SA. This review was then used to help undertake the appraisal of site allocations, using the SA framework. The site selection criteria can be found in Appendices A1 and A2.

been identified so that the potentially significant effects can be avoided or the magnitude of the impact reduced, to a level where there would no longer be a significant effect.

In order to correctly code the policy effects, the following table was utilised. The following significance criteria have been developed to assess the effects of the plan options. Significant effects are those as defined in the SEA Directive as illustrated below.

Having undertaken the SA of the site allocations preferred site allocations were selected. To address potentially significant adverse effects this process has resulted in the inclusion of additional policies in the draft plan to ensure that these are mitigated (these are covered by polices regarding infrastructure, school, facilities and access to local amenities and services).

The following sections of the SA Report describe the results from this assessment in more detail. However, in some instances the detailed appraisal results have been included as appendices to this document due to their size and the number of policy area/options that have had to be assessed.

Appendix F illustrates where the proposed SA objectives overlap and meet the demands of the Strategic Priorities of Thanet District Council. The information also discloses if the Objective would have a neutral or potentially negative influence upon the Strategic Priorities. The information was constructed in order to ensure that the Policies proposed met the requirements of the priority areas that were initially outlined. It can be seen that at least one objective positively meets the demands of the strategic priorities thus showing that the proposed SA Objectives have applicability for aiding to guide the Districts vision for sustainable development.

Appendix B

Policy Appraisal Updates

B1 Policy Appraisal Matrices

Policy 1: Policy SP02 – Economic Growth

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. and 2	N/A		N/A	N/A
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Permanent. Indirect. ST/LT + Growth in the employment sites and the associated job opportunities could indirectly contribute towards improving the educational attainment of the working age population by creating demand for an appropriately qualified and skilled workforce.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
4. To increase public safety and reduce crime and fear of crime.	Permanent. Indirect. ST/LT + /? Growth in the job opportunities and the overall growth in the economy will help to contribute towards reducing deprivation by increase employment opportunities. Indirectly this could help to reduce levels of crime. However, any links are remote hence the predicted impact is minor and uncertain.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
5. and 6	N/A		N/A	N/A.
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Direct. /LT ++ By targeting areas that the Economic Strategy have highlighted as having potential for growth it is likely that the proposed policy would deliver a greater number of job opportunities than the current situation and would have benefits for the district as a whole. Therefore a significant positive effect is predicted.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Indirect. LT + The proposed policy is strategic rather than spatial therefore they do not direct employment growth to areas of deprivation. However, by setting a target for growth the Local Plan has an opportunity to influence this growth.	Neutral. 0 A no policy option would not alter the status quo.	There are no likely significant effects on providing sustainable development of the proposed economic growth. However, the policy could provide for greater environmental protection.	Consideration should be given to amending this policy so as to state development is supported where it enhances the natural environment.
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. LT + + A significant effect is predicted because the proposed policy directly targets the tourism and visitor sector economies.	Neutral. 0 A no policy option would not alter the status quo.	There are no likely significant effects on the natural, semi-natural and street scene. However, the policy could provide for greater environmental protection.	Consideration should be given to amending this policy so as to state development is supported where it enhances the natural environment.
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on which sites are developed. However, because the proposed policy is spatial the significance of the effects cannot be predicted.	Neutral. 0 A no policy option would not alter the status quo.	There are no likely significant effects on the land use. However, the policy could provide for greater environmental protection.	Consideration should be given to amending this policy so as to state development is supported where it enhances the natural environment.
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT ?	Neutral. 0 A no policy option would not alter the status quo.	There are no likely significant effects on the sustainable pattern of development.	Consideration should be given to amending this policy so as to state

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	The proposed policy has the potential to have both a positive and negative effect depending on how development occurs. However, because the proposed policy is spatial the significance of the effects cannot be predicted.		However, the policy could provide for greater environmental protection.	development is supported where it enhances the natural environment.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on how development occurs. However, because the proposed policy is not spatial the significance of the effects cannot be predicted.	Neutral. 0 A no policy option would not alter the status quo.	There are no likely significant effects on character and quality of the area's landscape and townscape. However, the policy could provide for greater environmental protection.	The quality of design and how future development takes account of character, townscape and the countryside may also be mitigated by other policies. In addition consideration should be given to amending this policy so as to state development is supported where it enhances the natural environment.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on how development occurs. However, because the proposed policy is not spatial the significance of the effects cannot be predicted.	Neutral. 0 A no policy option would not alter the status quo.	NA	How future development respects and integrates with heritage and archaeological features may also be mitigated by other issues and policies.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on how development occurs. However, because the proposed policy is not spatial the significance of the effects cannot be predicted.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on which sites are developed. However, because none of the options are spatial the significance of the effects cannot be predicted.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on how development occurs. However, because the proposed policy is not spatial the significance of the effects cannot be predicted.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
17. To reduce waste generation and disposal and achieve the sustainable management of waste	Permanent. Indirect. ST/LT ? A growth in the number of businesses within the district is likely to generate greater volumes of waste, which might not be diverted from landfill. It is also likely to increase the total quantity of waste arising and requiring treatment and/or disposal. These adverse effects could be offset by a growth in the green economy, particularly if this includes businesses that help to divert waste from landfill and might result in overall beneficial effect. Hence an uncertain effect is predicted.	Neutral. 0 A no policy option would not alter the status quo.	NA	Significant adverse effects can be mitigated through wider waste management policy at the national and county scales (e.g. EU Landfill Directive targets, the Government Review of Waste Policy in England 2011 and Kent County Council's Mineral and Waste Plan) which will include new Energy from Waste facilities and the increased diversion of material from landfill.
18. To ensure development within the District responds to the	Permanent. Direct, Indirect. ST/LT ?	Neutral. 0 A no policy option would not alter the status quo.	NA	The uncertainties is addressed by other policies in the Local Plan (e.g. development management policies)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
challenges associated with climate change.	The proposed policy could result in positive effects by directly reducing greenhouse gas emissions e.g. helping existing business and properties to reduce emissions and/or indirectly contributing to reducing emissions by supporting businesses that support the green industry and renewables sectors (e.g. wind turbine OEMs). However the potential benefits of this option may be outweighed by the overall increase in employment land.			setting out how new development should be designed and contribute towards reducing GHG emissions).
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on how development occurs. However, because the proposed policy is not spatial the significance of the effects cannot be predicted.	Neutral. 0 A no policy option would not alter the status quo.	There are no likely significant effects on the developmental control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk. However, the policy could provide for greater environmental protection.	Consideration should be given to amending this policy so as to state development is supported where it enhances the natural environment.
20. To conserve and enhance biodiversity.	Permanent. Indirect. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on development occurs. The policy suggests that development should enhance the rural economy subject to protecting natural environments. This could contribute to protecting the biodiversity, however it is unclear how this would be achieved.	Neutral. 0 A no policy option would not alter the status quo.	There are no likely significant effects on the biodiversity. However, the policy could provide for greater environmental protection.	Consideration should be given to amending this policy so as to state development is supported where it enhances the natural environment.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on development occurs. However, because none of the options are spatial the significance of the effects cannot be predicted.	Neutral. 0 A no policy option would not alter the status quo.	There are no likely significant effects on the quality on fluvial and coastal water resources. However, the policy could provide for greater environmental protection.	Consideration should be given to amending this policy so as to state development is supported where it enhances the natural environment.
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Direct. Indirect. LT +/-? The proposed policy has the potential to have both a positive and negative effect depending on development occurs. However, because none of the options are spatial the significance of the effects cannot be predicted. However, there is the potential for this option to result in a net benefit if it supports the development of businesses and supply chains that support resource efficiency and reduce consumption of raw materials.	Neutral. 0 A no policy option would not alter the status quo.	NA	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed to contribute towards resource efficiency).
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Permanent. Direct. Indirect. LT + The proposed policy has the potential to have both a positive and negative effect depending on development occurs. However, because none of the options are spatial the significance of the effects cannot be predicted. However, there is the potential for this option to result in a net benefit if it supports the development of businesses and supply chains that support resource efficiency and reduce consumption of raw materials.	Neutral. 0 A no policy option would not alter the status quo.	NA	Any uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed and contribute towards reducing GHG emissions). With the above mitigation measures being implemented the proposed policy has a considerable opportunity for a beneficial effect.
Summary The proposed policy has no significant negative effects and provides a number of opportunities yield of 5,000 jobs. Notwithstanding the above comments, any potential negative significant effects could be mitigated, either by other Local Plan policies and the site allocation assessment process.				

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
With regards to the HRA implications there are no likely significant effects. However the policy could be strengthened to provide provision to environmental protection with regards to supporting new developments.				

Policy 2: Policy SP03 – Land allocated for Economic Development

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Indirect. ST/LT - /? Some of the sites that would be protected are within urban areas and could potentially be used for housing. As a result this option might indirectly restrict growth in housing development.	Permanent. Indirect. ST/LT +/-? By removing this, the protection of these sites from non-employment uses could have a beneficial effect if this resulted in further housing development occurring.	NA	Other policies within the Local Plan are concerned with the number of houses to be provided and where they should be located. It may be the case that there is sufficient capacity across the District to avoid the need to remove protection from these sites.
2.	N/A		N/A	N/A
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Permanent. Indirect. ST/LT +/-? Growth in the employment sites and the associated job opportunities could indirectly contribute towards improving the educational attainment of the working age population by creating demand for an appropriately qualified and skilled workforce.	Permanent. Indirect. ST/LT ? Removing the protection of these sites for employment uses could have an indirect adverse effect on education if it results in fewer opportunities for students. But this might be offset if some of these sites were used for providing new or enhancing existing education facilities.	NA	-
4. To increase public safety and reduce crime and fear of crime.	Permanent. Indirect. ST/LT +/-? Supporting the continued growth in job opportunities and the overall growth in the economy will help to contribute towards reducing deprivation by increase employment opportunities. Indirectly this could help to reduce levels of crime. However, any links are remote hence the predicted impact is minor and uncertain. Yet the option to be mixed use in function will allow the potential for other uses to support economic growth and create places that are less vulnerable to crime and reduce the fear and perception of a risk of crime.	Neutral 0. This option is unlikely to have any direct or indirect effects on this objective.	NA	Although there is no requirement for mitigation, it is recommended that design principles such as ‘Secured by Design’ are implemented where possible.
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Neutral 0. The proposed policy is only concerned with the area of land made available for employment opportunities and economic growth rather than the provision of or access to social support facilities. Therefore this objective is not applicable.	Permanent. Indirect. ST/LT ? The no policy option might provide an opportunity to provide facilities, particularly in areas of significant need. However, this option does not specify which alternative uses could be located at these sites instead of employment so it is not possible to assess the effect of this option.	NA	-
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Indirect. ST/LT +/-? The proposed policy will indirectly help to support a ‘sense of place’ by ensuring that jobs are located in accessible areas predominantly outside but also inside the town centres. It would also ensure areas are not dominated by employment uses that could adversely impact on the sense of place.	Permanent. Indirect. ST/LT +/-? The no policy option has the potential to have a positive effect because it could allow alternative uses, to employment, to be developed which could also contribute towards creating a vibrant and balanced community with a sense of place.	NA	Although positive effects were identified the uncertain effects of could be mitigated by spatial policy and allocations taking into account potential effects on communities and a sense of place.
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has	Permanent. Direct. ST/LT + + The spread of sites means that the associated job opportunities are accessible from the District’s main urban and residential areas. Focussing future development to	Permanent. Direct. ST/LT - /? The no policy option could potentially have a negative effect because it could result in development that does not create employment opportunities. However, it is noted that	NA	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
the opportunity to secure appropriate paid employment.	areas where existing employment uses are present will also help to support the creation of internal completion for employees which could also provide benefits for the District.	this option might result in other development that contributes towards the economic growth of the District so an 'uncertain effect is predicted'.		
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Direct. ST/LT ++ This option is likely to have a positive effect on the local economy because it supports the creation of new employment sites that can contribute towards economic growth and GVA. The spread of sites also means that some of these benefits can trickledown to adjacent area and support wider regeneration.	Permanent. Direct. ST/LT - /? This option could potentially have a negative effect because it could result in development that does not create employment opportunities or contribute towards economic growth. However, it is noted that this option might result in other development that contributes towards the economic growth of the District so an 'uncertain effect is predicted'.	NA	-
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT ? Both the proposed policy and no policy option have the potential to have both a positive and negative effect depending on how the sites are developed, in terms of the mix of brownfield / greenfield development occurring. However others are located within urban areas and could have a positive effect. As a result an overall uncertain effect is predicted.		NA	-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. ST/LT -/? These sites include greenfield and previously developed land and as a result an uncertain negative effect is predicted for both options.		NA	-
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT ?/+ The majority of existing sites are located on key road routes. As a result they are more likely to be accessible via public transport and non-motorised modes of transport. Therefore a minor beneficial effect is predicted.		NA	All of the potentially significant or uncertain effects identified here can be mitigated by other policies (e.g. development management and transport policies) that support the integration of employment sites with public and non-motorised transport network.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. ST/LT ?/+ Both options could have positive or negative effect on landscape, character of open space and the public realm as well as the appearance of the District's countryside. However, given that the development at the majority of these sites is already substantially complete, the surrounding landscape character is less likely to be sensitive to change.		NA	The uncertainties associated with both options could be mitigated by a combination of site selection to choose locations where development is unlikely to have an adverse effect and by putting in place development management and design policies that result in development that is sensitive to the surrounding townscape, landscape and visual receptors.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT ? Both the proposed policy and no policy option could have positive or negative effect on conservation areas, listed buildings, scheduled monuments and other features of cultural, historical or archaeological value and their setting.		NA	How future development respects and integrates with heritage and archaeological features will be addressed under development management and design policy options. It is anticipated that any potentially negative effects can be mitigated using this approach and the requirements of the NPPF.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Indirect. ST/LT ?		NA	Any development that could impact on the AQMA would require relevant

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	Both the proposed policy and no policy option could direct development away from the established AQMAs therefore there the likelihood of an adverse effect occurring is reduced. However, there might be indirect effects if this option results in an increase in traffic flows and congestion. Therefore an uncertain effect is identified.			assessments to be undertaken to support subsequent planning applications.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Direct. ST/LT +/-? The majority of existing sites are located on key road routes. As a result they are more likely to be accessible via public transport and non-motorised modes of transport. Therefore a minor beneficial effect is predicted.		NA	All of the potentially significant or uncertain effects identified here can be mitigated by other policies (e.g. development management and transport policies) that support the integration of employment sites with public and non-motorised transport network. In addition to this, the policy suggests that development proposals will have to be accompanied by a transport assessment and travel plan in accordance with Policy TP01.
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Direct. ST/LT +/-? The majority of existing sites are located on key road routes. As a result they are more likely to be accessible via public transport and non-motorised modes of transport. Therefore a minor beneficial effect is predicted.		NA	All of the potentially significant or uncertain effects identified here can be mitigated by other policies (e.g. development management and transport policies) that support the integration of employment sites with public and non-motorised transport network. In addition to this, the policy suggests that development proposals will have to be accompanied by a transport assessment and travel plan in accordance with Policy TP01.
17. To reduce waste generation and disposal and achieve the sustainable management of waste	Permanent. Indirect. ST -/? Increased development is likely to generate greater volumes of waste, which might not be diverted from landfill. It is also likely to increase the total quantity of waste arising and requiring treatment and/or disposal. This is assessed against an existing trend of reducing landfill capacity within Kent which could be exceeded within the life of the Plan ⁴⁵ . Potentially this could result in a significant effect. However, there is significant uncertainty about the amount of waste that might be generated under each option because this is also determined by the nature of the employment use and the density of development.		NA	The significant adverse effect can be mitigated through wider waste management policy at the national and county scales (e.g. EU Landfill Directive targets, the Government Review of Waste Policy in England 2011 and Kent County Council's Mineral and Waste Plan) which will include new Energy from Waste facilities and the increased diversion of material from landfill.
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Direct, Indirect. ST/LT -/? There is the potential for a negative effect as a result of both the proposed policy and no policy option because an increase in development land uses could increase consumption of energy and resources thereby increase emissions of GHG gases. But the extent and likelihood of this effect is not clear at this stage because this is also determined by the nature of the land use and the density of development.		NA	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed and contribute towards reducing GHG emissions).
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. ST/LT + A positive effect is predicted from both the proposed policy and no policy option because land around the airport is not within any of the Environment Agency's Flood zones or those identified in the SFRA.		NA	It is also assumed that the requirements of the NPPF would be applied to any forthcoming planning applications which would also help to mitigate any adverse effects.

⁴⁵ Based on data on landfill capacity in Kent from the Environment Agency.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT ? Both options have the potential to have both a positive and negative effect depending on where development occurs, the features associated with each site and the type of development. However it is noted that none of the sites are predicted as being likely to have a significant effect on an internationally designated site.		NA	-
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites	Permanent. Direct. ST/LT ? Both the proposed policy and no policy option have the potential to have both a positive and negative effect depending on where development occurs and the type of development.		NA	-
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Direct. Indirect. ST/LT -/? There is the potential for a negative effect because development could result in an increase in the consumption of resources. However, the extents of these effects are uncertain because the type and scale of development is not specified.		NA	There are uncertainties associated with both options because there is insufficient detail regarding the options to make a robust assessment. The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed to contribute towards resource efficiency).
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Permanent. Direct. Indirect. ST/LT -/? There is the potential for an adverse effect because an increase in employment land areas could indirectly increase consumption of energy and resources thereby increase emissions of GHG gases. But the extent and likelihood of this effect is not clear at this stage and is not necessarily directly linked to area of land allocated.		NA	There are uncertainties associated with both options because there is insufficient detail regarding the options to make a robust assessment. The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed and contribute towards reducing GHG emissions).
<p>Summary</p> <p>The proposed policy is predicted as having the potential to result in a significant positive effect, particularly in relation to job creation and supporting economic growth and this is the main differentiator between the options. Minor negative effects could be attributed to the proposed policy, however these and the uncertain effects can be mitigated by development management policies and the site specific assessment of effects that will be required for the allocations. One area where the no policy option performed better was in terms of its potential to have indirect benefits for housing by potentially allowing a greater area of land for housing and other types of development.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 3: Policy SP05 – Manston Airport

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Direct. ST/LT ++ The proposed policy inherently provides additional housing within the District, by proposing at least 2,500 new dwellings on the site.	Unknown ? A no policy option would require housing proposed at the Former Airport site to be accommodated elsewhere within the District. Details of where these locations would be are currently not known so it is not possibly to assess the impacts of the proposed policy.	The HRA is currently being carried out by AMEC and the conclusions will be addressed in this document in due course	-
2. To maintain appropriate healthcare provision and access to	Permanent. Direct. ST/LT + Adoption of the proposed policy requires the provision of a Doctors Surgery, ensuring the new development would	Permanent. Direct LT -/? A lack of policy support could allow developments to be granted permission without the consideration for the		The proposed policy has the potential to significantly affect the status quo by increasing the population covered by individual healthcare facilities. The

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
healthcare facilities for all sectors of society.	have adequate and appropriate access to healthcare facilities.	impacts upon local healthcare provisions. As such new developments could be introduced and place excess demand upon local healthcare provisions potentially causing a decline in service quality.		proposed policy includes provision of a Doctor's Surgery, though further assessment will identify shortfalls in local healthcare capacity and indicate the level of increased provision that may be required through developer contributions.
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Permanent. Direct. ST/LT + The proposed policy stipulates development of the Former Airport site must be accompanied by the provision of a primary school with four forms of entry, in line with the Infrastructure Deliver Plan and the requirements for the education authority.	Permanent. Direct LT -/? A lack of policy support could allow developments to be granted permission without the consideration for the impacts upon existing educational facilities in the region. As such new developments could be introduced and place excess demand upon such provisions for example through creating new housing developments in areas of fully populated school systems which could lead to a decline in educational access and standards.		-
4. To increase public safety and reduce crime and fear of crime.	Temporary/Permanent Indirect ST/LT + Development of new homes could contribute to the reduction of crime and fear of crime through the better design/layout of residential areas.	Neutral 0 A no policy option would not alter the status quo.		N/A
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Unknown ? It is not possible to say if policy adoption would satisfy the objective. No information is known in relation to future site uses and developments and thus cannot be assessed against the objective.	Permanent. Direct LT -/? A lack of policy support could allow developments to be granted permission without the consideration of the impacts upon the local population. As such by allowing uncontrolled developments, overcrowding and population rises could lead to a rise in deprivation as facilities and services would be unable to cope with the excess demand.		As part of the masterplanning process, mitigation in the form of further studies will be required to ensure positive outcomes against this sustainability objective. This will require an assessment of how demand on community facilities may increase as a result of the additional population in the area.
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent. Direct. ST/LT+/- The proposed policy would seek to create an appropriate environment whereby mixed use developments can be possible. Through the protection of environmental and heritage assets, as outlined in the proposed policy, an appropriate community feel will be created where landscaping schemes will be designed to be integral to new developments. All of the policy requirements in place will create an atmosphere that will result in residential satisfaction and pride in their region.	Neutral. 0 A no policy option would not alter the status quo.		A no policy option would allow current practices to ensue and thus would not impact the objective in either a positive or negative manner. However adoption of the policy would actively seek to enhance the local sense of place and community feel within the district by ensuring developments are designed in an appropriate manner.
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Direct. ST/LT+/? The proposed policy would allow the Former Airport site to be developed into a mixed use facility, with 85,000sqm allocated for employment and leisure floorspace. As such commercial business properties could be created as could retail facilities. In turn these establishments would create jobs for the local economy.	Permanent. Direct LT -/? A lack of policy support could allow developments to be granted permission without the consideration of the impacts upon the local population. As such residential developments could grow without appropriate facilities and provisions which could lead to the over saturation of employment markets and increased competition for jobs across Thanet. The impacts are questionable as future site developments are not known and the airport is a small area in relation to the wider Thanet vicinity.		-A business plan to demonstrate how the employment will be delivered and how it relates to Manston Business Park will be prepared.
8. To ensure the sustainable development of the proposed economic growth and encourage	Unknown ?	Neutral. 0 A no policy option would not alter the status quo.		-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
industrial and employment development at key sites within the District to support priority regeneration areas.	It is not possible to say if policy adoption would satisfy the objective. No information is known in relation to future site uses and developments.			
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT + Under policy adoption proposals to develop the Former Airport site, a development will minimise the visual impact and will be well linked to existing heritage sites to support tourism in Thanet. As such this would contribute to preserving the natural environment around the site which may be utilised for the tourist industry. Similarly the roofscape of any proposals will be mitigated to ensure that they are not obtrusive which would also yield positive effects. The impacts are only minor due to the size of the site.	Neutral 0. A no policy option could allow developments to negatively impact natural assets and reduce their economic tourist value. However existing legislation protects natural environments (such as SSSI and SPA) so it is unlikely that a no policy option would create a decline and thus would more likely yield neutral effects.		-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. ST/LT + Through adopting the policy the Former Airport site environment could potentially be subjected to developments to create a mixed use and multifunction district, accommodating residential, commercial and leisure facilities. Due to the size of the site and that the policy is site specific the impacts significance is minor.	Unknown ? It is not possible to say if a no policy choice would restrict the objective. No information is known to compare land prices between greenfield and urban spaces, whilst the details of future developments is not known yet either.		-
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT + Policy adoption would ensure sustainability most directly through the protection of environmental, cultural and heritage assets. The integration of new settlements into existing settlement patterns is fundamentally affected by good levels of transport connectivity and treatment of green buffers and edges between built up areas. For this, the proposed policy requires the Transport Strategy to be met by upgrading local roads, travel plan for public transport and traffic calming measures for key routes.	Neutral. 0 A no policy option would not alter the status quo.		It would be important for a future masterplanning process for this site to consider how development, particularly at the edge of the site boundaries, can be designed to limit the potential for settlements to merge. A travel plan to include a public transport strategy linking the site to existing services will be prepared. Key routes for traffic-calming measures will also be identified.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. ST/LT + Adopting the policy would ensure any development to or on the Former Airport site would be designed to minimise the visual impact on the open landscape. Additionally it would account for the local roofscape and skyline in order to minimise mass buildings when viewed from the South. The effects are only minor positive as the policy is site specific and localised.	Unknown? By not adopting the policy it is unknown if the character and quality of the local spaces would decline or enhance as future plans are unknown.		Landscape and Visual Impact Assessment will be prepared, to address the visual sensitivity of the site and will include information on how the new built development will be designed to minimise the visual impact. Development that contributes to the landscape character, rather than simply not affecting it, should be encouraged.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT+ For a development to be brought forward as part of this policy, a design and heritage statement is required to include measures which will reduce and mitigate sites of historic archaeological and or architectural importance, and their settings, through pre-design archaeological assessment and linking the development to existing heritage sites.	Permanent. Direct. LT -/? A lack of policy support could allow developments to be granted permission without the consideration for the impacts upon archaeological and architectural important sites and features. As such new developments could result in adverse effects on sites, features and areas of historic archaeological or architectural importance, and their settings.		The proposed policy includes provision for preparing a design and heritage statement which will include undertaking a pre-design archaeological assessment taking account of presence of significant and sensitive remains. Undertaking these measures would help identify issues and mitigate negative effects.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Temporary/Permanent. Direct. ST/LT - The proposed policy promotes development that is likely to result in an increase in car journeys within the District's Air Quality Management Areas. Not all new residents of the new housing provided on site are likely to be from outside of the District, though inward migration resulting from the development is likely to occur.	Temporary/Permanent. Direct. ST/LT + The no policy option potentially limits the increase of vehicle journeys within the Districts Air Quality Management Area.		As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to ensure positive outcomes against this sustainability objective. This would involve maximising connectivity for alternative forms of transport (e.g. walking and cycling) and extending bus service provision.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Direct. ST/LT+ Policy adoption would only allow mixed use of Former Airport site if new developments appropriately met the requirements of increased surface travel demand. This could be achieved by developments ensuring sustainable public transport networks and facilities. However the impacts are only deemed minor as it would not impact the significant wider area and is only relevant to the Airport. The impacts are questionable as the policy has no specific public transport information and states developments must meet the demands of increased surface traffic, which could be achieved by public transport infrastructure.	Permanent. Direct. LT -/? A lack of policy support could allow developments to be granted permission without the consideration for the impacts upon local transport services. As such new developments could saturate and stress current facilities and services leading to a decline in the quality of service.		As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to ensure positive outcomes against this sustainability objective. A travel plan to include a public transport strategy linking the site to existing services will be prepared. Key routes for traffic-calming measures will also be identified.
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	N Permanent. Direct. LT + This policy suggests the development proposal will have to demonstrate contributions to the comprehensive masterplan for the whole site. This will include how the requirements of the Transport Strategy will be met (including the upgrade of Manston Court Road and improvements to Spitfire junction) and describe the relationship to the Parkway Station and Ramsgate Port (including a southern bypass of Manston village and a direct link from the site to the A299 roundabout linking with the southbound dual carriageway).	Temporary/Permanent. Indirect. ST/LT - The potential increase in the number of residents in the area is likely to adversely impact transport links.		As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to ensure positive outcomes against this sustainability objective. A travel plan to include a public transport strategy linking the site to existing services will be prepared. Key routes for traffic-calming measures will also be identified.
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent Direct ST/LT - The proposed policy will facilitate housing development, which has the potential to increase the amount of domestic waste produced in the district.	Neutral 0 A no policy option would not alter the status quo.		Mitigation will be required through the design of all new housing developments to ensure that waste minimisation and recycling are promoted during the operation phase of these developments. This would be achieved by maximising the outcomes of other Local Plan policies.
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent Direct ST/LT + The proposed policy designates sites for housing that are more than 100m from the coastal area, minimising risks from sea level rises.	Neutral 0 A no policy option would not alter the status quo.		In addition, Policy SP35 states that new development must take account of: <ul style="list-style-type: none"> Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy. Mitigating against climate change by reducing emissions.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
				These measures will help enhance effects relating to this sustainability objective.
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent Direct ST/LT + The proposed policy designates sites for housing that are more than 100m from the coastal area, minimising risks from sea level rises.	Neutral 0 A no policy option would not alter the status quo.		-
20. To conserve and enhance biodiversity.	Unknown ? This policy supports a significant residential development at the Former Airport site. The impact of this policy on the biodiversity is unclear as the policy does not mention the protection or enhancement of biodiversity and/or greenspaces, which could provide habitat for the biodiversity. At the same time, as the development would occur at the Former Airport site, it is likely the presence of biodiversity is already limited.	Permanent. Direct. ST/LT+ The no policy option would still offer protection to biodiversity. Current legislation and directives already manage natural assets and sensitive areas and as such the addition of a new policy would only strengthen existing practices.		The proposed policy includes provision for undertaking a pre-design ecological assessment taking account of the presence of wintering and breeding birds. Undertaking these measures would help identify issues and mitigate negative effects.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites	Permanent. Direct. ST/LT++ Policy adoption would ensure development and creation of a residential, commercial and leisure mixed use site which would not contaminate groundwater resources and that appropriate mitigation measures will be incorporated to the design to prevent contamination.	Permanent. Direct. ST/LT+ The no policy option would still yield positive effects as existing legislation is already in place to protect water assets across the UK.		A surface water management/sustainable drainage schemes that will not contaminate groundwater sources will be prepared. The schemes will also describe proposed initiatives that will improve the condition of the groundwater.
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Unknown ? Effects against this objective are unknown at this stage as the policy does not include explicit reference to using local products or sustainable produce for development.	Neutral. 0 A no policy option would not alter the status quo.		In terms of mitigation, Policy SP35 states that new development must take account of: <ul style="list-style-type: none"> Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy. Mitigating against climate change by reducing emissions. These measures will help promote positive effects relating to this sustainability objective. However, the overall effect of this would be dependent on the final design of any emerging housing proposals.
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Unknown ? Effects against this objective are unknown at this stage as the policy does not include explicit reference to renewable energy or the requirement for energy efficiency measures.	Neutral. 0 A no policy option would not alter the status quo.		The success of the proposed policy would depend on the implementation of other Local Plan policies relating to renewable energy provision and energy efficiency. These policies would help promote beneficial effects and support this sustainability objective.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
<p>ASummary</p> <p>The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District's housing supply and improvements to community facilities, such as the provision of a new primary school. There is also potential for additional community facilities improvements, depending on further studies to be undertaken during design that will state any additional requirements as a result of development. The effects on with respect to the landscape are likely to be lesser for the development on brownfield land, when compared to development of greenfield land. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. The site is well connected, with the policy requiring numerous efforts to link with and improve the public transport links, particularly with the major centres of Margate, Broadstairs, Ramsgate and Westwood.</p> <p>The outcome of the HRA has not considered this policy though this will be addressed in due course.</p>				

Policy 4: Policy SP07 – Westwood

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 4	N/A		N/A	N/A
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Permanent. Indirect. ST/LT -/? The effects of the proposed policy are potentially negative because if this policy was implemented in isolation it would concentrate development in an area that could be difficult to access by people further away.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent. Indirect. ST/LT ? The effects of the proposed policy are potentially negative because if this policy was implemented in isolation it not directly support the role of town centres. However, indirectly the proposed policy might help to protect the town centres by ensuring that large and unrestricted retail development does not occur in town centres.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Direct. ST/LT +/? The proposed policy has the potential to have a beneficial effect. Development in the town centres will provide job opportunities that can easily be accessed by residents in those towns and development at Westwood would benefit residents in the adjacent residential areas (e.g. Northwood).	Neutral. 0 A no policy option would not alter the status quo.	NA	-
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Direct. ST/LT +/? The proposed policy has the potential to have a beneficial effect. Development in the town centres will contribute towards economic growth.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT +/? Indirectly, the proposed policy would help to direct large retail development away from the centres that are more suited to tourism development. This would help to avoid developments that might detract from the appeal of the coastal towns as visitor and tourist destinations.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse	Permanent. Direct. ST/LT ? Depending on the sites that are allocated, the proposed policy has the potential for both positive and negative	Neutral. 0 A no policy option would not alter the status quo.	NA	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
of materials from buildings, and encourage urban renaissance.	effects. Because they could result in the development of both PDL and greenfield sites. Therefore an uncertain effect is predicted.			
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT ? The proposed policy would not promote the development of key services in areas that reduce the need for people to travel. However, given the type of development already present at Westwood it is assumed that if any local services were sited at Westwood their catchment area would only be adjacent residential areas.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. ST/LT ? The quality of design and how future development takes account of character, townscape and the countryside will be addressed under other issues and policy options	Neutral. 0 A no policy option would not alter the status quo.	NA	-
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT ? How future development respects and integrates with heritage and archaeological features will be addressed under development management and design policy options.	Neutral. 0 A no policy option would not alter the status quo.	NA	It is anticipated that any potentially negative effects can be mitigated using this approach and the requirements of the NPPF.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Indirect. ST/LT ? The effects the proposed policy are uncertain because it might result in some increases in road traffic that impacts on air quality. Likewise, they could result in reduction in emissions if shoppers use more sustainable forms of transport.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Indirect. ST/LT ? he effects of the proposed policy might result in more people travelling by private car, due to parking provision and road links.	Neutral. 0 A no policy option would not alter the status quo.	NA	New development should seek to improve pedestrian connectivity.
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Indirect. ST/LT ? The effects of the proposed policy might result in more people travelling by private car, due to parking provision and road links.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent. Indirect. STT -/? Increased development is likely to generate greater volumes of waste, which might not be diverted from landfill. It is also likely to increase the total quantity of waste arising and requiring treatment and/or disposal. This is assessed against an existing trend of reducing landfill capacity within Kent which could be exceeded within the life of the Plan ⁴⁶ . Potentially this could result in a significant effect.	Neutral. 0 A no policy option would not alter the status quo.	NA	The significant adverse effect can be mitigated through wider waste management policy at the national and county scales (e.g. EU Landfill Directive targets, the Government Review of Waste Policy in England 2011 and Kent County Council's Mineral and Waste Plan) which will include new Energy from Waste facilities and the increased diversion of material from landfill.
18. To ensure development within the District responds to the	Permanent. Direct. Indirect. ST/LT -/?	Neutral. 0 A no policy option would not alter the status quo.	NA	The uncertainties can be addressed by other policies in the Local Plan (e.g.

⁴⁶ Based on data on landfill capacity in Kent from the Environment Agency.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
challenges associated with climate change.	There is the potential for a negative effect because an increase in development land uses could increase consumption of energy and resources thereby increase emissions of GHG gases.			development management policies setting out how new development should be designed and contribute towards reducing GHG emissions).
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. ST/LT +/-? A positive effect is predicted because land around Westwood is not within any of the Environment Agency’s Flood zones or those identified in the SFRA.	Neutral. 0 A no policy option would not alter the status quo.	NA	The requirements of the NPPF and would be applied to any forthcoming planning applications which would also help to mitigate any adverse effects.
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on which sites at Westwood are brought forward for development. However it is noted that none of the sites are predicted as being likely to have a significant effect on an internationally designated site.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on where development occurs, the features associated with each site and the type of development. This is particularly relevant to potential effects on groundwater resources and Source Protection Zones in this area of the district.	Neutral. 0 A no policy option would not alter the status quo.	NA	The NPPF requires unacceptable risks to water to be mitigated therefore development management policies and national policy should provide safeguards for aquifers and SPZs in particular. This will address the potential area of uncertainty identified here.
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Direct. Indirect. ST/LT -/? There is the potential for a negative effect because development could result in an increase in the consumption of resources.	Neutral. 0 A no policy option would not alter the status quo.	NA	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed to contribute towards resource efficiency).
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Permanent. Direct. Indirect. ST/LT -/? There is the potential for an adverse effect because an increase in retail could indirectly increase consumption of energy and resources thereby increase emissions of GHG gases. But the extent and likelihood of this effect is not clear at this stage and is not necessarily directly linked to area of land allocated.	Neutral. 0 A no policy option would not alter the status quo.	NA	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed and contribute towards reducing GHG emissions).
<p>Summary</p> <p>The proposed policy has potential to have positive and negative effects depending on the location of development and its relationship with the receiving environment. The proposed policy would primarily deliver these benefits at the Town Centres. Where potentially adverse effects have been predicted it is anticipated that they can be mitigated either by ensuring that development management policies are provided that counter or avoid adverse effects and/or by meeting the requirements of the NPPF.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 5: Policy SP08 – Margate

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Direct. ST/LT+ The aim of the proposed policy is to keep Margate as mixed use site thus will somewhat seek to address the housing issues within Margate. A minor beneficial effects is predicted because although the effects are direct this option would not affect the entire district.	Neutral. 0 A no policy option would not alter the status quo.	The policy may promote the development of opportunity sites within the existing developed areas of Margate, which would therefore be close to Thanet Bay and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	A no policy option would not alter the status quo. However by adopting the policy there is the potential for certain areas of Margate to develop residential premises.
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Neutral. 0 There will not be a change in the status quo under either the proposed policy or the no policy scenario. Neither will result in the addition or removal of healthcare provisions. Additionally as the area is already well established provisions are likely to already exist.		N/A	-
3.	N/A		N/A	N/A
4. To increase public safety and reduce crime and fear of crime.	Permanent. Direct. ST/LT+/? The increased facilities and services created through regeneration should be accompanied by additionally CCTV. Similarly the developments would be designed to factor out crime, through enhanced lighting for example. However the impacts are questionable as the redevelopment may lead to increased nightlife services (e.g. pubs) which may increase fear of crime and disorderly behaviour.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Unknown? The policy is centred upon developing Margate into a contemporary seaside resort. In order to make the area sustainable key facilities will have to be provided in order to support the local demands. However no specific provisions are mentioned and the impacts are as such unknown.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent. Direct. ST/LT+ Policy adoption to support the regeneration of Margate into a contemporary seaside resort would help enhance the local community feel. The redevelopment scheme would enhance local appeal and create a sense of pride whilst contributing to socially and economically. In turn increased pride and sense of belonging will follow.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Margate would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Direct. ST/LT+ By adopting the policy employment opportunities will arise. Through increasing the shops and facilities on offer, including developing Dreamland, a significant number of jobs will be created.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Margate would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the	Permanent. Direct. ST/LT+ Active development of Margate will increase employment opportunities within the area including entertainment, catering and retail jobs. This will aid economic growth of	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Margate would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
District to support priority regeneration areas.	the region as will the development of an amusement park and enhancing transport links; all of which will help create sustainable development.		management policies should be sufficient in preventing incidental significant effects.	
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT+ Adoption of the policy will actively encourage the development of the local tourist industry by promoting regeneration of the seaside resort. Additionally the active promotion of the seafront and Dreamland amusement park will enhance the street and semi-natural environments to help increase tourism to ensure that the objective is met.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. ST/LT+ The proposed policy will actively allow developments to redevelop and regenerate the area of Margate. As such reutilisation of land will occur in primary locations (i.e. the seafront) to create a new vibrant contemporary tourist resort.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Margate, particularly Old Town and Town Centre redevelopment, would improve land use efficiency but would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT+ A sustainable pattern of developments would occur through policy adoption by promoting the regeneration of the region; and combining it with enhancing the transport provisions. Utilisation of existing structures is promoted and by ensuring access is sufficient to reach the new developments long term utilisation of Margate as tourist location is promoted.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Margate, particularly Old Town and Town Centre redevelopment, would help maintain a sustainable pattern of development but would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. ST/LT+ Policy adoption will seek to preserve and protect the seafront character and heritage meaning that areas of architectural importance will be preserved. However the impacts are only minor as it is specific to the seafront and not any other areas of Margate.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Margate could result in increased pressure on the Thanet Coast and Sandwich Bay SPA due to population increases and resultant recreational demand. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT+ Policy adoption will seek to preserve and protect the town centres and seafront character and heritage meaning that areas of architectural importance will be preserved. However the impacts are only minor as it is specific to the town centres and seafront and not any other areas of Margate.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Margate, could result in increased pressure on the Thanet Coast and Sandwich Bay SPA due to population increases and resultant recreational demand. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. ST/LT+ Policy adoption does not contain any specific measures regarding AQMA's. However existing legislation would	Permanent. Direct. ST/LT+ By not adopting the policy it is likely that new developments would yield neutral impacts due to current legislation and guidance on a national and international	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	protect such assets and so positive effects would still ensue due to their legal protection.	level regarding the management of air pollution (Clean Air Act)		
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Direct. ST/LT+ With policy adoption seeking to enhance the local area and redevelop it into a primary tourist hotspot, an increase in transport provisions is inevitable to allow ease of access. The policy seeks to develop a new road, which will enhance opportunities for the growth of public transport. As such access to Margate improves thus access to employment is eased. The effects are only minor as the Policy will only directly affect Margate.	Permanent. Direct LT -/? A lack of policy support could allow developments to be granted permission without the consideration for the impacts upon local transport services. As such new developments could saturate and stress current facilities and services leading to a decline in the quality of service.	N/A	-
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Direct. ST/LT+ With policy adoption seeking to enhance the local area and redevelop it into a primary tourist hotspot, an increase in transport provisions is inevitable. This is reflected in the policy seeking to develop a new road along the southern edge of the site near the marine terrace to improve access. The effects are only minor as the named infrastructure will not adequately link Thanet to the wider region.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
17. and 18	N/A		N/A	N/A
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. ST/LT+ As policy adoption is centred upon developing Margate into a contemporary seaside resort, protection is inevitable in order to protect the new regeneration projects. However as this has not been explicitly detailed in the policy the effects are unknown.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Margate would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	With respect to the potential for impacts on the Thanet Coast and Sandwich Bay SPA, amendments to policy wording to refer to Policy SP25 and the SPA mitigation strategy are recommended,
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on where development occurs, the features associated with each site and the type of development. However it is noted that none of the sites are predicted as being likely to have a significant effect on an internationally designated site.	Permanent. Direct. ST/LT+ The no policy option would still yield positive effects as existing legislation is already in place to protect biodiversity and natural assets across the UK.	The regeneration and development of Margate would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	All development will have to comply with policies relating to the Protection of International and European Designated Sites and associated Mitigation Strategy. With respect to the potential for impacts on the Thanet Coast and Sandwich Bay SPA, amendments to policy wording to refer to Policy SP25 and the SPA mitigation strategy are recommended,
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct. ST/LT+ Policy adoption has no specific requirements regarding protection of water courses. However national legislation exists which would protect such assets from degradation by future developments.	Permanent. Direct. ST/LT+ The no policy option would still yield positive effects as existing legislation is already in place to protect water assets across the UK.	The regeneration and development of Margate would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	With respect to the potential for impacts on the Thanet Coast and Sandwich Bay SPA, amendments to policy wording to refer to Policy SP25 and the SPA mitigation strategy are recommended,
22. and 23	N/A		N/A	N/A
Summary				

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
<p>A no policy option would largely yield neutral impacts as there would not be a change in the status quo. By adopting the policy suitable development will be encouraged across Margate. Active support and promotion of developments will be seen to promote a contemporary seaside resort to help develop the area into a contemporary mixed use site. Employment opportunities will arise as will tourist and economic activity. Transport provisions will increase to ensure the viability of the location and facilities will grow that will be of benefit to both visitors and locals. As such the impacts of policy adoption are widely positive socio-economic factors, with local character and history preserved throughout.</p> <p>With regards to the HRA assessment, the adoption of the policy would result in development close to Thanet Coast and Sandwich Bay SPA. The implementation of the development management policies should be suitable to prevent incidental significant effects. In order to strengthen the position, this policy should cross-refer to Policy SP25 and the SPA mitigation strategy.</p>				

Policy 6: Policy SP09 – Ramsgate

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Direct. ST/LT+ The aim of this option is to address the use of Ramsgate as a mixed use site thus consideration will be given to the specific housing issues within Ramsgate. A minor beneficial effect is predicted because although the effects are direct this option would not affect the entire district.	Neutral. 0 A no policy option would not alter the status quo.	The policy may promote the development of opportunity sites within the existing developed areas of Ramsgate, which would therefore be close to Thanet Bay and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Neutral. 0 Neither the proposed policy nor no policy option will result in the addition or removal of healthcare provisions for the local society. As the area is already well established provisions are likely to already exist.		N/A	There will not be a change in the status quo under either option.
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	N/A		N/A	N/A
4. To increase public safety and reduce crime and fear of crime.	Permanent. Direct. ST/LT+/? The increased facilities and services will be accompanied by additionally CCTV and most likely increased policing of the area. Similarly the developments would be designed in a way to factor out crime (e.g. increased lighting and open spaces). However the impacts are questionable as the redevelopment may lead to increased nightlife activity which may promote the fear of crime or vulnerability.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Unknown? There is no specific guidance in place regarding efforts to increase the facilities to support vulnerable people. However this is due to the policy being centred upon developing Ramsgate into a contemporary tourist hotspot resort. In order to make the area sustainable, appropriate key facilities will have to be provided in order to support the local demands.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent. Direct. ST/LT+ Policy adoption to support the regeneration of Ramsgate would help enhance the local community feel by actively investing and enhancing the area. The local facilities that would be available to local residents' not just tourists	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Ramsgate would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	which would increase recreational opportunities. Similarly the redevelopment scheme would enhance local appeal and create a sense of pride.		management policies should be sufficient in preventing incidental significant effects.	
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Direct. ST/LT+ Through increasing the shops and facilities on offer and helping to continue the establishment of a café culture, a variety of jobs will be created for the immediate vicinity. The impacts are only minor positive as redevelopment is already occurring in the Ramsgate area. The addition of 1200m ² for retail floor space will also enhance employment opportunities.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Ramsgate would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Direct. ST/LT+ Through encouraging the continued redevelopment of the Ramsgate region employment opportunities will develop within the area. This will aid economic growth of the region as will the development of leisure, tourism and retail facilities to attract visitors to the area. The impacts are only minor positive as redevelopment is already occurring in the Ramsgate area; with the historic character and café culture already attracting visitors.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Ramsgate would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT+ Adoption of the policy will actively contribute to the regeneration of Ramsgate. Active investment in urban regeneration will enhance the local semi natural and street scene, which will enhance tourism opportunities by creating a vibrant atmosphere.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. ST/LT+ Policy adoption will actively allow developments to regenerate the Ramsgate area particularly around the Port, Harbour and Waterfront. As such reutilisation of land will occur in primary locations (i.e. the seafront) to create a new vibrant contemporary tourist resort.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Ramsgate, particularly the Town Centre, and the Waterfront and Royal Harbour development, would improve land use efficiency but would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT+ A sustainable pattern of developments would occur through policy adoption by promoting the regeneration of Ramsgate. The local character and heritage will be at the fore of any new developments meaning that local heritage will be preserved. The creation of a tourist hotspot and the provisions of new retail spaces will improve employment opportunities and the financial welfare of the area by increasing investors and businesses. The long term protection of the port area will be central to future sustainability as it will provide a historical feature to attract visitors. With the high speed rail proposal linking Ramsgate to the wider region a significant positive impact will occur upon the objective.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Ramsgate, particularly the Town Centre, and the Waterfront and Royal Harbour development, would help maintain a sustainable pattern of development but would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. ST/LT+ Policy adoption will seek to preserve and protect the seafront character and heritage, notably the Royal Harbour and Waterfront locations. Such assets are of local architectural importance and as such will be preserve within the public realm.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Ramsgate could result in increased pressure on the Thanet Coast and Sandwich Bay SPA due to population increases and resultant recreational demand. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT+ Policy adoption will seek to preserve and protect the seafront and Royal Harbour location and ensure that all developments contribute to local character and do not detract from the key local features.	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Ramsgate, could result in increased pressure on the Thanet Coast and Sandwich Bay SPA due to population increases and resultant recreational demand. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. ST/LT+ Policy adoption does not contain any specific measures regarding AQMA's. However existing legislation would protect such assets and so positive effects would still ensue due to their legal protection.	Permanent. Direct. ST/LT+ By not adopting the policy it is likely that new developments would yield neutral impacts due to current legislation and guidance on a national and international level regarding the management of air pollution (Clean Air Act)	N/A	-
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Indirect. ST/LT+/? With policy adoption seeking to enhance the local area and redevelop it into a primary tourist hotspot, an increase in transport provisions is inevitable to allow ease of access. However the policy option does not explicitly detail any set criteria regarding transport provisions so the inference is indirect and questionable. Yet as the existing area is largely developed such provision will already exists and would most likely only need minor improvements.	Permanent. Direct LT -/? A lack of policy support could allow developments to be granted permission without the consideration for the impacts upon local transport services. As such new developments could saturate and stress current facilities and services leading to a decline in the quality of service.	N/A	-
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Indirect. ST/LT+/? Policy adoption could aid the enhancement of the transport network as the continued redevelopment of Ramsgate will attract more visitors. Similarly policy adoption will support the future Ramsgate Maritime Policy which will link the area to the wider region. The proposed policy helps the wider strategic role of the port in terms of the benefits for Kent and the wider SE Region by helping to provide a diversity of transport connections to continent, particularly Belgium rather than Northern France. However, the primary links to the port are road based and there is no direct rail link that could help to reduce the quantity of freight that accesses the port by road.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
17. and 18	N/A		N/A	N/A
19. To ensure appropriate development control procedures in	Permanent. Direct. ST/LT+	Neutral. 0 A no policy option would not alter the status quo.	The regeneration and development of Ramsgate would inevitably lead to	With respect to the potential for impacts on the Thanet Coast and

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	There is no specific guidance in place regarding the protection from coastal erosion. However as policy adoption is centred upon developing Ramsgate Waterfront and Royal Harbour into a mixed use environment, protection is inevitable in order to protect the new regeneration protects.		potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	Sandwich Bay SPA, amendments to policy wording to refer to Policy SP25 and the SPA mitigation strategy are recommended.
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on where development occurs, the features associated with each site and the type of development. However it is noted that none of the sites are predicted as being likely to have a significant effect on an internationally designated site.	Permanent. Direct. ST/LT+ Adoption of a no policy scenario would yield positive effects as existing legislation is already in place to protect biodiversity and natural assets across the UK. Similarly it would not actively support developments at or close to sensitive environmental assets.	The regeneration and development of Ramsgate would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	Proposals will be required to submit an acceptable environmental assessment detailing their local impacts with appropriate mitigation. Where habitat destruction is inevitable the creation of alternative habitats should be mandatory. All development will have to comply with policies relating to the Protection of International and European Designated Sites and associated Mitigation Strategy. With respect to the potential for impacts on the Thanet Coast and Sandwich Bay SPA, amendments to policy wording to refer to Policy SP25 and the SPA mitigation strategy are recommended.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct. ST/LT +/- Policy adoption has no specific requirements regarding protection of water courses. However national legislation exists which would protect such assets from degradation by future developments. The impacts are questionable as developments along the Harbour front have the potential to pollute the local water courses through increased local activity leading to surface run off of contaminants or even litter for example.	Permanent. Direct. ST/LT + Adoption of a no policy scenario would still yield positive effects as existing legislation is already in place to protect water assets across the UK.	The regeneration and development of Ramsgate would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	Proposals will be required to submit an acceptable environmental assessment detailing their local impacts with appropriate mitigation. With respect to the potential for impacts on the Thanet Coast and Sandwich Bay SPA, amendments to policy wording to refer to Policy SP25 and the SPA mitigation strategy are recommended.
22. and 23	N/A		N/A	N/A
<p>Summary</p> <p>A no policy option would largely yield neutral impacts as there would not be a change in the status quo. By adopting the policy active regeneration of the Ramsgate district will occur with the developments taking into consideration the local maritime heritage and ensuring character is preserved in order to create a contemporary mixed use site. Employment opportunities will arise as will tourist and economic activity with the creation of retail and tourism facilities. Transport provisions will increase notably by the support of the Ramsgate Maritime Policy which will seek to build upon the conflux of a major seaport, international airport and high speed rail location. As such the impacts of policy adoption are widely positive, with local character and history preserved throughout. However it should be noted that policy adoption may be to the detriment of environmental assets and that housing opportunities are not overly supported within the policy due to the tourist and economic focus.</p> <p>With regards to the HRA assessment, the adoption of the policy would result in development close to Thanet Coast and Sandwich Bay SPA. The implementation of the development management policies should be suitable to prevent incidental significant effects. In order to strengthen the position, this policy should cross-refer to Policy SP25 and the SPA mitigation strategy.</p>				

Policy 7: Policy SP10 - Broadstairs

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate	Neutral. 0		N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
mix of types and tenures to reflect demand and need.	A no policy option would not alter the status quo.			
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Neutral. 0 Neither policy adoption nor rejection will result in the addition or removal of healthcare provisions for the local society. As the area is already well established provisions are likely to already exist.		N/A	-
3.	N/A		N/A	N/A
4. To increase public safety and reduce crime and fear of crime.	Permanent. Direct. ST/LT +/-? Policy adoption would seek to encourage the regeneration around Broadstairs. As such the increased facilities and services will be accompanied by additionally CCTV. However the impacts are questionable as the area is already largely developed and will most likely have sufficient provisions regarding crime reduction.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Unknown? The proposed policy is centred upon developing Broadstairs into a thriving town centre with retail and other recreational facilities. In order to make the area sustainable, appropriate key facilities will have to be provided in order to support the local demands. However as provisions have not been specifically detailed it cannot be assured and will be down to the discretion of the development plans.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent. Direct. ST/LT+ Regeneration of Broadstairs would help enhance the local community feel by investing and enhancing the area. The local facilities that grow would be available to local residents' not just tourists which would increase recreational opportunities, which will contribute to a sense of place. Similarly the redevelopment scheme would enhance local appeal and create a sense of pride, particularly along the beachfront and promenade.	Neutral. 0 A no policy option would not alter the status quo.	Proposals to maintain and enhance the role and character of Broadstairs Town Centre, and Promenade and Beach Front would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Direct. ST/LT+ By adopting the policy and supporting the growth of Broadstairs, employment opportunities will occur. Through increased shops and facilities a variety of jobs will be created. The impacts are only minor positive as the areas already has numerous retail and tourist facilities.	Neutral. 0 A no policy option would not alter the status quo.	Proposals to maintain and enhance the role and character of Broadstairs Town Centre, with a focus on retail, and Promenade and Beach Front would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Direct. ST/LT+ Through encouraging the continued redevelopment of Broadstairs, employment opportunities will develop. This will aid economic growth of the region and the development of leisure, tourism and retail facilities will help attract visitors to the area. The impacts are only minor as the town is relatively small in size in relation to the wider Thanet region.	Neutral. 0 A no policy option would not alter the status quo.	Proposals to maintain and enhance the role and character of Broadstairs Town Centre, with a focus on retail, and Promenade and Beach Front, with a focus on improving connectivity, would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
			should be sufficient in preventing incidental significant effects.	
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT+ Adoption of the policy will actively encourage the development of the local tourist industry by promoting regeneration of the existing retail facilities along the High Street and Albion Street. Additionally development of the promenade and beachfront will be encouraged; which will enhance tourism opportunities by creating a vibrant atmosphere full of life and character.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. ST/LT+ Policy adoption will actively allow developments to regenerate Broadstairs area particularly along the High Street, Promenade and Beachfront. As such reutilisation of land will occur in primary locations (i.e. the seafront) to create a new vibrant small tourist resort.	Neutral. 0 A no policy option would not alter the status quo.	The proposals to maintain and enhance the role and character of Broadstairs Town Centre, with a focus on retail, and Promenade and Beach Front, with a focus on improving connectivity, would improve land use. However, this would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT+ A sustainable pattern of developments would occur through policy adoption by promoting the regeneration of Broadstairs. The local character and heritage will be persevered whilst developing the beachfront and promenade will increase the tourist trade. The creation of a tourist hotspot and the provisions of new retail spaces will improve employment opportunities and the financial welfare of the area. By encouraging urban renaissance and the growth of the promenade and beach front a wider connectivity to the town centre and waterfront will occur.	Neutral. 0 A no policy option would not alter the status quo.	The proposals to maintain and enhance the role and character of Broadstairs Town Centre, with a focus on retail, and Promenade and Beach Front, with a focus on improving connectivity, would help maintain a sustainable pattern of development but would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of development management policies should be sufficient in preventing incidental significant effects.	-
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. ST/LT + Policy adoption will seek to preserve and protect the local character and heritage with enhancements made to the promenade and beach front locations. Such assets are of local townscape importance and as such will be preserved within the public realm.	Neutral. 0 A no policy option would not alter the status quo.	The focus on existing retail, for new retail to be on the edge of Broadstairs Town Centre and to improve connectivity between uses on the Broadstairs Promenade and Beach Front would help to conserve and enhance the areas character. However, this could result in increased pressure on the Thanet Coast and Sandwich Bay SPA due to population increases and resultant recreational demand.	-
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT + Policy adoption will seek to preserve and develop the seafront whilst ensuring the Broadstairs retains its character as a small seaside town. All developments are expected to be ensure that they do not occur in a way that will be detrimental to local character and heritage. The	Neutral. 0 A no policy option would not alter the status quo.	Proposals to maintain and enhance the role and character of Broadstairs Town Centre, and Promenade and Beach Front would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA. Effective implementation of	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	impacts are only minor as Broadstairs is a small town in relation to the wider Thanet area.		development management policies should be sufficient in preventing incidental significant effects.	
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. ST/LT + Policy adoption does not contain any specific measures regarding AQMA's. However existing legislation would protect such assets and so positive effects would still ensue due to their legal protection.	Permanent. Direct. ST/LT + By not adopting the policy it is likely that new developments would yield neutral impacts due to current legislation and guidance on a national and international level regarding the management of air pollution (Clean Air Act)	N/A	-
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Indirect. ST/LT +/- Developments will be encouraged to seek opportunities to increase connectivity between the town centre and beach front and across the general townscape. As such access to facilities, services and employment is expected to grow alongside the access to the promenade. The increased connectivity will lead to a wider public transport network or facility to cycle or walk.	Permanent. Direct. LT -/? A lack of policy support could allow developments to be granted permission without the consideration for the impacts upon local transport services. As such new developments could saturate current facilities and services leading to a decline in their quality.	N/A	-
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Indirect. ST/LT +/- With policy adoption seeking to continue the local regeneration, an increase in transport provisions is inevitable to cope with increased demands on the area. However policy adoption does not explicitly contain information regarding improved transport provisions to the wider region hence the impacts are questionable and indirect.	Neutral. 0 A no policy option would not alter the status quo.	N/A	In order to cope with increased transport demand from additional developments, a wider transport network will be required to allow ease of access to the district and south east region.
17. and 18	N/A		N/A	N/A
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. ST/LT + There is no specific guidance in place regarding the protection from coastal erosion. However as policy adoption is related to developing the promenade and beach front, protection is inevitable in order to protect the new regeneration protects. Such plans have not been detailed thus the effects are unknown.	Neutral. 0 A no policy option would not alter the status quo.	Proposals to maintain and enhance the role and character of Broadstairs Town Centre, and Promenade and Beach Front would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA.	With respect to the potential for impacts on the Thanet Coast and Sandwich Bay SPA, amendments to policy wording to refer to Policy SP25 and the SPA mitigation strategy are recommended.
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on where development occurs, the features associated with each site and the type of development. However it is noted that none of the sites are predicted as being likely to have a significant effect on an internationally designated site.	Permanent. Direct. ST/LT + A no policy option would still yield positive effects as existing legislation is already in place to protect biodiversity and natural assets across the UK.	Proposals to maintain and enhance the role and character of Broadstairs Town Centre, and Promenade and Beach Front would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA.	All development will have to comply with policies relating to the Protection of International and European Designated Sites and associated Mitigation Strategy. With respect to the potential for impacts on the Thanet Coast and Sandwich Bay SPA, amendments to policy wording to refer to Policy SP25 and the SPA mitigation strategy are recommended.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct. ST/LT +/- Policy adoption has no specific requirements regarding protection of water courses. However national legislation exists which would protect such assets from degradation by future developments. The impacts are questionable as developments along the Promenade and Beach Front have	Permanent. Direct. ST/LT + A no policy option would still yield positive effects as existing legislation is already in place to protect water assets across the UK.	Proposals to maintain and enhance the role and character of Broadstairs Town Centre, and Promenade and Beach Front would inevitably lead to potential impacts on Thanet Coast and Sandwich Bay SPA.	Proposals will be required to submit an acceptable environmental assessment detailing their local impacts with appropriate mitigation.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	the potential to pollute the local water courses through increased local activity leading to surface run off of contaminants or even litter for example.			With respect to the potential for impacts on the Thanet Coast and Sandwich Bay SPA, amendments to policy wording to refer to Policy SP25 and the SPA mitigation strategy are recommended.
22. and 23	N/A			N/A
<p>Summary</p> <p>A no policy option would largely yield neutral impacts as there would not be a change in the status quo. By adopting the policy active regeneration of Broadstairs will occur with the developments promoting the creation of employment opportunities by enhancing the existing commercial, retail and tourist infrastructure. This will add future economic resilience to the area by increasing the attraction of investors and visitors. The active support of developments along promenade and beach front will enhance the tourist economy whilst creating employment opportunities. Similarly by enhancing local character and exiting features a sense of place will be established that is attractive and in keeping with local history. Policy adoption undoubtedly meets the requirements of the SA objectives.</p> <p>With regards to the HRA assessment, the adoption of the policy would result in development close to Thanet Coast and Sandwich Bay SPA. The implementation of the development management policies should be suitable to prevent incidental significant effects. In order to strengthen the position, the policy should cross-refer to Policy SP25 and the SPA mitigation strategy.</p>				

Policy 8: Policy SP11 – Housing Provision

SA Objective	Proposed Policy	No policy ⁴⁷	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent direct LT ++ The proposed policy option would be expected to meet identified need in terms of predicted housing and employment growth	Unknown ? The no policy option may not deliver sufficient numbers and types of homes to accommodate expected need	N/A	-
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Unknown ? At this spatial scale, the potential effects of the proposed policy and no policy option cannot be assessed.		N/A	-
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Permanent direct LT + Both the proposed policy and no policy option are likely to support demand for qualified and educated people to support the aspirations for economic growth set out in all 3 options.		N/A	-
4. To increase public safety and reduce crime and fear of crime.	Permanent direct ST/LT + Development of new homes could contribute to the regeneration of areas suffering from high levels of deprivation and/or crime. This could lead to a direct reduction in crime through building works activity (for example by bringing derelict and unsafe sites into active use) and better design/layout of residential areas.		N/A	Encouragement of bringing empty properties into the housing market could reduce crime and safety fears.
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Permanent, direct LT + New employment opportunities and the provision of new homes can help lift people living in deprived areas. This can be through the provision of new housing to replace sub-standard stock, and through employment and training opportunities associated with employment. There is no information within the proposed policy, which could inform an assessment of the likely effects on key facilities.		N/A	The proposed policy does not discuss localities or proximity to key facilities. Policy should include this as a consideration for new developments.
6. To create vibrant balanced communities where residents feel a	Unknown ? The proposed policy ad no policy option are about housing provision based around employment growth. Likely effects on sense of place and community are not evident.		N/A	Benefits from housing development and employment should be extended to deprived areas.

⁴⁷ No Policy scenario represents housing demand based on past patterns of growth

SA Objective	Proposed Policy	No policy ⁴⁷	HRA implications	Mitigation and enhancement measures
'sense of place' and individual contribution is valued.				Policy should attempt to target developments in areas with substandard housing stock. New housing development should consider integration with surrounding areas and existing communities.
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Unknown ? The proposed policy and no policy option are about housing provision based around employment growth. However, due to the lack of detail regarding spatial information, the effects are unknown at this time.		N/A	Apprentice schemes and targeted employment of "people on unemployment benefits" may be appropriate, particularly for larger house building schemes. New employment opportunities should be targeted at deprived areas to maximise the positive effects on the unemployed.
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Direct. ST + Construction of thousands of new homes will increase GVA of construction industry across Thanet (all other things being equal). The supply chain effects will also help stimulate economic growth in other related sectors. No direct effects on the supply of industrial and employment development are described in either the proposed policy or the no policy option. Effects will be short term if carried out as one off investment.		N/A	- The policy suggests creating a sustainable new settlement incorporating appropriate mitigation measures to ensure its sustainability.
9.	N/A		N/A	N/A
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Unknown ? The proposed policy and no policy option relate to strategic housing provision. No spatial information has been given. Positive effects could be achieved through encouraging potential regeneration of previously developed land, avoiding greenfield land.		N/A	Building on previously developed land should be prioritised over greenfield sites where appropriate. Bringing forward current empty properties into the housing market could increase the efficiency in land use.
11. To ensure that a sustainable pattern of development is pursued.	Unknown ? The proposed policy and no policy option relate to strategic housing provision. No spatial information has been given, as such the likely effects of new housing on key services and facilities cannot be predicted.		N/A	New developments, particularly large scale developments should be encouraged in areas in close proximity to key facilities and services so that those without personal vehicles can access them. Links via public transport should also be considered.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Unknown ? The numbers of homes proposed are numerical targets only and do not include any information on patterns of development and spatial locations, as such it is not possible to assess potential impact on landscape and townscape.		N/A	Mitigating measures should include house building policy which seeks to minimise adverse effects on landscape and townscape character.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Unknown ? The numbers of homes proposed are numerical targets only and do not include any information on patterns of development and spatial locations, as such it is not possible to assess potential impact on historic sites/assets. The options do not include targets for restoration or reuse. Overall, it is not possible to assess the impacts of these options on these targets.		N/A	Mitigating measures should include house building policy which seeks to minimise adverse effects on historic sites and assets. Policy which encourages sustainable restoration and re-use of existing housing stock should be considered.

SA Objective	Proposed Policy	No policy ⁴⁷	HRA implications	Mitigation and enhancement measures
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Unknown ? No spatial information has been provided for the proposed locations of new housing. As such, it cannot be accurately predicted how the housing will interact with or influence existing AQMAs.		N/A	Mitigating measures should include policy around house building which seeks to minimise adverse effects on air quality and encourage sustainable transport options. Where possible, new development should be located near to existing public transport links and investment in these facilities should also follow from house building to ensure adequate capacity.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Indirect LT +/-? Growth in the green sectors suggests growth in more sustainable sectors/industries, which could include sustainable transport systems. If this is the case, there will be positive effects felt on the Thanet public transport networks. Consequently, this might bring about a reduction in private vehicle use. For the housing; no spatial information has been provided for the proposed locations. As such, it cannot be accurately predicted how the housing will affect the existing public transport network. Similarly, the location of the new jobs is unknown.	Unknown ? No spatial information has been provided for the proposed locations of new housing. As such, it cannot be accurately predicted how the housing will affect the existing public transport network. Similarly, the location of the new jobs and their type are unknown.	N/A	It is likely development of this much housing will have some effect on public transport networks. Encouraging new housing and employment growth near to existing or proposed transport links will help reduce reliance on private vehicles for commuting. Further, it may be desirable to require investment in public transport from larger scale developers, particularly if facilities serving new developments are not well served (or are considered at full capacity in terms of users).
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Unknown ? The numbers of homes housing proposed are numerical targets only and do not include any information on proximity to existing sustainable transport links. Further, there are no elements of these policy options which will help promote connectivity to the wider South East.		N/A	It is likely development of this much housing will have some effect on public transport networks. Encouraging new housing and employment growth near to existing or proposed transport links will help reduce reliance on private vehicles for commuting. Further, it may be desirable to require investment in public transport from larger scale developers, particularly if facilities serving new developments are not well served (or are considered at full capacity in terms of users).
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent. Direct ST/LT - Large scale development of new homes will bring about construction (short term) and operational waste (long term).		N/A	Promotion of best practice methods through local policy should help minimise waste production.
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Direct LT - This growth in housing development will bring about long term increase greenhouse gas emissions from household activities such as heating, cooking and electricity consumption.		N/A	Develop new homes according to the minimum level required under Code for Sustainable Homes (suggest level four).
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Neutral. 0 The numbers of homes housing proposed are numerical targets only and do not include any information on proximity to flood risk areas. A neutral effect has been assumed as it is expected that development will adhere to local and national planning policy (including Environment Agency guidance) in place which discourages development in at risk areas and attempts to ensure new development does not increase flood risk elsewhere.		N/A	Follow Environment Agency policy and guidance. Develop away from flood risk areas. Carry out full flood risk assessments for new developments in at risk areas, and for large scale developments which may have the potential to change flood risk in their vicinity.

SA Objective	Proposed Policy	No policy ⁴⁷	HRA implications	Mitigation and enhancement measures
20. To conserve and enhance biodiversity.	Unknown ? It is not possible to assess the effects of the proposed policy and no policy option without considering the spatial distribution of development.		N/A	Potential effects are better assessed through the allocations and via topic specific criteria based policies.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Unknown ? It is not possible to assess the effects of the proposed policy and no policy option without considering the spatial distribution of development.		N/A	Potential effects are better assessed through the allocations and via topic specific criteria based policies.
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Direct ST/LT -/? The proposed policy and no policy option relates to house building. As such, this will result in increased unavoidable short term demand for scarce resources. The option does not distinguish itself as performing better in terms of sustainability. Further, this option does not point towards a level of refurbishment of existing housing stock.		N/A	It is important to ensure that new housing adheres to best practice design and local targets for sustainable house building. This will help ensure that sustainability is considered in design, lessening the impacts of resource use.
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Permanent. Direct. ST/LT -/? The proposed policy and no policy option relates to house building which will increase the number of houses across the Thanet area (all things being equal). As such, it will result in increased unavoidable short term energy demand. Longer term there will be increase in consumption of energy from increased housing stock (however, with more sustainable design this should be less than existing stock). The option does not distinguish itself as performing better in terms of sustainability.		N/A	Both the proposed policy and no policy option would perform better if they are developed with best practice design considered throughout.
<p>Summary</p> <p>Areas of new build homes have the potential to create areas that may be perceived as being safer. This is often the case when brownfield or previously developed land is developed and brought back into active use. However, this was not factored into the assessment of the scenarios at this stage, given their strategic nature.</p> <p>The development of new homes will have no direct effect on the provision of public transport links. The increase in new homes will likely increase demand on public transport facilities indirectly by increasing the population of certain areas. The extent of the effect will depend on the provision of public transport facilities and the availability of public transport options for a given area. Gathering data on capacity of existing public transport facilities will be crucial in understanding the effects increased populations will have. Many of the potentially uncertain effects and adverse effects will be mitigated by other criteria and topic specific policies as well as the site assessment criteria used to assess and select site allocations.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 9: Policy SP12 – General Housing Policy

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Direct. LT ++ The policy suggests the provision of an appropriate mix of dwellings, affordable houses and accessible homes. While there is no target for the delivery of affordable houses, this policy would contribute positively towards the housing demand.	Unknown ? In the absence of this policy it is unclear if the provision of housing would be diverse, affordable or accessible.	N/A	O-
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Permanent. Direct. ST/LT + This policy supports the provision of community facilities, which are likely to include healthcare facilities.	Permanent. Indirect. ST/LT -/? Depending on the number of new residential developments, this policy could have an adverse effect on this objective as the access to the existing healthcare facilities could become limited.	N/A	A Statement of Social Impacts will be required for developments of 50 or more dwellings. This Statement will address the needs for community facilities.
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Permanent. Direct. ST/LT + This policy supports the provision of community facilities, which are likely to include educational facilities.	Permanent. Indirect. ST/LT -/? Depending on the number of new residential developments, this policy could have an adverse effect on this objective as the access to the existing educational facilities could become limited.	N/A	A Statement of Social Impacts will be required for developments of 50 or more dwellings. This Statement will address the needs for community facilities.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
4. To increase public safety and reduce crime and fear of crime.	Unknown ? While this policy promotes residential development, there is no indication of the design or safety features that would be implemented.	Neutral. 0 A no policy option would not alter the status quo.	N/A	Policy likely to be reinforced by Local Plan design policies.
5.	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent. Indirect. ST/LT + This policy will contribute towards the provision of an appropriate mix of dwellings and associated community facilities. This policy will have a positive effect on the community.	Neutral. 0 A no policy option would not alter the status quo.	N/A	A Statement of Social Impacts will be required for developments of 50 or more dwellings. This Statement will address the needs for community facilities.
7. to 11	N/A		N/A	N/A
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Unknown ? While this policy promotes residential development, the impact on the landscape character is unclear, as no details of design considerations are provided.	Permanent. Indirect. ST/LT - Depending on the number of new residential developments and the designs used, this policy could have a negative effect on the character of an area.	N/A	Policy likely to be reinforced by Local Plan design policies.
513. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT +/- This policy suggests cumulative impacts of the site allocations and highways infrastructure on heritage assets and archaeological resources will be assessed. This should contribute in protecting historic assets.	Permanent. Indirect. ST/LT - In the absence of this policy, development could have an adverse effect on historic assets.	N/A	A Heritage Impact Assessment will be required at the masterplanning stage.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Indirect. ST/LT - This policy include the provision of parking spaces in communal area. This is likely to encourage residents to use a car and therefore have an adverse effect on the local air quality.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
15.	N/A	N/A	N/A	N/A
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Unknown ? The policy includes the provision of one electric car charging point for every 10 parking spaces or one charging point to be provided for every dwelling with parking provision within its curtilage. While this could encourage the use of a more sustainable mode of transport (i.e. electric car), the impact on the residents' behaviour is unclear.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
17. and 18	N/A		N/A	N/A
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Indirect. ST/LT + The policy will ensure residential development allow for future access to the existing water supply infrastructure for maintenance and upsizing purposes which will contribute to reduce flood risk.	Neutral. 0 A no policy option would not alter the status quo.		-
20. To conserve and enhance biodiversity.	Permanent. Direct ST/LT ++ This policy suggests development proposals will need to provide an assessment of the sites functionality as a roosting or feeding habitat for wintering and breeding	Permanent. Indirect. ST/LT - In the absence of this policy, development could occur in areas of roosting or feeding habitat, which would have an	N/A	All development must comply with policies relating to the Protection of International and European Designated Sites and associated mitigation strategy.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	birds cited in the Special Protection Area, which will contribute to the protection of the local biodiversity.	adverse impact on the wintering and breeding bird populations.		
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Indirect. ST/LT + The policy will ensure residential development provide a connection to the sewerage system which will help protecting the water resources.	Neutral. 0 A no policy option would not alter the status quo.		-
22. and 23	N/A		N/A	N/A
Summary The promotion of the proposed policy is beneficial in terms of the housing objective as it supports mix dwellings, accessible and affordable residential development. It also has a positive effect on the water, limiting the flood risk and reducing pollution by connecting to the existing sewerage system. However, the impact of this policy on public safety and on the character of an area is unclear has there if no information about the design.				

Policy 10: Policy SP13 – Strategic Housing Sites - Manston Green

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent Direct LT ++ The proposed policy inherently provides for additional housing within the District, by proposing up to 700 new dwellings on site.	Neutral 0 The omission of this policy in isolation would not significantly affect the status quo as other housing sites would provide strategic housing allocations.	Development of housing sites at Manston Green are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	-
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Permanent Direct ST/LT - Implementation of the proposed policy is likely to place additional burden on community facilities, including local healthcare provision.	Neutral 0 A no policy option would not alter the status quo.	N/A	The proposed policy includes criteria for assessment of the effects of housing development, which will identify shortfalls in local healthcare capacity and indicate the level of increased provision that may be required through developer contributions.
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Permanent Direct ST/LT + The proposed policy stipulated that a fully serviced area of 2.05ha is to be provided for the provision of a new two-form entry primary school. This would mitigate the impact of new school age children on local primary schools. It is important that the policy provides provision for the development of the new school to at least one-form entry as required by the education authority.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
4. To increase public safety and reduce crime and fear of crime.	Temporary/Permanent Indirect ST/LT + Development of new homes could contribute to the reduction of crime and fear of crime through the better design/layout of residential areas.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Unknown ? The effects on existing community facilities cannot be assessed and are therefore unknown at this stage as effects will depend upon the housing mix and tenure.	Neutral 0 A no policy option would not alter the status quo.	N/A	As part of the masterplanning process, mitigation in the form of further studies will be required to ensure positive outcomes against this sustainability objective. This will require an assessment of how demand on community facilities may increase as a

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
				result of the additional population in the area.
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent Indirect ST/LT - The proposed policy allocated housing on a site that is outside of the existing urban area and is separated from existing settlements. In addition, there is potential for development to remove corridors between settlements. This would potentially reduce community identity as settlement areas merge.	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Manston Green with a balanced and vibrant community are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	It would be important for a future masterplanning process for sites to consider how development, particularly at the edge of the site boundaries, can be designed to limit the potential for settlements to merge.
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Neutral 0 Whilst the policy includes provision for small-scale retail provision within the development, this is unlikely to significantly contribute towards achieving this objective.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
8. and 9	N/A		N/A	N/A
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent Direct ST/LT - Implementation of the proposed policy would require the use of greenfield land and would therefore not directly support this sustainability objective.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT - Due to the location of the sites that form the proposed policy, achieving sustainable development patterns might be problematic due to the potential issue of merging settlements.	Temporary/Permanent. Direct. ST/LT + By limiting development in this location, separation of settlements is maintained, which might help focus development in previously developed areas.	Development of housing sites at Manston Green ensuring a sustainable pattern are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy..	It would be important for a future masterplanning process for sites to consider how development, particularly at the edge of the site boundaries, can be designed to limit the potential for settlements to merge.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Unknown ? The effects of the proposed policy on existing landscape character are unknown at this stage as they would depend upon the ultimate design of the site.	Neutral. 0 A no policy option would not alter the status quo.	Development of housing sites at Manston Green conserving and enhancing the areas landscape are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy. .	It would be important for a future masterplanning process for sites to consider how development may effect landscape character. Development that contributes to the landscape character, rather than simply not affecting it, should be encouraged.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Unknown ? The effects of the proposed policy on historic and archaeological sites are unknown at this stage as they would depend upon the ultimate design of the sites and relevant assessment of these effects.	Neutral. 0 A no policy option would not alter the status quo.	N/A	The proposed policy includes provision for undertaking a pre-design archaeological assessment taking account of presence of significant and sensitive remains and an assessment of the effects on the setting of listed buildings at Ozengell. Undertaking these measures would help identify issues and mitigate negative effects.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Temporary/Permanent. Direct. ST/LT - The proposed policy promotes development that is likely to result in an increase in car journeys within the District's Air Quality Management Areas. Not all new residents of	Temporary/Permanent. Direct. ST/LT + The no policy option potentially limits the increase of vehicle journeys within the Districts Air Quality Management Area.	N/A	As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	the new housing provided on site are likely to be from outside of the District, though inward migration resulting from the development is likely to occur.			ensure positive outcomes against this sustainability objective. This would involve maximising connectivity for alternative forms of transport (e.g. walking and cycling) and extending bus service provision.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Unknown ? The proposed policy allocates new housing development in an area that has the potential for sustainable integration of public transport. The sites are within proximity to public transport routes, but the design and integration of site access is important in determining overall accessibility. This is important as there is provision within the proposed policy for improved multi-modal connections for the sites and to assess the potential for bus service extensions	Neutral. 0 A no policy option would not alter the status quo.	N/A	As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to ensure positive outcomes against this sustainability objective.
16.	N/A		N/A	N/A
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent. Direct. ST/LT - The proposed policy will facilitate housing development, which has the potential to increase the amount of domestic waste produced in the district.	Neutral. 0 A no policy option would not alter the status quo.	N/A	Mitigation will be required through the design of all new housing developments to ensure that waste minimisation and recycling are promoted during the operation phase of these developments. This would be achieved by maximising the outcomes of other Local Plan policies.
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Direct. ST/LT + The proposed policy designates sites for housing that are more than 100m from the coastal area, minimising risks from sea level rises.	Neutral. 0 A no policy option would not alter the status quo.	N/A	In addition, Policy SP35 states that new development must take account of: <ul style="list-style-type: none"> Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy. Mitigating against climate change by reducing emissions. These measures will help enhance effects relating to this sustainability objective.
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. ST/LT + The proposed policy designates sites for housing that are more than 100m from the coastal area, minimising risks from sea level rises.	Neutral. 0 A no policy option would not alter the status quo.	Development of housing sites at Manston Green are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	-
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT + The proposed policy designates sites for housing that have minor potential for ecological effects, though by keeping development away from Green Wedges, impacts on habitats could be minimised, assuming the allocated site, ecological value is low.	Unknown ? A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.	Development of housing sites at Manston Green are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	See Policy SP12: It includes an assessment of the sites functionality as a roosting or feeding habitat for wintering and breeding birds cited in the Special protection Area, and

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
				provide mitigation where necessary. This was originally part of this policy.
21.	N/A		N/A	N/A
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Unknown ? A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.	Neutral. 0 A no policy option would not alter the status quo.	N/A	In terms of mitigation, Policy SP35 states that new development must take account of: <ul style="list-style-type: none">Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government’s Zero Carbon Policy.Mitigating against climate change by reducing emissions. These measures will help promote positive effects relating to this sustainability objective. However, the overall effect of this would be dependent on the final design of any emerging housing proposals.
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Unknown ? Effects against this objective are unknown at this stage as the policy does not include explicit reference to renewable energy or the requirement for energy efficiency measures.	Neutral. 0 A no policy option would not alter the status quo.	N/A	The success of the proposed policy would depend on the implementation of other Local Plan policies relating to renewable energy provision and energy efficiency. These policies would help promote beneficial effects and support this sustainability objective.
<p>Summary</p> <p>The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District’s housing supply and improvements to community facilities, such as the provision of a new primary school. There is also potential for additional community facilities improvements, depending on further studies to be undertaken during design that will state any additional requirements as a result of development. However, any new development of greenfield land is likely to have the potential for adverse effects against environmental objectives, particularly relating to landscape and ecology. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. Due to its location, the proposed policy advocates housing sites that do not currently connect well with existing urban settlements, though design of the sites can improve urban connectivity. The sites are served by public transport and available capacity on the highway network, which enables good links with the rest of the District, but particularly the major centres of Margate, Broadstairs, Ramsgate and Westwood.</p> <p>With regards to the HRA implications there are no likely significant effects on designated sites. This policy provides for masterplanning being informed by and addressing the implementation of Policy SP25 and the SPA mitigation strategy.</p>				

Policy 11: Policy SP14 – Strategic Housing Sites at Birchington

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent Direct LT ++ The proposed policy inherently provides for additional housing within the District, by proposing up to 1000 new dwellings on site.	Neutral 0 The omission of this policy in isolation would not significantly affect the status quo as other housing sites would provide strategic housing allocations.	Development of housing sites at Birchington are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	-
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Permanent Direct ST/LT - Implementation of the proposed policy is likely to place additional burden on community facilities, including local healthcare provision.	Neutral 0 A no policy option would not alter the status quo.	N/A	The proposed policy has the potential to significantly affect the status quo by increasing the population covered by individual healthcare facilities. The proposed policy includes criteria for

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
				assessment of the effects of development of housing, which will identify shortfalls in local healthcare capacity and indicate the level of increased provision that may be required through developer contributions.
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Permanent Direct ST/LT + The proposed policy stipulated that a fully serviced area of 2.05ha is to be provided for the provision of a new two-form entry primary school. This would mitigate the impact of new school age children on local primary schools. It is important that the policy provides provision for the development of the new school to at least one-form entry as required by the education authority.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
4. To increase public safety and reduce crime and fear of crime.	Temporary/Permanent Indirect ST/LT + Development of new homes could contribute to the reduction of crime and fear of crime through the better design/layout of residential areas.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Unknown ? The effects on existing community facilities cannot be assessed and are therefore unknown at this stage as effects will depend upon the housing mix and tenure.	Neutral 0 A no policy option would not alter the status quo.	N/A	As part of the masterplanning process, mitigation in the form of further studies will be required to ensure positive outcomes against this sustainability objective. This will require an assessment of how demand on community facilities may increase as a result of the additional population in the area.
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent Indirect ST/LT + The proposed policy allocated housing on a site that is outside of the existing urban area but is adjacent to existing settlements. This helps maintain a distinctive settlement pattern within Birchington-on-sea, whilst maintaining green edges with the countryside	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Birchington with a balanced and vibrant community are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	It would be important for a future masterplanning process for this site to consider how development, particularly at the edge of the site boundaries, can be designed to fully integrate development within the existing community.
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Neutral 0 Whilst the policy includes provision for small-scale retail provision within the development, this is unlikely to significantly contribute towards achieving this objective.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
8. and 9	N/A		N/A	
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent Direct ST/LT - Implementation of the proposed policy would require the use of greenfield land and would therefore not directly support this sustainability objective.	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Birchington are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	-
11. To ensure that a sustainable pattern of development is pursued.	Permanent Direct ST/LT + Due to the location of the site that forms the proposed policy, there is potential for achieving sustainable	Temporary/Permanent Direct ST/LT +	Development of housing sites at Birchington ensuring a sustainable pattern are achievable without significant effects on designated sites,	It would be important for a future masterplanning process for this site to consider how development, particularly

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	development patterns as the proposed policy advocates development adjacent to the existing settlement, whilst maintaining green edges.	By limiting development in this location, separation of settlements is maintained, which might help focus development in previously developed areas.	assuming the implementation of Policy SP25 and the SPA mitigation strategy.	at the edge of the site boundaries, can be designed to limit the potential for settlements to merge.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Unknown ? The effects of the proposed policy on existing landscape character are unknown at this stage as they would depend upon the ultimate design of the site.	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Birchington conserving and enhancing the areas landscape are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	It would be important for a future masterplanning process for this site to consider how development may effect landscape character. Development that contributes to the landscape character, rather than simply not affecting it, should be encouraged.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Unknown ? The effects of the proposed policy on historic and archaeological sites are unknown at this stage as they would depend upon the ultimate design of the site and relevant assessment of these effects.	Neutral 0 A no policy option would not alter the status quo.	N/A	The proposed policy includes provision for undertaking a pre-design archaeological assessment taking account of presence of significant and sensitive remains and an assessment of the effects on the setting of listed buildings on site and at Quex Park. Undertaking these measures would help identify issues and mitigate negative effects.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Temporary/Permanent Direct ST/LT - The proposed policy promotes development that is likely to result in an increase in car journeys within the District's Air Quality Management Areas. Not all new residents of the new housing provided on site are likely to be from outside of the District, though inward migration resulting from the development is likely to occur.	Temporary/Permanent Direct ST/LT + The no policy option potentially limits the increase of vehicle journeys within the Districts Air Quality Management Area.	N/A	As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to ensure positive outcomes against this sustainability objective. This would involve maximising connectivity for alternative forms of transport (e.g. walking and cycling) and extending bus service provision.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Unknown ? The proposed policy allocates new housing development in an area that has the potential for sustainable integration of public transport. The site is within proximity to public transport routes, but the design and integration of site access is important in determining overall accessibility. This is important as there is provision within the proposed policy for improved multi-modal connections for the site and to assess the potential for bus service extensions	Neutral 0 A no policy option would not alter the status quo.	N/A	As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to ensure positive outcomes against this sustainability objective.
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent Direct ST/LT + The provision of a new link road extending from Minnis Road and the A28 will help alleviate the pressures of additional traffic on the A28, particularly around The Square in Birchington.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent Direct ST/LT - The proposed policy will facilitate housing development, which has the potential to increase the amount of domestic waste produced in the district.	Neutral 0 A no policy option would not alter the status quo.	N/A	Mitigation will be required through the design of all new housing developments to ensure that waste minimisation and recycling are promoted during the operation phase of these developments. This would be achieved by maximising the outcomes of other Local Plan policies.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent Direct ST/LT + The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises.	Neutral 0 A no policy option would not alter the status quo.	N/A	In addition, Policy SP35 states that new development must take account of: <ul style="list-style-type: none"> Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy. Mitigating against climate change by reducing emissions. These measures will help enhance effects relating to this sustainability objective.
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent Direct ST/LT + The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises.	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Birchington are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	-
20. To conserve and enhance biodiversity.	Permanent Direct ST/LT + The proposed policy designates a site for housing that has minor potential for ecological effects, though by keeping development away from Green Wedges, impacts on habitats are could be minimised, assuming the allocated site, ecological value is low.	Unknown ? A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.	Development of housing sites at Birchington are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	See Policy SP12: It includes an assessment of the sites functionality as a roosting or feeding habitat for wintering and breeding birds cited in the Special protection Area, and provide mitigation where necessary. This was originally part of this policy.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent Direct ST/LT + The proposed policy stipulates that the potential effects on the SPA should be identified and how the SPA mitigation strategy dictated by Policy SP25 is being met.	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Birchington are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	-
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Unknown ? A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.	Neutral 0 A no policy option would not alter the status quo.	N/A	In terms of mitigation, Policy SP35 states that new development must take account of: <ul style="list-style-type: none"> Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy. Mitigating against climate change by reducing emissions. These measures will help promote positive effects relating to this sustainability objective. However, the overall effect of this would be dependent on the final design of any emerging housing proposals.
23. To increase energy efficiency and the proportion of energy	Unknown ?	Neutral 0 A no policy option would not alter the status quo.	N/A	The success of the proposed policy would depend on the implementation of other Local Plan policies relating to

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
generated from renewable sources in the area.	Effects against this objective are unknown at this stage as the policy does not include explicit reference to renewable energy or the requirement for energy efficiency measures.			renewable energy provision and energy efficiency. These policies would help promote beneficial effects and support this sustainability objective.
<p>Summary</p> <p>The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District’s housing supply and improvements to community facilities, such as the provision of a new primary school. There is also potential for additional community facilities improvements, depending on further studies to be undertaken during design that will state any additional requirements as a result of development. However, any new development of greenfield land is likely to have the potential for adverse effects against environmental objectives, particularly relating to landscape and ecology. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. The proposed policy advocates housing on a site that connects well with existing urban settlements, though design of the site can help maximise urban connectivity. The site is served by public transport, though available capacity on the highway network might be limited. The implementation of a new link road to serve the site is likely to help free up capacity, which will enable good links with the rest of the District, but particularly the major centres of Margate, Broadstairs, Ramsgate and Westwood.</p> <p>With regards to the HRA implications there are no likely significant effects on designated sites. This policy provides for masterplanning being informed by and addressing the implementation of Policy SP25 and the SPA mitigation strategy.</p>				

Policy 12: Policy SP15 – Strategic Housing Sites at Westgate-on-Sea

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent Direct LT ++ The proposed policy inherently provides for additional housing within the District, by proposing up to 1000 new dwellings on site.	Neutral 0 The omission of this policy in isolation would not significantly affect the status quo as other housing sites would provide strategic housing allocations.	Development of housing sites at Westgate-on-Sea are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	-
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Permanent Direct ST/LT - Implementation of the proposed policy is likely to place additional burden on community facilities, including local healthcare provision.	Neutral 0 A no policy option would not alter the status quo.	N/A	The proposed policy has the potential to significantly affect the status quo by increasing the population covered by individual healthcare facilities. The proposed policy includes criteria for assessment of the effects of development of housing, which will identify shortfalls in local healthcare capacity and indicate the level of increased provision that may be required through developer contributions.
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Permanent Direct ST/LT + The proposed policy stipulated that a fully serviced area of 2.05ha is to be provided for the provision of a new two-form entry primary school. This would mitigate the impact of new school age children on local primary schools. It is important that the policy provides provision for the development of the new school to at least one-form entry as required by the education authority.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
4. To increase public safety and reduce crime and fear of crime.	Temporary/Permanent Indirect ST/LT + Development of new homes could contribute to the reduction of crime and fear of crime through the better design/layout of residential areas.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
5. To provide appropriate key facilities to support vulnerable people and reduce the level of	Unknown ?	Neutral 0 A no policy option would not alter the status quo.	N/A	As part of the masterplanning process, mitigation in the form of further studies will be required to ensure positive

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
deprivation identified across the wards.	The effects on existing community facilities cannot be assessed and are therefore unknown at this stage as effects will depend upon the housing mix and tenure.			outcomes against this sustainability objective. This will require an assessment of how demand on community facilities may increase as a result of the additional population in the area.
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent Indirect ST/LT + The proposed policy allocated housing on a site that is outside of the existing urban area but is adjacent to existing settlements. This helps maintain a distinctive settlement pattern within Westgate-on-Sea, whilst maintaining green edges with the countryside	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Westgate-on-Sea with a balanced and vibrant community are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	It would be important for a future masterplanning process for this site to consider how development, particularly at the edge of the site boundaries, can be designed to fully integrate development within the existing community.
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Neutral 0 Whilst the policy includes provision for small-scale retail provision within the development, this is unlikely to significantly contribute towards achieving this objective.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
8. and 9	N/A		N/A	N/A
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent Direct ST/LT - Implementation of the proposed policy would require the use of greenfield land and would therefore not directly support this sustainability objective.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
11. To ensure that a sustainable pattern of development is pursued.	Permanent Direct ST/LT + Due to the location of the site that forms the proposed policy, there is potential for achieving sustainable development patterns as the proposed policy advocates development adjacent to the existing settlement, whilst maintaining green edges.	Temporary/Permanent Direct ST/LT + By limiting development in this location, separation of settlements is maintained, which might help focus development in previously developed areas.	Development of housing sites at Westgate-on-Sea ensuring a sustainable pattern are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	It would be important for a future masterplanning process for this site to consider how development, particularly at the edge of the site boundaries, can be designed to limit the potential for settlements to merge.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Unknown ? The effects of the proposed policy on existing landscape character are unknown at this stage as they would depend upon the ultimate design of the site.	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Westgate-on-Sea conserving and enhancing the areas landscape are achievable without significant effects designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	It would be important for a future masterplanning process for this site to consider how development may effect landscape character. Development that contributes to the landscape character, rather than simply not affecting it, should be encouraged.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Unknown ? The effects of the proposed policy on historic and archaeological sites are unknown at this stage as they would depend upon the ultimate design of the site and relevant assessment of these effects.	Neutral 0 A no policy option would not alter the status quo.	N/A	The proposed policy includes provision for undertaking a pre-design archaeological assessment taking account of presence of significant and sensitive remains and an assessment of the effects on scheduled monuments and the listed Dent de Lion Gateway. Undertaking these measures would help identify issues and mitigate negative effects.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Temporary/Permanent Direct ST/LT - The proposed policy promotes development that is likely to result in an increase in car journeys within the District's Air Quality Management Areas. Not all new residents of the new housing provided on site are likely to be from outside of the District, though inward migration resulting from the development is likely to occur.	Temporary/Permanent Direct ST/LT + The no policy option potentially limits the increase of vehicle journeys within the Districts Air Quality Management Area.	N/A	As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to ensure positive outcomes against this sustainability objective. This would involve maximising connectivity for alternative forms of transport (e.g. walking and cycling) and extending bus service provision.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Unknown ? The proposed policy allocates new housing development in an area that has the potential for sustainable integration of public transport. The site is within proximity to public transport routes, but the design and integration of site access is important in determining overall accessibility. This is important as there is provision within the proposed policy for improved multi-modal connections for the site and to assess the potential for bus service extensions	Neutral 0 A no policy option would not alter the status quo.	N/A	As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to ensure positive outcomes against this sustainability objective.
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent Direct ST/LT + The proposed policy will result in improvements to junctions and roads, particularly the A28. Improvements to this strategic route will help facilitate additional traffic movement towards the A299.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent Direct ST/LT - The proposed policy will facilitate housing development, which has the potential to increase the amount of domestic waste produced in the district.	Neutral 0 A no policy option would not alter the status quo.	N/A	Mitigation will be required through the design of all new housing developments to ensure that waste minimisation and recycling are promoted during the operation phase of these developments. This would be achieved by maximising the outcomes of other Local Plan policies.
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent Direct ST/LT + The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises.	Neutral 0 A no policy option would not alter the status quo.	N/A	In addition, Policy SP35 states that new development must take account of: <ul style="list-style-type: none"> Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy. Mitigating against climate change by reducing emissions. These measures will help enhance effects relating to this sustainability objective.
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent Direct ST/LT + The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises.	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Westgate-on-Sea are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
20. To conserve and enhance biodiversity.	Permanent Direct ST/LT + The proposed policy designates a site for housing that has minor potential for ecological effects, though by keeping development away from Green Wedges, impacts on habitats are could be minimised, assuming the allocated site, ecological value is low.	Unknown ? A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.	Development of housing sites at Westgate-on-Sea are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	See Policy SP12: It includes an assessment of the sites functionality as a roosting or feeding habitat for wintering and breeding birds cited in the Special protection Area, and provide mitigation where necessary. This was originally part of this policy.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent Direct ST/LT + The proposed policy stipulates that the potential effects on the SPA should be identified and how the SPA mitigation strategy dictated by Policy SP25 is being met.	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Westgate-on-Sea are achievable without significant effects on the designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	-
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Unknown ? A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.	Neutral 0 A no policy option would not alter the status quo.	N/A	In terms of mitigation, Policy SP35 states that new development must take account of: <ul style="list-style-type: none">Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government’s Zero Carbon Policy.Mitigating against climate change by reducing emissions. These measures will help promote positive effects relating to this sustainability objective. However, the overall effect of this would be dependent on the final design of any emerging housing proposals.
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Unknown ? Effects against this objective are unknown at this stage as the policy does not include explicit reference to renewable energy or the requirement for energy efficiency measures.	Neutral 0 A no policy option would not alter the status quo.	N/A	The success of the proposed policy would depend on the implementation of other Local Plan policies relating to renewable energy provision and energy efficiency. These policies would help promote beneficial effects and support this sustainability objective.
<p>Summary</p> <p>The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District’s housing supply and improvements to community facilities, such as the provision of a new primary school. There is also potential for additional community facilities improvements, depending on further studies to be undertaken during design that will state any additional requirements as a result of development. However, any new development of greenfield land is likely to have the potential for adverse effects against environmental objectives, particularly relating to landscape and ecology. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. The proposed policy advocates housing on a site that connects well with existing urban settlements, though design of the site can help maximise urban connectivity. The site is served by public transport, though available capacity on the highway network might be limited. The implementation of a new link road to serve the site is likely to help free up capacity, which will enable good links with the rest of the District, but particularly the major centres of Margate, Broadstairs, Ramsgate and Westwood.</p> <p>With regards to the HRA implications there are no likely significant effects on designated sites. This policy provides for masterplanning being informed by and addressing the implementation of Policy SP25 and the SPA mitigation strategy.</p>				

Policy 13: Policy SP16 – Westwood Strategic Housing Sites

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent Direct LT ++ The proposed policy inherently provides for additional housing within the District, by proposing up to 1450 new dwellings on site.	Neutral 0 The omission of this policy in isolation would not significantly affect the status quo as other housing sites would provide strategic housing allocations.	Development of housing sites at Westwood are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	-
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Permanent Direct ST/LT - Implementation of the proposed policy is likely to place additional burden on community facilities, including local healthcare provision.	Neutral 0 A no policy option would not alter the status quo.	N/A	The proposed policy has the potential to significantly affect the status quo by increasing the population covered by individual healthcare facilities. The proposed policy includes criteria for assessment of the effects of development of housing, which will identify shortfalls in local healthcare capacity and indicate the level of increased provision that may be required through developer contributions.
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Unknown ? The proposed policy does not include a clear requirement for on-site educational provision, though there is provision for developer contributions, where required, to a new school off-site. Effects of this are unknown at this stage as the timing of the implementation of any required new school, will dictate impacts on existing educational facilities.	Neutral 0 A no policy option would not alter the status quo.	N/A	The need for a new school off-site, should be identified and implemented in line with development of the site.
4. To increase public safety and reduce crime and fear of crime.	Temporary/Permanent Indirect ST/LT + Development of new homes could contribute to the reduction of crime and fear of crime through the better design/layout of residential areas.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Unknown ? The effects on existing community facilities cannot be assessed and are therefore unknown at this stage as effects will depend upon the housing mix and tenure.	Neutral 0 A no policy option would not alter the status quo.	N/A	As part of the masterplanning process, mitigation in the form of further studies will be required to ensure positive outcomes against this sustainability objective. This will require an assessment of how demand on community facilities may increase as a result of the additional population in the area.
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent Indirect ST/LT + The proposed policy allocated housing on a site that is partly within the existing urban area. This helps maintain a distinctive settlement pattern within Westwood, whilst maintaining green edges with the countryside	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Westwood with a balanced and vibrant community are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	It would be important for a future masterplanning process for this site to consider how development, particularly at the edge of the site boundaries, can be designed to fully integrate development within the existing community.
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has	Neutral 0 Whilst the policy includes provision for small-scale retail provision within the development, this is unlikely to significantly contribute towards achieving this objective.	Neutral 0 A no policy option would not alter the status quo.	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
the opportunity to secure appropriate paid employment.				
8. and 9	N/A		N/A	N/A
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent Direct ST/LT - Implementation of the proposed policy would require the use of greenfield land and would therefore not directly support this sustainability objective.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
11. To ensure that a sustainable pattern of development is pursued.	Permanent Direct ST/LT + Due to the location of the site that forms the proposed policy, there is potential for achieving sustainable development patterns as the proposed policy advocates development adjacent to the existing settlement, whilst maintaining green edges.	Temporary/Permanent Direct ST/LT + By limiting development in this location, separation of settlements is maintained, which might help focus development in previously developed areas.	Development of housing sites at Westwood ensuring a sustainable pattern are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	It would be important for a future masterplanning process for this site to consider how development, particularly at the edge of the site boundaries, can be designed to limit the potential for settlements to merge.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Unknown ? The effects of the proposed policy on existing landscape character are unknown at this stage as they would depend upon the ultimate design of the site.	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Westwood conserving and enhancing the areas landscape are achievable without significant effects on designated sites, assuming the implementation of Policy SP25 and the SPA mitigation strategy.	It would be important for a future masterplanning process for this site to consider how development may effect landscape character. Development that contributes to the landscape character, rather than simply not affecting it, should be encouraged.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Unknown ? The effects of the proposed policy on historic and archaeological sites are unknown at this stage as they would depend upon the ultimate design of the site and relevant assessment of these effects.	Neutral 0 A no policy option would not alter the status quo.	N/A	The proposed policy includes provision for undertaking a pre-design archaeological assessment taking account of presence of significant and sensitive remains. Undertaking these measures would help identify issues and mitigate negative effects.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Temporary/Permanent Direct ST/LT - The proposed policy promotes development that is likely to result in an increase in car journeys within the District's Air Quality Management Areas. Not all new residents of the new housing provided on site are likely to be from outside of the District, though inward migration resulting from the development is likely to occur.	Temporary/Permanent Direct ST/LT + The no policy option potentially limits the increase of vehicle journeys within the Districts Air Quality Management Area.	N/A	As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to ensure positive outcomes against this sustainability objective. This would involve maximising connectivity for alternative forms of transport (e.g. walking and cycling) and extending bus service provision.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Unknown ? The proposed policy allocates new housing development in an area that has the potential for sustainable integration of public transport. The site is largely within proximity to public transport routes, but the design and integration of site access is important in determining overall accessibility. This is important as there is provision within the proposed policy for improved multi-modal connections for the site and to assess the potential for bus service extensions	Neutral 0 A no policy option would not alter the status quo.	N/A	As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to ensure positive outcomes against this sustainability objective.
16. To develop key sustainable transport links between Thanet and	Permanent Direct ST/LT +	Neutral 0	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
the wider Kent district and beyond, including road, rail and air.	The provision of a highway improvements including road widening and link roads will help alleviate the pressures of additional traffic on the local transport network.	A no policy option would not alter the status quo.		
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent Direct ST/LT - The proposed policy will facilitate housing development, which has the potential to increase the amount of domestic waste produced in the district.	Neutral 0 A no policy option would not alter the status quo.	N/A	Mitigation will be required through the design of all new housing developments to ensure that waste minimisation and recycling are promoted during the operation phase of these developments. This would be achieved by maximising the outcomes of other Local Plan policies.
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent Direct ST/LT + The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises.	Neutral 0 A no policy option would not alter the status quo.	N/A	In addition, Policy SP35 states that new development must take account of: <ul style="list-style-type: none"> Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy. Mitigating against climate change by reducing emissions. These measures will help enhance effects relating to this sustainability objective.
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent Direct ST/LT + The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises.	Neutral 0 A no policy option would not alter the status quo.	Development of housing sites at Westwood are achievable without significant effects on designated sites assuming the implementation of Policy SP25 and the SPA mitigation strategy.	-
20. To conserve and enhance biodiversity.	Permanent Direct ST/LT + The proposed policy designates a site for housing that has minor potential for ecological effects, though by keeping development away from Green Wedges, impacts on habitats are could be minimised, assuming the allocated site, ecological value is low.	Unknown ? A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.	Development of housing sites at Westwood are achievable without significant effects on designated sites assuming the implementation of Policy SP25 and the SPA mitigation strategy.	See Policy SP12: It includes an assessment of the sites functionality as a roosting or feeding habitat for wintering and breeding birds cited in the Special protection Area, and provide mitigation where necessary. This was originally part of this policy.
21.	N/A		N/A	N/A
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Unknown ? A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.	Neutral 0 A no policy option would not alter the status quo.	N/A	In terms of mitigation, Policy SP35 states that new development must take account of: <ul style="list-style-type: none"> Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy. Mitigating against climate change by reducing emissions.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
				These measures will help promote positive effects relating to this sustainability objective. However, the overall effect of this would be dependent on the final design of any emerging housing proposals.
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Unknown ? Effects against this objective are unknown at this stage as the policy does not include explicit reference to renewable energy or the requirement for energy efficiency measures.	Neutral 0 A no policy option would not alter the status quo.	N/A	The success of the proposed policy would depend on the implementation of other Local Plan policies relating to renewable energy provision and energy efficiency. These policies would help promote beneficial effects and support this sustainability objective.
<p>Summary</p> <p>The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District’s housing supply and improvements to community facilities. There may be a need for a new off-site school, which would benefit from identification and implementation that aligns with a phasing programme for the site. There is also potential for additional community facilities improvements, depending on further studies to be undertaken during design that will state any additional requirements as a result of development. However, any new development of greenfield land is likely to have the potential for adverse effects against environmental objectives, particularly relating to landscape and ecology. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate these adverse effects. The proposed policy advocates housing on a site that connects well with existing urban settlements, though design of the site can help maximise urban connectivity. The site is largely served by public transport, though available capacity on the highway network might be limited. The implementation of highway improvements to serve the site is likely to help free up capacity, which will enable good links with the rest of the District, but particularly the major centres of Margate, Broadstairs and Ramsgate.</p> <p>With regards to the HRA implications there are no likely significant effects on designated sites. This policy provides for masterplanning being informed by and addressing the implementation of Policy SP25 and the SPA mitigation strategy.</p>				

Policy 14: Policy SP18 - Land at Manston Court Road/Haine Road (former policy number New Policy 01)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Direct. LT ++ he proposed policy inherently provides for additional housing within the District, by proposing up to 700 new dwellings on site at a density of 30 dwellings per hectare net.	Neutral. 0 The omission of this policy in isolation would not significantly affect the status quo as other housing sites would provide strategic housing allocations.	The HRA is currently being carried out by AMEC and the conclusions will be addressed in this document in due course	To ensure no significant effects as a result of recreational pressure on designated sites, the policy should cross-refer to Policy SP25 and the SPA mitigation strategy.
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Neutral. 0 There will not be a change in the status quo under either the proposed policy or the no policy scenario. Neither will result in the addition or removal of healthcare provisions.			-
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Neutral. 0 There will not be a change in the status quo under either the proposed policy or the no policy scenario. Neither will result in the addition or removal of educational provisions.			-
4. To increase public safety and reduce crime and fear of crime.	Temporary/Permanent. Indirect. ST/LT + Development of new homes could contribute to the reduction of crime and fear of crime through the better design/layout of residential areas.	Neutral. 0 A no policy option would not alter the status quo.		-
5. To provide appropriate key facilities to support vulnerable people and reduce the level of	Unknown ? The effects on existing community facilities cannot be assessed and are therefore unknown at this stage as effects	Neutral. 0 A no policy option would not alter the status quo.		As part of the masterplanning process, mitigation in the form of further studies will be required to ensure positive

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
deprivation identified across the wards.	will depend upon the housing mix and tenure. However the policy does provide for a minimum of 9ha of open space to be provided.			outcomes against this sustainability objective. This will require an assessment of how demand on community facilities may increase as a result of the additional population in the area.
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Indirect. ST/LT + The proposed policy allocated housing on a site that is outside of the existing urban area but is located between Westwood Cross and Bradgate Caravan Park. This helps maintain a settlement pattern within Westwood, whilst maintaining green edges with the countryside	Neutral. 0 A no policy option would not alter the status quo.		<p>It would be important for a future masterplanning process for this site to consider how development, particularly at the edge of the site boundaries, can be designed to fully integrate development within the existing community.</p> <p>In addition, to ensure no significant effects as a result of recreational pressure on designated sites, the policy should cross-refer to Policy SP25 and the SPA mitigation strategy.</p>
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Neutral. 0 There will not be a change in the status quo under either the proposed policy or the no policy scenario. Neither will result in the addition or removal of employment opportunities.			-
8. and 9	N/A			N/A
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. ST/LT - Implementation of the proposed policy would require the use of greenfield land and would therefore not directly support this sustainability objective.	Neutral. 0 A no policy option would not alter the status quo.		-
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT ++ Due to the location of the site that forms the proposed policy, there is potential for achieving sustainable development patterns as the proposed policy advocates development within the existing urban environment, whilst maintaining green edges.	Temporary/Permanent. Direct. ST/LT + By limiting development in this location, separation of settlements is maintained, which might help focus development in previously developed areas.		<p>It would be important for a future masterplanning process for this site to consider how development, particularly at the edge of the site boundaries, in order to maximise the potential for achieving sustainable development patterns.</p> <p>In addition, to ensure no significant effects as a result of recreational pressure on designated sites, the policy should cross-refer to Policy SP25 and the SPA mitigation strategy.</p>
12. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	Unknown ? The effects of the proposed policy on existing landscape character are unknown at this stage as they would depend upon the ultimate design of the site.	Neutral. 0 A no policy option would not alter the status quo.		It would be important for a future masterplanning process for this site to consider how development may effect landscape character. Development that contributes to the landscape character, rather than simply not affecting it, should be encouraged.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
				In addition, to ensure no significant effects as a result of recreational pressure on designated sites, the policy should cross-refer to Policy SP25 and the SPA mitigation strategy.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Neutral. 0 There will not be a change in the status quo under either the proposed policy or the no policy scenario. Neither will enhance nor remove sites of historic archaeological or architectural importance, and their settings.			-
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Unknown ? The proposed policy promotes development that is likely to result in an increase in car journeys within the District's Air Quality Management Areas. Not all new residents of the new housing provided on site are likely to be from outside of the District, though inward migration resulting from the development is likely to occur. However, there is a requirement for ongoing monitoring of local air quality attached to the proposed policy, which may inform TDC's ongoing air quality review and assessment programme.	Temporary/Permanent. Direct. ST/LT + The no policy option potentially limits the increase of vehicle journeys within the Districts Air Quality Management Area.		The results of any local air quality monitoring are likely to indirectly affect performance against this objective, via TDC's ongoing air quality review and assessment programme.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Unknown ? The proposed policy allocates new housing development in an area that has the potential for sustainable integration of public transport. The site is within proximity to public transport routes, but the design and integration of site access is important in determining overall accessibility. This is important as there is provision within the proposed policy for improved multi-modal connections for the site and to assess the potential for bus service extensions	Neutral. 0 A no policy option would not alter the status quo.		As part of the masterplanning process, in particular the undertaking of a site Transport Assessment, mitigation in the form of further work will be required to ensure positive outcomes against this sustainability objective.
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Direct. ST/LT + The provision of a highway improvements identified through further traffic studies will help alleviate the pressures of additional traffic on the local transport network.	Neutral. 0 A no policy option would not alter the status quo.		-
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent. Direct. ST/LT - The proposed policy will facilitate housing development, which has the potential to increase the amount of domestic waste produced in the district.	Neutral. 0 A no policy option would not alter the status quo.		Mitigation will be required through the design of all new housing developments to ensure that waste minimisation and recycling are promoted during the operation phase of these developments. This would be achieved by maximising the outcomes of other Local Plan policies.
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Direct. ST/LT + The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises.	Neutral. 0 A no policy option would not alter the status quo.		In addition, Policy SP35 states that new development must take account of: <ul style="list-style-type: none"> Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy. Mitigating against climate change by reducing emissions.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
				These measures will help enhance effects relating to this sustainability objective.
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. ST/LT + The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises.	Neutral. 0 A no policy option would not alter the status quo.		To ensure no significant effects as a result of recreational pressure on designated sites, the policy should cross-refer to Policy SP25 and the SPA mitigation strategy.
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT + The proposed policy designates a site for housing that has minor potential for ecological effects, though by keeping development away from Green Wedges, impacts on habitats could be minimised, assuming the allocated site, ecological value is low.	Unknown ? A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.		<p>The proposed policy includes provision for undertaking a pre-design ecological assessment taking account of the presence of wintering and breeding birds. Undertaking these measures would help identify issues and mitigate negative effects.</p> <p>In addition, to ensure no significant effects as a result of recreational pressure on designated sites, the policy should cross-refer to Policy SP25 and the SPA mitigation strategy.</p>
21.	N/A			N/A
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Unknown ? A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.	Neutral. 0 A no policy option would not alter the status quo.		<p>In terms of mitigation, Policy SP35 states that new development must take account of:</p> <ul style="list-style-type: none">Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government’s Zero Carbon Policy.Mitigating against climate change by reducing emissions. <p>These measures will help promote positive effects relating to this sustainability objective. However, the overall effect of this would be dependent on the final design of any emerging housing proposals.</p>
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Unknown ? Effects against this objective are unknown at this stage as the policy does not include explicit reference to renewable energy or the requirement for energy efficiency measures.	Neutral. 0 A no policy option would not alter the status quo.		The success of the proposed policy would depend on the implementation of other Local Plan policies relating to renewable energy provision and energy efficiency. These policies would help promote beneficial effects and support this sustainability objective.
Summary				
The promotion of the proposed policy is beneficial in terms of socio-economic objectives as there is a clear contribution to the District’s housing supply. Any new development of greenfield land is likely to have the potential for adverse effects against environmental objectives, particularly relating to landscape and ecology. Mitigation through implementing robust design principles and undertaking further studies relating to potential environmental impacts are likely to help mitigate				

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
<p>these adverse effects. The proposed policy advocates housing on a site that connects well with existing urban settlements, though design of the site can help maximise urban connectivity. The site is served by public transport, though available capacity on the highway network might be limited. The implementation of highway improvements is likely to help free up capacity, which will enable good links with the rest of the District, but particularly the major centres of Margate, Broadstairs, Ramsgate and Westwood.</p> <p>The outcome of the HRA has not considered this policy though this will be addressed in due course.</p>				

Policy 15: Policy SP20 – Affordable Housing (former policy number SP19)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent, ST/LT + The proposed policy would maintain the status quo and deliver at least 30% of the dwellings as affordable housing, of which 17% will be Starter Homes, 18% Affordable Rent and 65% Social Rent. The housing topic paper states that an economic viability study of development in Thanet has found that the headline district wide 30% affordable housing target would be not impact on scheme viability. Therefore it is assumed that development will not be restricted with this target.	Permanent LT -- It is assumed that without the affordable housing target, developers would not necessarily factor this in, and the supply would stagnate in the context of very high need. This would mean continued growth in the number of homes but reduced housing mix.	N/A	-
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Neutral 0 Both the no policy option and no policy option would not alter the status quo.		N/A	
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Neutral 0 None of the options alter the accessibility or provision of education facilities or educational attainment.		N/A	-
4. To increase public safety and reduce crime and fear of crime.	Neutral 0 All other things being equal this would maintain the status quo. It is assumed that this means no change in the levels of crime or public perceptions of crime.	Permanent LT - It is assumed that this would result in under provision of affordable housing. This could have knock on effects to homelessness which in turn affect crime.	N/A	-
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Permanent LT + Assuming that new development will be tested in terms of its accessibility to key facilities, this means the affordable housing therein will have adequate access.	Permanent LT -- It is assumed that without the affordable housing target, developers would not necessarily factor this in, and the supply would stagnate in the context of very high need. Assuming that more vulnerable people in society are more likely to depend on affordable housing, this means these people would suffer from reduced supply in housing potentially increasing deprivation.	N/A	-
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent LT + This will maintain the status quo. It will ensure that a certain amount of affordable housing is integrated with all larger housing developments and result in a mix of people from different socio-economic background within housing developments.	Permanent LT - It is assumed that without the affordable housing target, developers would not necessarily factor this in, and the supply would stagnate in the context of very high need. This could potentially result in less integration in new/existing communities.	N/A	-

SA Objective	Proposed Policy		No policy	HRA implications	Mitigation and enhancement measures
7. and 8	N/A.			N/A	N/A
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	<div>Unknown ?</div> <div>House building will continue under the proposed policy and no policy options. It is not known where this will occur. If it occurs near tourist or natural, semi natural or built assets there could be an impact, however more spatial information is required to inform this decision.</div>			N/A	-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	<div>Permanent LT +</div> <div>Mix of development will continue to include affordable housing, in line with local needs. Questions exist over whether this is enough.</div> <div>Not possible to predict effects on previously developed land or greenfield.</div>	<div>Permanent LT -</div> <div>Assuming this option results in a fall in supply of affordable housing, the mix of development will not match up to the need.</div> <div>Not possible to predict effects on previously developed land or greenfield.</div>		N/A	-
11. To ensure that a sustainable pattern of development is pursued.	<div>Unknown ?</div> <div>House building will continue under the proposed policy and no policy options. It is not known where this will occur. If development occurs near or within more densely populated (and therefore better served) areas, there will be a positive effect through reduced need to travel. The opposite will be true of development in more rural areas.</div>			N/A	-
12. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	<div>Unknown ?</div> <div>House building will continue under the proposed policy and no policy options. It is not known where this will occur (i.e. if development will avoid sensitive areas) or how landscape and townscape design / mitigation will be employed.</div>			N/A	-
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	<div>Unknown ?</div> <div>House building will continue under the proposed policy and no policy options. It is not known where this will occur (i.e. if development will avoid sensitive areas, structures of in situ remains) or how design / mitigation will be employed.</div>			N/A	Specific projects which occur as a result of these options will need to consider their impact on historic archaeological or architectural features.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	<div>Unknown ?</div> <div>The proposed policy and no policy options have the potential to affect the housing mix and the economic viability of some house building projects. It is not clear where development will occur, as such it is unclear how the need to travel and car use will be influenced, and as such effects on air quality cannot be predicted.</div>			N/A	-
15. to 21	N/A			N/A	N/A.
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	<div>Unknown ?</div> <div>The proposed policy and no policy options have the potential to affect the housing mix and the economic viability of some house building projects. It is not clear how sustainably housing will be built in terms of operational standards, or use of best practice construction methods.</div>			N/A	-
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	<div>Unknown ?</div> <div>The proposed policy and no policy options have the potential to affect the housing mix and the economic viability of some house building projects. It is not clear how sustainably housing will be built in terms of operational standards, or use of best practice construction methods.</div>			N/A	-
<div>Summary</div> <div>The proposed policy adheres to the SHMA recommendations to ensure that the make-up of the market and affordable housing types and sizes is accounted for. Similarly developments resulting in a net loss will not be prohibited unless in exceptional circumstances. As such affordable housing provision is appropriately met through the adoption of the proposed policy.</div> <div>With regards to the HRA there are no likely significant effects.</div>					

Policy 16: Policy SP23 – Landscape Character Areas (former policy number SP22)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 5	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Direct. ST/LT + The proposed policy has the potential to positive impact on this objective by helping to protect and retain areas of townscape value that contribute towards the sense of place and can make towns pleasant places to live.	Permanent. Direct. LT - /? The no policy option has an adverse effect because without any form of protection development detrimental to townscape value.	N/A	A detailed Landscape Character Assessment will be prepared.
7. and 8	N/A		N/A	N/A
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT + The proposed policy have the potential to positive impact on this objective by helping to protect and retain areas of townscape value that contribute towards the sense of place and can retain the appeal of the towns within the District as visitor attractions.	Permanent. Direct. LT - /? The no policy option has an adverse effect because without any form of protection development detrimental to townscape value	N/A	A detailed Landscape Character Assessment will be prepared.
10. and 11	N/A		N/A	N/A
12. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. ST/LT ++ The proposed policy has the potential to have a positive impact on this objective by helping to protect and retain areas of townscape, landscape and seascape value that contribute to the environmental quality of Thanet. The policy also suggests that all development should seek to avoid skyline intrusion and the loss or interruption of long views of the coast and the sea.	NNeutral. 0 A no policy option would not alter the status quo.	N/A	A detailed Landscape Character Assessment will be prepared.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT ++ The proposed policy has the potential to positive impact on this objective by helping to protect and retain areas of townscape value that will often include heritage features such as listed and locally listed buildings.	Neutral. 0 A no policy option would not alter the status quo.	N/A	A detailed Landscape Character Assessment will be prepared.
14. to 23	N/A		N/A	N/A
Summary The proposed policy is predicted as being likely to have positive effects on townscape and indirectly the role that areas of high value townscape has on the sense of place, people’s satisfaction with where they live and cultural heritage features within those areas. With regards to the HRA there are no likely significant effects.				

Policy 17: Policy SP24 – Green Infrastructure (former policy number SP23)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 5	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Indirect. ST/LT + The proposed policy has the potential to positively impact on this objective by delivering new development that includes adequate open space, landscaping and provision of wildlife habitats.	Neutral 0 A no policy option would not alter the status quo.	N/A	-
7. and 8	N/A		N/A	N/A

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Indirect. ST/LT + The proposed policy has the potential to positively impact on this objective by delivering new development that includes adequate open space, landscaping and provision of wildlife habitats. This could protect and enhance the street scheme and support the tourist economy.	Neutral 0 A no policy option would not alter the status quo.	N/A	
10. and 11	N/A		N/A	N/A
12. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Indirect. ST/LT + The proposed policy has the potential to positively impact on this objective by delivering new development that includes adequate open space, landscaping and provision of wildlife habitats. This has the potential to enhance and conserve the landscape and townscape. The policy also suggests developments should make a positive contribution to the green infrastructure network by following the relevant landscape character assessment guidelines.	Neutral 0 A no policy option would not alter the status quo.	N/A	
13. to 19	N/A		N/A	N/A
20. To conserve and enhance biodiversity.	Permanent. Indirect. ST/LT + The proposed policy has the potential to positively impact on this objective by delivering new development that includes adequate open space, landscaping and provision of wildlife habitats. The policy also suggests developments should make a positive contribution to the green infrastructure network by following the relevant landscape character assessment guidelines.	Neutral 0 A no policy option would not alter the status quo.	N/A	
21. to 23	N/A		N/A	N/A
Summary The proposed policy has the potential to positive impact on this objective by delivering new development that includes adequate open space, landscaping and provision of wildlife habitats. With regards to the HRA there are no likely significant effects.				

Policy 18: Policy SP26 – Strategic Access Management and Monitoring Plan

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
11. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Unknown? This policy suggests that all new residential development proposals will be required to comply with the Strategic Access Management and Monitoring Strategy (SAMM). It is not clear what the impact on housing will be; it could potentially have an adverse effect on the viability of housing development.	Neutral. 0 A no policy option would not alter the status quo.	N	N
2. to 7	N/A		N/A	N/A
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment	Permanent. Indirect. ST/LT + The proposed policy has the potential to positively impact objectives relating to sustainable development by ensuring developments do not undermine the viability of protected	Permanent Indirect LT - This proposed policy ensures the protection of designated sites and without it, the viability of these could be threatened and development prioritised over protection.	The development of a tariff ensures development continues but also positively contributes to the management of local natural resources	Ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
development at key sites within the District to support priority regeneration areas.	sites. This policy does not discourage housing developments in absolute terms, but ensures that all new developments make a positive contribution to the management of local designated sites which provide environmental, social and economic benefits for the local area.			
9. To protect and enhance the areas natural landscape, semi-natural landscape and street scene to support the tourist economy.	Permanent. Direct. ST/LT +/O The proposed policy has the potential to positively impact objectives relating specifically to the natural environment as it ensures the protection of designated sites. However, this policy identifies the negative impacts recreational activities can have, and proposes measures such as limiting access as a means to protect the sites. This would therefore not offer support to the tourist economy.	Permanent Indirect LT - This proposed policy identifies the impact recreational activities, such as dog walking, are having on designated sites. Without this policy the SAMM could not be effectively implemented to ensure the protection and management of these natural environments. New developments would continue to increase the local population and put further pressure on these already vulnerable environments.	This Policy ensures the protection and management of designated sites, resulting in significant positive effects on biodiversity.	Ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats.
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Indirect/Direct. ST/LT + The proposed policy has the potential to positively impact built environment objectives. It promotes the reuse of buildings but does not prohibit development, instead using a tariff to ensure new development contributes positively to the management of these areas.	Permanent Indirect LT - This proposed policy ensures the protection of designated sites and without it, the viability of these could be threatened and development prioritised over protection.	The development of a tariff ensures development continues but also positively contributes to the management of local natural resources	Ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats.
11.	N/A	N/A	N/A	
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Indirect/Direct. ST/LT + The proposed policy has the potential to enhance the conservation and character of the local landscape by protecting designated sites which form an important part of the wider landscape.	Permanent Indirect LT - This proposed policy ensures the protection of designated sites and without it, the viability of these could be threatened and development prioritised over protection.	This Policy ensures the protection and management of designated sites, resulting in significant positive effects on biodiversity.	Ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Indirect. LT ? Unknown ? The proposed policy could have wider benefits to historic and cultural assets which can fall within these areas. This would ensure these features are protected in their natural setting.	Permanent. Indirect. LT ? Unknown ? Without this policy, the protection of historical assets which fall within natural settings may be threatened by over development.	This Policy ensures the protection and management of designated sites, resulting in significant positive effects on biodiversity.	Mitigating measures should include house building policy which seeks to minimise adverse affects on historic sites and assets.
14. to 18	N/A	N/A	N/A	
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Indirect/Direct. ST/LT + Local natural sites can act as important interceptors to flood waters and storage locations to reduce flood risk. Protection of these are therefore deemed beneficial.	Neutral 0 Without this policy, the protection of sites that can intercept and store flood water would not be ensured and local flood risk could be exacerbated.	This Policy ensures the protection and management of designated sites, resulting in significant positive effects on biodiversity.	
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT ++ The proposed policy has the potential to positively impact biodiversity objectives by ensuring developments do not undermine the viability of natural sites. This policy does not discourage housing developments, but ensures that all new developments make a positive contribution to the management of local designated sites which provide environmental, social and economic benefits for the local area.	Permanent Indirect LT - This proposed policy ensures the protection of designated sites and without it, the viability of these could be threatened and development prioritised over protection.	The development of a tariff ensures development continues but also positively contributes to the management of local natural resources. This Policy ensures the protection and management of designated sites, resulting in significant positive effects on biodiversity.	Ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct. ST/LT ++ This proposed policy has the potential to positively impact water resources which are designated sites, or fall within designated sites. This policy does not discourage housing developments, but ensures that they make a positive contribution to the management of local sites and the biodiversity within.	Permanent Indirect LT - This proposed policy ensures the protection of designated sites and without it, the viability of the aquatic environment within them could be threatened and development prioritised over protection.	This Policy ensures the protection and management of designated sites, resulting in significant positive effects on biodiversity.	Ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats.
22. and 23	N/A	N/A	N/A	
<p>Summary</p> <p>This proposed policy would likely have positive impacts on objectives relating to the protection of biodiversity assets. Water resources and heritage assets that fall within designated sites would also benefit from the protection this policy affords. This policy does not prohibit development, but rather ensures that it positively contributes to the protection of the local environment.</p>				

Policy 19: Policy SP27 – Biodiversity and Geodiversity Assets

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 5	N/A	N/A	N/A	N/A
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Indirect. ST/LT + This policy supports the conservation, enhancement and management of biodiversity and geodiversity assets, including restore/enhance existing habitats, create wildlife habitats where appropriate, create linkages between sites and enhance significant features of nature conservation value on development sites. This policy will contribute positively to the community.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
7. and 8	N/A	N/A	N/A	N/A
9. To protect and enhance the areas natural landscape, semi-natural landscape and street scene to support the tourist economy.	Permanent. Direct. ST/LT + One of the aims of this policy is to create linkages between sites to create local and regional ecological networks. This will enhance the natural landscape.	Neutral. 0 A no policy option would not alter the status quo.	This policy could result in positive effects on biodiversity.	-
10. to 19	N/A	N/A	N/A	N/A
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT ++ This policy supports the conservation, enhancement and management of biodiversity and geodiversity assets. More specifically, development proposals will have to restore/enhance existing habitats, create wildlife habitats where appropriate, create linkages between sites and enhance significant features of nature conservation value on development sites.	Permanent. Indirect. ST/LT - - In the absence of this policy, development could occur without consideration of the biodiversity, which would have a negative impact on this objective.	This policy could result in significant positive effects on biodiversity.	Ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats.
21. to 23	N/A	N/A	N/A	N/A
<p>Summary</p> <p>By conserving, enhancing and managing the biodiversity and geodiversity assets, this policy will have positive effects on the biodiversity, natural environment and community objectives. In the absence of this policy is it likely adverse effects would occur on the biodiversity, however the policy suggests that an ecological assessment will be required to assess the impact of a proposed development on species and habitats.</p>				

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
With regards to the HRA there are no likely significant effects.				

Policy 20: Policy SP28 – Biodiversity Opportunity Areas (former policy number SP24)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 5	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	<div>Permanent LT +</div> <div>The proposed policy will seek to enhance the local environment and will improve the sense of place in a number of rural / semi-rural locations.</div>	<div>Permanent LT -/?</div> <div>Without the policy, biodiversity potential could be adversely affected. The magnitude of the effect is uncertain because this would depend scale of any open space loss.</div>	N/A	-
7. and 8	N/A		N/A	N/A
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	<div>Permanent LT +</div> <div>The proposed policy is likely to have a beneficial effect on this objective because they help to support a natural and semi-natural areas. Improving public areas and the green areas will increase the likelihood of tourism.</div>	<div>Permanent LT -/?</div> <div>Without protection many areas could be adversely affected. The magnitude of the effect is uncertain because this would depend scale of any open space loss.</div>	N/A	-
10. and 11	N/A		N/A	N/A
12. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	<div>Permanent Direct ST/LT +</div> <div>The effects of the proposed policy are beneficial because these options both contribute towards enhancing the character of the district. The proposed policy relates to the enhancement and/or protection of open space. As a result of the proposed policy there will be a slight positive effect.</div>	<div>Permanent LT -</div> <div>Without this policy support the loss of public open spaces could have a detrimental effect on this objective.</div>	N/A	-
13. to 18	N/A		N/A	N/A
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	<div>Permanent, Direct, ST/LT +</div> <div>Certain types of green infrastructure and green space can provide protection from flooding. Encouraging their development and/or protection will have appositive effects The proposed policy is likely to support sustainable forms of drainage where the open space supports natural infiltration of surface water and rain water</div>	<div>Unknown ?</div> <div>The effects are unknown because this policy might not have any effect on flood risk or it could result in the loss of natural greenspace resulting in an increased risk from flooding.</div>	N/A	-
20. To conserve and enhance biodiversity.	<div>Permanent; Direct. LT ++</div> <div>The proposed policy is inherently supportive of this objective, suggesting proposals should enhance, maintain and protect the identified Biodiversity Opportunity Areas, especially when proposals increase the biodiversity value of the site.</div>	<div>Neutral 0</div> <div>A no policy option would not alter the status quo.</div>	N/A	-
21. to 23	N/A.		N/A	N/A.
<p>Summary</p> <p>The proposed policy seeks to preserve an environmental aspect and as such commonly yield positivity on similar objectives. The no policy option largely yields negative impacts as by removing protection or having no support there is the potential for unrestricted development action which could be to the detriment of environmentally sensitive parameters. Biodiversity enhancements are clearly supportive of all of the SA objectives they relate to. Whilst focusing on species and habitats, the effects of the proposed policy are more wide reaching and affect many other aspects of the natural environment.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 21: Policy SP25 – Protection of International and European Designated Sites

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 8	N/A.		N/A	N/A.
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT + The proposed policy is likely to have a positive contribution towards this objective by protecting features that contribute to the character of the area. It also supports the visitor economy.	Neutral. 0 A no policy option would not alter the status quo.	The policy would not result in significant effects to the natural, semi-natural and street scenes. However it could be strengthened to ensure importance of the quantum of development affecting designated sites is considered.	Proposals likely to have a significant effect on an SPA, SAC or Ramsar site, either alone or in combination, will be required to undergo appropriate assessment as per the Conservation of Habitats and Species Regulations 2010 (as amended). Where possible, applicants should incorporate measures to avoid or mitigate any adverse impacts. This policy should cross-refer to policies SP24 and SP31.
10. and 11	N/A.		N/A	N/A.
12. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. LT ++ The proposed policy would help to maintain areas of nature conservation importance, which would aid in the conservation of wider coastal and rural landscapes.	Neutral. 0 A no policy option would not alter the status quo.	The policy would not result in significant effects to the character and quality of landscape. However it could be strengthened to ensure importance of the quantum of development affecting designated sites is considered.	Proposals likely to have a significant effect on an SPA, SAC or Ramsar site, either alone or in combination, will be required to undergo appropriate assessment as per the Conservation of Habitats and Species Regulations 2010 (as amended). Where possible, applicants should incorporate measures to avoid or mitigate any adverse impacts. This policy should cross-refer to policies SP24 and SP31.
13. to 18	N/A.		N/A	N/A.
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Indirect. LT + Certain types of green infrastructure and green space can provide protection from flooding. Encouraging their development and/or protection will have a positive effect by safeguarding green spaces which can act as flood mitigation. Active protection and enhancement of nature conservation areas will prevent unacceptable development, particularly on Thanet’s coastal areas.	Neutral. 0 A no policy option would not alter the status quo.	The policy would not result in significant effects to coastal erosion, costal and fluvial flood risk. However it could be strengthened to ensure importance of the quantum of development affecting designated sites is considered.	Proposals likely to have a significant effect on an SPA, SAC or Ramsar site, either alone or in combination, will be required to undergo appropriate assessment as per the Conservation of Habitats and Species Regulations 2010 (as amended). Where possible, applicants should incorporate measures to avoid or mitigate any adverse impacts. This policy should cross-refer to policies SP24 and SP31.
20. To conserve and enhance biodiversity.	Permanent. Direct. LT ++ The proposed policy is inherently supportive of this objective. The policy supports the highest level of protection for sites of international nature conservation importance. This will have positive effects on biodiversity.	Neutral. 0 A no policy option would not alter the status quo.	The policy would not result in significant effects on biodiversity. However it could be strengthened to ensure importance of the quantum of development affecting designated sites is considered.	Proposals likely to have a significant effect on an SPA, SAC or Ramsar site, either alone or in combination, will be required to undergo appropriate assessment as per the Conservation of Habitats and Species Regulations 2010 (as amended). Where possible, applicants should incorporate measures to avoid or mitigate any adverse impacts. This policy should cross-refer to policies SP24 and SP31.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
21. to 23	N/A.			N/A.
<p>Summary</p> <p>The proposed policy is largely a reflection of existing legislation and will yield the most substantial environmental protection and sustainability. The protection to the highest level of sites of international nature conservation importance will be especially beneficial to the natural environment and biodiversity objectives. The proposed policy will be restrictive to infrastructure and housing as protecting environmental assets will mean developments upon such lands will most likely be prohibited and thus restricted to other areas of Thanet.</p> <p>With regards to the HRA assessment this is this principle protective policy for which all developmental policies refer to. Whilst there are no likely significant effects the policy should refer to SP31, in addition to SP24, as the requirements in both policies instil the principle of enhancement and protection of the natural environment.</p>				

Policy 22: Policy SP30 – Local Green Space

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 3	N/A	N/A	N/A	N/A
4. To increase public safety and reduce crime and fear of crime.	Permanent. Indirect. ST/LT + This policy suggests that development on the identified Local Green Spaces will be allowed if it is essential for public safety. This would likely reduce the level of crime and increase the public perception of safety.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
5.	N/A	N/A	N/A	N/A
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Direct. ST/LT + This policy promotes development proposals that protect and enhance the Local Green Spaces. It is likely this will contribute positively towards creating a vibrant community as the community would be able to make use of the greenspaces for different activities.	Permanent. Indirect. ST/LT - If development occurs and impact negatively on the Local Green Space, the greenspaces could eventually disappear and therefore having a negative effect on the community who would have to travel to enjoy green areas.	N/A	-
7. and 8	N/A	N/A	N/A	N/A
9. To protect and enhance the areas natural landscape, semi-natural landscape and street scene to support the tourist economy.	Permanent. Direct. ST/LT + By allowing developments protecting and enhancing Local Green Spaces, this policy will have positive effects on the natural environment.	Permanent. Indirect. ST/LT – If development proposals in Local Green Space to not protect of enhance these spaces, it is likely it would have an adverse impact on the natural environment.	This policy could result in positive effects on European protected sites.	-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. ST/LT + This policy suggests development could occur in Local Green Spaces if is reusing an existing building on the site. This policy will encourage redevelopment which will benefit the built environment.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
11. to 19	N/A	N/A	N/A	N/A
20. To conserve and enhance biodiversity.	Permanent. Indirect. ST/LT ++ This policy aims to protect or enhance the Local Green Spaces. Greenspaces are good environment for biodiversity.	Permanent. Indirect. ST/LT - Allowing developments on Local Green Spaces that would not protect or enhance the greenspaces could have an adverse effect on the presence of biodiversity.	This policy could result in significant positive effects on biodiversity.	-
21. to 23	N/A	N/A	N/A	N/A
<p>Summary</p> <p>This policy will have positive effects on the biodiversity and the natural environment, public safety and redevelopment objectives. It will also contribute to creating vibrant communities. In the absence of this policy, it is likely the biodiversity would be impacted negatively, as development would occur in greenspaces without implementing measures to enhance or protect the greenspaces. It would also have a negative impact on the natural environment and the communities as the amount of greenspaces would become limited.</p>				

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures

Policy 23: Policy SP31 – Provision of Accessible nature and Semi Natural Green Space, Parks Gardens and Recreation Grounds (former policy number SP27)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 5	N/A.		N/A	N/A.
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent, Direct, ST/LT + The proposed policy will help to maintain a sense of place by restricting the amount of sprawling growth that occurs by ensuring that amenity and natural / semi-natural green space, parks and allotments are included within the urban realm.	Permanent LT -/? Without protection the sense of place in many areas could be adversely affected. The magnitude of the effect is uncertain because this would depend scale of any development.	N/A	-
7. and 8	N/A.		N/A	N/A.
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent, Direct, ST/LT +. The proposed policy is likely to have a positive contribution towards this objective by promoting features that contribute to the character of the area and also support the visitor economy.	Permanent LT -/? Without protection many areas could be adversely affected. The magnitude of the effect is uncertain because this would depend scale of any development.	The policy would not result in significant effects on the natural, semi-natural and street scene. However it could be strengthened to encourage the integration of existing networks with new greenspace.	-Consideration should be given to amending this policy so as to encourage integrating the existing networks with proposed new greenspace.
10. and 11	N/A.		N/A	N/A.
12. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	Permanent Direct ST/LT + The effects of the proposed policy are beneficial as it directly contributes towards enhancing the character of the district.	Permanent LT - Without this policy support the lack of public open spaces could have a detrimental effect on this objective.	The policy would not result in significant effects on the landscape and townscape. However it could be strengthened to encourage the integration of existing networks with new greenspace.	Consideration should be given to amending this policy so as to encourage integrating the existing networks with proposed new greenspace.
13. to 18	N/A.		N/A	N/A.
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent LT + Certain types of green infrastructure and green space can provide protection from flooding. Encouraging their development will have appositive effects.	Unknown ? The effects are unknown because this policy might not have any effect on flood risk or it could result in the increase in developed areas resulting in an increased risk from flooding from surface run off.	N/A	-
20. To conserve and enhance biodiversity.	Permanent Indirect LT + Policy support for green spaces and opens space etc. can have positive effects on biodiversity by promoting such areas as an integral part of new developments. This inherently increases the provision of accessible open space of all types.	Neutral 0 A no policy option would not alter the status quo.	TThe policy encourages the integration of green spaces with existing greenspace, green wedges and/or the wider countryside and public rights of way network.	C
21. to 23	N/A.		N/A	N/A.
Summary The proposed policy seeks to promote an environmental aspect and as such commonly yield positivity on a number of the sustainability objectives. ith regards to the HRA,Tthe policy encourages the integration of green spaces with existing greenspace, green wedges and/or the wider countryside and public rights of way network.				

Policy 24: Policy SP32 – Allotments

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 6	N/A	N/A	N/A	N/A
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Direct. ST/LT + This policy supports the protection of allotments, which will contribute in maintaining a vibrant community. It also supports relocating the allotments when development in the area is necessary.	Permanent. Indirect. ST/LT - In the absence of this policy, development could occur on allotments which would likely have a negative effect on this objective	N/A	-
7. to 23	N/A	N/A	N/A	N/A
Summary This policy will have a positive effect on the community objective as it will protect the allotments, or relocate them if development needs to occur.				

Policy 25: Policy SP34 – Conservation and Enhancement of Thanet’s Historic Environment (former policy number SP29)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 4	N/A		N/A	N/A
5. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Indirect. ST/LT + The proposed policy will have the potential to positive impact on this objective by helping to protect and retain areas of townscape value that contribute towards the sense of place and can make towns pleasant places to live.	Permanent, indirect ST/LT -/? The no policy option has an adverse effect because without any form of protection development could be detrimental to townscape value.	N/A	
6. and 7	N/A		N/A	N/A
8. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Indirect. ST/LT + The proposed policy will have the potential to positive impact on this objective by helping to protect and retain areas of townscape value that contribute towards the sense of place and can retain the appeal of the towns within the District as visitor attractions.	Permanent. Indirect ST/LT -/? The no policy option has an adverse effect because without any form of protection development could be detrimental to townscape value	N/A	-
9. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Indirect. ST/LT + The proposed policy will actively encourage and support urban renaissance by promoting the reuse of existing listed buildings.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
10.	N/A		N/A	N/A
11. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. ST/LT ++ The proposed policy has the potential to positive impact on this objective by helping to protect and retain areas of townscape value that contribute the quality of townscape.	Permanent. Indirect. ST/LT -/? The no policy option has an adverse effect because without any form of protection developments could be detrimental to the overall townscape value.	N/A	
12. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT ++ The proposed policy has the potential to positive impact on this objective by helping to protect and retain areas of townscape value that contribute the quality of townscape.	Permanent. Indirect ST/LT -/? The no policy option has an adverse effect because without any form of protection developments could be detrimental to the overall townscape value.	N/A	
13. To preserve and enhance sites, features and areas of historic	Permanent. Direct. ST/LT ++ The policy will encourage the conservation of the buildings or its historical/archaeological significance. This will have	Permanent. Indirect. ST/LT -/?	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
archaeological or architectural importance, and their settings.	a positive effect on the protection of the historic environment.	The no policy option has an adverse effect because without any form of protection developments could be detrimental to the overall townscape value.		
14. to 23	N/A		N/A	N/A
<p>Summary</p> <p>The proposed policy is predicted as being likely to have positive effects on townscape and indirectly the role that areas of high value townscape has on the sense of place, people’s satisfaction with where they live and cultural heritage features within those areas. There is also the added ability of the proposed policy to encourage the reuse of listed buildings to aid urban renaissance and also to enhance the protection of the historical and archaeologically important sites across Thanet. The policy will also have a positive effect on the protection of the historic environment.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 26: Policy SP35 – Climate Change (former policy number SP30)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Unknown ? Depending on the nature of the measures required this could have a potentially adverse effect on housing supply if it affects viability. However, it is noted that over the long term the effect might be beneficial if it results in housing that is more viable in a warmer and drier climate.	Neutral. 0 A no policy option would not alter the status quo.	N/A	The robust design of housing sites should incorporate climate change requirements whilst not being detrimental to viability.
2. to 6	N/A		N/A	N/A
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Indirect ST + Indirectly, there may be some small scale opportunities to support jobs within the green sector by requiring retrofit projects to adapt to climate change.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
8. to 12	N/A		N/A	N/A
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Unknown ? The proposed policy might result in some impact on listed buildings, if they undergo refurbishment.	Neutral. 0 A no policy option would not alter the status quo.	N/A	Any refurbishment in line with climate change issues should be sympathetic to the historic environment.
14. to 18	N/A		N/A	N/A
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. LT + The proposed policy will enhance provisions with regards to the management of flood risk yet it would potentially occur in differing ways, but with the same effects.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
20. To conserve and enhance biodiversity.	Permanent. Direct. LT + The adoption of this policy will result in new development taking into account opportunities to reduce the impact of climate change on biodiversity, which should contribute positively towards the biodiversity.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
221. to 23	N/A		N/A	N/A

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
<p>Summary</p> <p>Generally, the proposed policy seeks to protect assets through ensuring climate change resilience for new development. The proposed policy also ensures that the design of new development should consider the effects it can have on climate change issues by helping to reduce emissions. The policy will result in positive effects towards biodiversity.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 27: Policy SP37 – QEQM Hospital Margate

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1.	N/A	N/A	N/A	N/A
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Permanent. Direct. ST/LT + This policy aims to expand the QEQM Hospital. This will contribute in providing additional healthcare facilities to the neighbouring residents.	Unknown ? The need to expand the hospital is unclear from the policy. It could be that not enough people can receive healthcare currently, in which case in the absence of this policy there would be an adverse impact on the provision of healthcare, or it could be to be prepared for potential future healthcare need, in which case the ‘no policy’ would be considered ‘neutral’.	N/A	-
3. and 4	N/A	N/A	N/A	N/A
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Permanent. Direct. ST/LT + This policy aims to expand the QEQM Hospital. This will contribute in providing additional healthcare facilities to the neighbouring residents, including vulnerable groups.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
6.	N/A	N/A	N/A	N/A
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Unknown? This policy aims to expand the QEQM Hospital. This could lead to more employment opportunities, however this is not clear from the policy.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
8.	N/A	N/A	N/A	N/A
9. To protect and enhance the areas natural landscape, semi-natural landscape and street scene to support the tourist economy.	Neutral. 0 This policy suggests that development proposals should be designed to involve the minimum take of fresh land, to provide a pleasant environment for patients and staff. It also supports the retention of existing footpaths. This policy is unlikely to enhance the natural landscape, but the adverse effects on the environment should be minimised.	Neutral. 0 A no policy option would not alter the status quo.	This policy should not have adverse effects on European designated sites.	-
10.	N/A	N/A	N/A	N/A
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Indirect. ST/LT + This policy supports proposals that are compatible with a green transport strategy for the hospital. This will encourage the use of sustainable modes of transport to commute to the hospital.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
12. to 14	N/A	N/A	N/A	N/A

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Direct. ST/LT + This policy supports proposals that are compatible with a green transport strategy for the hospital. It also suggests car parking space associated with the new development should be limited to the minimum within the context of the green transport strategy. This will encourage the use of sustainable modes of transport to commute to the hospital.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
16. to 22	N/A	N/A	N/A	N/A
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Unknown? This policy suggests the development proposals should demonstrate how more effective use can be made of the hospital site as a whole. However, it does not explicitly detail how this will be achieve.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
<p>Summary</p> <p>This policy will have positive effects on the provision of healthcare, including vulnerable groups, as it supports the extension to QEQM Hospital. It will also benefit the sustainability and transport objective as it will promote the green transport strategy.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 28: Policy E38 –Westwood Medical Centre

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1.	N/A	N/A	N/A	N/A
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Permanent. Direct. ST/LT + This policy aims to provide a new medical centre. This will contribute in providing additional healthcare facilities to the neighbouring residents.	Permanent. Direct. ST/LT – In the absence of this policy, the neighbouring residents would be negatively impacted as the policy clearly the medical centre is required to meet the needs generated by the strategic allocations.	N/A	-
3. and 4	N/A	N/A	N/A	N/A
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Permanent. Direct. ST/LT + This policy aims to provide a new medical centre. This will contribute in providing additional healthcare facilities to the neighbouring residents, including vulnerable groups.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
6.	N/A	N/A	N/A	N/A
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Unknown? This policy aims to provide a new medical centre. This could lead to more employment opportunities, however this is not clear from the policy.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
8. to 23	N/A	N/A	N/A	N/A
<p>Summary</p> <p>This policy will have positive effects on the provision of healthcare, including vulnerable groups, as it supports the provision of a new medical centre.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 29: Policy SP44 – New Railway Station (former policy number SP39)

A Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 5	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent. Indirect. ST/LT ? An uncertain effect is predicted because creating a new station might help to boost the image of the area by making it more accessible. However, creating a new station away from the existing urban centres could detract from their sense of place if fewer people visit.	Neutral. 0 A no policy option will not alter the status quo.	N/A	The uncertain and associated with the proposed policy could be mitigated by combining it with other policies that ensure that where the station is located supports non-car transport links to the Airport, and employment sites and residential areas.
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Indirect. ST/LT ++/? The proposed policy provides considerable potential benefit as it would increase accessibility to jobs across Kent and into Central London. A new station would allow a greater proportion of resident's easier access to jobs in other towns along the HS1 route and also opportunities in the Thames Gateway and East and Central London. A new station could also provide a focus for further employment development if designed appropriately. The effect is indirect because the proposed policy does not guarantee that the employment opportunities will be created or available to residents using the link.	Neutral. 0 A no policy option will not alter the status quo.	N/A	-
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Indirect. ST/LT ++ The proposed policy would provide the potential benefits as it would contribute towards economic growth throughout Thanet. A new station would allow a greater proportion of resident's easier access to jobs in other towns along the HS1 route and also opportunities in the Thames Gateway and East and Central London. It would also support the visitor economy by increasing access to the District and the Airport. As a consequence this is likely to have a significant effect on per capita GVA.	Neutral. 0 A no policy option will not alter the status quo.	N/A	-
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT ++ /? The proposed policy will create potential benefits, due to its proximity and potential for connectivity to the Airport. A new station would support the visitor economy by attracting visitors to the area as well as providing the UK tourism market with enhanced access to the Airport, although the station and associated infrastructure could have an adverse visual and landscape effect	Neutral. 0 A no policy option will not alter the status quo.	N/A	-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. ST/LT -/? The proposed policy is likely to result in the development of a greenfield site and would therefore not be in support of this objective.	Neutral. 0 A no policy option will not alter the status quo.	N/A	During the design and construction there might be opportunities to re-use materials, existing features (e.g. drainage) to minimise potentially adverse effects.
11. To ensure that a sustainable pattern of development is pursued	Permanent. Direct. ST/LT + /? A new rail station would increase transport access for both Ramsgate and rural communities within its environs, opening up increased travel opportunities within Thanet and to London. However, pressure may be placed on land surrounding the new rail station to be developed for commuter housing, hence the uncertainty of the effects against this objective.	Neutral. 0 A no policy option will not alter the status quo.	N/A	N/A.

A Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	PUnknown? The proposed policy has the potential to alter the landscape character and have visual impacts in the area around the station. However, the policy suggests that for planning permission to be granted the proposal will have to demonstrate the compatibility of the development with the landscape character and its location. A	Neutral. 0 A no policy option will not alter the status quo.	N/A	The quality of design and how future development takes account of character, townscape and the countryside will be addressed under other issues and policy options.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT ? The proposed policy could have positive or negative effect on, listed buildings, scheduled monuments and other features of cultural, historical or archaeological value and their setting.	Neutral. 0 A no policy option will not alter the status quo.	N/A	How future development respects and integrates with heritage and archaeological features will be addressed under other issues and policy options including NPPF.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. ST/LT + The proposed policy has the potential to have a positive effect. The policy could potentially result in modal shift away from private car use which might contribute towards achieving the objectives of the AQMA. However, the policy is unlikely to fully address the root cause of air quality issues in the District so the effect is considered minor.	Neutral. 0 A no policy option will not alter the status quo.	N/A	-
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Direct. ST/LT ++ The proposed policy provides the greatest benefits to the provision of a sustainable transport network and would help to support modal shift, particularly for commuters from settlements outside of Ramsgate. It also suggests proposals will have to demonstrate the integration of the new railway with the wider public transport services. This will help to expand rail capacity within the District, access to the Airport by non-private car and would also increase the transport for commuters to access the district from elsewhere and also increase access to other centres in Kent and London via the HS1 route.	Neutral. 0 A no policy option will not alter the status quo.	N/A	-
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Direct. ST/LT ++ The proposed policy provides the greatest benefits to the provision of a sustainable transport network and would help to support modal shift, particularly for commuters from settlements outside of Ramsgate. The policy suggests proposals will have to demonstrate satisfactory vehicular access arrangements from East Kent Access. This will help to expand rail capacity within the District, access to the Airport by non-private car and would also increase the transport for commuters to access the district from elsewhere and also increase access to other centres in Kent and London via the HS1 route.	Neutral. 0. A no policy option will not alter the status quo.	N/A	-
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent. Indirect. STT -/? Increased development is likely to generate greater volumes of waste, which might not be diverted from landfill. It is also likely to increase the total quantity of waste arising and requiring treatment and/or disposal. This is assessed against an existing trend of reducing landfill	Neutral. 0. A no policy option will not alter the status quo.	N/A	The potentially significant adverse effect of the proposed policy can be mitigated through wider waste management policy at the national and county scales (e.g. EU Landfill Directive targets, the Government Review of Waste Policy in England

A Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	capacity within Kent which could be exceeded within the life of the Plan ⁴⁸ . Potentially this could result in a significant effect.			2011 and Kent County Council's Mineral and Waste Plan) which will include new Energy from Waste facilities and the increased diversion of material from landfill.
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Direct. ST/LT ? Although the development of a new station and related infrastructure will result in the emission of GHG. There is the potential for these emissions to be offset by reduced emissions from modal shift away from private car use.	Neutral. 0. A no policy option will not alter the status quo.	N/A	The scale of the potential benefits of the proposed policy are, at this level of assessment, unclear due to insufficient detail about the scale of potential emissions reductions from modal shift. It is suggested that development management policies include this as a requirement of any future development to fully understand the contribution that these measures could make to tackling climate change.
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct ST/LT 0 A neutral effect is predicted because the broad area described for the station is outside the flood zones. If the development is greater than 1ha, which is quite likely, it will also require a FRA which will identify how surface runoff levels will be maintained or enhanced.	Neutral. 0. A no policy option will not alter the status quo.	N/A	It is also assumed that the requirements of the NPPF would be applied to any forthcoming planning applications which would also help to mitigate any adverse effects.
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have a positive or a negative effect. This is dependent upon where the development occur and also the type of development. However the proposed site is unlikely to have an effect on any locally designated sites.	Neutral. 0. A no policy option will not alter the status quo.	N/A	The effects of land allocation has been assessed as part of the site allocations process as detailed within this SA. For example it will be possible to assess potential effects upon this particular objectives through studying the Kent BAP.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on where development occurs (though a general site is safeguarded for the development), the features associated with each site and the type of development. This is particularly relevant to potential effects on groundwater resources and Source Protection Zones in this area of the district.	Neutral. 0. A no policy option will not alter the status quo.	N/A	The effects of land allocation has been assessed as part of the site allocations process as detailed within this SA. The NPPF also requires unacceptable risks to water to be mitigated therefore development plans and national policy should provide adequate safeguards, particularly for aquifers and SPZs. This would subsequently address the potential uncertainty.
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Direct, Indirect. ST/LT -/? There is the potential for a negative effect because development could result in an increase in the consumption of resources. However, the extents of these effects are uncertain because the type and scale of development is not specified.	Neutral. 0. A no policy option will not alter the status quo.	N/A	There are uncertainties associated with the proposed policy because there is insufficient detail regarding the proposed development to make a robust assessment.
23. To increase energy efficiency and the proportion of energy	Permanent. Direct, Indirect. ST/LT ? There is the potential for an adverse effect as the development of a new station could indirectly increase	Neutral. 0. A no policy option will not alter the status quo.	N/A	There are uncertainties associated with the proposed policy because there is

⁴⁸ Based on data on landfill capacity in Kent from the Environment Agency.

A Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
generated from renewable sources in the area.	consumption of energy and resources thereby increase emissions of GHG gases. However, these may be offset by reductions in emission from modal shift from cars to trains. So an uncertain effect is predicted.			insufficient detail to make a robust assessment at this stage.
<p>Summary</p> <p>The proposed policy is likely to result in significant beneficial effects, particularly in terms of contributing towards employment, economic growth (particularly the visitor economy) and providing infrastructure to support modal shift. However, without further details of the proposed policy it is not possible to assess whether it is likely to result in significantly greater benefits than the no policy option. Where potentially adverse or uncertain effects have been predicted mitigation measures can be used to ameliorate the effects.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 30: Policy E07 – Serviced Tourist Accommodation

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 5	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Indirect. ST/LT ? It is unclear at this stage whether the proposed policy or the no policy option would have an effect on people’s sense of place and identity of communities.		N/A	All of the potentially significant or uncertain effects identified here can be mitigated by other policies (e.g. development management and transport policies) that support the integration of employment sites with public and non-motorised transport network
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Direct. ST/LT + + The proposed policy is likely to result in job creation in one of the important growth sectors for the economy of Thanet. As a result a significant positive effect is predicted.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Direct. ST/LT + + The proposed policy is likely to contribute towards economic growth in one of the important growth sectors for the economy of Thanet. As a result a significant positive effect is predicted.	Neutral. 0 A no policy option would not alter the status quo.	N/A	Uncertain effects could be mitigated by spatial policy and allocations that direct development towards regeneration areas so that the benefits from the development of new employment sites are more likely to reach those in greatest need. With this mitigation in place both options would result in a significant beneficial effect.
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT + + The proposed policy is likely to contribute towards economic growth in one of the important growth sectors for the economy of Thanet. As a result a significant positive effect is predicted.	Neutral. 0 A no policy option would not alter the status quo.	N/A	Uncertain effects could be mitigated by spatial policy and allocations that direct development towards regeneration areas so that the benefits from the development of new employment sites are more likely to reach those in greatest need. With this mitigation in place both options would result in a significant beneficial effect.
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse	Permanent. Direct. ST/LT ? The effects of the proposed policy are uncertain at this level of assessment because they will be dependent on the location of development.	Neutral. 0 A no policy option would not alter the status quo.	N/A	Given the limited amount of PDL available it is unlikely that development of greenfield sites can be avoided. Instead the potentially adverse effects of greenfield development could be

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
of materials from buildings, and encourage urban renaissance.				mitigated via development management type policies.
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Indirect. ST/LT + TThe policy suggests the serviced tourist accommodation should be located in sustainable areas and accessible by a range of means of transport. This would likely encourage visitors to use more sustainable forms of transport.		N/A	All of the potentially significant or uncertain effects identified here can be mitigated by other policies (e.g. development management and transport policies) that support the integration of employment sites with public and non-motorised transport network.
12. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Indirect. ST/LT ? Depending on where development occurs, the proposed policy could have a positive or negative effect.	Neutral. 0 A no policy option would not alter the status quo.	N/A	The uncertainties associated with the proposed policy could be mitigated by a combination of site selection to choose locations where development is unlikely to have an adverse effect and by putting in place development management and design policies that result in development that is sensitive to the surrounding townscape, landscape and visual receptors.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Indirect. ST/LT ? Depending on where development occurs, the proposed policy could have a positive or negative effect.	Neutral. 0 A no policy option would not alter the status quo.	N/A	How future development respects and integrates with heritage and archaeological features will be addressed under development management and design policy options. It is anticipated that any potentially negative effects can be mitigated using this approach.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Indirect. ST/LT ? Neither the proposed policy nor the no policy option identify specific sites for development so it is not possible to make an informed assessment of the effects.		N/A	Any development that could impact on the AQMA would require relevant assessments to be undertaken to support subsequent planning applications.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Indirect. ST/LT ? The effects of the proposed policy and no policy option are uncertain because they are not spatial and could result visitors and tourist taking both more sustainable forms of transport or increasing the use of private cars.		N/A	All of the potentially significant or uncertain effects identified here can be mitigated by other policies (e.g. development management and transport policies) that support the integration of employment sites with public and non-motorised transport network.
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Indirect. ST/LT ? The effects of the proposed policy and no policy option are uncertain because they are not spatial and could result in visitors and tourist taking both more sustainable forms of transport or increasing the use of private cars.		N/A	All of the potentially significant or uncertain effects identified here can be mitigated by other policies (e.g. development management and transport policies) that support the integration of employment sites with public and non-motorised transport network.
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent. Indirect. STT - / ? Increased development as a result of the proposed policy is likely to generate greater volumes of waste, which might not by diverted from landfill. It is also likely to increase the total quantity of waste arising and requiring treatment and/or disposal. This is assessed against an existing trend of reducing landfill capacity within Kent	Neutral. 0 A no policy option would not alter the status quo.	N/A	The adverse effect can be mitigated through wider waste management policy at the national and county scales (e.g. EU Landfill Directive targets, the Government Review of Waste Policy in England 2011 and Kent County Council’s Mineral and Waste Plan)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	which could be exceeded within the life of the Plan ⁴⁹ . Potentially this could result in a significant effect. However, there is significant uncertainty about the amount of waste that might be generated as this is also determined by the nature of the use and the density of development.			which will include new Energy from Waste facilities and the increased diversion of material from landfill.
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Indirect. STT - / ? There is the potential for a negative effects as a result of the proposed policy because development could increase consumption of energy and resources thereby increase emissions of GHG gases. But the extent and likelihood of this effect is not clear at this stage because this is also determined by the nature of the land use and the density of development.	Neutral. 0 A no policy option would not alter the status quo.	N/A	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed and contribute towards reducing GHG emissions).
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. ST/LT ? The proposed policy has the potential to have both a positive and negative effect depending on development occurs. However, because none of the options are spatial the significance of the effects cannot be predicted.	Neutral. 0 A no policy option would not alter the status quo.	N/A	- It is also assumed that the requirements of the NPPF would be applied to any forthcoming planning applications which would also help to mitigate any adverse effects.
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT ? The proposed policy could have an adverse or positive effect on ecology and BAP species, depending on where development occurs and how it occurs.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct. ST/LT ? It is not possible to make a specific and robust comparison of the options without more detail about the nature and the location of the development.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Indirect. STT - / ? There is the potential for negative effects from the proposed policy as development could result in an increase in the consumption of resources. However, the extents of these effects are uncertain because the type and scale of development is not specified.	Neutral. 0 A no policy option would not alter the status quo.	N/A	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed to contribute towards resource efficiency).
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Permanent. Indirect. ST - / ? There is the potential for an adverse effect from the proposed policy because an increase in tourist accommodation could indirectly increase consumption of energy and resources thereby increase emissions of GHG gases. But the extent and likelihood of this effect is not clear at this stage and is not necessarily directly linked to area of land allocated.	Neutral. 0 A no policy option would not alter the status quo.	N/A	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed and contribute towards reducing GHG emissions).
<p>Summary</p> <p>The proposed policy is likely to have a significant effect on job creation and economic growth in the tourist and visitor economy. Both the proposed policy and the no policy option are likely to have uncertain effects. This is particularly because the options do not identify in any detail where development is likely to occur. This uncertainty can be addressed during the assessment of specific site allocations. All of the other remaining negative and uncertain effects associated with the proposed policy and no policy option can potentially be mitigated either by development management policies or the NPPF requirements.</p>				

⁴⁹ Based on data on landfill capacity in Kent from the Environment Agency.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
With regards to the HRA there are no likely significant effects.				

Policy 31: Policy E14 – Quex Park

SA Objective	Proposed Policy	No policy.	HRA implications	Mitigation and enhancement measures
1. to 5	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Direct. ST/LT + Creation of the Quex Park facility would aid site diversification to create a tourism and leisure development with the upkeep of the House and Gardens estate. Ensuring the protection of such heritage assets would give opportunities for locals to utilise such facilities and create a community atmosphere and pride within the region for upkeep a cultural asset.	Unknown? A no policy option would have unknown effects as the facility may or may not be managed. Resultantly the effects upon the objective are unknown.	N/A	-
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Direct. ST/LT + Policy adoption would allow the protection and development of Quex Park and support their future role in the visitor economy. Subsequently policy adoption would be a positive effect on job opportunities by the promotion of the tourist and leisure facilities.	Unknown? A no policy option would have unknown effects as the facility may or may not be managed. Resultantly the effects upon the objective are unknown.	N/A	-
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Direct. ST/LT + Policy adoption would allow the protection and development of Quex Park and support their future role in the visitor economy. Subsequently policy adoption would be a positive effect on job opportunities by the promotion of the tourist and leisure facilities.	Unknown? A no policy option would have unknown effects as the facility may or may not be managed. Resultantly the effects upon the objective are unknown.	N/A	Uncertain effects could be mitigated by spatial policy and allocations that direct development towards regeneration areas so that the benefits from the development of new employment sites are more likely to reach those in greatest need. With this mitigation in place both options would result in a significant beneficial effect
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT + Policy adoption would allow the protection and development of Quex Park and support their future role in the visitor economy. Subsequently policy adoption would be a positive effect on supporting the tourist economy.	Unknown? A no policy option would have unknown effects as the facility may or may not be managed. Resultantly the effects upon the objective are unknown.	N/A	-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. ST/LT +/- Policy adoption would allow local assets to be retained and preserved which might help to prevent over development on the partly greenfield site of Quex Park.	Unknown? A no policy option would have unknown effects as the facility may or may not be managed. Resultantly the effects upon the objective are unknown.	N/A	-
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT ? The effects of both the proposed policy and no policy option are uncertain because they could result visitors and tourist via more sustainable forms of transport or increasing the use of private cars. Similarly either option could produce sustainable or unsustainable development practices that impact the local landscape yet as specific details of development plans are unknown the effects cannot be quantified.		N/A	The potentially uncertain effects identified can be mitigated by other policies that support the integration of increased sustainability practices and an enhanced transport network and local access to key facilities without placing excess stress on the existing infrastructure.

SA Objective	Proposed Policy	No policy.	HRA implications	Mitigation and enhancement measures
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Indirect. ST/LT ? There is minimal difference between the proposed policy and no policy option as specific nature of the development under policy adoption is not known and thus the impacts cannot be quantified. Similarly no policy option effects are uncertain because it would not influence whether or not a site or facility is retained or lost.		N/A	The uncertainties associated with both policy options could be mitigated by development management and design policies that result in Quex Park development structures that are sensitive to the immediate landscape and visual receptors.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT + Policy adoption would allow a key site within Thanet and the associated assets of the estate to be retained and protected as such preventing any adverse effects on the historic or architectural assets through the safeguarding policy to promote the site for tourism and leisure but not to the detriment of the heritage assts.	Unknown? A no policy option would have unknown effects as the facility may or may not be managed. Resultantly the effects upon the objective are unknown.	N/A	How future developments on the site integrate with heritage and archaeological features will be addressed under development management and design policy options.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. ST/LT++/? Policy adoption does not provide any specific guidance in relation to air quality management. However given that policy adoption would be supported by national legislation in relation to air quality the effects would still be positive.	Permanent. Direct. ST/LT+ By not adopting the policy it is likely that new developments would yield neutral impacts due to current legislation and guidance on a national and international level regarding the management of air pollution (Clean Air Act).	N/A	-
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Indirect. ST/LT +/-? The effects of policy adoption are uncertain because the option is not specific with regards to improvement of public transport. Yet under policy adoption the results could be more visitors and tourist taking sustainable forms of transport to reach the Quex Park site. As such improvements to the local public transport network may occur but are not guaranteed.	Neutral. 0 A no policy option would not alter the status quo.	N/A	The unknown effects of the proposed policy can be mitigated by other policies (e.g. development management and transport policies) that support the integration of Quex Park with public and non-motorised transport network
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Indirect. ST/LT ? The effects of the options are uncertain because they are not spatial and could result visitors and tourists taking both more sustainable forms of transport or increasing the use of private cars.		N/A	All of the potentially significant or uncertain effects identified here can be mitigated by other policies that support the integration of a transport network within new developments. In addition to this, the applications that are likely to have an impact on the highway network must be accompanied by a Transport Assessment in accordance with Policy TP01.
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent. Indirect. STT - / ? Increased development as a result of the proposed policy on Quex Park is likely to generate greater volumes of waste, which might not be diverted from landfill. Yet similarly under no policy option, developments could occur on the site just without the safeguarded nature of policy adoption. Thus an increase in the total quantity of waste arising and requiring treatment and/or disposal could occur. However, there is significant uncertainty about the amount of waste that might be generated under either option as policy adoption is site specific where management protocols will already be in place across the Estate and the nature of potential developments via non safeguarding under no policy option cannot be quantified until future plans become apparent, or if no plans occur at all the effects would be neutral due to a status quo.		N/A	The adverse effect can be mitigated through wider waste management policy at the national and county scales which will include new Energy from Waste facilities and the increased diversion of material from landfill.
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Indirect. ST - / ? There is the potential for a negative effect because development could occur under either option (under no policy scenario the site could be developed in any possible manner) which could increase consumption of energy and		N/A	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development

SA Objective	Proposed Policy	No policy.	HRA implications	Mitigation and enhancement measures
	resources thereby increase emissions of GHG gases. But the extent and likelihood is likely to be questionably minor as the Quex Park site is not significant in size.			should be designed and contribute towards reducing GHG emissions).
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. ST/LT ? Both policy options have the potential to have both a positive and negative effect yet it is dependent on how works are undertaken on the Quex Park estate.		N/A	Ensure that BAP are also selected in order to reduce the effects and mitigate any potential negative impacts upon the SA objective.
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT++ Policy adoption could have an adverse or positive effect on ecology and BAP species, depending on where development occurs and how it occurs. Yet national policies and legislation would protect biodiversity and environmental assets.	Permanent. Direct. ST/LT++ Adoption of a no policy scenario would still yield positive effects as existing legislation is already in place to protect biodiversity and natural assets across the UK	N/A	-
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct.ST/LT++/? It is not possible to fully quantify the effects of policy adoption as the sites specific characteristics regarding water are not known neither are the actual detailed plans of development locations in relation to any apparent assets. Yet national policies and legislation would protect such assets through the WFD.	Permanent. Direct.ST/LT++/? Adoption of a no policy scenario would still yield positive effects as existing legislation is already in place to protect water assets across the UK.	N/A	-
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Indirect. STT - /? There is the potential for a negative effect because development upon the Quex Park site could occur via either scenario which in turn; could result in an increase in the consumption of resources. However, the extents of these effects are uncertain because the site is not overly large.		N/A	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed to contribute towards resource efficiency).
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Permanent. Indirect. STT - /? Policy adoption could increase the presence of traffic and the accompanying consumption of resources in order to power the developments that would occur. As such energy usage would increase across the Quex Park site. However the scale of increase is unknown as is the prospect for any renewable onsite energy generation which has not been disclosed as a possibility or not.	Unknown? A no policy option would have unknown effects as the facility may or may not be managed. Resultantly the effects upon the objective are unknown.	N/A	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed and contribute towards reducing GHG emissions).
<p>Summary</p> <p>The proposed policy and no policy option commonly reflected one another in that the impacts were the same either as the future development specifics were unknown or that national legislation that already exists ensured that the objective would be met under either option. However under policy adoption it would be ensured that a local heritage and cultural asset would be preserved with the opportunity to increase local employment and helping develop a tourist industry within Thanet. The safeguarding of Quex Park in such a way would yield significant economic benefits which may not be attained under a no policy option as it would not be known if the facility would be retained and developed or not; under this option.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 32: Policy E15 – New build development for economic development purposes in the rural area

SA Objective	Proposed Policy	No policy.	HRA implications	Mitigation and enhancement measures
1. to 4	N/A		N/A	N/A

SA Objective	Proposed Policy	No policy.	HRA implications	Mitigation and enhancement measures
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Neutral. 0 The effects of both the proposed policy and no policy option are neutral because neither aims to provide new facilities or improve access to them.		N/A	-
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Neutral. 0 The proposed policy would not alter the status quo.	Permanent. Indirect. ST/LT -/? The no policy option would not have these safeguards and as result might lead to amenity conflicts, particularly if there are nearby residential areas in a village.	N/A	-
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Indirect. ST/LT + Both the proposed policy and the no policy option have the potential to indirectly support the creation of rural job opportunities. However the scale of any such development is likely to be limited so a minor effect is predicted.		N/A	Both options present an opportunity for TDC to work with future developers and operators to put in place measures and agreements (outside of the plan making process) to also try and secure schemes and training to help people, particularly the young unemployed, to take advantage of future job creation.
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Direct. ST/LT + The proposed policy has the potential to have a positive effect by supporting rural economic growth and could make a significant contribution towards the district's per capita GVA.	Permanent. Direct. ST/LT +/-? There is more uncertainty about the effects from the no policy option because over the long term potential benefits might be lost if the development results in adverse local impacts and/or reduces the productivity attributed to rural economies.	N/A	-
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT + The proposed policy would directly support this objective by ensuring that development does not detract from the value of the countryside as part of the tourist economy.	Permanent. Direct. ST/LT -/? The effects of the no policy option are negative because without the criteria, there may be development with the potential to detract from the natural environment and the visitor economy.	N/A	-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Indirect. ST/LT +/-? The proposed policy could result in a positive effect because farm and rural buildings are often preferred for redevelopment because of their architectural interest.	Permanent. Indirect. ST/LT ? The no policy option is less likely to have a benefit than the proposed policy because it does not directly support rural development.	N/A	-
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Indirect. ST/LT ? The proposed policy is likely to affect development patterns, but the level and nature of effects depends on the location and characteristics of developments. In addition to this, the policy suggests that new build development would be permitted in sustainable locations. However, there is no reference to the accessibility to a range of means of transport, it is therefore unclear if it would lead to sustainable behaviours.	Neutral. 0 A no policy option would not alter the status quo.	N/A	All of the uncertain effects identified here can be mitigated by other policies (e.g. development management and transport policies) that support the integration of rural development sites with public and non-motorised transport network.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Indirect. ST/LT ? The proposed policy is likely to affect the landscape in some form, but the level and nature of effects depends on the size and characteristics of developments.	Neutral. 0 A no policy option would not alter the status quo.	N/A	The quality of design and how future development takes account of character, townscape and the countryside will be addressed under other issues and policy options. Potentially, any large scale development could require a Landscape and Visual Impact Assessment (LVIA)

SA Objective	Proposed Policy	No policy.	HRA implications	Mitigation and enhancement measures
				to be undertaken to assess the effects of applications as they come forward.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT ? The effects of both the proposed policy and the no policy option are uncertain because depending on where development occurs, its scale and design it might affect designated heritage features and archaeology.		N/A	How future development respects and integrates with heritage and archaeological features will be addressed under development management and design policy options. It is anticipated that any potentially negative effects can be mitigated using this approach and the requirements of the NPPF.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. ST/LT 0 Both options are unlikely to alter the status quo.		N/A	Any development that could impact on the AQMA would require relevant assessments to be undertaken to support subsequent planning applications
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Indirect. ST/LT +/-? The proposed policy may have a positive effect because it would support the process of rural regeneration and development. If development is located near existing rural settlements, it might help to reduce the distance residents have to travel to get to work or access services	Permanent. Direct. ST/LT -/? The effects of the no policy option are potentially adverse because rural economic development might result in adverse local traffic impacts.	N/A	There is a degree of uncertainty associated with both options because the site specific issues of potential rural economic development cannot be assessed.
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Indirect. ST/LT +/-? The proposed policy may have a positive effect because it would support the process of rural regeneration and development. If development is located near existing rural settlements, it might help to reduce the distance residents have to travel to get to work or access services	Permanent. Direct. ST/LT -/? The effects of the no policy option are potentially adverse because rural economic development might result in adverse local traffic impacts	N/A	There is a degree of uncertainty associated with both options because the site specific issues of potential rural economic development cannot be assessed.
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent. Indirect. ST -/? Development as a result of both the proposed policy and the no policy option is likely to generate greater volumes of waste, which might not be diverted from landfill. It is also likely to increase the total quantity of waste arising and requiring treatment and/or disposal. This is assessed against an existing trend of reducing landfill capacity within Kent which could be exceeded within the life of the Plan ⁵⁰ . Potentially this could result in a significant effect.		N/A	The adverse effect can be mitigated through wider waste management policy at the national and county scales (e.g. EU Landfill Directive targets, the Government Review of Waste Policy in England 2011 and Kent County Council's Mineral and Waste Plan) which will include new Energy from Waste facilities and the increased diversion of material from landfill. In addition to this It should also be noted that sustainable forms of waste management (e.g. Anaerobic digestion) might contribute towards a more diverse rural economy.
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Indirect. STT -/? There is the potential for a negative effect because an increase in development as a result of the proposed policy and no policy option could increase consumption of energy and resources thereby increase emissions of GHG gases. But the extent and likelihood of this effect is not clear at this stage because this is also determined by the nature of the land use and the density of development.		N/A	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed and contribute towards reducing GHG emissions).
19. To ensure appropriate development control procedures in	Permanent. Direct. ST/LT ?		N/A	The requirements of the NPPF and would be applied to any forthcoming

⁵⁰ Based on data on landfill capacity in Kent from the Environment Agency.

SA Objective	Proposed Policy	No policy.	HRA implications	Mitigation and enhancement measures
place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	An uncertain effect is predicted for both the proposed policy and no policy option because they do not specify the location or type of development that would occur as a result of the options.			planning applications which would also help to mitigate any adverse effects.
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT ? An uncertain effect is predicted for both the proposed policy and no policy option because they do not specify the location or type of development that would occur as a result of the options.		N/A	Any potentially adverse effects of either of the proposed policy or no policy option would be mitigated by NPPF policy and also possibly development management policies. Any infrastructure works would also be subject to relevant legislation.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct. ST/LT ? Both the proposed policy and no policy option have the potential to have both a positive and negative effect depending on where development occurs, the features associated with each site and the type of development. This is particularly relevant to potential effects on groundwater resources and Source Protection Zones in this area of the district and the Bathing Waters Directive (for Broadstairs).		N/A	The NPPF also requires unacceptable risks to water to be mitigated therefore development management policies and national policy should provide safeguards for aquifers and SPZs in particular. This will address the potential area of uncertainty identified here.
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Direct, Indirect. ST/LT -/? There is the potential for a negative effect from the proposed policy and no policy option because development could result in an increase in the consumption of resources. However, the extents of these effects are uncertain because the type and scale of development is not specified.		N/A	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed to contribute towards resource efficiency).
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Permanent. Direct, Indirect. ST/LT -/? There is the potential for an adverse effect from both the proposed policy and the no policy option because an increase in development could indirectly increase consumption of energy and resources thereby increase emissions of GHG gases. But the extent and likelihood of this effect is not clear at this stage and is not necessarily directly linked to area of land allocated.		N/A	The uncertainties can be addressed by other policies in the Local Plan (e.g. development management policies setting out how new development should be designed and contribute towards reducing GHG emissions).
<p>Summary</p> <p>Both the proposed policy and no policy option have positive and negative effects. However, the proposed policy is more likely to result in neutral and beneficial effects than the no policy option because it would allow Thanet to gain the benefits from rural economic development, whilst avoiding many of the potential downsides (e.g. traffic impact, visual and landscape effects and adverse effects on nature conservation). All of the negative and uncertain effects associated with the proposed policy can potentially be mitigated either by development management policies or the NPPF requirements. However it may not be possible to enhance the effects of the no policy option because it has been included to reflect the sustainability issues of a ‘policy void’.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

- Policy 33: Policy H02 – Additional Site – Land at Manston Road/Shottendance Road, Margate
- Policy 34: Policy H03 – Land on west side of Old Haine Road, Ramsgate (former policy number H02A)
- Policy 35: Policy H04 – Land fronting Nash Road and Manston Road (former policy number H02B)
- Policy 36: Policy H05 – Land fronting Park Lane, Birchington (former policy number H02C)
- Policy 37: Policy H06 – Land south of Brooke Avenue Garlinge (former policy number H02D)
- Policy 38: Policy H07 – land at Haine Road and Spratling Street, Ramsgate (former policy number H02E)
- Policy 39: Policy H08 – Land south of Canterbury Road East, Ramsgate (former policy number H02F)

Policy 40: Policy H09 - Land at Melbourne Avenue, Ramsgate (former policy number H02G)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	Policy H05 The allocation of up to 90 dwellings at land fronting Park Lane, Birchington, could increase recreational pressure on European sites. Policy H09 The allocation of up to 49 dwellings at Land at Melbourne Avenue, Ramsgate, could increase recreational pressure on European sites.	Policy H05 – Land fronting Park Lane, Birchington, and Policy H02G – Land at Melbourne Avenue, Ramsgate, should make reference to policy SP25 in order to protect European sites from recreational pressure as a result of development.
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.	Permanent. Direct. ST/LT++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
4. To increase public safety and reduce crime and fear of crime.	Permanent. Direct. ST/LT++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Permanent. Direct. ST/LT++/? Policy adoption would ensure all new residential developments were equipped with the appropriate infrastructure in order to make them immediately habitable. In turn deprivation levels can reduce in the knowledge that all newer developments are appropriately equipped to meet the resident's needs. Additionally policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	Policy H05 The creation of balanced and vibrant communities within the land allocated fronting Park Lane, Birchington, could increase recreational pressure on European sites. Policy H09 The creation of balanced and vibrant communities within the land allocated at Melbourne Avenue, Ramsgate, could increase recreational pressure on European sites.	Policy H05 – Land fronting Park Lane, Birchington, and Policy H02G – Land at Melbourne Avenue, Ramsgate, should make reference to policy SP25 in order to protect European sites from recreational pressure as a result of development.
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	Policy H05 The creation of sustainable developments at land allocated fronting Park Lane, Birchington, could increase recreational pressure on European sites. Policy H09 The creation sustainable developments at land allocated at Melbourne Avenue, Ramsgate, could increase recreational pressure on European sites.	Policy H05 – Land fronting Park Lane, Birchington, and Policy H02G – Land at Melbourne Avenue, Ramsgate, should make reference to policy SP25 in order to protect European sites from recreational pressure as a result of development.
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. Additionally the policy specifically supports the re-use of previously developed land where possible. The scale of	Neutral. 0 A no policy option would not alter the status quo.	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	impact is unknown as details of the proposed developments are unknown at this stage.			
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	Policy H05 The creation of a sustainable pattern of development at land allocated fronting Park Lane, Birchington, could increase recreational pressure on European sites. Policy H09 The creation of a sustainable pattern of development at land allocated at Melbourne Avenue, Ramsgate, could increase recreational pressure on European sites.	Policy H05 – Land fronting Park Lane, Birchington, and Policy H02G – Land at Melbourne Avenue, Ramsgate, should make reference to policy SP25 in order to protect European sites from recreational pressure as a result of development.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	Policy H05 To conserve and enhance the character of the area's landscape at land allocated fronting Park Lane, Birchington, could increase recreational pressure on European sites. Policy H09 To conserve and enhance the character of the area's landscape at land allocated at Melbourne Avenue, Ramsgate, could increase recreational pressure on European sites.	Policy H05 – Land fronting Park Lane, Birchington, and Policy H02G – Land at Melbourne Avenue, Ramsgate, should make reference to policy SP25 in order to protect European sites from recreational pressure as a result of development.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that plans will be created on how to mitigate air pollution and thus will aid contributions towards a net reduction in GHG emissions. The assessment of transport issues as part of the development for each site will help reduce congestion and maximise alternative forms of transport where feasible.	Neutral. 0 By not adopting the policy it is likely that new developments would yield neutral impacts due to current legislation and guidance on a national and international level regarding the management of air pollution (Clean Air Act).	N/A	-
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities	Permanent. Direct. ST/LT ++ Policy adoption provides guidance for housing developments to have appropriate infrastructure to serve the needs of the unit's ready occupation. This would mean that provision for public transport will be accounted for in	Permanent. Direct. LT -/? A lack of policy support could allow developments to be granted permission without the consideration for the impacts upon local transport services. As such new	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
without reliance on private vehicles.	new housing developments. Similarly the policy states that developments must not conflict with other policies thus meaning transport provisions will be accounted for as it is a separate policy seeking to provide sustainable public transport.	developments could saturate and stress current facilities and services leading to a decline in the quality of service.		
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positive meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT ++/? Policy adoption would help ensure the conservation and enhancement of the district's natural habitats, by ensuring new developments protect designated nature conservation sites.	Permanent. Direct. ST/LT++/? The no policy option would still yield positive effects as existing legislation is already in place to protect biodiversity and natural assets across the UK.	N/A	T-.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure new housing developments will not contaminate water resources or coastal features.	Permanent. Direct. ST/LT ++/? The no policy option would still yield positive effects as existing legislation is already in place to protect water assets across the UK.	N/A	-
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Direct. ST/LT ++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy	Neutral. 0 A no policy option would not alter the status quo.	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.			
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Permanent. Direct. ST/LT++/? Policy adoption would ensure that developments do not undermine other policies. Consequently due to alternative policies positively meeting the requirements of the objective, a carryover of impacts will occur under policy adoption to positively meet the sustainability criteria. The scale of impact is unknown as details of the proposed developments are unknown at this stage.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
<p>Summary</p> <p>Under policy adoption there are specific requirements that developments must undertake in order to be granted permission. One concerns the management of natural conservation sites and infrastructure provisions. The policy states that developments must not conflict with another policy, resultantly all SA objectives are positively met as alternative policies all provide positive impacts to the objectives. A no policy option would largely yield neutral impacts as there would not be a change in the status quo.</p> <p>With regards to the HRA, policies H02, H05 and H09 need to include a cross-reference to Policy SP25 and the SPA mitigation strategy, demonstrating how these are being met in order to protect European sites from recreational space.</p>				

Policy 41: Policy H027 – Ancillary accommodation for a family member

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Direct. ST/LT+/O This proposed policy allows for a greater mix of housing, ensuring residents can extend their own house to accommodate particular needs through the use of annexes. This is only a small part of the wider housing delivery, but ensures that more vulnerable residents can live independently, but close to family.	Neutral. 0 A no policy option would not alter the status quo, this is only a small component of the wider housing market but this proposed policy does support more vulnerable groups.	N/A	Appropriate planning permission should always be secured in these circumstances.
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Neutral. 0/+ While this proposed policy does not increase or secure the provision of healthcare facilities, it seeks to support the provision of annexes which can reduce the burden on healthcare facilities. This policy can allow more vulnerable people to live close to relatives, but maintain some degree of independence, which can reduce pressures on health and social care facilities and services.	Neutral. 0 A no policy option would not alter the status quo. This does not increase or secure the provision of healthcare facilities, but would help to reduce pressures.	N/A	-
3. and 4	N/A	N/A	N/A	N/A
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Neutral. 0/+ While this proposed policy does not ensure access to facilities, it seeks to support the provision of annexes which can reduce the burden on healthcare facilities. This can allow more vulnerable people to live close to relatives, but maintain some degree of independence, which can reduce pressures on health and social care facilities and services.	Neutral. 0 A no policy option would not alter the status quo. This does not increase or secure the provision of healthcare facilities, but would help to reduce pressures.	N/A	-
6. to 23				
<p>Summary</p> <p>This proposed policy would benefit objectives relating to healthcare services and vulnerable groups. Whilst it does not directly increase access to facilities or services, it allows more vulnerable groups to live close to relatives but maintain some degree of independence.</p>				

Policy 42: Policy GI01 – Protection of Nationally Designated Sites (SSSI) and Marine Conservation Zones (MCZ)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1-5	N/A	N/A	N/A	N/A
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Direct. ST/LT + The proposed policy ensures that harmful developments are prohibited; and exceptional developments are integrated with the natural environment. Engagement with designated sites of value will seek to enhance a sense of place and increase the vibrancy of the community. This will have implications for social value, and will seek to enhance individual and collective perceptions of health and wellbeing. This can have long term sustainable and positive impacts where managed and maintained.	Permanent. Direct. ST/LT -/? If this policy is not implemented, and the area loses its designated sites of natural value, it is likely that the vibrancy of the area will reduce; particularly where harmful developments are implemented. The potential implications are unclear; as replacement strategies may work to bolster a sense of community and the value of individual contribution; but where possible the designated natural sites should be conserved and enhanced.	Harmful development will reduce and degrade habitats in the area; and this will negatively impact upon the populations of rare and scarce species.	It is important to enhance a sense of community and individual contribution through the conservation and enhancement of these sites. Strategies that encourage the integration of the natural and physical environment and a sense of community may be beneficial. This can include ecological corridors, living walls, and community-nature engagement projects such as resident ecological service to enhance vibrancy and represent tangible developments in individual contribution.
7. & 8	N/A	N/A	N/A	N/A
9. To protect and enhance the areas natural landscape, semi-natural landscape and street scene to support the tourist economy.	Permanent. Direct. ST/LT + Policy adoption would ensure the protection and enhancement of natural landscape; and areas of important wildlife and geological value in particular. The impacts are positive as natural landscapes are conserved as a result of development restriction; and this supports the tourist economy. Any public bodies that are infringing upon the natural landscape face duties to enhance the wildlife; and thus the policy is beneficial for ecological prosperity. Notably, developments that may support the tourist economy and cannot be built elsewhere may infringe upon the SSSI’s and MCZ’s. However, the policy suggests that mitigating measures will be required to maintain the integrity of the site.	Permanent. Direct. ST/LT -/? A lack of policy support could result in new developments infringing upon areas of natural landscape. As such SSSI’s and MCZ’s may lack protection, and the degradation and decline of such will negatively impact upon the tourist economy. However, new developments may abide by their own sustainability and GBC codes of conduct to protect the natural landscape. Rare species are also legally protected; and thus may face protection without the implementation of the policy.	The proposed policy would conserve and enhance areas of natural landscape for rare and scarce species.	In the case of development that act as exceptions of the rule, important wildlife and geological features should be harmoniously incorporated into the built and natural environment.
10.	N/A	N/A	N/A	N/A
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT + Policy adoption would ensure that a sustainable pattern of development is pursued; conserving and protection SSSI’s, NNR’s, and MCZ’s and the invaluable species that reside within them. This would allow the natural landscape to prosper harmoniously alongside the built environment; and encourage long term sustainability.	Permanent. Direct. ST/LT -/? If this policy was not implemented, new developments may be allowed to develop at unprecedented rates and degrade the nature conservation designations. Such development would therefore be unsustainable, unless mitigation measures were implemented.	The implementation of the GI01 policy in accordance with a sustainable pattern of development with significantly benefit	Should no policy be implemented, designated sites of value may become vulnerable against climatic and human factors. The sustainable pattern of development should ensure that the sustainable prosperity of the sites is maintained, and in some cases enhanced. As such termly reviews should assess the current and predicted patterns of development; and control measures for the sites should be adopted accordingly.
12. To conserve and enhance the character and quality of the area’s landscape and townscape	Permanent. Direct. ST/LT+ If the policy were to be implemented, the quality and character of Thanet’s landscape would be protected through the conservation of the designated sites of value,	Permanent. Direct. ST/LT - If this policy was not implemented, new developments may be allowed to develop, and this may be harmful for the natural landscape. In turn, this would reduce the	Through conserving and enhancing the character of the landscape and townscape, protected species will remain protected and be allowed to thrive in harmony with the built environment. This may also be	Frequent reviews should be undertaken to analyse the cultural and natural heritage of the Thanet area; and effective policies should be

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
particularly associated with town centres and coastal areas.	particularly focusing on Thanet’s coastal MCZ and SSSI. Strategies could also be implemented to enhance the site; and not simply focus on the restriction of development.	character and quality of the Thanet area, and be particularly detrimental to the coastal areas. However, if new developments were implemented that seamlessly integrated with the natural landscape, this may work to create a living community of high character and quality.	beneficial for climate resistance, as species will increase their strength against risk.	put in place to conserve and enhance biodiversity where possible.
13.	N/A	N/A	N/A	N/A
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. ST/LT+ The implementation of the policy prevents harmful developments from impacting upon designated sites of biological and geological value and importance. This results in the maintenance and/or enhancement of the natural landscapes; vital as pathways for the sequestration of harmful air pollutants.	Permanent. Direct. ST/LT - If this policy isn’t implemented, developments may be introduced that are harmful to the environment. Such developments may not account for sustainable building design and may negatively impact upon air quality pre-construction, during construction, and post-construction with use value. This should be analysed and effectively monitored throughout the whole building process where developments are permitted.	N/A	New developments must have air quality monitoring systems to ensure that individuals and organisations are responsible for the air quality impact of their developments. Strategies should be introduced that embed naturally with the built and natural environment and focus on enhancing air quality.
15-17	N/A	N/A	N/A	N/A
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Direct. ST/LT + By implementing the GI01 policy, harmful developments are prevented from infringing upon designated sites of ecological and geological value. This is very responsive to the challenges associated with climate change; particularly through conserving ecological environments for rare and scarce species.	Permanent. Direct. ST/LT - If this policy wasn’t implemented, developments may negatively impact upon the sites of ecological value and threaten the already turbulent/vulnerable ecosystems for rare and scarce species. This impact would be negative for the species residing within the designated sites; and if not realised may be irreversible. However, if the developments are built harmoniously with the natural environment this may provide a useful template for human/nature coexistence.	Increased climate risks such as exposure to flooding may negatively affect habitats in the Thanet region; particularly those in the Thanet Coastal MCZ and SSSI.	A review of the climate associated threats to the Thanet region should be undertaken and this should be incorporated into the policy framework associated with the designated sites of interest. Then, where appropriate, effective climate-resilience strategies should be implemented to protect the designated sites and maintain/enhance their geological and ecological value.
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. ST/LT + The policy prevents the detrimental development from negatively impacting upon sites of special value. In the Thanet area, the Thanet Coast is classified as an SSSI and an MCZ; and the policy attempts to limit development. In the case of development that is permitted, mitigation approaches must be put into place to manage coastal risks or the development may not go ahead. This policy therefore effectively accounts for coastal risks and positively benefits the area.	Permanent. Direct ST/LT -/? If this policy was not implemented, new developments may be allowed to develop at unprecedented rates, without accounting for coastal risks. This would be detrimental to the ecological sites and valuable and the human populations residing nearby.	Coastal risks could severely impact upon the habitat security of rare and scarce species in the area. However, it is important to note that coastal defences should also not infringe on the natural environment.	New developments where permitted should include coastal infrastructure to mitigate against coastal risks.
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT++ Policy adoption would ensure the conservation and enhancement of biodiversity and the habitats in which they reside. This should significantly and positively impact upon biodiversity in Thanet and encourage the protection of rare and scarce species; as well as encourage the growth of thriving and vulnerable species; particularly in coastal areas. This policy is biodiversity-centric and thus is extremely important for this objective.	Permanent. Direct ST/LT -- If this policy is not implemented, and the area loses its designated sites of natural value, biodiversity in the area will decline, and ecosystem services will suffer. Laws and policies already in place may conserve the area and protect species, particularly vulnerable ones. However this policy ensures heightened protection for biodiversity and a sustainable pattern of development.	The GI01 policy protects and enhances biodiversity and associated habitats, and prevents harmful developments from threatening the areas ecological services.	Where developments are permitted, biodiversity may be threatened. This suggests that strategies should be implemented to enhance biodiversity such as green infrastructure features, including living walls, green roofs, and pocket habitats.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Indirect. ST/LT+ This policy directly protects and improves the quality of coastal water resources as it aims to protect Thanet’s Marine Coastal Zone and the coastal SSSI zone from harmful developments. This positively benefits coastal	Permanent. Direct. ST/LT - If the policy isn’t implemented, fluvial and coastal water resources at designated sites are more susceptible to contamination and degradation. This may significantly impact upon the human and ecological health of the area;	The negative impacts upon the quality of fluvial and coastal water resources may significantly impact upon the habitats of rare and protected species; and negatively affect the ecological value of the area.	Where developments are implemented and introduced, mitigation strategies should be incorporated to reduce any potential risks to coastal and fluvial water

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	and fluvial water resources as it limits and prevents harmful contaminants from entering the water source; and thus in turn protects the surrounding environment. Where developments are permitted, sustainable drainage systems and appropriate infrastructure tools should ensure that water resources are protected and enhanced.	and if not reviewed, may have long term impacts on the Thanet area. However, laws may be in place to currently analyse and managed water resources; and this must be further analysed.		resources. This could include sustainable drainage systems; and the introduction of effective green scheme developments that harmoniously integrate into the environment, enhance biodiversity, and natural filter water resources.
22.	N/A	N/A	N/A	N/A
23.	N/A	N/A	N/A	N/A
<p>Summary</p> <p>Adoption of the GI01 policy would undoubtedly enhance the conservation, protection, and enhancement of the designated sites of ecological and geological value (SSSI's, MCZ's, and NNR's); and benefit protected, rare and scarce species. It is unclear whether the absence of the policy would significantly impact upon the area or not due to existing legislation; however, the implementation of the policy will reinforce the need for sustainable development and ecological conservation. The strategy, where harmoniously and interactively integrated with the human population, will also seek to enhance the vibrancy of the community. There are many positive impacts for the HRA and these should be considered in policy planning.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 43: Policy GI05 – Protection of Playing Fields and Outdoor Sports Facilities

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 5	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent; Direct LT ++ Policy adoption would protect and safeguard playing fields and outdoor sport facilities which will increase social interactions across the community. As such an increased sense of place and community feel could be established through using the medium of sport and physical recreation.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Neutral 0 Both options are unlikely to alter the status quo.		N/A	-
8. and 9	N/A		N/A	N/A
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Neutral. 0. Policy adoption would not increase or decrease local employment provision as the policy is based upon protection of facilities as opposed to the creation of new structures.	Unknown ? A no policy option places potential development pressure on playing fields and outdoor sports facilities, which doesn't promote the use of previously developed land. The no policy option impacts are not easily quantifiable.	N/A	-
11.	N/A		N/A	N/A
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Neutral 0 Policy adoption would not have a negative or positive impact on the character of the area.		N/A	-
13. to 19	N/A		N/A	N/A

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
20. To conserve and enhance biodiversity.	Neutral 0 Both options are unlikely to alter the status quo.		N/A	-
21. to 23	N/A		N/A	N/A
<p>Summary</p> <p>Adoption of the proposed policy would be beneficial as it could help provide social benefits through preserving recreational facilities. Similarly the policy could preserve the associated health benefits of active recreation on the protected areas by encouraging and preserving exercise spaces. A no policy option would not actively support the aims of several objectives regularly yielding neutral impacts in comparison to the significant social benefits of the proposed policy.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 44: Policy GI06 – Landscape and Green Infrastructure

SA Objective	Proposed Policy	No policy.	HRA implications	Mitigation and enhancement measures
1. to 5	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent. Indirect. ST/LT + Indirectly all of these options will add to and support the sense of place within new and existing developments.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
7. and 8	N/A		N/A	N/A
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	Permanent. Indirect. ST/LT + Indirectly all of these options will add to and support natural, semi-natural and street scene through the provision and implementation of green infrastructure.	Permanent, Indirect. ST/LT - A no policy option would not support the tourist economy as new developments would not need to create an attractive environment for users and could make Thanet less appealing to tourists.	N/A	-
10. and 11	N/A		N/A	N/A
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Indirect. ST/LT + Indirectly all of these options will add to and support and enhance the character and quality of landscape and townscape across the district. The policy will improve the connectivity between new and existing features.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT + Policy adoption will contribute in retaining historic features, including boundaries and layouts.	Neutral. 0 A no policy option would not alter the status quo.		
14. to 19	N/A		N/A	N/A
20. To conserve and enhance biodiversity.	Permanent. Indirect. ST/LT + Indirectly all of these options will add to and support and enhance biodiversity.	Permanent, Direct. ST/LT - Without provisions for green infrastructure biodiversity would not be enhanced with new developments and this could lead to a reduction in habitat quality and connectivity.	N/A	-
21. to 23	N/A		N/A	N/A
<p>Summary</p> <p>The proposed policy has the potential to positive impact on this objective by delivering new development that includes adequate open space, landscaping and provision of wildlife habitats. It will also contribute in retaining historic features.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 45: Policy QD02 – General Design Principles (former policy number QD01)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Direct. ST/LT + The proposed policy will ensure that the design of new residential development is robustly undertaken to provide proportionate, well designed units based on demand. The policy is unable to define tenure requirements however, so positive effects are limited	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
2. to 3	N/A		N/A	N/A
4. To increase public safety and reduce crime and fear of crime.	Permanent. Direct. ST/LT + The proposed policy emphasises that people's quality of life will be improved by designing out crime to promote public safety and security.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
5.	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	Permanent. Direct. ST + The proposed policy places significant emphasis on the integration of new developments and surrounding locations in terms of scale, massing and character. New developments should be inclusive in its design for all users.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
7. to 10	N/A		N/A	N/A
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. LT + Through integrating new developments within the character and uses of existing locations, the proposed policy will help contribute towards implementing compatible land uses.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Indirect. LT + The proposed policy aims to ensure that new developments are complimentary with existing buildings and areas. The primary aim of this is to retain the local character of defined areas.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
13. to 17	N/A		N/A	N/A
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Indirect. LT + The robust design of new developments will ensure that climate change resilience is integrated in to land use patterns. Effects will depend on the degree to which design measures are implemented, but designs that limit energy use will also assist in meeting this objective.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
19.	N/A		N/A	N/A
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT + The policy suggests that features (including trees and natural habitats) that contribute positively to the quality and character of an area should be retained, enhanced and protected. In addition to this, the adoption of the policy will include the provision of opportunities to increase biodiversity interest and improve the connectivity between	Permanent. Indirect. ST/LT - Without provisions for increasing the interest in biodiversity, and/or the protection of trees and natural habitats, the design of new development could have on adverse impact on biodiversity.	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	nature conservation sites where appropriate. This will contribute in protecting the natural environment.			
21. to 22	N/A		N/A	N/A
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	<div>Permanent. Direct. LT +</div> <div>The proposed policy will help to implement strong design principles as part of new development, which should help towards increasing energy efficiency in new developments.</div>	<div>Neutral. 0</div> <div>A no policy option would not alter the status quo.</div>	N/A	-
<div>Summary</div> <div>The proposed policy will contribute towards a number of SA objectives, most notably where there is a likely improvement in the quality of housing stock. Additionally there is also the potential for increasing resilience to climate change and reducing the effect on climate change, through implementing robust design standards and reducing energy efficiency respectively. The new developments will promote people’s safety and security and will have a positive effect on the protection of the natural environment. The no policy option is unlikely to impact on the SAS objectives as it will not alter the status quo.</div> <div>With regards to the HRA there are no likely significant effects.</div>				

Policy 46: Policy QD04 – Technical Standards

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 10	N/A		N/A	N/A
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct ST/LT + The proposed policy has the potential to make a positive contribution towards this objective by setting out clear standards for internal space within residential accommodation. The standards will provide efficient use of space, as land take will be better understood. The implementation of a water efficiency standard will increase the sustainability of water supplies, which in-turn may encourage more sustainable development.	Neutral. 0 A no policy option would not alter the status quo	There are no significant effects on the sustainable pattern of development.	The proposed policy could be developed to aspire to better water efficiency standards over specific timescales
12. to 17	N/A		N/A	N/A
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Direct LT + The proposed policy has the potential to make a positive contribution towards this objective by setting a water efficiency standard of 110 litres/person/day. The policy is in response to the challenge facing water resources, which can be associated to climate change effects.	Permanent. Indirect. LT – No policy option will allow developments to take place without water efficiency standards, which may potentially impact water resources by lack of regulation. In-turn the standard of living may decline due to restrictions on use of water.	There are no significant effects on developments responding to challenges associated with climate change.	The proposed policy could be developed to aspire to better water efficiency standards over specific timescales.
19. to 21	N/A		N/A	N/A
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Direct LT + The proposed policy has the potential to make a positive contribution towards this objective by shifting towards a more sustainable consumption level of water. The policy will potentially reduce the social and environmental impacts by increasing sustainability and stock of water resources.	Permanent. Indirect. LT – No policy option will allow developments to take place without water efficiency standards, which may potentially impact water resources by lack of regulation. The global, social and environmental impacts will most likely increase due to pressures from population increase and climate change.	There are no significant effects on using sustainably produced and local products.	The proposed policy could be developed to aspire to better water efficiency standards over specific timescales.
23	N/A		N/A	N/A
Summary				
Overall the proposed policy does not affect many of the SA objectives. The policy will most likely result in permanent direct positive effects. The policy may negatively impact the residents of new accommodation developments by setting limits on their water usage. However, the internal space minimum may increase the standards of residential accommodation. The proposed policy will most likely reduce water consumption in the area and increase the sustainability of water supplies.				
ith regards to the HRA there are no likely significant effects.				

Policy 47: Policy QD05 – Accessible and Adaptable Accommodation

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Direct ST/LT + The proposed policy has the potential to make a positive contribution towards this objective by supplying the appropriate housing needs to those that require them. Especially new houses with wheelchair access. The policy mentions a minimum 10% of new build developments are expected to comply with building regulation part M4 (2), which should be designed to be accessible and adaptable dwellings for the future demographic trends. The policy evidently reflects the requirement for long and short term demand and need.	Permanent. Direct. ST/LT – No policy option will allow developments to not accommodate the changing demographic and wheelchair users.	There are no significant effects on the sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	The proposed policy could include plans to redevelop existing accommodation for short term needs of wheelchair users.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
2. to 5	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	<div>Permanent. Indirect LT +</div> <div>The proposed policy has the potential to make a positive contribution towards this objective by providing housing for a wide demographic and mixed housing base. The policy mentions the adaptability of new housing developments which may provide individual contributions from stakeholders. The policy also mentions the future needs of households, which tailors to residents.</div>	<div>Temporary. Direct. ST/LT –</div> <div>No policy option may allow developments to build housing which is not fit for purpose and there is not an associated integrated community.</div>	There are no significant effects on creating vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	The proposed policy could include more minorities other than just wheelchair users in its plan.
7. to 10	N/A		N/A	N/A
11. To ensure that a sustainable pattern of development is pursued.	<div>Permanent. Direct LT +</div> <div>The proposed policy has the potential to make a positive contribution towards this objective by providing accommodation which is adaptable. Therefore, if future housing requirements are needed, adaptation of existing developments is an option. This may reduce the need for building new housing developments, consequently increasing the long-term sustainability pattern.</div>	<div>Permanent. Indirect. ST/LT</div> <div>As future developments are not yet known, it is not possible to fully assess the impacts of a no policy option to the sustainability pattern of developments.</div>	There are no significant effects on the sustainable pattern of development.	The proposed policy could include reviews of the current sustainability of developments, including the accessibility and adaptability of accommodation.
12. to 23	N/A		N/A	N/A
Summary				
Overall the proposed policy does not affect many of the SA objectives. The policy will most likely result in positive effects to residents and developers, as adaptable and accessible accommodation will provide for all demographics. The policy is mostly relevant in the long term, as the aspiration is to be a sustainable housing initiative. If the policy is not introduced, significant negative effects may occur. Including developments which are not fit for purpose and wheelchair users without accommodation.				
With regards to the HRA there are no likely significant effects.				

Policy 48: Policy HE03 – Local Heritage Assets

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 5	N/A		N/A	N/A
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent; Indirect ST/LT + The proposed policy will provide protection and guidance for heritage assets. Indirectly the options will help to support sense of place locally by ensuring that local assets are protected which contribute to the local atmosphere.	Permanent. Indirect. ST/LT ? As future development are not yet known, it is not possible to fully assess the impacts of a no policy option to protect heritage features.	N/A	-
7.	N/A		N/A	N/A
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Indirect. ST/LT + The proposed policy has ability to indirectly lead to minor positive impacts upon the objective. The proposed policy will safeguard heritage assets in their own given way. The protection of heritage assets would promote sustainability and economic growth of the district by ensuring such assets can be utilised for business and tourism. By safeguarding such assets the business and tourist industry growth will aid the creation of job opportunities and help increase GVA per capita.	Permanent. Indirect. ST/LT ? As future development are not yet known, it is not possible to fully assess the impacts of a no policy option to protect heritage features.	N/A	-

SA Objective	Proposed Policy		No policy	HRA implications	Mitigation and enhancement measures
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	<div>Permanent. Indirect. ST/LT +</div> <div>The proposed policy will provide protection and guidance for heritage assets. Indirectly the options will help to support the local tourist economy as such features provide help to attract visitors to the local area.</div>	<div>Permanent. Indirect. ST/LT ?</div> <div>As future development are not yet known, it is not possible to fully assess the impacts of a no policy option to protect heritage features.</div>		N/A	-
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	<div>Permanent. Direct. ST/LT ?</div> <div>Both the proposed policy and no policy option have an unknown impact upon the objective. This is due to future developments being unknown in design and location and as such the ability to assess the impacts of land reutilisation is restricted.</div>			N/A	The proposed policy could be developed to try to actively promote the reuse of local spaces and materials, where possible, in order to encourage urban renaissance.
11.	N/A			N/A	N/A
12. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	<div>Permanent. Indirect. ST/LT +</div> <div>The proposed policy will provide protection and guidance for heritage assets. Indirectly the proposed policy will help to enhance and preserve local character by providing safeguarding policies for local heritage which is integral to local landscape and townscape.</div>	<div>Permanent. Indirect. ST/LT ?</div> <div>By not adopting the policy it is unknown if the character and quality of the local spaces would decline. It could be conceivable that local heritage sustains its integrity; yet similarly without guidance a decline could be possible due to a lack of safeguarding.</div>		N/A	-
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	<div>Permanent. Direct. ST/LT ++</div> <div>The proposed policy will provide protection and guidance for heritage assets. Given the proposed policy is specific towards heritage assets the impacts will be significant and direct upon the objective. The policy also suggests proposals affecting non-designated heritage assets will be assessed on the scale of harm (both direct or indirect) or loss, and the significance of the heritage asset.</div>	<div>Permanent. Indirect. ST/LT ?</div> <div>A no policy option has unknown impacts as future developments are not yet known and as such the impacts cannot be wholly assessed. It could be conceivable that local heritage sustains its importance and appeal; yet similarly without guidance a decline could be possible due to a lack of safeguarding.</div>		N/A	-
14. to 21	N/A			N/A	N/A
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	<div>Permanent. Indirect. ST/LT +</div> <div>With the proposed policy seeking to protect heritage assets it is likely that the objective will be met indirectly. Through the protection of heritage assets appropriate design and developments will occur with a focus on ‘green’ processes.</div>	<div>Permanent. Direct. ST/LT ?</div> <div>A no policy option has unknown impacts as future developments are not yet known and as such the impacts cannot be wholly assessed.</div>		N/A	-
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	<div>Permanent. Direct. ST/LT ?</div> <div>Both the proposed policy and no policy option have an unknown impact upon the objective. This is due to a lack of specificity in relation to energy efficiency and renewable energy within the options.</div>			N/A	-
<div>Summary</div> <div>The proposed policy will have direct and indirect effects on the character and sense of place of settlements, help to support the economy and visitor economy in particularly as visitor attractions in their own right and contribute to character of townscape. Only one significant beneficial effect was predicted on SA objective 13. Adoption of the proposed policy should be promoted as not only would it be beneficial to SA objective 13, but a succinct fully rounded heritage protection would benefit all objectives. The effects of the no policy option are uncertain because without specific policies in the Local Plan, it is not certain to what extent the NPPF on its own would protect heritage assets, whilst future developments are not yet known which could be either positive or negative in relation to many of the objectives.</div> <div>With regards to the HRA there are no likely significant effects.</div>					

Policy 49: Policy CC02 – Surface Water Management

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Indirect. LT +/- The proposed policy has the potential to make a positive contribution towards this objective by making sure that housing development exacerbate the risk of flooding to other areas through the implementation of poor drainage systems.	Permanent. Indirect. LT – Lack of sustainable drainage systems could compromise water quality in groundwater source protection zones, put housing areas at increased flood risk, and increase pollution from run-off.	There are no significant effects on providing a sustainable supply of housing. However, the policy could be strengthened to require new developments on greenfield sites to maintain greenfield levels of run-off.	Consideration should be given to amending this policy so as to require new developments on greenfield sites to maintain greenfield run-off rates through use of SUDS.
2. to 10	N/A		N/A	N/A
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. LT + The proposed policy likely to result in development located in sustainable locations that takes into account coastal, fluvial and surface water flooding.	Neutral. 0 A no policy option would not alter the status quo.	There are no significant effects on ensuring a sustainable pattern of development. However, the policy could be strengthened to require new developments on greenfield sites to maintain greenfield levels of run-off.	Consideration should be given to amending this policy so as to require new developments on greenfield sites to maintain greenfield run-off rates through use of SUDS.
12. to 18	N/A		N/A	N/A
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	Permanent. Direct. LT + The proposed policy will enhance provisions with regards to the management of flood risk yet it would potentially occur in differing ways, but with the same effects. The policy mentions that developers should seek and refer to guidance produced by the Lead Local Flood Authority (LLFA) when submitting a planning application for any major development which will contribute in reducing the risk of flooding.	Permanent. Indirect. LT – No policy option would allow developments to take place without appropriate measures to manage flood risk.	There are no significant effects ensuring the appropriate developmental controls are in place to manage the risks of coastal erosion, coastal and fluvial flood risk. However, the policy could be strengthened to require new developments on greenfield sites to maintain greenfield levels of run-off.	CApproval for the design and long term maintenance of SuDS will be required prior to development being permitted.
20. to 23	N/A		N/A	N/A
Summary				
Overall the proposed policy does not affect many of the SA objectives. The proposed policy could result in the restriction of housing developments by introducing measures to combat climate change or flood risk through the implementation of sustainable drainage systems, though the positives are likely to outweigh any inhibiting of house building. However, the proposed policy will aid flood mitigation efforts but potentially at the expense of local archaeological and architectural integrity. The effects of the no policy option are negative as this would place various existing and future land uses at risk from inappropriate development.				
ith regards to the HRA there are no likely significant effects. Approval for the design and long term maintenance of SuDS will be required prior to development being permitted.				

Policy 50: Policy CC03 – Coastal Development

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Indirect. LT +/- The proposed policy has the potential to make a positive contribution towards this objective by making sure that housing development does not occur in areas of coastal flood risk or erosion.	Permanent. Direct. LT – Lack of provision toward the prevention of erosion and damage caused by erosion could put houses and occupants at risk.	The policy, which may limit developments within 40 metres of the coast, could result in adverse effects on European protected sites.	-An additional specific criteria should be included in the policy stating coastal development will not adversely affect the interest features of any designated nature conservation sites.
2. to 10	N/A		N/A	N/A
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. LT +	Permanent. Direct. LT -	The policy promotes a sustainable pattern of development in coastal areas.	-An additional specific criteria should be included in the policy stating coastal development will not adversely affect

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	The proposed policy is likely to result in development located in sustainable locations that takes into account coastal, fluvial and surface water flooding.	Development in an area at risk to coastal erosion or without erosion management measures is unsustainable due to potential damage from coastal erosion.	However, it may result in adverse effects on European protected sites.	the interest features of any designated nature conservation sites.
12. to 18	N/A		N/A	N/A
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with development management policies and NPPF.	<div>Permanent. Direct. LT ++</div> <div>The proposed policy will enhance provisions with regards to the management of coastal flooding and coastal erosion. This would protect various land uses from the effects of coastal change.</div>	<div>Permanent. Direct. LT -</div> <div>No policy option would allow developments to take place without appropriate measures to manage coastal flooding and coastal erosion.</div>	N/A	N/A
20. To conserve and enhance biodiversity.	<div>Permanent. Indirect. ST/LT +</div> <div>The proposed policy suggests proposals for new development within 40 metres of the coastline will not adversely affect the features of any designated nature conservation sites. This will contribute in protecting coastal habitat and therefore protecting the local biodiversity.</div>	<div>Neutral. 0</div> <div>A no policy option would not alter the status quo.</div>	N/A	-
21. to 23	N/A		N/A	N/A
<div>Summary</div> <div>Overall the proposed policy does not affect many of the SA objectives. The proposed policy could result in the restriction of housing developments by introducing measures to combat climate change, flood risk and coastal erosion through the implementation of restrictive criteria for new developments. The effects of the no policy option are negative as this would place various existing and future land uses at risk from inappropriate development within coastal areas, particularly within 40m of the coastline or cliff top. The policy will contribute positively to the coastal biodiversity.</div> <div>With regards to the HRA, the policy should be strengthened to include potential effects on European protected sites as a specific criteria requiring consideration. For example, stating coastal development will not adversely affect the interest features of any designated nature conservation sites.</div>				

Policy 51: Policy QD01 – Sustainable Design

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Permanent. Direct. LT + The proposed policy has the potential to make a positive contribution towards this objective by designing buildings flexibly from the outset to allow a wide variety of possible uses. The policy mentions that buildings will be re-used wherever possible, which will increase the overall sustainability.	Permanent. Indirect. LT - No policy option will allow developments to take place without considering re-use of vacant buildings and a mixture of housing types.	There are no significant effects on providing a sustainable supply of housing. However, the policy could be strengthened to require new developments on greenfield sites to maintain green spaces and enhance the natural landscapes.	Consideration should be given to amending this policy so as to require new developments on greenfield sites to maintain green spaces.
2. to 9	N/A		N/A	N/A
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	Permanent. Direct. LT + The proposed policy has the potential to make a positive contribution towards this objective by designing buildings flexibly from the outset to allow a wide variety of possible uses. The policy mentions that buildings will be re-used wherever possible, which will increase the overall sustainability. The policy mentions using sustainable	Permanent. Indirect. LT - No policy option will allow developments to take place without considering re-use of vacant buildings and previously developed land. It will also not consider the reusing sustainable materials from existing buildings.	There are no significant effects on improving efficiency in land use through re-use.	Consideration should be given to amending this policy so as to require new developments on previously developed sites to enhance green spaces.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	materials wherever possible and making the most sustainable use of other materials.			
11. to 13	N/A		N/A	N/A
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. LT + The proposed policy has the potential to make a positive contribution towards this objective by making best use of solar energy and providing cycling and walking routes to reduce the need to travel by car.	Permanent. Indirect. LT - No policy option will allow pollutants to not be minimised and the continuation of levels that exceed the national standards.	There are no significant effects on improving air quality in areas where air quality levels exceed national standards.	Consideration should be given to the use of wind and other energy production designs, which limit pollutant emissions.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Direct. LT + The proposed policy has the potential to make a positive contribution towards this objective by cycling and walking routes to reduce the need to travel by car.	Neutral. 0 No policy option will allow private vehicle reliance to remain the same.	There are no significant effects on providing sustainable transport networks.	Consideration should be given to the efficiency of public transport networks.
16.	N/A		N/A	N/A
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	Permanent. Direct. LT + The proposed policy has the potential to make a positive contribution towards this objective by minimising waste and promoting recycling during construction and operation. .	Neutral. 0 No policy option will allow waste disposal to remain the same.	There are no significant effects on reducing waste generation and disposal.	Consideration should be given to the potential increase in waste generation from population increases.
18. to 21	N/A		N/A	N/A
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Direct. LT + The proposed policy has the potential to make a positive contribution towards this objective by encouraging the re-use of existing buildings, using sustainable materials wherever possible and minimising waste by promoting recycling during construction and operation.	Neutral. 0 A no policy option would not alter the status quo.	There are no significant effects on reducing the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Consideration should be given to the use of local materials and labour during developments.
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Permanent. Direct. LT + The proposed policy has the potential to make a positive contribution towards this objective by making the best use of solar energy in new building design.	Neutral. 0 A no policy option would not alter the status quo.	There are no significant effects on increasing energy efficiency and the proportion of energy generated from renewable sources in the area.	Consideration should be given to more renewable sources other than solar energy generation.
<p>Summary</p> <p>Overall the proposed policy does not affect a significant proportion of the SA objectives. The policy could result in the restriction on new buildings and housing developments by introducing measures to re-use existing buildings and designing buildings for a wide-range of possible uses. However, the proposed minimised land-use could allow for a greater number of developments and investment to be supplied to the area. The proposed policy will most likely reduce the energy consumption and related pollutants in the area and reduce strain on transport systems by the design of cycling and walking opportunities.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 52: Policy CC04 – Renewable energy (former policy number CC05)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.	Unknown ? The policy option is not likely to have an effect on housing, though the degree to which solar photo-voltaic panels are incorporated in to residential developments may have a positive contribution.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
2. to 6	N/A	N/A	N/A	N/A

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	Permanent. Indirect. LT + The proposed policy could, indirectly, support the green economy in terms of jobs associated with the installation and operation of renewable energy.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
8. To ensure the sustainable development of the proposed economic growth and encourage industrial and employment development at key sites within the District to support priority regeneration areas.	Permanent. Indirect. LT + The proposed policy could, indirectly, support the green economy in terms of jobs associated with the installation and operation of renewable energy.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
9. and 10	N/A	N/A	N/A	N/A
11. To ensure that a sustainable pattern of development is pursued.	Neutral. 0 None of these options are spatial therefore a neutral effect is predicted.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct LT + This policy suggests the applicants will need to demonstrate there is no significant impact on the landscape setting and that the visual impacts have been minimised in the design and layout of the scheme. This will have a positive effect on the landscape.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Neutral. 0 This policy suggests the applicants will need to demonstrate there is no adverse impact on heritage assets. While this will not contribute in enhancing the historic environment, it is unlikely to have an adverse impact on in.	Permanent. Indirect. ST/LT – In the absence of this policy, renewable energy development would likely have an adverse impact on the historic environment as it would not be considered in the design.	N/A	N-
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. LT + The proposed policy will contribute towards improving air quality by helping to reduce reliance on fossil fuel derived energy sources that are the source of atmospheric pollutants such as NO ₂ .	Permanent. Indirect ST/LT - No policy option would encourage the use of fossil fuels which could worsen air quality.	N/A	-
15. to 17	N/A	N/A	N/A	N/A
18. To ensure development within the District responds to the challenges associated with climate change.	Permanent. Direct. LT ++ The proposed policy will make a significant contribution towards achieving this objective by promoting the installation of low carbon and renewable energy.	Permanent. Indirect LT - No policy option would encourage the use of fossil fuels which could contribute toward climate change.	N/A	-
19.	N/A	N/A	N/A	N/A
20. To conserve and enhance biodiversity.	Neutral. 0 This policy suggests the applicants will need to demonstrate there is no significant impact on habitats, biodiversity or wildlife assets, particularly protected species and habitats. While this will not contribute in enhancing the biodiversity, it is unlikely to have an adverse impact on it.	Permanent. Indirect. ST/LT – In the absence of this policy, renewable energy development would likely have an adverse impact on the biodiversity as it would not be considered in the design.	N/A	-
21.	N/A	N/A	N/A	N/A

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	Permanent. Direct. LT ++ The proposed policy will make a significant contribution towards achieving this objective by promoting the use of sustainable materials, re-using buildings and structures where possible and minimising waste in construction and operation and supporting the installation of low carbon and renewable energy.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Permanent. Direct. LT ++ The proposed policy will make a significant contribution towards achieving this objective by supporting the installation of low carbon and renewable energy.	Permanent. Indirect. LT - No policy option would encourage the continued use of fossil fuels.	N/A	-
<p>Summary</p> <p>The proposed policy explicitly states a presumption in favour of renewable technologies within developments, assuming that there are no detrimental impacts, including visual effects, natural environment and biodiversity, and historic environment. This supports a range of the sustainability objectives. The no policy option will have a largely neutral effect, though could have significant adverse effects associated with the continued use of fossil fuels.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 53: Policy SE01 – Potentially Polluting Development

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 12	N/A		N/A	N/A
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. LT + The proposed policy will have a beneficial effect on significant heritage assets in the long term by helping to reduce atmospheric pollutants that can have a detrimental effect on the status and condition of designated wild life sites.	Permanent. Indirect. ST - Without policy adoption there is a risk that development could occur that indirectly has a detrimental effect on significant heritage assets through air pollution. However, this is likely to be limited to the short term as air quality improves due to lower emissions from road vehicles and more efficient heating systems, etc.	N/A	-
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct LT ++ The proposed policy will have a significant beneficial effect on air quality particularly where future development might otherwise have detrimental effect by providing planning policy controls.	Permanent. Indirect. ST - Without policy adoption there is a risk that development could occur that indirectly exacerbates air quality problems. However, this is likely to be limited to the short term as air quality improves due to lower emissions from road vehicles and more efficient heating systems etc.	N/A	-
15. to 19	N/A		N/A	N/A
20. To conserve and enhance biodiversity.	Permanent. Direct. LT + The proposed policy will have a beneficial effect on biodiversity in the long term by helping to reduce atmospheric pollutants that can have a detrimental effect on the status and condition of designated wild life sites such as SSSIs, SACs and SPAs.	Permanent. Indirect. ST - Without policy adoption there is a risk that development could occur that indirectly has a detrimental effect on biodiversity through air pollution. However, this is likely to be limited to the short term as air quality improves due to lower emissions from road vehicles and more efficient heating systems etc.	N/A	-
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	Permanent. Direct LT + The proposed policy will have a beneficial effect on water quality by providing planning policy controls to mitigate potentially polluting activities.	Permanent. Indirect. ST - Without policy adoption there is a risk that development could occur that indirectly exacerbates air quality problems. However, this is likely to be limited to the short term as air quality improves due to lower emissions from road vehicles and more efficient heating systems etc.	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
22. and 23	N/A		N/A	N/A
<p>Summary</p> <p>The proposed policy result in beneficial effects because it would allow the District to control polluting development through the planning system. The policy will be beneficial in terms of improving air quality and the quality of water resources, as well as benefits for biodiversity and significant heritage assets. The no policy option performs negatively against the objectives as it provides no such control.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 54: Policy SE05 – Air Quality

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 13	N/A		N/A	N/A
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	Permanent. Direct. LT ++ The proposed policy will have a significant beneficial effect on air quality particularly where future development might otherwise have detrimental effect by providing planning policy controls.	Permanent. Indirect. ST - Without policy control there is a risk that development could occur that indirectly exacerbates air quality problems. However, this is likely to be limited to the short term as air quality improves due to lower emissions from road vehicles and more efficient heating systems etc.	N/A	The policy suggests new development located in an AQMA must include mitigation measures where appropriate to avoid or reduce significant adverse effects on the users. In addition to this, major developments or developments within or adjacent to the AQMA will be required to submit an Air Quality and/or Emissions Mitigation Assessment, in line with the Air Quality Technical Planning Guidance 2016.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Direct. LT + The proposed policy will contribute towards providing a sustainable transport network by promoting a shift towards the use of sustainable low emission transport; and ensuring that development is located where it is accessible to support the use of public transport, walking and cycling.	Neutral. 0 A no policy option would not alter the status quo.	N/A	-
16. to 19	N/A		N/A	N/A
20. To conserve and enhance biodiversity.	Permanent. Direct. LT + The proposed policy will have beneficial effects on biodiversity in the long term by helping to reduce atmospheric pollutants that can have a detrimental effect on the status and condition of designated wild life sites such as SSSIs, SACs and SPAs.	Permanent. Indirect. ST - Without policy control there is a risk that development could occur that indirectly exacerbates air quality problems. However, this is likely to be limited to the short term as air quality improves due to lower emissions from road vehicles and more efficient heating systems etc.	N/A	-
21. to 23	N/A		N/A	N/A
<p>Summary</p> <p>The proposed policy is more likely to result in beneficial effects than the no policy option because, by the use of criteria, it would allow the District to control polluting development through the planning system. The proposed policy would contribute towards promoting more sustainable, low emission forms of transport as well as providing beneficial effects in relation to both air quality and biodiversity.</p> <p>With regards to the HRA there are no likely significant effects.</p>				

Policy 55: Policy SE08 – Light Pollution (former policy number SE10)

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1. to 11	N/A		N/A	N/A
12. To conserve and enhance the character and quality of the area’s landscape and townscape particularly associated with town centres and coastal areas.	Permanent. Direct. ST/LT + The development proposals will have to demonstrate there is no adverse effect on the residential amenity and character of the surroundings, the landscape character areas or the long distance views from vantage points. The proposed policy would have direct benefits for landscape and townscape with a landscape and visual assessment required (to cover light pollution effects) for developments that fall in E1 category (National Parks, AONBs etc.).	Permanent. Direct. ST/LT- A no policy option may result in negative effects on landscape and townscape as a result of light spillage and pollution from new developments.	N/A	Mitigation measures should be proposed where appropriate.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Permanent. Direct. ST/LT + The policy also suggests development proposals will have to demonstrate there is no adverse effects on heritage assets.	Permanent. Direct. ST/LT – A no policy option may result in negative effects on wildlife as a result of light spillage and pollution from new developments.	N/A	Mitigation measures should be proposed where appropriate.
14. to 19	N/A		N/A	N/A
20. To conserve and enhance biodiversity.	Permanent. Direct. ST/LT + The policy would have direct benefits for wildlife (e.g. bats) with lighting within developments needing to be designed to prevent disturbance to wildlife. The policy also suggests development proposals will have to demonstrate there is no adverse effects on sites of nature conservation and/or protected and other vulnerable species.	Permanent. Direct. ST/LT – A no policy option may result in negative effects on wildlife as a result of light spillage and pollution from new developments.	N/A	Mitigation measures should be proposed where appropriate.
21. to 22	N/A		N/A	N/A
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	Permanent. Indirect. ST/LT + Development proposals would also need to use the best available technology to minimise light glare, light trespass, light spillage and sky glow to minimise light pollution and conserve energy.	Permanent. Indirect. ST/LT – A no policy option may result in negative effects on the energy consumption as a result of light spillage and pollution from new developments.	N/A	-
Summary The policy supports objectives to conserve the character of the areas townscape and landscape as well as biodiversity and heritage assets by minimising the potential impacts of light spillage and pollution. Minimising light pollution will also contribute in conserving energy. A no policy option could lead to negative effects with respect to townscape and biodiversity.				

Policy 56: Policy CM01 – Provision of New Community Facilities

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
1.	N/A		N/A	N/A
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	Permanent. Direct. ST/LT + The proposed policy is likely a to have a positive effect by ensuring that the land use allocations for existing facilities are retained and that additional facilities can be provided in the future as and when demand increases.	Permanent. Direct. LT – A no policy option may result in the loss of local healthcare facilities, with buildings and land given over to other uses.	N/A	-
3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills	Permanent. Direct. ST/LT + The proposed policy is likely to have a positive effect by ensuring that the land use allocations for existing facilities are retained and that additional facilities can be provided in the future as and when demand increases.	Permanent. Direct. LT – A no policy option may result in the loss of local educational facilities, with buildings and land given over to other uses.	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
necessary to ensure year round employment.				
4.	N/A		N/A	N/A
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	Permanent. Direct. ST/LT + The proposed policy is likely to have a positive effect by ensuring that community facilities are retained at a local level to support vulnerable people.	Permanent. Direct. LT – A no policy option may have an adverse effect as it may result in the loss of existing community facilities that support local people. The most vulnerable members of society are likely to be disproportionately affected by those losses.	N/A	
6. To create vibrant balanced communities where residents feel a ‘sense of place’ and individual contribution is valued.	Permanent. Direct. ST/LT + The proposed policy will have a beneficial effect by supporting the continued role of facilities that can contribute towards a sense of place. The new, extensions or improvements to community facilities will be permitted provided they do not significantly impact upon the amenity of neighbouring residents and allow for the provision of broadband to facilitate the creation of a community hub network.	Permanent. Direct. LT - A no policy option might have an adverse effect on ‘sense of place’ if existing facilities are lost.	N/A	-
7. to 14	N/A		N/A	N/A
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	Permanent. Indirect. ST/LT + The proposed policy is likely to have an indirect positive effect by ensuring that community facilities are retained at a local level. This should enable more sustainable modes of travel to be used to access facilities.	Permanent. Direct. ST/LT - A no policy option may result in the loss of local community facilities, with greater travel distances required to access alternative services and greater reliance on private motor vehicles.	N/A	-
16. to 23	N/A		N/A	N/A
Summary				
The proposed policy supports objectives to maintain and enhance existing key facilities and services, especially local services such as those in rural areas. By protecting, and allowing for enhancement of such facilities it ensures that they are still available for the most vulnerable members of society. It also promotes more sustainable modes of travel by ensuring services are available at local level and can be accessed by cycling and walking, rather than reliance on private motor vehicles. Conversely, the no policy option is likely to perform adversely against these aspects.				
With regards to the HRA there are no likely significant effects.				

Annex 3 – Summary of Local Green Space assessments

Site Number	Site	LGS	Summary of assessment
1	Kitty's Green Broadstairs	Y	Site has value for visual amenity, historic significance, informal recreation. Site is local in character. Designate as local green space.
2	Culmer's Amenity Land Broadstairs	Y	Site has value for visual amenity, historic significance, informal recreation. Site is local in character. Designate as local green space.
3	Prince Andrew Road Broadstairs	N	Site has limited tranquillity, recreational or wildlife value. Site does not meet the NPPF criteria for designation.
4	Linley Road Broadstairs	N	Site has limited tranquillity, recreational or wildlife value. Site does not meet the NPPF criteria for designation.
5	Broadhall Manor, off Foreland Heights Broadstairs	N	Site is private open space for residents. Has some visual amenity, limited tranquillity and wildlife value, no historical significance. Site does not meet the NPPF criteria for designation.
6	Cliff-top Area on the North Foreland Estate Broadstairs	N	Site is part of the wider network of cliff-top grassland around the Thanet Coast and the designation of LGS may impact on flood protection and coastal works. Propose that site should be included in the protection of existing open space to be consistent with other cliff-top areas.
7	Cross-roads of Fairfield Road and Bromstone Road Broadstairs	N	Site does not meet the NPPF criteria for designation.
8	Taddy's Allotments Broadstairs	N	Site is already sufficiently protected as allotments and therefore additional protection is not needed.
9	Land at Mill Piece, Canterbury Road, Birchington	N	Site does not meet the NPPF criteria for designation.
10	Land at Gore End Farm, Birchington	N	Site has been identified as strategic housing allocation and does not meet the NPPF criteria for designation.
11	Holmes Park Broadstairs	Y	Site has value for visual amenity, historic significance, informal recreation, wildlife, tranquillity. Site is local in character. Designate as local green space.
12	Manston Airport	N	Site has been identified as strategic housing allocation and does not meet the NPPF criteria for

Site Number	Site	LGS	Summary of assessment
			designation.
13	Cliftonville's cliff top greens, between the Winter Gardens and Kingsgate	N	Site forms part of the clifftop area and the designation of LGS may impact on flood protection and coastal works. Site is already protected open space.
14	Manston Airport Northern Grass and other sections of the airport	N	Site has been identified as strategic development allocation and does not meet the NPPF criteria for designation.
15	Land between Windermere Avenue and Kentmere Avenue Nethercourt Estate	Y	Site fulfils some of the criteria for LGS and is an important small open space in an otherwise built up area. Designate as local green space.
16	Land between Garlinge and Westgate	N	Site forms part of the strategic housing allocation in the draft local plan and therefore does not fulfil the NPPF criteria.
17	Chapel Place Gardens, Ramsgate	N	Inappropriate to designate as LGS given the current educational use of the site. Site does not meet the NPPF criteria.
18	Dane Valley Woods, Dane Valley Road, Margate	Y	Site was created as a community woodland. It has value for visual amenity, informal recreation, tranquillity, wildlife, is important locally. Designate as Local Green Space.
19	Village Green, Foads Lane/ Cottington Road Cliffsend	Y	Site is local, has value for visual amenity, informal recreation, tranquillity and wildlife. Designate as Local Green Space.
20	Meadow, Cliffs End Road, Cliffsend	Y	Site is local, has value for visual amenity, informal recreation, tranquillity and wildlife. Designate as Local Green Space.
21	Hugin Green Sandwich Road Cliffsend	N	Although it is an important open space it is already is protected open space and therefore does not require any additional protection. Site forms part of the clifftop area and the designation of LGS may impact on flood protection and coastal works.
22	Cliffs End Road green	N	Site does not meet most of the NPPF.
23	Area at Earlsmead Crescent, Cliffsend	Y	Site is local, has value for visual amenity, informal recreation and tranquillity. Designate as Local Green Space.

Site Number	Site	LGS	Summary of assessment
24	Playground, Foads Lane, Cliffsend	Y	Site is local, has value for visual amenity, recreation, tranquillity and wildlife. Designate as local green space.
25	Green space adjacent to Culmers Allotments (See LGS2)	Y	Site has value for visual amenity, wildlife, informal recreation. Site is local in character. Designate as local green space.
26	Pierremont Park Broadstairs	Y	Site has value for visual amenity, historical significance, wildlife, tranquillity, and informal recreation. Site is local in character. Designate as local green space.
27	King George VI Memorial Park	N	Although it is an important open space, it forms part of the clifftop area and the designation of LGS may impact on flood protection and coastal works. Site is already protected open space and additional protection is not appropriate as it may have an impact on any future required coastal works.
28	Memorial Recreation Ground Lawn Road, Broadstairs	Y	Site has value for visual amenity, wildlife, tranquillity, formal and informal recreation. Site is local in character. Designate as local green space.
29	St Peters Recreation Ground, Grange Road Broadstairs	Y	Site has value for visual amenity, wildlife, tranquillity, formal and informal recreation. Site is local in character. Designate as local green space.
30	Joss Bay, Kingsgate Bay, North Foreland and Botany Bay	N	This is an extensive area and includes part of the clifftop area and the designation of LGS may impact on flood protection and coastal works. It is also covered by other designations such as green wedge.
31	Jackey Bakers Fields, Broadstairs	N	Site is allocated for sport and is an extensive tract of land.
32	Victoria Gardens Broadstairs	N	Although site meets some of the criteria for local green space, it forms part of the clifftop area and its designation may impact on necessary coastal protection works. The site is, however, already protected as open space.
33	Southcliff Parade, Broadstairs	N	Although site meets some of the criteria for local green space, it forms part of the clifftop area and its designation may impact on necessary coastal protection works. The site is, however, already protected as open space.
34	Western Esplanade, Broadstairs	N	Although site meets some of the criteria for local green space, it forms part of the clifftop area and its designation may impact on necessary coastal

Site Number	Site	LGS	Summary of assessment
			protection works. The site is, however, already protected as open space.
35	Nash Road Allotments OS Grid Reference TR 35500 69246	N	Allotments are already protected by policy.
36	Mocketts Wood, Broadstairs	Y	Site has value for visual amenity, historic significance, informal recreation, tranquillity and biodiversity. Designate as local green space.
37	Westover Gardens Broadstairs	Y	Site has some visual and informal recreation value. The site would benefit from extra protection as it is the only usable open space in an otherwise built up area. Designate as local green space.
38	Reading Street Broadstairs	N	Site is part of the grass verge adjacent to the highway. It does not meet the NPPF criteria.
39	Disused railway line from Margate Station, Tivoli Road, College Road to Enterprise Way	N	Although an important feature in the urban area the site is in multiple ownership and is extensive. Therefore site does not meet the NPPF criteria.
40	Area near scheduled grade 2 listed ancient monument of Dent De Lion Gatehouse in Garlinge	N	Site does not meet the NPPF criteria as it has been identified as a strategic development allocation in the draft local plan.
41	Proposing ST3 as a local green space. A solar panel field would be most suitable for the whole area	N	Site does not meet the NPPF criteria as it has been identified as a strategic development allocation in the draft local plan.
42	Clifftops between Botany Bay and Palm Bay	N	Although site meets some of the criteria for local green space, it forms part of the clifftop area and its designation may impact on necessary coastal protection works. The site is, however, already protected as open space.
43	Asparagus field Cliffsend	N	Site does not meet the NPPF criteria as it has planning permission.

Annex 4: Proposed main changes to draft Local Plan (in Plan order)

Policy Ref	Proposed Main Change
Draft Policy SP12	<p><u>General Housing Policy:</u></p> <p>Proposals for residential development on sites allocated in this plan must:</p> <ul style="list-style-type: none"> • Provide one electric car charging point for every 10 parking spaces provided in communal areas, or one charging point to be provided for every new dwelling with parking provision within its curtilage • Retain existing boundary features where possible • Provide a connection to the sewerage system at the nearest point of adequate capacity, in collaboration with the service provider • Allow future access to the existing water supply infrastructure for maintenance and upsizing purposes • Provide for the installation of digital infrastructure • Provide for the installation of Fibre to the Home (FTTH) • Contribute towards the Strategic Access Management and Monitoring scheme to meet the requirements of SP25 <p>Additionally, proposals for 10 or more units must:</p> <ul style="list-style-type: none"> • Provide an appropriate mix of dwellings (including care and supported housing) to meet the requirements of Policy SP18 • Make every reasonable effort to accommodate any self-build requirements included in the Councils self-build register • Provide affordable housing to meet the requirements of Policy SP19 • Provide accessible homes to meet the requirements of Policy H09 • Include an assessment of the sites functionality as a roosting or feeding habitat for wintering and breeding birds cited in the Special Protection Area, and provide mitigation where necessary. All development must comply with policies relating to the Protection of International and European Designated Sites and associated Mitigation Strategy. <p>A Statement of Social Impacts will be required for developments of 50 or more dwellings, addressing any needs for community facilities identified in the Infrastructure Delivery Plan. Strategic Sites will also be expected to provide complementary uses such as community business space.</p> <p>A Heritage Impact Assessment will be required at the masterplanning stage for the strategic sites to assess any cumulative impacts of the site allocations and highways infrastructure on heritage assets and archaeological resources.</p>
Draft Policy SP22	<p><u>Green Wedges/Safeguarding the Identity of Thanet's Settlements:</u></p> <p>Within the Green Wedges new development (including changes of use) will only be permitted if it can be demonstrated that the development is:</p> <p>1) not detrimental or contrary to the following aims to:</p> <ul style="list-style-type: none"> • Protect areas of open countryside between the towns from the

	<p>extension of isolated groups of houses or other development.</p> <ul style="list-style-type: none"> • Ensure physical separation and avoid coalescence of the towns, retaining their individual character and distinctiveness. • Conserve, protect and enhance the essentially rural and unspoilt character, and distinctive landscape qualities of the countryside that separates the urban areas, for the enjoyment and amenity of those living in, and visiting, Thanet. • Increase access and usability without compromising the integrity of the Green Wedges. <p>Or</p> <p>2) essential to be located within the Green Wedges.</p> <p>Open sports and recreational uses will be permitted subject to there being no overriding conflict with other policies, the wider objectives of this plan and the stated aims of this policy. If granted, any associated built development must be kept to a minimum, essential, small in scale and be necessary to support the open use. It should also be well related to adjacent urban edge and sensitively located to retain openness of the area.</p> <p>Proposals for development that include measures that will create or enhance wildlife habitats and biodiversity within the Green Wedges, or will improve the quality of the green wedges by providing high quality public amenity space will be supported.</p>
Draft Policy SP23	<p><u>Landscape Character Areas:</u></p> <p>The Council will identify and support opportunities to conserve and enhance Thanet's landscape character and local distinctiveness.</p> <p>Development proposals should demonstrate how their location, scale, design and materials will conserve and enhance Thanet's local distinctiveness, in particular:</p> <ol style="list-style-type: none"> 1) Its island quality surrounded by the silted marshes of the former Wantsum Channel and the sea; 2) A sense of openness and 'big skies', particularly in the central part of the district; 3) Its long, low chalk cliffs and the sense of 'wildness' experienced at the coast and on the marshes; 4) Gaps between Thanet's towns and villages, particularly those areas designated as green wedges; 5) Long-distance, open views, particularly across the Dover Strait and English Channel, North Sea and across adjacent lowland landscapes; and 6) Subtle skylines and ridges which are prominent from lower lying landscape both within and beyond the District. <p>Development proposals should demonstrate how they respect and respond to the character, key sensitivities, qualities and guidelines of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA) and summarised below.</p> <p>All development should seek to avoid skyline intrusion and the loss or interruption of long views of the coast and the sea, and proposals should</p>

	<p>demonstrate how the development will take advantage of and engage with these views.</p> <p>Development should generally be directed away from the Stour Marshes (E1), Wade Marshes (E2) and Pegwell Bay (F1) character areas (as detailed in the LCA), as these are largely undeveloped and key to retaining the island character of Thanet.</p> <p>The undeveloped character of Landscape Character Type F: Undeveloped Coast should also be maintained.</p> <p>Proposals on the coast (within landscape character types F: Undeveloped Coast and G: Developed Coast and the surrounding area) should respect the traditional seafront architecture of the area, maintain existing open spaces and should ensure that recreational and wildlife opportunities are not compromised by development. Proposals should maintain and enhance the setting of sandy bays, low chalk cliffs and associated grassland and long sweeping views of the coastline.</p> <p>The rural-urban boundary is distinctive in some parts of Thanet, particularly where there is an abrupt urban edge and where the countryside extends into the urban areas as green wedges. The distinction between town and countryside should be retained.</p> <p>Development proposals that conflict with the above principles will only be permitted where it can be demonstrated that they are essential for the economic or social well-being of the area. In such cases, landscape impacts should be minimised and mitigated as far as possible.</p>
Draft Policy SP25	<p><u>Protection of the International and European Designated Sites:</u></p> <p>Sites of International nature conservation importance will receive the highest level of protection.</p> <p>Proposals likely to have a significant effect on an SPA, SAC or Ramsar site, either alone or in-combination, will be required to undergo appropriate assessment as per the Conservation of Habitats and Species Regulations 2010 (as amended). Where possible applicants should incorporate measures to avoid or mitigate any adverse impacts. Where, despite all possible avoidance and mitigation measures being put in place, a proposal is still shown to have an adverse effect on the integrity of an International site, planning permission will only be granted in exceptional circumstances, where there are no less ecologically damaging alternatives, there are imperative reasons of overriding public interest and damage can be fully compensated.</p> <p>Where proposals are considered likely to have a significant effect on an International site, early consultation with Natural England, the Council and any other appropriate statutory consultees is recommended.</p>

Draft Policy SP26	<p><u>Strategic Access Management and Monitoring Plan:</u></p> <p>All proposals for new residential development will be required to comply with the Strategic Access Management and Monitoring Strategy (SAMM) in order to mitigate against the in-combination effects of new development, through the pathway of recreational pressure on the Thanet Coast SPA and Ramsar site. A financial contribution based on the current tariff in paragraph/table (<i>reference to be finalised, see table below</i>) and any subsequent amendments, is required in-perpetuity towards an Access Management Scheme. This will be collected via a S106 payment.</p> <p>Developments for other uses that would increase recreational activity causing disturbance to qualifying species will be assessed on a case by case basis under the Habitat Regulations and may be required to make full or partial contributions towards the SAMM Strategy if appropriate.</p> <p><u>Tariff:</u></p> <table border="1"> <tr> <th>Development type</th><th>Tariff per dwelling – including requirement for in-perpetuity funding</th></tr> <tr> <td>1 bedroom unit</td><td>£202</td></tr> <tr> <td>2 bedroom unit</td><td>£320</td></tr> <tr> <td>3 bedroom unit</td><td>£424</td></tr> <tr> <td>4+ bedroom unit</td><td>£530</td></tr> </table>	Development type	Tariff per dwelling – including requirement for in-perpetuity funding	1 bedroom unit	£202	2 bedroom unit	£320	3 bedroom unit	£424	4+ bedroom unit	£530
Development type	Tariff per dwelling – including requirement for in-perpetuity funding										
1 bedroom unit	£202										
2 bedroom unit	£320										
3 bedroom unit	£424										
4+ bedroom unit	£530										
Draft Policy SP27	<p><u>Biodiversity and Geodiversity Assets:</u></p> <p>Development proposals will, where possible, be required to make a positive contribution to the conservation, enhancement and management of biodiversity and geodiversity assets through the following measures:</p> <ul style="list-style-type: none"> i) the restoration / enhancement of existing habitats, ii) the creation of wildlife habitats where appropriate, by including opportunities for increasing biodiversity in the design of new development iii) the creation of linkages between sites to create local and regional ecological networks, iv) the enhancement of significant features of nature conservation value on development sites. <p>On sites where important biodiversity assets, including protected species and habitats including SPA functional land, or other notable species, may be present, an ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats. Planning permission will not be granted for development if it results in significant harm to biodiversity and geodiversity assets, which cannot be adequately mitigated or as a last resort compensated for, to the satisfaction of the appropriate authority.</p>										
Draft Policy SP30	<p><u>Local Green Spaces:</u></p> <p>The sites identified in paragraph (<i>reference to be finalised, see list below</i>) will be protected as Local Green Space. Development proposals that protect or enhance these spaces will be permitted. Proposals for built development</p>										

on local green spaces will only be permitted in the following circumstances:-

- i) the built form is minimal and essential to the operation of the local green space;
- ii) the development represents a suitable extension to an existing structure;
- iii) the development is an acceptable or reuse of an existing building on the site;
- iv) the development is essential for public safety.

Policy will apply to the following sites

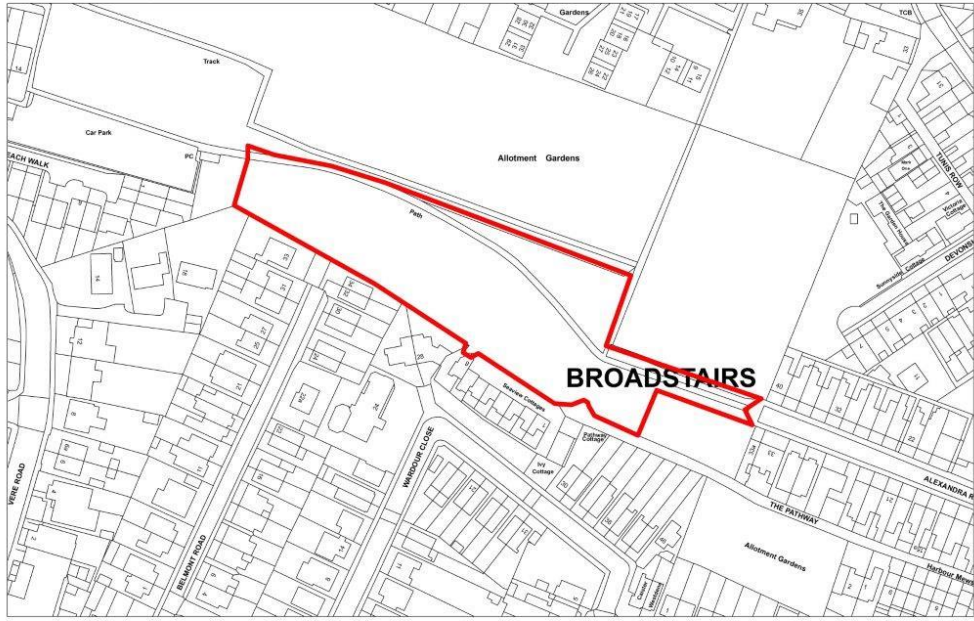
- Kitty's Green, Broadstairs
- Culmer's Amenity Land Broadstairs
- Holmes Park, Broadstairs
- Pierremont Park, Broadstairs
- Memorial Recreation Ground, Lawn Road Broadstairs
- St Peter's Recreation Ground, Broadstairs
- Mocketts Wood, Broadstairs
- Westover Gardens, Broadstairs
- Village Green, Foads Lane, Cliffsend
- Meadow, Cliffs End Road Cliffsend
- Playground Foads Lane, Cliffsend
- Earlsmead Crescent, Cliffsend
- Dane Valley Woods, Margate
- Windermere Avenue, Ramsgate

Kitty's Green

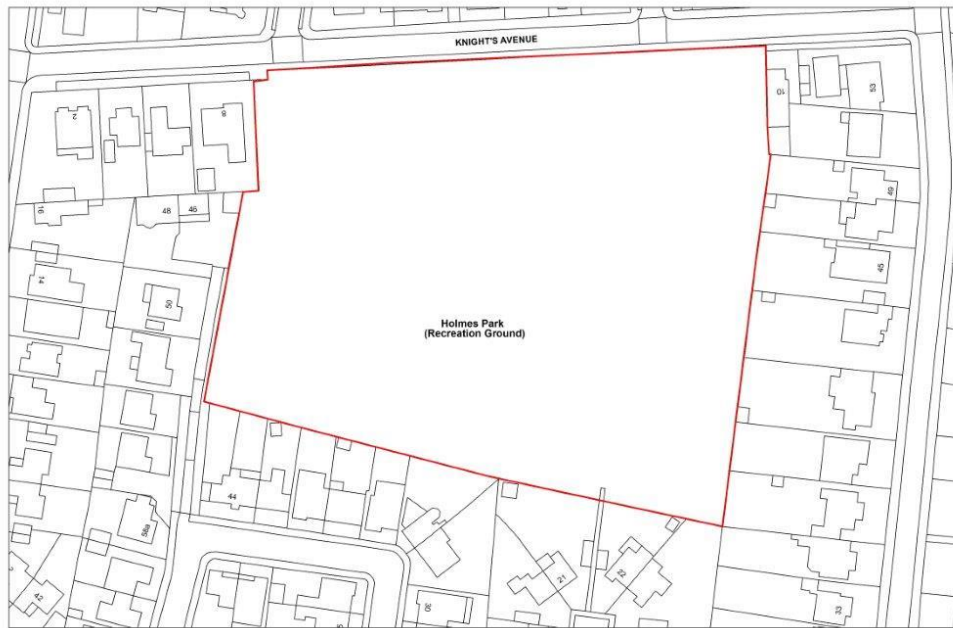


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Culmer's Amenity Land



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Land between Kentmere and Windemere Avenue

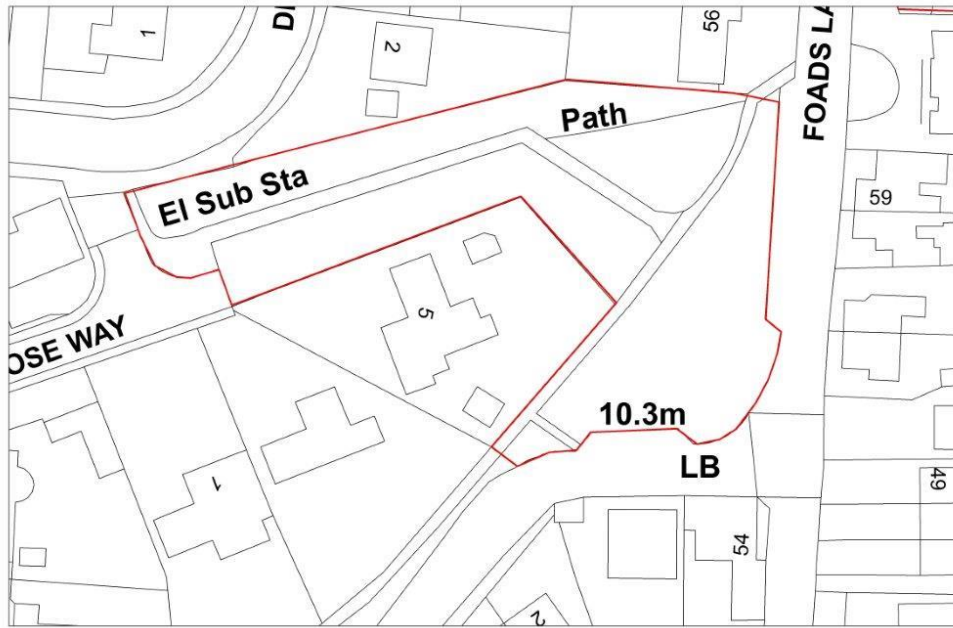


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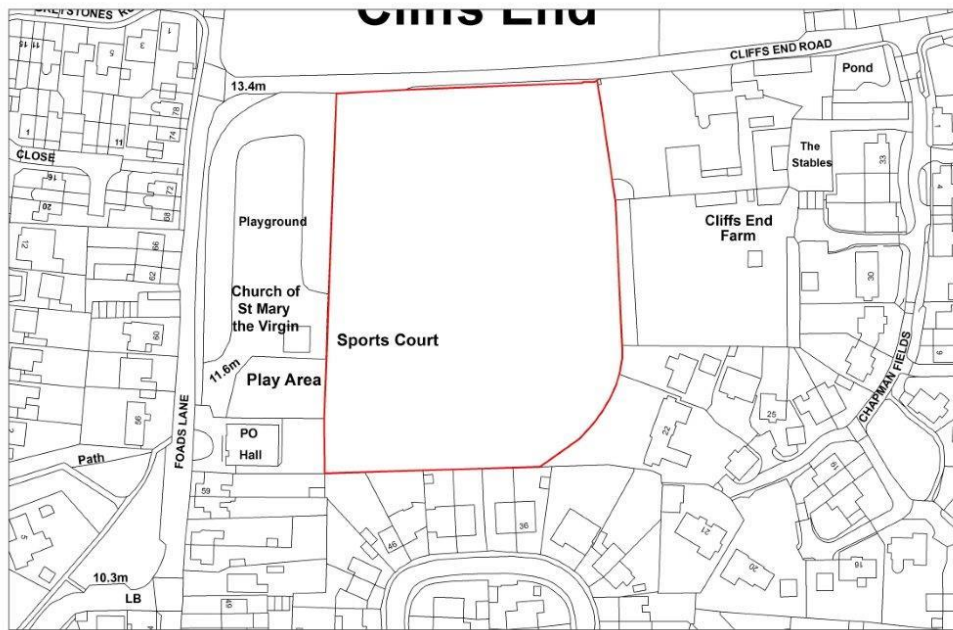
Dane Valley Woods



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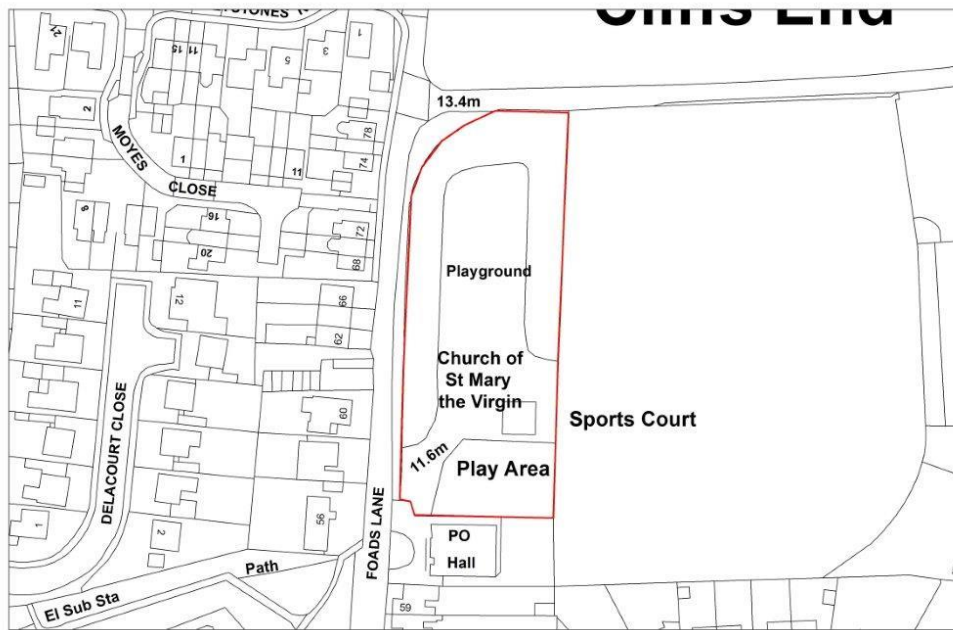
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Title: Pierremont Park LGS26

Scale 1:412

Date: 27/09/2017

Thanet District Council
Cecil Street
Margate
Kent
CT19 1XZ



Title: Memorial Recreation Ground LGS28

Scale 1:553

Date: 27/09/2017

Thanet District Council
Cecil Street
Margate
Kent
CT19 1XZ





Title: St Peters Recreation Ground Broadstairs

Scale 1:571

Date: 27/09/2017

Thanet District Council
Cecil Street
Margate
Kent
CT19 1XZ




Title: Mocketts Wood, Broadstairs

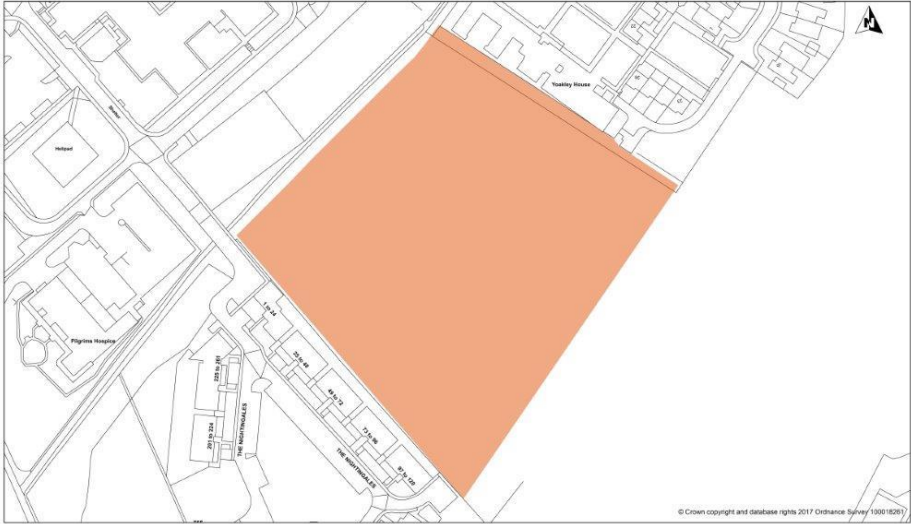
Scale 1:472

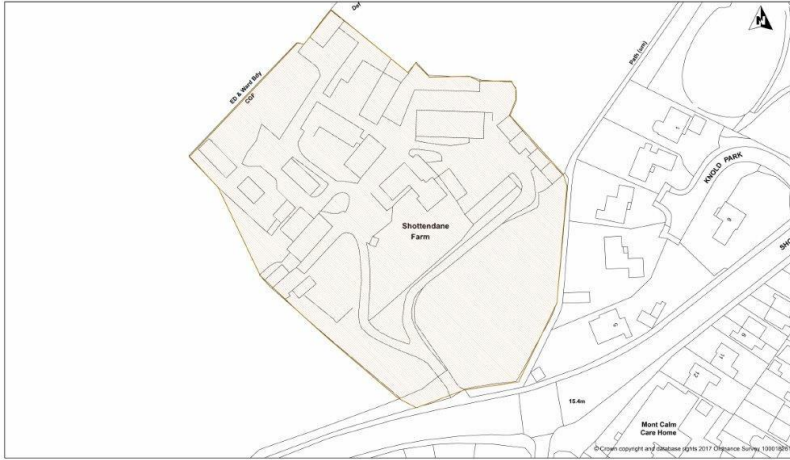

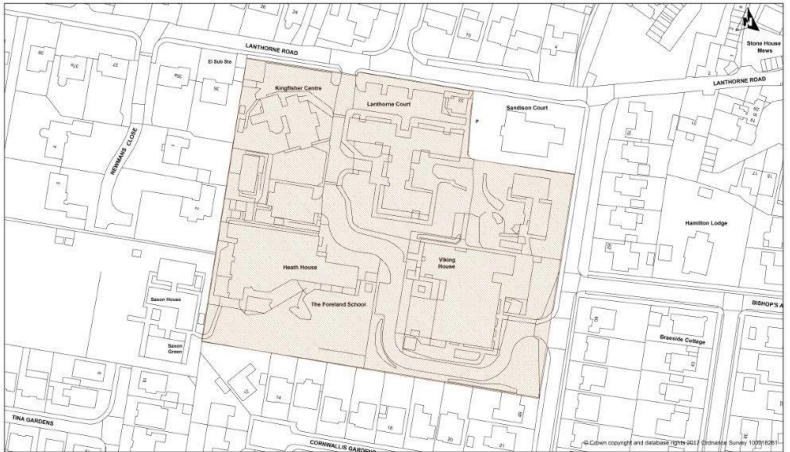

Date: 27/09/2017

Thanet District Council
Cecil Street
Margate
Kent
CT19 1XZ



	 <p>Title: Westover Gardens</p> <p>Scale 1:208</p> <p>Date: 27/09/2017</p> <p>Thanet District Council Cecil Street Margate Kent CT19 1XZ</p> <p>thanet district council</p>
<p>Draft Policy SP32</p>	<p><u>Allotments:</u></p> <p>Allotments will be protected from development and their development will only be permitted if:</p> <ol style="list-style-type: none"> 1) There is an overriding need for development that outweighs the need to protect the allotments which cannot be located elsewhere. In this case, provision of alternative allotment space of at least an equivalent size and quality must be provided in a suitable nearby location to serve existing users. 2) There is no longer a demand for the allotments and they do not make a contribution to the visual amenity of the area.
<p>Draft Policy SP35</p>	<p><u>Climate Change:</u></p> <p>New development must take account of:</p> <ul style="list-style-type: none"> • Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change • Mitigating against climate change by reducing emissions and energy demands • Improving building resilience to climate change through the use of best available technology • Opportunities to reduce the impact of climate change on biodiversity.
<p>Draft Policy SP37</p>	<p><u>QEQM Hospital:</u></p> <p>Land to the south-east of the existing QEQM Hospital, Margate, is identified for release for expansion of the hospital. No other development will be permitted on this site.</p>

	<p>Development for hospital purposes should meet the following criteria:</p> <ol style="list-style-type: none"> 1. Proposals should be designed to involve the minimum take of fresh land, consistent with the need to provide a pleasant environment for patients and staff; 2. Development proposals should demonstrate how more effective use can be made of the hospital site as a whole; 3. Proposals should incorporate the retention of the existing footpath and provision of a substantial landscaping screen; proposals should incorporate a comprehensive review of access arrangements associated with the hospital and access provision should reflect the findings of a specific traffic impact assessment. 4. Proposals should be compatible with a green transport strategy for the hospital; 5. The level of car parking associated with new development should be limited to the minimum necessary within the context of the green transport strategy; and 6. New parking areas should, as far as possible, be located on the newly allocated site.  <p>Title: QEOM Extension</p> <p>Scale 1:515</p> <p>Date: 27/09/2017</p> <p>Thanet District Council Cecil Street Margate Kent CT19 1XZ</p> <p>thanet district council</p>
<p>Draft Policy SP38</p>	<p><u>New medical centre at Westood:</u></p> <p>A new medical centre is required at Westwood to meet the needs generated by the strategic allocations. The council will work with the CCG, developers and other appropriate organisations to identify a suitable site.</p>
<p>Draft Policy SP40</p>	<p><u>Expansion of Primary and Secondary Schools</u></p> <p>The Council will support the expansion of existing and development of new primary and secondary schools in Thanet to meet identified needs and will work with Kent County Council in identifying, allocating and safeguarding land as appropriate.</p> <p>To meet the requirement for a secondary school at Westwood, the Council will</p>

	work with Kent County Council and developers to identify a suitable site.
Draft Policy H01/ Appendix 2	<p><u>New housing sites:</u></p>  <p>Title: Land at Shottendane Farm, Shottendane Rd, Margate</p> <p>Scale 1:361</p> <p>Date: 27/09/2017</p> <p>Thanet District Council Cecil Street Margate Kent CT19 1XZ</p>   <p>Title: LANTHORNE COURT, BROADSTAIRS</p> <p>Scale 1:436</p> <p>Date: 27/09/2017</p> <p>Thanet District Council Cecil Street Margate Kent CT19 1XZ</p> 
Draft Policy HO26	<p>Ancillary accommodation for a family member</p> <p>Residential annexes are a common form of development that are generally proposed in order to allow relatives to live with their family with a degree of independence. The benefits of this include:</p> <ul style="list-style-type: none"> • Allows family members to provide the care and support required • Reduces the stress and impact on local services, ie nursing homes, home visits from care professionals etc. • Cost effective and affordable solution to supported living • Provides a measure of independence, while still being close to support

	<ul style="list-style-type: none"> • Can provide accommodation for family members unable to purchase a house through the open market <p>In many cases, such proposals are considered to be acceptable by the Council.</p> <p>However, such annexes would rarely be suited for occupation as separate living accommodation unrelated to the household occupying the main dwelling for a number of reasons including lack of self-containment, inadequate separate access, amenity space and lack of privacy.</p> <p>Planning permission will therefore normally be subject to a condition to ensure that the occupation of the unit remains ancillary to the main dwelling.</p> <p>Policy HO26 Proposals to provide an annexe for ancillary accommodation will be permitted where the proposed annexe is:</p> <ol style="list-style-type: none"> 1. within the curtilage of the principal dwelling and shares its vehicular access 2. has a functional connection with the main dwelling 3. is in the same ownership as the main dwelling 4. designed in such a way as to easily allow the annex to be used as an integral part of the main dwelling when it is no longer needed for independent occupation 5. has no boundary demarcation or sub division of the land between the main dwelling and the annexe 6. of a scale subservient to the principal dwelling and complies with the Council's design policies
Draft Policy GI01	<p><u>Protection of Nationally Designated Sites (SSSI) and Marine Conservation Zones (MCZ):</u></p> <p>Development which would materially harm either directly, indirectly or cumulatively, or detract from the scientific or nature conservation interest of a Site of Special Scientific Interest, National Nature Reserve or Marine Conservation Zone will not be permitted.</p> <p>Exceptionally, where it can be demonstrated that the need for the proposed development is compelling and overrides the national importance of the site, and it has been demonstrated that no suitable alternative site exists, mitigating measures will be required to maintain the integrity of the site, to the satisfaction of the appropriate authority.</p>
Draft Policy QD01	<p><u>Sustainable Design:</u></p> <p>All new buildings and conversions of existing buildings must be designed to reduce emissions of greenhouse gases and function in a changing climate. All developments will be required to:</p> <ol style="list-style-type: none"> 1) achieve a high standard of energy efficiency in line with most recent

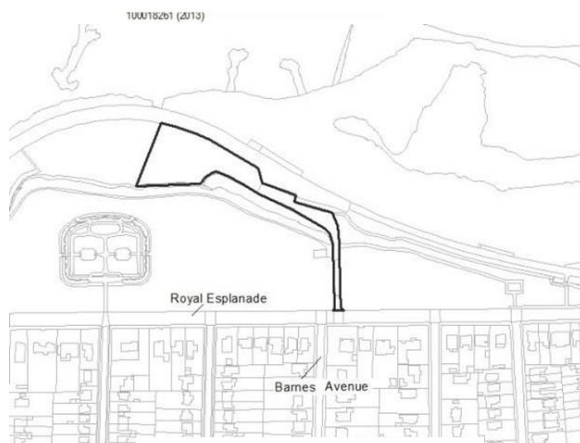
	<p>government guidance and building regulations;</p> <p>2) make the best use of solar energy passive heating and cooling, natural light, natural ventilation and landscaping.</p> <p>3) provide safe and attractive cycling and walking opportunities to reduce the need to travel by car.</p> <p>All new buildings and conversions of existing buildings must be designed to use resources sustainably. This includes, but is not limited to:</p> <p>4) re-using existing buildings and vacant floors wherever possible;</p> <p>5) designing buildings flexibly from the outset to allow a wide variety of possible uses;</p> <p>6) using sustainable materials wherever possible and making the most sustainable use of other materials;</p> <p>7) minimising waste and promoting recycling, during both construction and occupation.</p>
Draft Policy QD04	<p><u>Technical Standards:</u></p> <p>All new development will be expected to meet the new technical standards as follows:</p> <ol style="list-style-type: none"> 1) Internal space standards as set out in paragraph (<i>reference to be finalised</i>) 2) Water efficiency standard of 110litres/person/day
Draft Policy QD05	<p><u>Accessible and Adaptable Accommodation:</u></p> <p>Accessibility provision in new developments as required by Building Regulations Part M4 shall be provided as follows:</p> <ol style="list-style-type: none"> 1) 10% of new build developments will be expected to be built in compliance with building regulation part M4(2); 2) Within new build developments which are affordable, a proportion of wheelchair accessible homes, complying with building regulations part M4(3) will be required. The exact proportion will be dependent on the number of households identified as requiring accessible homes on the Council's housing register, in suitable locations. This should be provided as part of the affordable element of the scheme.
Draft Policy CC03	<p><u>Coastal Development:</u></p> <p>Add new criterion:</p> <p>3) will not adversely affect the interest features of any designated nature conservation sites, particularly by exacerbating coastal squeeze or otherwise restricting the capacity of the coastline to adjust to sea-level rise and climate change.</p>

Draft Policy CC04	<p><u>Renewable energy:</u></p> <p>Major new developments will be expected to make provision for renewable energy or micro-generation equipment a part of their proposals subject to the following criteria:</p> <p>Applicants will need to demonstrate that</p> <ul style="list-style-type: none"> i) They have considered the environmental, social and economic benefits of their proposals ii) There are no significant adverse impacts on the surrounding area such as visual, noise and amenity iii) Visual impacts have been minimised in the design and layout of the scheme iv) There is no significant loss of residential amenity of local residents v) There is no adverse impact on heritage assets vi) There is no significant impact on the landscape setting, habitats, biodiversity or wildlife assets, particularly protected species and habitats vii) They do not have an impact on the best and most versatile agricultural land unless that it can be demonstrated that it is necessary and no alternative lower grade land is available.
Draft Policy SE08	<p><u>Light Pollution:</u></p> <p>Development proposals that include the provision of new outdoor lighting or require specific lighting in connection with the operation of the proposed development will be permitted if it can be demonstrated that:</p> <ul style="list-style-type: none"> 1) It has been designed to minimise light glare, light trespass, light spillage and sky glow through using the best available technology to minimise light pollution and conserve energy; 2) There is no adverse impact on residential amenity and the character of the surroundings; 3) There is no adverse impact on sites of nature conservation interest and/or protected and other vulnerable species and heritage assets 4) There is no adverse impact on landscapes character areas, the wider countryside or those areas where dark skies are an important part of the nocturnal landscape; 5) It does not have an adverse impact on long distance views or from vantage points 6) Where appropriate, mitigation measures are proposed. <p>In addition, a lighting strategy may be required for large developments or those developments with specific lighting requirements or for those that are in or adjacent to sensitive locations.</p> <p>A Landscape and Visual Impact Assessment will be required for proposed developments that fall in to the E1 category.</p> <p>Proposals that exceed the Institute of Lighting Professionals standards will not be permitted.</p>
Draft Policy	<u>Coach Parking:</u>

TP05

Deletion of sites deemed unsuitable for coach parking as a result of Coach Parking Study:

1. Palm Bay Coach Park, Cliftonville
2. Barnes Avenue Car Park, Westbrook



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.

Vision	<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>	This issue is dealt with in detail under Policy TC07.	
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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>
	Lower housing numbers - not needed – where is evidence for housing numbers?/flawed assumptions	See response above	As above
	Who is housing for? In-migration/London overspill	<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>	No change

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
		<p>authority should seek to use areas of poorer quality land in preference to that of a higher quality.</p> <p>A high proportion of Thanet's greenfield land consists of best quality agricultural land, and identifying sufficient land to meet the total housing requirement taking account of this and other relevant criteria, has inevitably resulted in the need to allocate some such land.</p>	
	<p>Schools, doctors, hospitals inadequate</p> <p>Open space insufficient</p>	<p>Engagement of the Clinical Commissioning Groups and Hospital Trust alongside other service providers in the Plan preparation process 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 in turn inform the Plan by identifying the infrastructure and resources needed, when they will be required and how they will be provided/funded.</p> <p>The Plan acknowledges need, and aims to ensure that planned new homes have sufficient accessible natural and semi-natural green space (draft Policy SP27 refers).</p>	<p>No change other than to continue engagement to inform Infrastructure Delivery plan and Local Plan policies.</p> <p>No change as already addressed.</p>
	<p>Out of line with jobs/unemployment</p> <p>Lower employment target (hence less homes) is more realistic.</p>	<p>Evidently a key concern is why the planned the number of new homes exceeds the expected number of new jobs. Much of the housing requirement for new homes stems from factors such as formation of new households and is not driven by employment. However, the</p>	<p>No change as this factor is considered to be adequately addressed.</p>

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	Strategic Priority 4 of the draft Local Plan includes protection and enhancement of Thanet's environment including the coast and countryside. 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	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

Policy	Issues Raised	Council response (including reason for change/no change including any relevant new guidance etc.)	Outline change
		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	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>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>	No change in respect of this comment, however, policy SP20 will need to refer to the Policies map rather than the 2006 Local Plan.

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

	Minster has had too much housing development already	<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>	No change
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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)
Para 16.17	<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>	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.	Reword paragraph 16.17 accordingly.

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.	Paragraph 70 of the NPPF states that planning policies and decisions should <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	Infrastructure Delivery Plan, Sustainability Appraisal, Viability assessment and Transport Modelling work should have been published as part of the consultation.	<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>	No change required. Intention to publish all available evidence at next consultation stage.
Duty to cooperate	Thanet has failed to cooperate on major cross boundary issues and evidence base documents	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.	No change required to draft Local Plan. It is the intention to publish more information on duty to cooperate at Publication stage.
	Not meeting duty to cooperate (specifically in relation to housing numbers)	<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>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>	
Infrastructure provision/ s106/CIL/ viability	<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.

Thanet District Transport Strategy 2015-2031

**Draft Version 1
30/10/2017**

Contents

Foreword

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Appendices

Appendix A - Achievements from the Thanet Transport Plan
2005 – 2011

Appendix B - Policy Context

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Foreword

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Introduction

This Strategy replaces the former Thanet Transport Plan (2005). Its purpose is to provide a framework of transport policy to the year 2031 to support planned growth within the Thanet District.

The main objectives of this Transport Strategy are to:-

1. Provide a policy framework for the district which is consistent with existing National and Regional policy.
2. Support delivery managed growth identified within Thanet District Council's emerging local plan
3. Identify a package of robust transport improvements and interventions to enable the highway network to effectively accommodate the likely increase in travel demand across the plan period.
4. Propose a funding and delivery mechanism for identified interventions and actions.



The strategy will be subject to periodic review throughout its lifetime. Whilst review points are not fixed they could be triggered by a number of internal/external factors. These factors include changes in local/national policy, additional transport/modelling data and a change in the funding environment for infrastructure. The current infrastructure funding environment is challenging, particularly in areas where property prices are lower (hence development land being less profitable). There are also many other competing priorities for supporting infrastructure to manage growth. Therefore it is important to maintain a level of realism in relation to the affordability of development whilst providing a robust policy and evidence base to support future funding and investment opportunities.

This strategy is both ambitious and realistic. It will require a strong level of partnership working and collaboration between Kent County Council and Thanet District Council in order to ensure that it effectively delivers and meets the future needs of the local highway network and its many users.

If you would like to discuss any aspect of this Strategy, please contact us at:

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Executive Summary

The Thanet District Local Plan provides a strategy to deliver 17,140 new dwellings and 5000 new jobs in between the period 2015–2031. This figure is in line with objectively assessed needs (OAN) as prescribed in national planning policy guidance. This Transport Strategy outlines the framework for a range of transport interventions and strategies to support growth and provide a more resilient local highway network to serve future generations.

The aim of the strategy is to balance the needs of all road users, providing reliable journeys within the highway network through a package of new and improved highway routes, whilst not losing sight of core sustainability principles that are central to current planning policy and good public health.

There are four key themes that are prevalent within this strategy and these are outlined in **Figure 1**.

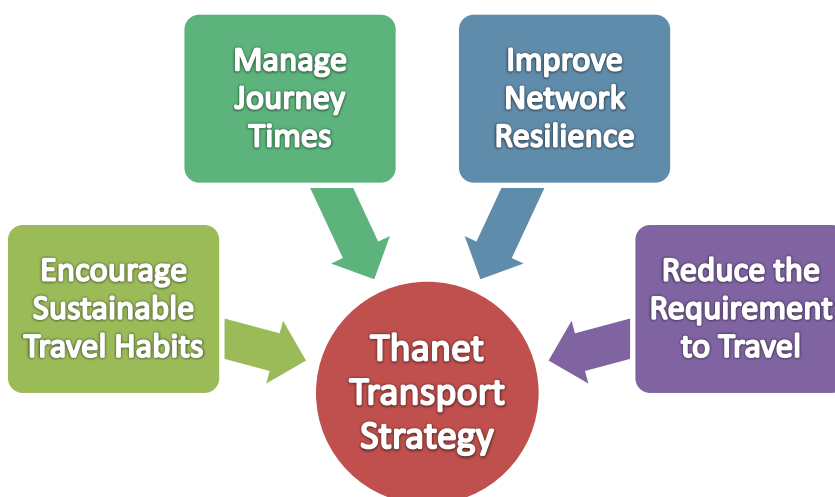


Figure 1 - Key themes of the Thanet Transport Strategy

In order to satisfy the above themes, the following interventions have been identified:-

Encourage Sustainable Travel Habits

- Introduction of new cycle and pedestrian routes.
- Improvements to existing cycle and pedestrian routes.
- Extend and improve access to bus travel through increased frequency and network coverage.
- Implement improvements to the highway network to improve bus journey time reliability.
- Provision of a new Thanet Parkway Rail Station at Cliffsend.
- Ensure that new and existing bus infrastructure is delivered or renewed with easy access in mind.
- Ensure that developments provide and have access to appropriate walking and cycling facilities.
- Car Parking Strategy

Manage Journey Times

- Provision of new & improved inner highway routes to complement existing primary road network.
- Localised junction improvements to improve traffic flow and levels of service.
- Reduction in the need to travel

Improve Network Resilience

- Provision of new & improved inner highway routes to complement existing primary road network.
- Improve journey time reliability within the local road network by providing new link roads and junction improvements to avoid congestion.
- Improved directional Signage

Reduce The Requirement To Travel

- Promotion of mixed use development where appropriate.
- Robust Travel Planning Measures to be implemented for new developments.
- Encourage Car Sharing.
- Improved communication infrastructure (High Speed Broadband)

The above actions will provide a framework to improve journey time reliability, whilst providing residents with a choice of travel modes, making essential journeys to key destinations, accessible by a range of travel modes.

The vision underpinning the Transport Strategy is as follows:

By 2031 Thanet will have a safe, accessible, affordable, sustainable, reliable and integrated transport network incorporating improved road, public transport, cycle and pedestrian routes.

The transport system will empower people to make informed choices about the way they travel, and facilitate economic growth, and social and environmental improvements across the district.

This will be reflected in a shift to more sustainable travel patterns and modes, a healthier population and a competitive low carbon economy. Whilst also making provision for essential private vehicle based journeys.

1 Introduction

1.1 Role and Purpose of the Transport Strategy

- 1.1.1 This Transport Strategy provides a framework to guide the development of transport based improvements and interventions within the Thanet District for the period up to 2031. It identifies priority schemes and projects that are deliverable, but whose implementation will be dependent on the rate of development coming forward, viability and the availability of resources. It is therefore a fluid document which can be adjusted in accordance with changing circumstances.
- 1.1.2 It will be used to facilitate effective engagement with stakeholders at both a national and local level, provide a policy position for transport improvements, and support associated funding bids. It is being prepared jointly by Kent County Council and Thanet District Council and has been one of many considerations when appraising the proposed the scale and location of strategic allocations as part of the emerging Local Plan.
- 1.1.3 This strategy will support, guide and be developed further through revisions to future Local Transport Plans (LTP) and the Local Plan. It seeks to achieve a balance between a range of transport and development issues at local and strategic level. The horizon period for the strategy is 2031, which is consistent with the emerging Local Plan. This strategy supports expected economic growth, it is not intended to represent an exhaustive list of all transport interventions desired within the District by local stakeholders.
- 1.1.4 Each significant development site will be expected to appraise its own specific highway impacts whilst contributing to this overarching strategy in line with an accompanying Infrastructure Delivery Plan (IDP).

1.2 Policy Context

- 1.2.1 Thanet District Council's Corporate Plan recognises the importance of working closely with Kent County Council to prepare a District Transport Strategy to improve transportation and parking to benefit business, residents and visitors.

Areas of focus include:

- Management of traffic flow and road safety within the district.
 - Parking offer to residents and visitors alike.
 - Identifying infrastructure needed to enable smooth travel to key destinations.
 - Widening choice in relation to means of travel including measures to improve attractiveness and convenience of public transport, cycling and walking, car clubs and charging points for electric and hybrid cars.
 - Managing air quality issues.
- 1.2.2 The District Council's Local Plan will set out a long term strategy to accommodate new housing, job creation and other development in a sustainable way. A Transport Strategy has a key role in informing and complementing the Local Plan, and will be integral to the delivery of the plan as intended.

- 1.2.3 This Transport Strategy includes a high level appraisal of the transport network and addresses the local and wider transport and infrastructure implications arising from associated development sites with development options being tested. It identifies strategic transport issues, key infrastructure requirements, and specific transport improvement and initiatives, whilst taking account of relevant policy at both a local and national level.
- 1.2.4 The outgoing Thanet Transport Plan set a number of actions to be completed. These actions and the achievements, as a result of the 2005 plan, are summarised in **Appendix A**.
- 1.2.5 There are a number of national, county and local strategies, plans and policies that will influence or be influenced by this Transport Strategy. These include:
- The National Planning Policy Framework (March 2012)
 - Local Transport Plan for Kent 2016-31
 - The Evidence Base of the Emerging Thanet Local Plan.
 - Rail Action Plan for Kent
 - Freight Action Plan for Kent
 - Thanet Air Quality Action Plan
 - Thanet Cycling Strategy
 - Feet First Walking Strategy
 - Vision for Kent
 - Bold Steps for Kent
 - Growth & Infrastructure Framework (GIF)
 - KCC Road Casualty Reduction Strategy
 - KCC Active Travel Strategy
 - Countryside and Coastal Access Improvement Plan 2013 - 2017

Local Transport Plan 4 (2016-2031)

- 1.2.6 The preparation of a Local Transport Plan (LTP4) is a statutory requirement of Local Transport Authorities in England. It is intended to outline policies and provide a delivery plan to manage and enhance the local transport network. A LTP is intended to reflect and support District Local Plans, as such they are reviewed on a regular basis to ensure that they align with local planning policy and evolving land use scenarios throughout the county and district.
- 1.2.7 LTP4 was recently adopted by KCC and provides a county plan for the period 2016-2031.
- It consists of five high level themes.
1. Economic growth and minimised congestion
 2. Affordable and accessible door-to-door journeys
 3. Safer travel
 4. Enhanced environment
 5. Better health and wellbeing
- 1.2.8 Whilst LTP4 provides a high level strategic overview of priorities at a county and district level, this Transport Strategy focusses on Thanet in more detail. **Figure 2** outlines the currently identified transport priorities within Thanet as set out in LTP4.

Transport Priorities for Thanet

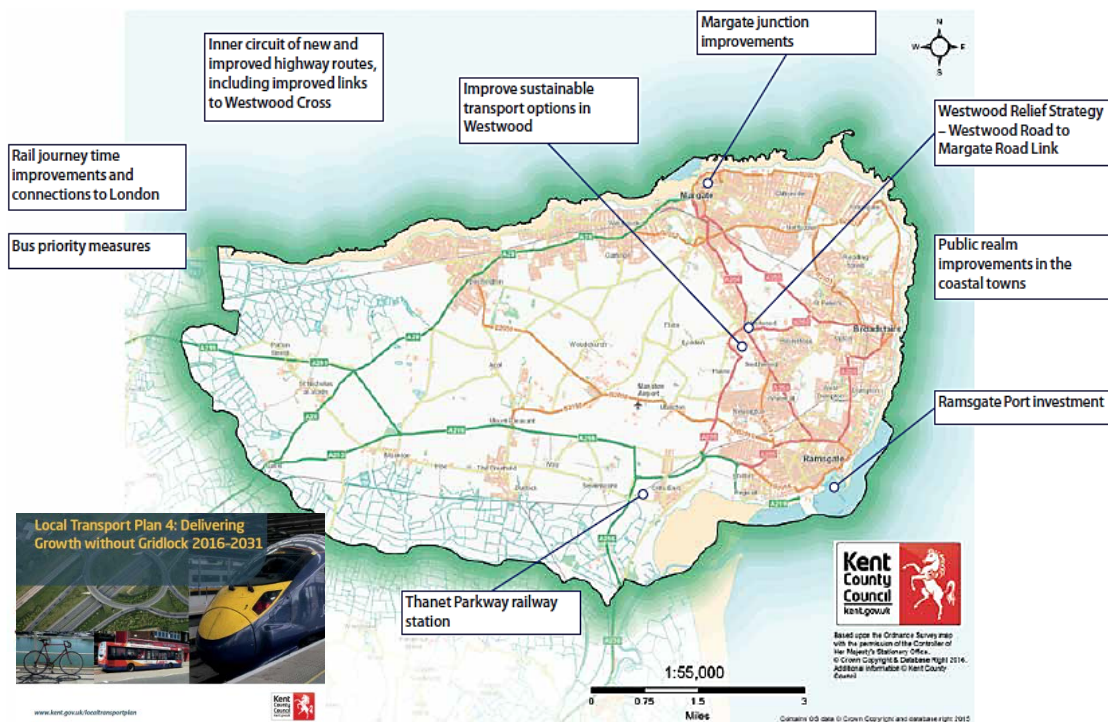


Figure 1 - LTP4 Transport Priorities for Thanet

1.2.9 Other Policy considerations are summarised in **Appendix B**

1.3 Roles and Responsibilities

- 1.3.1 Kent County Council is the strategic Local authority for Kent with a statutory role providing a comprehensive range of services as the Local Transport Authority. It has a responsibility for all non-strategic highway routes within the county, which equates to 5,400 miles of carriageway and 3,900 miles of footway.
- 1.3.2 Amongst a number of maintenance related activities in relation to the highway asset and planning of public transport, KCC plans and delivers highway improvement scheme leads on infrastructure funding bids to government in collaboration with TDC.
- 1.3.3 In terms of highway and transport matters, Thanet District Council is responsible for the enforcement of on and off street parking (under the Traffic Management Act 2004). TDC are also responsible for a number of public car parks, street cleaning, bus shelters and the monitoring of air quality.
- 1.3.4 Officers at KCC and TDC enjoy close working relationships, which seek to ensure that district and county transport priorities are aligned. This is evident through regular stakeholder meetings, such as Local Quality Bus Partnerships (QBP), which involve stakeholders (including members) from both KCC and TDC.

2 Geographical Context

2.1 Local Geography

- 2.1.1 Thanet is located in East Kent, and is surrounded by sea on three sides. It comprises three main coastal towns Margate, Broadstairs and Ramsgate. It incorporates a number of attractive coastal and rural villages.
- 2.1.2 The geography of the area results in a very self-contained road network, as such highway routes into and out of the district is currently geographically limited. Whilst coastal towns remain integral to the economic prosperity of the district, Westwood represents the core Retail and Leisure destination for many residents.



Figure 2 - Map of Thanet's Location

- 2.1.3 Historically, Thanet has suffered from a perception that it is isolated from London and the rest of the country, being 75 miles from central London and 56 miles from the M25/Dartford Crossing. However, new and improved transport infrastructure is helping to change this perception. Recent initiatives such as the new A299 East Kent Access Road in Cliffsend, improvements to the road network in Westwood and High Speed 1 Rail Links have had a positive impact on highway accessibility.
- 2.1.4 Thanet is now becoming a place where people seek to live and work and businesses invest. Tourism has always represented an important element to the local economy; with coastal towns being popular tourist destinations, particularly during summer months. As such the local highway network is subject to differing patterns of travel through seasonal peaks.

3 Spatial Characteristics

3.1 Social, Economic and Environmental Character

- 3.1.1 Thanet's estimated population at 2011 was 134,400. Work undertaken on population projections to 2031 to inform housing needs indicates an estimated population of 161,527 at that date.
- 3.1.2 The economy of East Kent is generally less buoyant than other areas of the county. This is partly due to perceptions of parts of it being peripheral with historically slow transport links to London. However, a number of regeneration projects and initiatives are in place and serving to diversify the employment base; for example the location of the Turner Contemporary gallery in Margate and the introduction of access to High Speed rail services within the district.
- 3.1.3 Furthermore, the economy has been growing and diversifying in recent years, and the Council, working in partnership with business, has set an ambitious Economic Growth Strategy for the area. The Council is working with business and other key partners to implement the Strategy.
- 3.1.4 Most of Thanet's coastline is designated a Site of Special Scientific Interest (SSSI), a Special Area of Conservation or a Special Protection Area. Areas at risk of flooding are mainly restricted to the lowlands of the former Wantsum Channel and a small area of Margate Old Town. Some of these designations are shown in **Figure 4**.
- 3.1.5 There are 20 Conservation Areas within Thanet, which include areas of special architectural or historical interest. In addition there are around 2,500 listed buildings in the district. In order to preserve the character of Conservation Areas interventions to manage traffic, such as road markings and signage require sensitive consideration. This is expressed in the District's Conservation Area Management Plan (2008)¹.

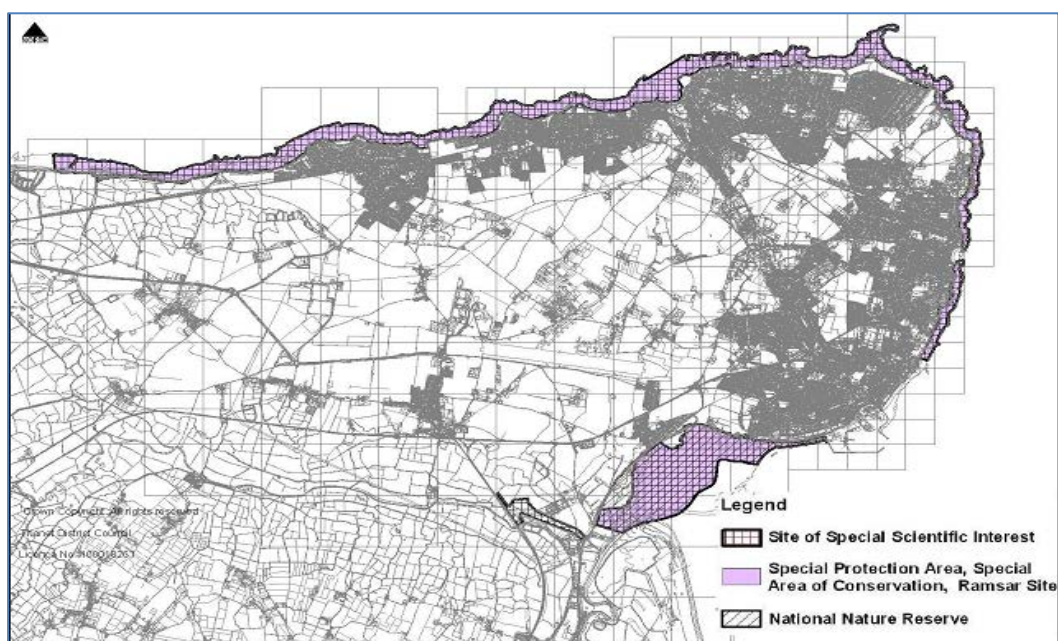


Figure 3 - Designations in Thanet

¹ http://www.thanet.gov.uk/pdf/Conservation_Areas_Management_Plan2008.pdf

- 3.1.6 There are two junctions in Thanet which show levels of nitrogen dioxide (NO₂) exceeding the recommended health objective, in both cases due to road transport emissions. These junctions are at The Square, Birchington, and High Street St Lawrence, Ramsgate.
- 3.1.7 It was found that Heavy Duty Vehicles (Heavy Goods Vehicles plus buses) contribute disproportionately to poor air quality. For example, at The Square HDVs produced a third of emissions of nitrogen oxides but were less than 5% of traffic².
- 3.1.8 In November 2011 an urban wide Air Quality Management Area (AQMA) was created and this includes both junctions (figure 4). This is because the two existing Areas are intrinsically linked to the road network across the wider district and by covering all heavily trafficked areas a coherent strategy can be developed. The one AQMA will then cover areas that will potentially exceed acceptable limits in the future.

3.2 Settlements

- 3.2.1 Thanet includes the three main coastal towns of Margate, Ramsgate and Broadstairs. These together with the smaller settlements of Westgate on Sea and Birchington on Sea are located within an almost continuous urban belt, with limited sections of green separation between some of them. Within the District's rural area there are seven villages of varying size, each having its own individual character. The furthest of these is about 5 km from the urban area containing the towns.

3.3 Margate

- 3.3.1 Margate is a popular tourism resort and has a strong cultural and creative community. The well-known "Dreamland" amusement park has recently reopened featuring historic rides, including the scenic railway, and other attractions, and also hosts events, such as nationally recognised music concerts.
- 3.3.2 Margate Railway Station is a short distance from the Margate main sands and gives direct access on foot to the seafront and its amenities. In March 2010, Jacobs was commissioned by Kent County Council to develop a conceptual master plan for improvements to the public realm of Margate Seafront and Station Approach³. The main features are to include:
- A less dominant highway environment with reduced road widths and highway furniture throughout
 - A series of new and improved public spaces along the frontage
 - Controlled pedestrian crossing points at key locations along the frontage
 - Widened pavements and promenade where possible

² http://www.thanet.gov.uk/pdf/Thanet_AQAP_2011_DRAFT.pdf

³ Margate Seafront & Station Approach Public Realm Improvements Scheme Development & Stakeholder Engagement Report

- 3.3.3 Margate town comprises narrow streets with properties fronting directly on to the road, many of which fall within conservation areas. Some of these streets are too narrow to safely accommodate two way flows and consequently follow a one-way system. The streets follow a comprehensive grid layout which offers good connectivity on foot and makes walking between key destinations in the town likely to be quicker than the car. Some of the existing pedestrian crossing points over the major arterial routes are located just off of the walking desire line which can sometimes result in additional interruptions to the free flow of traffic.
- 3.3.4 The Turner Contemporary has dramatically increased visitor numbers to the town but does not have on-site parking provision. Parking for the gallery is located in College Square, some 0.6km from the site and is accessed via a walk through Margate Old Town. The increased footfall in this area has had a significant effect on the commercial viability of the Old Town with more than 35 new businesses having opened in the first 18 months after the opening of the gallery (April 2011) and existing shops reporting a significant increase in takings.
- 3.3.5 Car parking can significantly influence the success of a town centre. KCC undertook a car parking survey in 2007 over a bank holiday weekend to assess the availability and utilisation of car parking within the town centre. Margate was found at that time to have 847 on street parking spaces of which an average of 69% were utilised during the week and 64% at weekends. There are 1,795 off street parking spaces of which 52% on average were utilised during the week and 26% at weekends. It is clear that parking capacity was abundant at that time but with the success of the Turner Contemporary and the upsurge of the Old Town a new Parking Strategy has been called for to take account of future regeneration projects.
- 3.3.6 The Queen Elizabeth the Queen Mother hospital is located on the edge of the town which is a facility that serves a large proportion of East Kent, bringing with it associated trips from outside of the district.

3.4 Broadstairs

- 3.4.1 Situated on the Thanet coastline between Margate and Ramsgate, Broadstairs is a popular holiday destination and has an array of festivals held throughout the year attracting tourists and locals to the town and seafront, whereby the main streets are closed to traffic. Its position in the district means that trains to London can go in either direction, via Canterbury or via Margate.
- 3.4.2 Due to its status as a thriving tourist location, peak season visitor parking needs to be reviewed and this could be done as part of a wider parking strategy for Margate, Broadstairs and Ramsgate.

3.5 Ramsgate

- 3.5.1 Home to the Royal Harbour Marina (just 35 miles from the French coast) and a member of the ancient confederation of Cinque Ports, Ramsgate is connected to the national road network primarily through the A299 Thanet Way and along the A256, East Kent Access Road, to Dover (and onwards to the Channel Tunnel), to which improvements have recently been completed.

- 3.5.2 Serving fishermen and yachtsmen, the Marina is also a tourist site. The town's Royal Harbour is unique in the UK and, like Broadstairs, the economy is underpinned by the tourist industry. Much of the town is Regency and Victorian and there are around 900 listed buildings.
- 3.5.3 The Port of Ramsgate has an access tunnel from outside of the town thereby avoiding town centre congestion except for times when this link is closed for maintenance.

3.6 Westwood

- 3.6.1 This area is located at the centre of the district, at the intersection of the A254 and A256. Westwood now represents the District's principal retail centre. It is also gradually developing into a residential settlement. The EuroKent site, which was originally allocated for employment, has recently been granted consent to build 550 new homes within the application site in addition to the 1000 new homes planned for Land North Of Haine Road. Recent improvements to the road network in the area have almost created a "loop" around the core shopping area, and this has led to improved traffic flows in the locality.



Figure 4 - Westwood Roundabout (A256 / A254)

4 Existing Transport Network

4.1 Road

- 4.1.1 Thanet is well connected to the UK motorway network via the A299 Thanet Way (a dual carriageway), which in turn links the District to the M2. The recently completed East Kent Access Road (A256 / A299) creates a high quality road connection to surrounding principle road corridors, which in turn link Thanet to the strategic road network (SRN) of the A2, M2 and M20 which are managed by Highways England.
- 4.1.2 The A28 (Canterbury Road) links Margate, Westgate on Sea and Birchington into Canterbury District and on to Ashford before ending on the East Sussex border. The A254 (Ramsgate Road) and A255 (St Peters Road) connect Margate, Ramsgate and Broadstairs. The A254 and A256 between Margate Ramsgate and Broadstairs serve as inter urban routes with Westwood being located at the point where these two routes intersect.

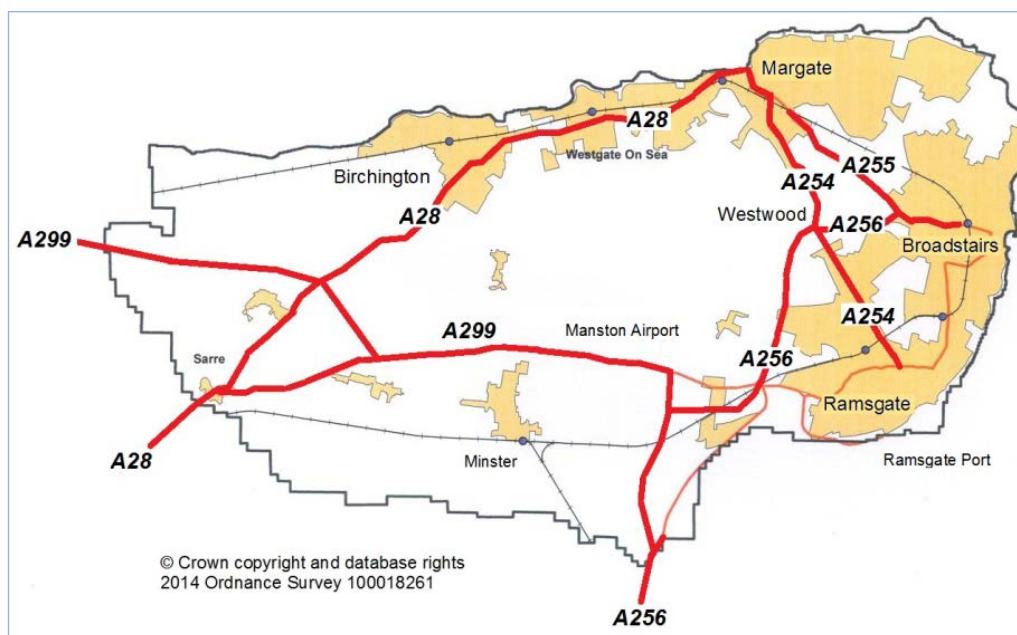


Figure 5 - Principal Road Links Around Thanet

- 4.1.3 All adopted public roads in Thanet are managed and maintained by Kent County Council as the highway authority. Those under KCC's responsibility can range from principal 'A' roads to the dense urban networks and rural lanes.

4.2 Rail

- 4.2.1 Thanet is currently served by seven railway stations and has direct services to London, Canterbury, Ashford and Dover. In December 2009 High Speed One services commenced from Ramsgate to London St. Pancras reducing rail journey times to 1 hour and 16 minutes (figure 5). For purposes of comparison, the mainline journey time to London Victoria is around 2 hours and to London Charing Cross up to 2 hours and 30 minutes.

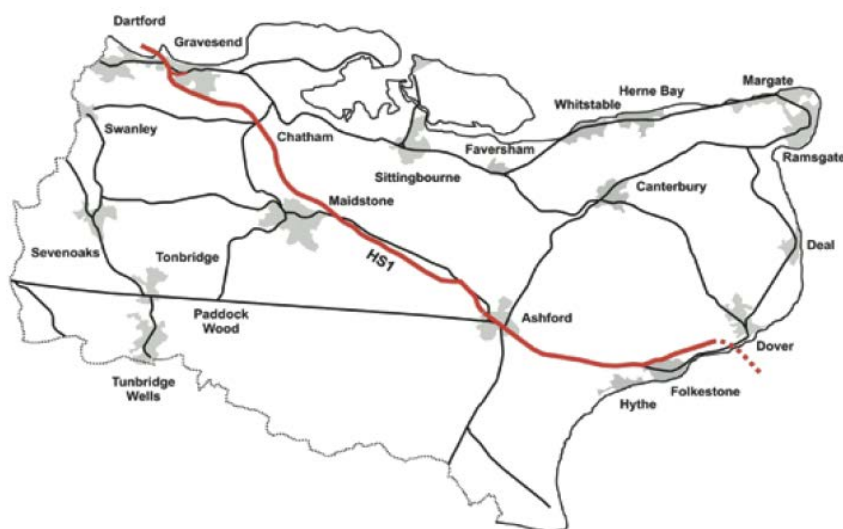


Figure 6 - The Kent Rail Network

4.2.2 The three principal stations are Ramsgate, Broadstairs and Margate with routes in three directions:

- London via Faversham and Chatham
- London via Canterbury and Ashford
- Dover and Folkestone via Sandwich

4.2.3 Parking availability at Thanet's existing rail stations is generally poor, which has an impact on the attractiveness of this form of transport for the local population. The delivery of a new Parkway Station at Cliffsend would provide high quality and convenient parking offer improving the attractiveness of rail travel.

4.2.4 The Kent Route Utilisation Strategy (January 2010) is Network Rail's strategic vision for the railway up to 2020, it has two possible areas for improvement in Thanet:

- Cutting journey times from London St Pancras to North Kent (Thanet via Medway) to promote economic growth. Current journey times are restricted by line speeds in Gravesend and Medway and the number of stations served on the route.
- The possible provision of a new Thanet Parkway station to assist in economic regeneration in Thanet, and improve connectivity with Discovery Park (just in Dover district), which provides a significant source of employment for Thanet residents.

4.2.5 In January 2012 the East Kent Resignalling Project was completed on routes from Sittingbourne to Minster via Ramsgate and from Faversham to Buckland Junction via Canterbury East. This renewed the existing equipment, which dated from the 1950s.

4.3 Bus

- 4.3.1 Approximately 97% of the local bus network in Thanet is provided on a commercial basis predominantly by Stagecoach. The remaining services are subsidised by KCC where it is considered there is a social need not met by the commercial network. KCC has clear criteria to help identify which services receive subsidy. These mainly include rural, evening and weekend services providing access to education, food shopping, health care or employment.
- 4.3.2 Thanet's predominant bus service provider Stagecoach is one of the largest operators in the UK and currently operates throughout East Kent. The introduction of the 'Thanet LOOP' in October 2004 was an immediate success and the existing Margate and Ramsgate local services the 'Thanet STARS' were upgraded as a result to complement it.
- 4.3.3 In an era when many districts have seen a net fall in the number of bus passengers (despite the introduction of free travel for over 60s), this is a remarkable achievement. Stagecoach in East Kent reports that bus use in the Thanet District over the last 10 years has been as follows:

Year	Passenger boarding's per year commencing 1 st April
2004	4,157,610
2005	5,313,565
2006	6,358,351
2006	6,761,854
2008	7,288,773
2009	7,469,328
2010	7,737,112
2011	7,957,379
2012	7,824,858
2013	8,167,933
2014	Data Unavailable
2015	8,973,879
2015	8,850,442

- 4.3.4 As referred to above, a key reason behind this transformation was the re-casting of the local bus network using DfT Kick Start funding and investment from Stagecoach to create a new route called 'The Thanet Loop'. This offered modern accessible vehicles providing a frequent service on a simple route connecting the main town centres and the new development at Westwood Cross. Its introduction was backed with an extensive marketing campaign.
- 4.3.5 It has been developed with improvements to frequency, length of operating day and investment in a new fleet of larger vehicles with improved engines for better efficiency and lower emissions. Other commercial routes have also received similar improvements. with 8/8A in particular benefitting from an investment of £2.5million in new Euro 6 double deck buses in 2016 and revisions to the routes created new links across the district.

Quality Bus Partnership (QBP)

- 4.3.6 All bus routes within Thanet are supported by an established QBP between three partners – the commercial bus operator (Stagecoach), Kent County Council and Thanet District Council. This group meets quarterly and includes attendance by council members from both Local Authorities.
- 4.3.7 The purpose of the QBP is to co-ordinate all matters which might affect bus operation, including potential investment opportunities, which could range from new bus stock, localised highway improvements to complement bus routes to new highway infrastructure associated with new development proposals.

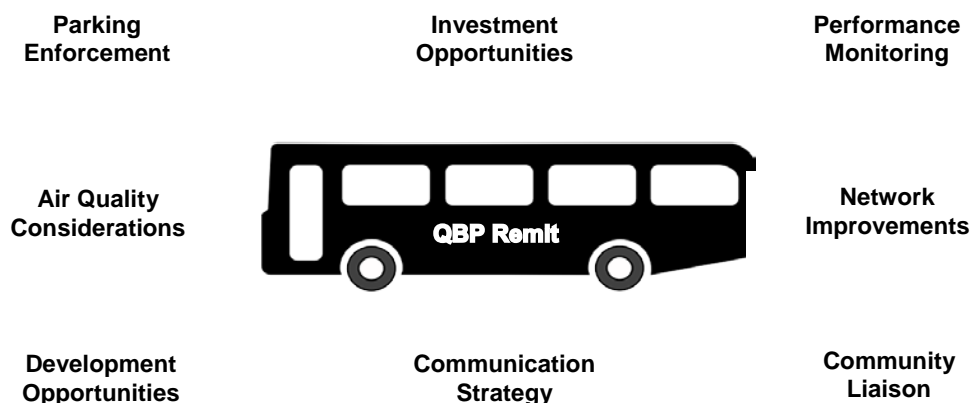


Figure 7 - QBP Roles

Young Persons Travel Pass/16+ Travel Pass

- 4.3.8 This is a concessionary scheme to assist parents with the cost of travel to and from school and evolved from the Kent Freedom Pass introduced in 2009. The current cost of the pass is £280 (£400 for the 16+ pass) and allows for travel between the hours of 6am and 7pm (at all times 16+ card).
- 4.3.9 The County Council currently issues just over 24 000 YPTP passes and 6500 16+ passes across Kent, this underlines KCC's ongoing commitment to reducing congestion especially at peak times. From September 2017 Stagecoach has launched a new initiative which allows for YPTP passes to be accepted at all times of the year and on all evenings and at weekends.

English National Concessionary Travel Scheme (ENCTS)

- 4.3.10 KCC administers this nationwide scheme in Kent for disabled people and those who have reached the state pension age. This allows for free travel between the hours of 0930 and 2300 Monday to Friday and anytime on Saturdays and Sundays.

Bus Stop Infrastructure

- 4.3.11 KCC hold overall responsibility for bus stop infrastructure in Thanet and across Kent overall. A contract is in place for the maintenance of existing bus stop assets and the Authority also considers requests for new bus stops and for the re-location / adaption of existing bus stops.
- 4.3.12 In Thanet, Stagecoach are proactive in assisting with the management of bus stops on their commercial corridors, performing the maintenance and repair

function (cases and flags) for the sites in question. It is important that bus stop infrastructure is considered as part of the planning process and that a) bus stop locations are identified early on within developments and b) appropriate financial contributions are included. More widely it is also important that developments consider bus access with respect to their design, for instance with respect to turning circles, road widths etc.

- 4.3.13 The original Thanet Loop scheme intended to make as many bus stops as possible fully accessible to support the new accessible buses being provided. The on-going development of bus infrastructure within Thanet has been a key component in the development of the existing network.
- 4.3.14 Bus shelter maintenance falls under the jurisdiction of TDC and this is currently administered through a term contract with the private sector, which devolves the responsibility for maintenance to the private sector with added revenue from relevant stops forming the funding stream to make this commercially viable. The current maintenance contract is reaching end point, and the delivery of good quality infrastructure will form part of future negotiations during 2017/2018. It is essential for any future contract to include a level of flexibility to enable new shelters to be provided within new development sites.



4.4 Community Transport

- 4.4.1 Thanet Community Transport Association provides accessible minibuses for residents who are unable to use other public transport. This is a door-to-door dial-a-ride service timetabled to operate to/from selected destinations each day.
- 4.4.2 Kent Carrier Service – Is a flexible dial a ride service that takes members directly from their door to useful destinations in their local area. All services are operated with wheelchair accessible vehicles and trained drivers. The scheme provides for those with a mobility impairment/medical condition, who live more than 500 metres from a bus stop/railway station or who are over 85 years of age.

4.5 Sea

- 4.5.1 Ramsgate Port has facilities for handling freight and passengers and is operated by Thanet District Council. These facilities include the ability to handle Roll on – Roll off (Ro Ro) vessels up to 175m and 6.5m draft, dedicated warehousing for transshipment and storage, and coach, car and foot passenger handling. In addition Ramsgate Marina also enables private vessels to be moored.
- 4.5.2 The previous operator of Cross Channel ferry services to both Dunkerque and Ostend ceased trading in May 2013 and a new operator is being actively sought. The Port has become a construction and operation base for three nearby offshore wind farms and the Council is currently exploring a range of freight and other operational options for the Port.
- 4.5.3 It has good connectivity with a dedicated Port access road and tunnel that diverts traffic away from the town and delivers customers direct to the Port. Because the route from the M25 to the Port of Ramsgate does not rely upon the M20/A20 corridor it is largely unaffected by the long delays which result from the implementation of Operation Stack.
- 4.5.4 With space for up to 550 freight units on site, specialist logistical equipment and storage areas only metres from the berth, turnarounds can be kept short. A focus on pre-booked, just in time services that are not affected by seasonal traffic variations guarantee customers can get to the Port without delays, providing a cost-effective way forward for the European freight distribution market.
- 4.5.5 The Port has an existing capacity of 500,000 units and the potential for up to one million. Cross channel freight is already expected to increase by 1.43 million units per year by 2035, and the Port of Ramsgate can play a significant part in providing additional capacity. This would give increased resilience to the European logistics market and support the flow of traffic across the South East of England especially the Thames corridor and would potentially link into the third Thames crossing, diverting traffic east rather than south to Dover and the Channel tunnel.
- 4.5.6 The Port has a strong vision for phased future development starting with a new double deck linkspan berth. This would give the Port a second double deck berth that would improve resilience whilst unlocking significant additional capacity and the Council has started to develop the business case to bring this forward.
- 4.5.7 The second phase would include the development of a logistics hub at Manston Business Park. This would provide additional off-port vehicle storage to act as a pre-parking area, supporting the maximum capacity of one million units. The hub would also incorporate storage facilities to allow for post and pre-assembly for loads for onward transport and units for advanced manufacturing.

4.6 Walking

- 4.6.1 Thanet has a road network which largely accommodates footways on both sides, not only in the main towns and seaside settlements but also along the distributor routes connecting them. In the rural areas the Public Rights of Way network offers walkers (and sometimes horse riders and cyclists) a good connection across open countryside to the coast, rural settlements and end destinations, with some circular walks offering superb views of both coast and countryside combined. The Thanet Coastal Path follows the longest stretch of chalk coastline in the country, the route having been set up in the 1990s. The Viking Coastal Trail is good for beginner walkers, offering good views out to sea. There are other signposted walks in Thanet, including the Turner and Dickens Walk linking Margate and Broadstairs.
- 4.6.2 In 2005 “Feet First,” a local walking strategy for Thanet was published. This identifies barriers to walking in the District and aims to promote and enable walking, for example by specifying a network of routes for improvements.
- 4.6.3 KCC’s Countryside and Coastal Access Improvement Plan 2013 is the overarching policy document for improvements to network of Public Rights of Way and recreational walking access in Kent.
- 4.6.4 Active Ramsgate is a recently completed partnership project from Ramsgate Town Council and Explore Kent to help develop Ramsgate Town as a destination for walking and cycling. The project included a number of promoted self-guided walks and the establishment of three new walking trails; ‘The Contra Trail’, ‘See it all’ and ‘Ramsgate Town Rounders’. On the back of this initiative Ramsgate Town is applying to be a ‘Walkers Welcome’ town. The Turner and Dickens Walk and Thanet Coastal Path provide longer distance promoted trails. All promoted routes have accompanying maps and leaflets that provide all the information you need for an enjoyable day out. For further information see - Parks and outdoor activities - kent.gov.uk
- 4.6.5 Following the Marine and Coastal Access Act 2009, Kent has been working with Natural England to establish its section of the emerging “England Coast Path” national trail. Establishment of sections from Folkestone to Whitstable are a key part of that initiative, although the focus of walking remains in and around the Coastal Promenades there is wider network of Public Rights of Way of around 106km.

4.7 Cycling

- 4.7.1 The Viking Coastal Trail (27 miles) roughly encircles the former Isle of Thanet providing connections between the towns, leisure and heritage attractions, as well as the National Cycle Network. Other routes have designated facilities to make cycling more attractive, such as the shared use footway/cycleways adjacent to New Haine Road. The provision of toucan crossings and facilities such as cycle parking at key locations (e.g. stations and shopping centres) also helps to improve the attractiveness of cycling in the district.
- 4.7.2 There is an existing Thanet Cycling Plan dated December 2003, with many of the targets within this document having already been achieved, notably:
 - 1. The completion of the Viking Coastal Trail (VCT) in June 2001, linking Thanet’s town and villages together with a 45km (28 mile) circular route and joining them to the National Cycle Network.

2. The continuing review of the VCT, improving signage and surfaces on the route, using funds from the Connect 2 project to complete the circular route and maintain it as an asset for Thanet.
3. Improvement of road junctions, Westfield Road/Caxton Road/Maynard Avenue/Brook Avenue/Crow Hill Road to reduce traffic speeds and give better access to pedestrians and cyclists
4. Construction of Dane Valley cycle route linking Marine Drive, Margate to Vicarage Street, St Peters and linking into the safer routes to school scheme.
5. Scheme to reduce traffic speeds at Nethercourt Hill, Canterbury Road East, High Street, Margate, Reading Street, Albion Street, Broadstairs and on various estate roads in Thanet with links to encourage more walking and cycling.
6. Cycle links from Margate Station and Broadstairs Station have been revised and improved.
7. The building of safe crossing facilities on Westwood Road fronting St George's C of E School.
8. Cycle route connections at Westwood, in the vicinity of Westwood roundabout.
9. New cycle path connection between A253 Minster and Sandwich Road Cliffsend to connect into NCN1.

5 Key Transport Challenges and Options

- 5.1.1 The purpose of this strategy is to manage growth within the district, whilst providing an improved quality of life for Thanet's residents by addressing key transport related challenges.
- 5.1.2 For most road users, congestion and delay is the biggest issue related to transport, with previous studies suggesting that congestion was a problem for the majority of the time when undertaking general road journeys⁴. It has also been forecast that, based on recent patterns of car usage, the housing growth planned for Kent could result in an extra 250,000 car journeys on the county's roads every day⁵
- 5.1.3 There is a general recognition that car ownership is the largest single component of traffic growth, with journeys to and from work and for educational purposes being one of the biggest contributors to peak hour road congestion.
- 5.1.4 Statistical data from the 2011 census identifies that whilst Thanet is geographically smaller than other districts within Kent, the number of households are comparable. The level of private vehicle trips in the district is commensurate with the national average. It is relevant to note that the percentage of bus use is the second highest in Kent, which suggests that existing bus services are a feasible option for existing residents.

5.2 Existing Travel Patterns

- 5.2.1 To gain a perspective on current and future transport demographics, it is valuable to examine existing sources of data in relation to Transport matters. Data sourced from the 2011 census provides some insight into the current travel habits of Thanet Residents when compared to local and national trends. **Figure 9** outlines the percentage of the resident population at different levels of car/van ownership in the District.
- 5.2.2 This data suggests that 30% of the district's population live in households with no cars/vans compared to just 20% for the whole KCC area. The average car ownership across the district is the lowest in the county
- 5.2.3 This can have accessibility implications for particular groups as when the car is being used (for example during the working day) other household members do not have access to the car and must rely on Public Transport. Likewise, where households have no car/van reliance on other forms of transport is high.
- 5.2.4 This theory would appear to be supported by further analysis of travel to work dataset See **Figure 10** below, which suggests that the use of bus travel is higher than the local (Kent) Average.

⁴ DfT (2008), Public attitudes to congestion and road pricing

⁵ Kent County Council (2010), Growth without Gridlock – A transport delivery plan for Kent

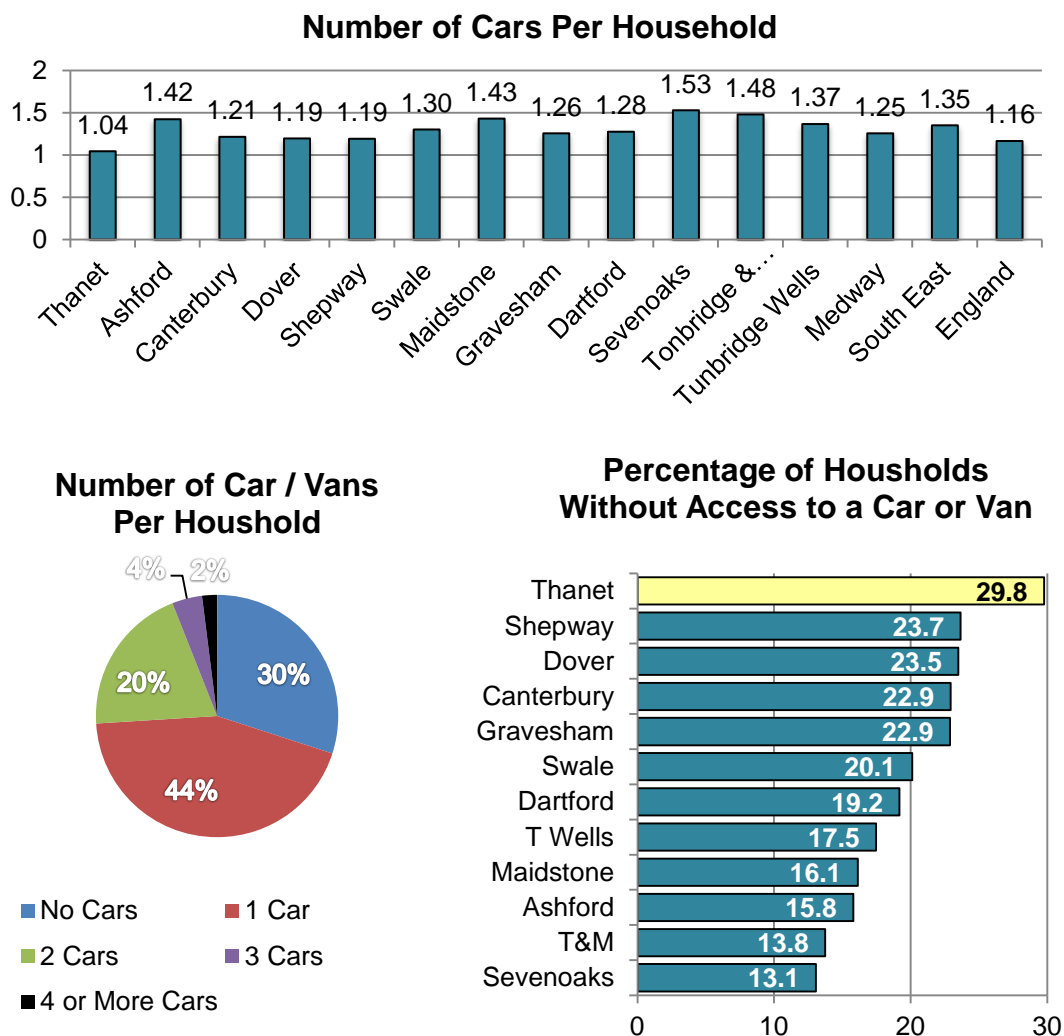


Figure 8 - Car Ownership (Data Sourced from 2011 Census)

Area	Working from home	Rail	Bus, minibus coach	Motorised Vehicle	Passenger car or van	Cycling	Walking	Other
Ashford	6.9	6.7	2.6	64.9	5.4	2.5	10.3	0.5
Canterbury	6.3	5.4	5.0	59.3	4.9	2.7	15.8	0.5
Dartford	3.6	17.9	5.2	60.1	4.4	1.1	7.3	0.5
Dover	5.3	3.8	3.6	65.7	6.2	2.2	12.4	0.8
Gravesham	3.9	11.3	6.7	62.2	6.3	1.0	8.1	0.6
Maidstone	6.0	6.9	3.8	65.2	4.9	1.2	11.6	0.5
Sevenoaks	8.0	20.4	1.6	57.4	3.6	0.8	7.5	0.7
Shepway	5.6	4.1	4.9	64.3	5.5	1.8	13.0	0.8
Swale	5.0	7.1	2.0	66.3	5.5	2.2	11.3	0.6
Thanet	5.3	4.1	6.3	61.7	6.9	2.5	12.5	0.7
Tonbridge & Malling	6.3	12.4	2.2	64.3	4.4	1.4	8.6	0.5
Tunbridge Wells	8.5	14.9	2.3	53.8	4.0	1.2	14.8	0.6
Kent	6.0	9.5	3.8	62.2	5.1	1.7	11.2	0.6
England and Wales	5.4	9.0	7.3	58.9	5.1	2.9	10.7	0.6

Figure 9 - Method of travel to work by percentage split (data sourced from 2011 Census)

5.3 Supporting Expansion at the Port of Ramsgate

- 5.3.1 Ramsgate's Port and Royal Harbour is located 76 miles from the heart of London, and close to continental ports and harbours across the North Sea and Straits of Dover. The commercial port has, until recently; operated ferry services to both Dunkerque and Ostend and has become both a construction and now operation and maintenance base for three nearby offshore wind farms. As owner and operator of the Port, Thanet District Council has published a Maritime Plan to provide a high level guide for the future operation, development and management of the port and adjacent Royal Harbour.



Figure 10 - Ramsgate Port

- 5.3.2 The Port includes 32 acres of commercial port land, three modern Ro-Ro bridges, a fast ferry service capability, tri-berth simultaneous operation, full passenger services and freight vessel facilities. This plan reflects the objective of accelerating local economic growth recognises the Port as a strategic asset and outlines how it is expected to grow over time. Its vision includes :
- Safeguarding the commercial port and its commercial shipping facilities.
 - Supporting development of new marine infrastructure and ro-ro expansion opportunities, as well as ferry lines.
 - Capitalising on potential to grow the port's existing role as an engineering and logistics base centred around off-shore renewable energy installations.
 - Pursuing expansion of bulk commodity trade.
 - Promoting capabilities to accommodate cruise ship calls.
- 5.3.3 The Port benefits from a dedicated access road enabling road traffic to connect directly to the principal road network without passing through the built up area and local road network.

5.4 Economic Situation

- 5.4.1 The prevailing economic situation in recent years has affected Thanet as it has elsewhere in the country. The local economy is focused on tourism, cultural and creative industries and the service sectors, particular in the public sector, with a high proportion of small businesses. Thanet's towns have their own unique identities and heritage on which to trade, for example Margate's connections with the artist Turner and the country's only Royal Harbour in Ramsgate.

- 5.4.2 Thanet has strong economic connections with the surrounding districts. The recently completed East Kent Access Road (encompassing both the A299 and A256) provides dual carriageway from the M25. Its completion now means that there is a direct dual carriageway connection between Sandwich, Ramsgate and the motorway network to the London arterial motorways. It also links Thanet and major economic assets including Manston Business Park, the Port of Ramsgate and Discovery Park to the UK's main arterial strategic road network.
- 5.4.3 The introduction of High Speed 1 (HS1) rail services have reduced commuting time from London St. Pancras to Ramsgate to 76 minutes and Margate to 88 minutes, from almost two hours. Although journey times remain longer than those to comparator locations (such as Folkestone), recently secured Government investment is set to lead to further reductions. This route had also facilitated access from Thanet to North London rather than just to the South. Efficient transport connections and improved journey times can help make the area more accessible and therefore more attractive as a location for business investment and commuting.
- 5.4.4 Thanet's Economic Growth Strategy for 2016 to 2031 identifies key areas for the Thanet economy to grow quickly and attract significant investment:

Transformational Initiatives

1. Developing the Port at Ramsgate
2. Investing in high value manufacturing and engineering across Thanet and East Kent
3. Positioning Thanet as a global agritech hub
4. Promoting Thanet's broader cultural/leisure offer
5. Cultivating the creative industries across Thanet
6. Designing enterprise into communities
7. Long term feasibility modelling for Margate and Ramsgate

Foundational Priorities

1. Working with businesses, schools and FE/HE providers to improve workforce skills
2. Developing and implementing measures to support new and small businesses in the District, particularly the provision of managed workspace and focused business support
3. Ensuring major employment sites in Thanet are managed and promoted effectively
4. Working with local partners to ensure that the visitor economy continues to evolve, reflecting fast-changing patterns of demand.

5.5 Car Parking Strategy

- 5.5.1 Car parking is an important issue for residents, business and visitors. Kent County Council is the highway authority for the district, and TDC work in close partnership with KCC on all parking related matters for the district.

5.5.2 The ongoing aspiration to diversify the local economy, leisure and tourism (for example; the opening of Turner Contemporary in Margate and the re-opening of Dreamland) will attract more people to travel to the district and the towns thus generating demand for parking. In parallel there is potential for local growth in car ownership. While the Local Plan aims to facilitate greater use of alternative modes of travel it remains very important to ensure that parking provision is properly managed, sufficient and suitably located for those who elect to travel by car.

5.5.3 The District Council has prepared a Parking Policy (2015-20) to provide a framework for effective parking management, and to support the Council's strategic objectives as outlined in the Corporate Plan and links in with the Thanet District Transport Strategy, Local Plan, Regeneration Strategy and the Destination Management Plan. It is important that we have a consistent approach across the whole of the district. Some of the aims of the Parking Policy are:

- Ensure the safety of all roads users by restricting parking in inappropriate locations;
- Be fair in setting fees and charges that are related to supply and demand, encouraging use of parking spaces and incentivising people to come into town centres and other attractions, and have a consistent approach across the district;
- Support the viability of Thanet's economy and regeneration initiatives that form part of this;
- Provide a clear policy for enforcement which will allow the council to deal with parking issues fairly and consistently, ensuring an efficient and effective enforcement function;
- Ensure the appropriate control of residents' parking, especially where this is affected by other parking demands;
- Seek to ensure that the provision, location and safety of public car parks are of a good quality;
- Provide a consistent and clear approach for different types of parking permits;
- Seek to ensure a clear approach towards parking for disabled persons including dealing with misuse of the blue badge scheme;
- Consider parking's contribution to environmental agendas (for example, if demand of the current electric charging points increases then the council will look at increasing the number of charging points within the district's car parks with external funding if available); and
- Ensure that the policies and services are transparent and provided consistently throughout the district.

- 5.5.4 Exploration of digital solutions to support parking services will become an on-going action within the service to continue delivering a more cost effective and efficient service for the public. These will include:
- New smartphone handhelds
 - Virtual permits
 - Residents visitors permits purchased on line
 - Mobile CCTV/ ANPR camera technology for enforcement
 - Extending our online permits system to online renewals.
- 5.5.5 New schemes will be introduced to help residents and businesses to be able to get a turnaround of visitors using the bays close by. Parking services will explore a number of sites around the district for pay and display and parking schemes.
- 5.5.6 Its objectives include making more productive use of existing provision and regulation of on and off-street parking to help keep traffic flowing, improve pedestrian and motorist safety, facilitate business deliveries and enable people to park near their homes and shops. The Policy also addresses charging policy, enforcement and signage.
- 5.5.7 The established benefits of providing parking enforcement are to:
- To improve the safety of road users;
 - To assist the free flow of traffic and reduce traffic congestion, especially for emergency services;
 - To assist and improve bus movement;
 - To ensure effective loading/unloading for local businesses;
 - To provide a turnover of available parking spaces in areas of high demand;
 - Increase protection of disabled spaces, bus stops, loading bays, taxi ranks and residents parking areas; and
 - To promote and enhance the health of the local economy.
- 5.5.8 The Parking Policy seeks to ensure that parking is of good quality, safe and suitably located. It also indicates that new pay and display parking locations will be investigated as well as consideration given to potential disposal of some car parks. It is intended that existing off street town centre car parks should continue to be safeguarded.
- 5.5.9 The Parking Policy acknowledges the need to improve existing coach parking, and to explore options for locating increased provision. In particular replacement provision is expected to be required for Margate following construction of the Turner gallery and adjacent land. There is currently no specific coach parking provision for Ramsgate, and it is anticipated that additional provision will be required for Broadstairs to address peak demand.

- 5.5.10 Park and ride is an alternative solution that has been considered previously. However unlike most towns that have a scheme Thanet is unique by having four town areas that have a greater visitor demand during the summer months only. Most schemes offer drivers an easier way to leave their vehicle at an out of town location and then use a quick service to travel in to town without delays. Thanet does not have a central point that could be used for all towns that would give drivers the same opportunity.
- 5.5.11 A large amount of investment would be required for such a scheme not only for the land but for the on-going operating costs. It may be possible with partners to look at a scheme for the summer period only covering the towns that get traffic congestion.
- 5.5.12 There is also a role for planning policy to achieve the following:
- Safeguard town centre car parks but with flexibility to accommodate situations where sites are under used and where development might facilitate more suitably located or better quality provision to be delivered elsewhere
 - Set out guidance on the level of car parking to be provided for in new developments including within the individual town centres, and to identify areas where additional on-street parking may not be required
 - At Westwood, to consider how car-parking might be more effectively provided as part of a wider redesign of the area, to create a more pedestrian-friendly public realm as part of the centre
 - Support new, suitably located off-street parking
 - Improved directional signage; and
 - Safeguard existing coach parking provision and support solutions to augment provision in appropriate locations to address unmet need.

The Parking Policy will be reviewed in 2020.

5.6 Quality of Life

- 5.6.1 One of the expected key challenges for the Local Plan will be to deliver a change necessary to raise the quality of life for Thanet's less advantaged citizens, whilst maintaining the quality of life for everyone. Thanet's historically deprived communities are found in the wards of Cliftonville West, Central Margate, Newington and Eastcliff. Alongside other programmes and initiatives, transport can go some way to address these challenges by increasing accessibility to public amenities and connectivity from some of Thanet's more deprived or rural areas.
- 5.6.2 To encourage walking and cycling generally improves overall health and fitness levels, improves air quality and helps to reduce the number of cars on the network, thus reducing congestion and saving money for the individual. Creating active street frontages, with more people walking and cycling, also reduces crime levels and can act as a catalyst for more people to become active.
- 5.6.3 The quality, safety and convenience of access by foot, bicycle and public transport are all key factors in encouraging people to select alternative modes to the private car.

5.7 Thanet Parkway Rail Station

- 5.7.1 The County Council's Transport Delivery plan identifies key opportunities and challenges to be addressed to deliver long-lasting regeneration and economic growth in the County. It recognises that many of Thanet's existing rail stations are difficult to reach by sustainable transport and offer limited car parking opportunities. This causes some commuters to travel significantly longer distances by car to access stations with better parking facilities.
- 5.7.2 The project's objective is to support growth at Manston, Business Parks around Westwood and Discovery Park.
- 5.7.3 The following outcomes are expected from the delivery of the station:
- Increased inward investment in Thanet and Dover.
 - Thriving Enterprise Zone and surrounding Business Parks.
 - Greater employment opportunities for Thanet and Dover residents.
 - Access to high speed rail services across district.
- 5.7.4 The Parkway station will consist of the following elements which are subject to discussions with Network Rail and Local Train Operating Company.
- Two station platforms with disabled access.
 - Disabled access ramps/lifts with footbridge.
 - Ticket vending machine, waiting area and journey information point.
 - CCTV and passenger help points
 - Car Park and associated facilities with disabled access to platform.
 - Drop off/ pick up point for buses, taxis and cars.
 - Pedestrian and Cycle access

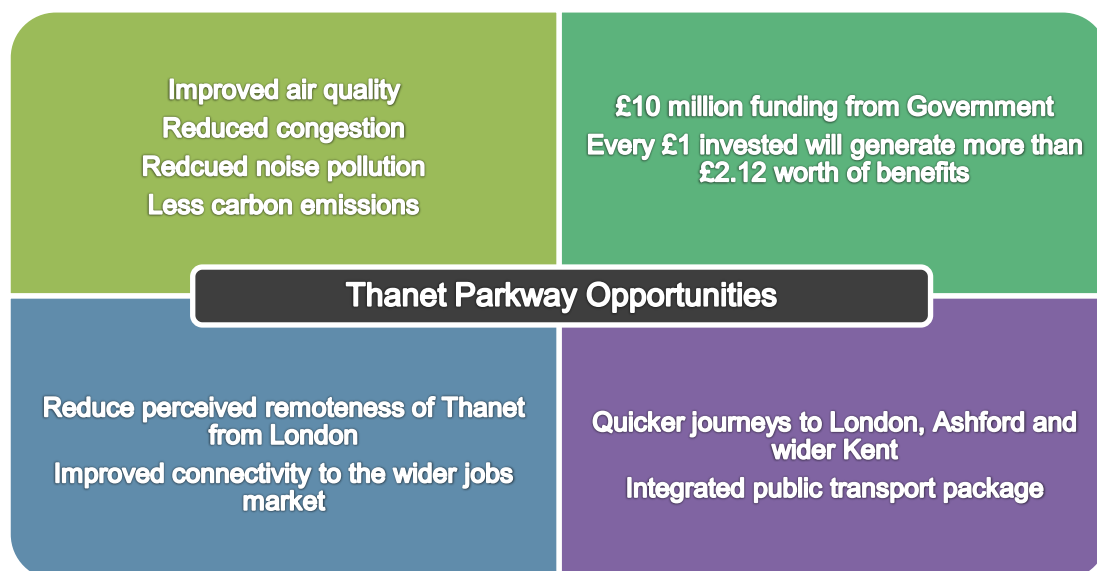


Figure 11 - Thanet Parkway Headline Opportunities

- 5.7.5 Alongside parallel JTI scheme which increases line speeds between Ashford International and Ramsgate stations, it is anticipated that journey times from London to the Thanet Parkway would reduce to 1 hour, providing a significant boost to tourism, and regeneration of the area and enhancing access to private sector employment at Ashford and Ebbsfleet.



Figure 12 - An artist's impression of Thanet Parkway

6 Traffic Challenges

- 6.1.1 When compared to other areas of the county, existing traffic flows within Thanet are reasonably catered for, however the road network generally lacks resilience to cope with future growth. There are a number of junctions that cause localised delays during peak hour demand. These junction delays will continue to be exacerbated if necessary improvements are not made.
- 6.1.2 A significant proportion of Thanet's housing growth is identified on land within or adjoining the main urban area, which in turn will add pressure to existing primary highway routes and junctions, which are already subject to extended delays and environmental impacts. An appraisal of the local highway network through stakeholder engagement and interrogation of junction performance has identified a number of congestions 'hotspots' within the district. The purpose of this strategy is to highlight these challenges and seek to manage growth within this specific context.

6.2 M2 / A2 / A299 - Brenley Corner

- 6.2.1 Brenley Corner lies outside Thanet at Junction 7 of the M2, where traffic splits between the A2 (for Canterbury, Dover and the Channel Tunnel) and the A299 into Thanet. The M2 and A2 are part of the Strategic Road Network (SRN) managed by Highways England (HE), who have identified potential future congestion issues at Brenley Corner.
- 6.2.2 Improvements at this junction must consider future growth in Thanet, as well as the travel implications arising from growth plans of other districts.
- 6.2.3 Thanet District Council, in cooperation with neighbouring district councils and Kent County Council, has prepared an assessment of the scale of planned development and transport principles to assist HE in identifying its potential impact on those parts of the SRN where capacity may be an issue.

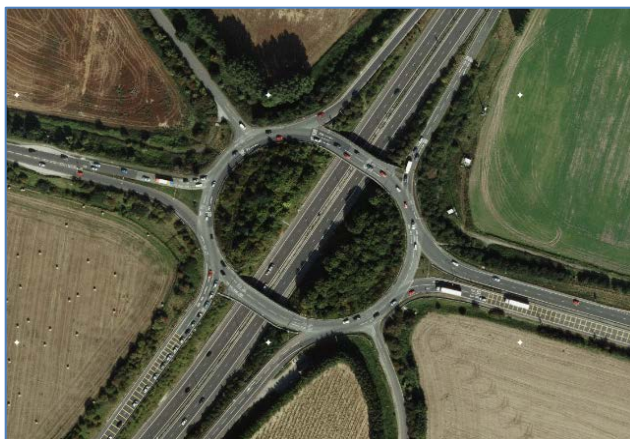


Figure 13 - Brenley Corner

- 6.2.4 Due to the way in which the junction is arranged, it is anticipated that the impact of development within Thanet will potentially have a lower level of impact on the operation of the existing junction when compared to directly adjacent districts.

- 6.2.5 The strategic importance of ensuring that Thanet remains directly accessible from the SRN, for both commuting and leisure based trips makes continued liaison with Highways England and investigation of a long term solution for this junction a key consideration for the interests of Thanet District.

6.3 B2050 / B2190 - Spitfire Junction

- 6.3.1 The Spitfire Junction is a convergence of two distributor roads located in the middle of the district (the B2050 Manston Road and B2190 Spitfire Way). The B2190 is a very important local route with the A299, which is one of the primary arterial routes serving Thanet, for locally bound traffic to Margate, Broadstairs and Ramsgate.



Figure 14 - Spitfire Junction

- 6.3.2 This operates with two priority junctions adjoining the B2050, a major distributor road that links Birchington, Manston and Ramsgate. Lengthy queues form at peak times on the B2190 from the west and on the westbound approach of Manston Road. Several designs have been considered at this junction to seek to improve junction performance and safety, however the alignment of the carriageway of the B2050 and the availability of residual highway land currently present geometrical challenges to an alternative approach.

6.4 A28 / B2055 / B2051 - Marine Terrace / Marine Parade (Margate Seafront)

- 6.4.1 Margate seafront is the final connection point of the A28 primary highway corridor and is the end point for one of the two principal routes into the Thanet area. The clock tower junction has been subject to alternative traffic schemes in the past, which has generated mixed results. Given the nature of Margate as a popular tourist destination, there is a clear requirement to accommodate pedestrian movement whilst managing considerable traffic flow.

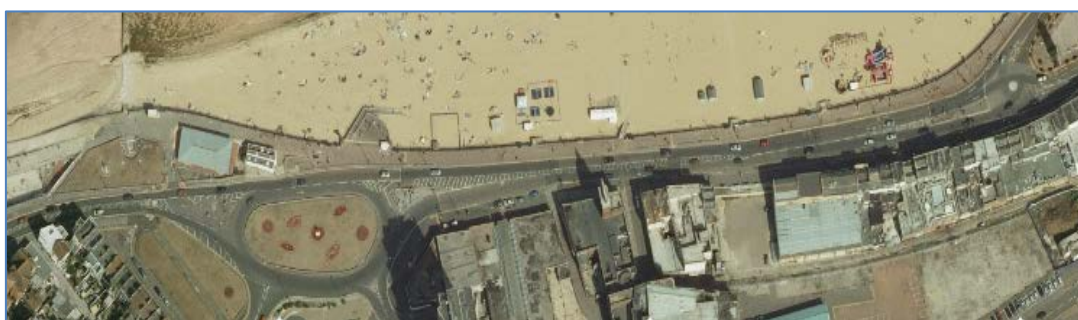


Figure 15 - A28 / B2055 / B2051 Marine Terrace / Marine Parade

- 6.4.2 At present, the numerous pedestrian crossing points located on the seafront create journey time delay to motorists due to the popularity of the beach and seafront facilities (particularly during the busy summer tourist season) create a need for these crossing points to remain operational. Network reliability also has an impact on the punctuality of bus services.

6.5 A256 / A255 - Dane Court Roundabout

- 6.5.1 This roundabout junction serves as a central convergence point for distributor routes to Westwood, Margate, Broadstairs and St Peter's. It suffers from long queue lengths at peak times but is constrained by frontage development and could not be significantly improved without utilising land to the west of the junction. Recent traffic surveys suggest that the predominant flows on this roundabout take place between the A256 & Vicarage Street, which in turn impacts on the ability for traffic on the A255 to 'gap seek', leading to extended queuing within the A255 Dane Court Road.



Figure 16 - A256 / A255 Dane Court Roundabout

- 6.5.2 A possible method of better managing queues at this junction would be to introduce signal control or provision of a larger roundabout with increased capacity, however these solutions will require the use of third party land.

6.6 B2052 - Coffin House Corner

- 6.6.1 This junction is located at the intersection between four important local routes and as such is now one of the busiest junctions in the district.
- 6.6.2 It forms part of the entry to and exit from the Tivoli one way system and is operating as a traffic signal controlled junction. The presence of popular primary schools within close proximity of this junction have a significant impact on its operation during peak hours, both in terms of on street parking and general traffic queuing. This also creates extended delay at the Manston Road / Shottendane Road Junction, which is a well-used local route and serves the local Waste and Recycling Centre and Thanet Cemetery & Crematorium.

6.7 Westwood Cross

- 6.7.1 Westwood continues to be a centre of development activity in Thanet. The now well established Westwood Cross town centre, which has extensive retail and leisure facilities has been highly successful in stemming leakage of retail spend from the district and attracts visitors from beyond Thanet.
- 6.7.2 In recent years, a phased development to deliver over 1,000 new homes has commenced on land fronting Haine Road and Nash Road. New Haine Road opened in November 2008 providing access to further land allocated for development.
- 6.7.3 Westwood is comprised of different land parcels; however these are separated by the Primary Road Network, thus creating a barrier to walking and cycling between retail outlets. Ongoing development and subsequent congestion around the town centre, (particularly at weekends), remains a challenge, however recent improvements to the road network have provided considerable benefit, with better route choice to spread traffic demand.
- 6.7.4 The Westwood Transport Plan was endorsed by the Joint Transportation Board (JTB) in 2010. This plan includes new roads / improved junctions, alongside widening of the existing arterial roads in the Westwood area, to provide alternative routes and disperse traffic more efficiently within the local area.

6.8 A254 / B2052 Victoria Traffic Signal Junction

- 6.8.1 Known locally as the Victoria Traffic Lights – This junction consists of a busy and complex five way junction linking College Road, A254 Ramsgate Road and Beatrice Road. The junction is located close to local primary schools, which in turn create further constraints in and around the College Road corridor during peak hours.
- 6.8.2 Recent traffic surveys reveal a total of 27,500 vehicles travel through this junction between 7am and 7pm on a typical weekday. It is a key junction within the A254 corridor and any reduction in the level of service at this junction can impact on the wider urban areas of Margate and beyond.



Figure 18 – Victoria Traffic Signals

- 6.8.3 The junction has been subject to phase and stage changes in order to manage journey times and safety. In terms of air quality, College Road was previously identified as an area approaching the health objective for nitrogen dioxide. However, since the recent junction improvements at Victoria Traffic Signals, levels have reduced significantly.
- 6.8.4 Recent junction improvements to this junction are as follows:
- An altered the pattern of the signals to optimise traffic flow.
 - Introduction of MOVA, a system that can adjust the timing of the lights depending on levels of traffic on the different approach roads.
 - Installation of 'smart' traffic signal control equipment to provide a level of bus priority within the timing of the signals.
 - Provision of a signal controlled pedestrian crossing on College Road (east) to improve safety and amenity for those travelling by foot.
- 6.8.5 Since the introduction of the new improvements there has been a reduction in queue lengths and early indications suggest that safety at the junction has been improved. Despite these improvements, the junction continues to experience congestion during network peak times.

6.9 A28 / Birchington Square

- 6.9.1 This junction is located at the end of Station Road and forms part of the A28 Canterbury Road, which is the principal road corridor leading to Margate. Throughout much of the day, Birchington Square operates acceptably, however it is subject to long delays during peak periods. This issue is compounded during hot summer months with increased visitor traffic entering and leaving Thanet. Air quality has exceeded health objectives for nitrogen dioxide here since 2005.
- 6.9.2 The junction operates as a mini roundabout and is constrained by historic frontage development and local features. A priority junction is located at Park Lane to the south of the mini roundabout, which provides access to the local Primary School, Acol Village and local rural road network.
- 6.9.3 A visual appraisal of the junction has identified that the cause of the congestion often relates to the positions of existing bus stops in the square and operation of the pedestrian crossing at the end of Park Lane combined with right turning traffic movements, which impede the free flow of traffic in the locality. When buses are stationary at the same time on both the eastbound and west bound stops, the gap between them impedes the free flow of larger vehicles.
- 6.9.4 Right turning traffic into Park Lane often cause queues at peak times partly due to the 'single way working' system which is in place, which only allows a very limited number of vehicles to queue on Park Lane. Those vehicles at the junction have difficulty emerging onto the A28 Park Lane which can lead to instances of gridlock. This often leads to queuing back along the A28, the result of which encourages traffic to seek alternative routes though the residential areas to the north and south of the A28.

- 6.9.5 Proposed growth at Birchington and Westgate will impact on Birchington Square and as such developers would be required to mitigate the impacts of their development. In order to better manage journey times and air quality issues within the locality a more comprehensive solution to traffic accessibility needs to be explored which would allow the A28 to operate with minimal interruption.

6.10 A255 St Lawrence Junctions

- 6.10.1 The St Lawrence area in Ramsgate suffers from extended peak hour queuing at its junctions of A255 Nethercourt Hill / Newington Road / High Street St Lawrence and Newington Road / Manston Road. Both junctions impact on each other due to the sheer volume of traffic and the blocking back that occurs between them. The junction with the High Street is difficult to address by way of increased road space due to the proximity of listed buildings within the immediate vicinity.
- 6.10.2 Air quality issues are prevalent in this location. The presence of a number of primary schools in close proximity to this junction exacerbate the situation, as pedestrian crossings further impact on the free flow of traffic. Unreliable journey times on the A256 Haine Road corridor currently contribute to local route choice in relation to Broadstairs; as such an improvement to journey times on the Haine corridor could be an appropriate method of managing traffic flow in this location.

6.11 A256 Haine Road / Westwood Road Corridor

- 6.11.1 The A256 Haine Road is the principal road corridor for vehicles entering and leaving Thanet from the south. The popularity of Westwood Cross as a shopping destination results in a significant number of motorised journeys during morning and evening peak hours, and also at weekends.
- 6.11.2 Haine Road is an important commuter route, used by traffic seeking to access other primary routes. The corridor is generally accessed by via roundabout junctions, however Lord of the Manor operates as a complex signal controlled junction. Lord of the Manor is subject to extended queues during peak hours, particularly on its Northern and eastern arms. An increase in activity at Ramsgate Port back to levels formally realised at full operation would exacerbate this existing traffic situation.
- 6.11.3 The junction of Manston Road and Haine Road is currently formed of a compact roundabout and priority junction arrangement. Peak hour journey times on the Haine Road corridor are generally impacted by a combination of both link demand and junction delay. Recently consented development at Manston Green, seeks to provide further junction capacity in this location through the provision of a new spine road and greater separation between junctions. Further mitigation will need to be introduced within the locality to accommodate additional traffic growth.

7 Air Quality

- 7.1.1 Poor air quality has an impact on people's health. It mainly affects the respiratory and inflammatory systems, but can also lead to more serious conditions such as heart disease and cancer. Transport is widely recognised as one of the biggest causes of Nitrogen Dioxide (NO₂) pollution.
- 7.1.2 The urban wide Air Quality Management Area (AQMA) in the district requires management through the Air Quality Action Plan (AQAP). The two junctions that have exceeded recommended NO₂ levels have done so due to transport emissions. Therefore this Strategy can support and take action to improve air quality not only in these areas but throughout the district. These include:
- Improving traffic flow by looking at junction and signal configuration.
 - Ensuring freight traffic uses the most suitable routes.
 - Increasing use of public transport and more sustainable modes, including car sharing, cycling and walking.
 - Considering air quality in the Development Planning process in terms of site location, travel planning and obtaining contributions for example towards public transport and supporting low emission vehicles.
- 7.1.3 Fine particles and NO₂ continue to be monitored across Thanet at over 30 key locations. Two areas have been identified as exceeding the annual objective for NO₂: The Square, Birchington and High Street St Lawrence.
- 7.1.4 The junction of Boundary Road / Hereson Road Ramsgate is fluctuating around the NO₂ objective and another location close to the objective is the junction at College Road / Ramsgate Road, Margate (known locally as Victoria traffic lights). However, since the junction improvements there has been a significant reduction in pollution levels. All exceedance areas are due to traffic related pollutants in congested locations near housing. In 2011 an urban wide AQMA was declared to enable a strategic approach to be taken in tackling the problem.
- 7.1.5 The AQAP was amended in 2016 to include an Air Quality Technical Planning Guidance. The Guidance requires all major development to undertake an Emissions Mitigation Assessment to determine the appropriate level of mitigation required from a development. A transport emissions calculation produces an exposure cost value to be spent on mitigation measures.
- 7.1.6 An emissions mitigation calculation inputs the additional number of trips generated by the development into the latest DEFRA Emissions Factor Toolkit which calculates the amount of transport related pollutant emissions a development is likely to produce. The output is then multiplied by the Interdepartmental Group on Costs and Benefits damage costs for the key pollutants; NO₂ and Particulates. Finally the emissions total is then multiplied by 5 to provide a 5 year exposure cost value which is the amount (value) of mitigation that is expected to be spent on measures to mitigate those impacts. This value is used for costing the required emissions mitigation for the development.

- 7.1.7 The Air Quality Technical Planning Guidance seeks to increase the number of electric charging points within or close to the urban AQMA. Electric Vehicles offer the benefits of zero emissions at the point of use but the network of charging points is not yet widespread.
- 7.1.8 Recent central government announcements have provided a commitment to phase out Petrol and Diesel based on UK roads over the coming decades, therefore it is now even more important that the necessary infrastructure to facilitate this is introduced at the earliest possible opportunity.
- 7.1.9 To reflect this evolving position, it is proposed that all development within the urban wide AQMA will be required to implement EV on the following basis:
- Residential (where there are 10 or more units): 1 Electric Vehicle charging point per dwelling with dedicated parking or 1 charging point per 10 spaces (unallocated parking)
 - Commercial/Retail/Industrial: 10% of parking spaces to be provided with Electric Vehicle charge points which may be phased with 5% initial provision and the remainder at an agreed trigger level

8 Planned Development

- 8.1.1 The Thanet Local Plan will guide investment and planning decisions by identifying the scale and location of development to meet requirements over the period to 2031.
- 8.1.2 Traffic modelling carried out to inform this Strategy also serves to inform options for the allocation of development. This Strategy will inform policies for the Local Plan seeking to address existing challenges and identify the key transport infrastructure required to support the planned development.
- 8.1.3 The Thanet Local Plan sets a target of 17,140 dwellings to be provided over the period to 2031. Alongside this, some 5,000 jobs are expected to be created in different sectors across the district. Development includes a number of strategic sites at Birchington, Westgate, Westwood, Ramsgate and Manston, which can assist in the provision of Transport Infrastructure. Jobs growth and economic development is expected to be focused on the town centres and existing employment sites, therefore it is expected that existing patterns of trip distribution will apply to the majority of new residential development.

8.2 Key Development Sites

- 8.2.1 A recent study was undertaken by Thanet District Council to consider the required level of development for the district to meet future growth needs; these are known as Objectively Assessed Needs (OAN). In order to meet the OAN, the District Council has identified a number of key strategic sites for development along with a number of smaller sites and windfall assumptions.
- 8.2.2 The strategic allocations and housing delivery projections across the entire Local Plan, are outlined below and shown geographically in **Figure 18**.

Period	2011-16	2016-21	2021-26	2026-31	Total
Additional Homes	4,285	4,285	4,285	4,285	17,140

Site	Housing Allocation (Dwellings)
Former Airport Site (Manston)	2500
Westwood	1450
Birchington on Sea	1000
Westgate on Sea	1000
Land at Manston Court Road/Haine Road	700
Manston Green	700

(1) Former Manston Airport Site

- 8.2.3 This site is located to the south of the district adjacent to the A299. It represents Thanet's largest brownfield site with development potential. There is opportunity to facilitate a number of new internal highway links within the site, with potential to improve existing road foot and cycle access between Minster / Cliffsend and Westwood. It is essential that redevelopment of this site positively contributes towards wider off site road links, in order to manage potential impacts on the surrounding highway network such as Manston Village and Manston Court Road.

(2) Birchington on Sea

- 8.2.4 An open site located to the south and west of Birchington settlement to both sides of the A28 Road corridor. This site provides an opportunity to improve highway access to Minnis Bay and Quex Park, providing a level of managed growth in relation to the A28 Birchington Square.

(3) Westgate on Sea

- 8.2.5 A residential development located to the south of existing settlements in Westgate and Garlinge on both sides of Minster Road. The site provides an opportunity for sustainable development, and can deliver contributions towards wider improvements within Shottendane Road.

(4) Westwood

- 8.2.6 Situated alongside the existing Nash Road corridor, this site provides a natural extension to consented development at Land North of Haine Road. There is opportunity to upgrade the existing Nash Road corridor, which in turn will provide a tangible alternative to the congested A254 Road corridor for Margate to Westwood bound trips. There is further potential to better link Westwood Industrial Estate to the wider highway network and enhance pedestrian and cycle access.

(5) Land at Manton Court Road/ Haine Road

- 8.2.7 A mixed use development located to the south of Manston Court Road and the east of the existing Westwood Cross shopping centre. This site provides an opportunity to deliver part of / a proportionate contribution towards a new principal highway link between the A299 and the A256.

(6) Manston Green

- 8.2.8 A development of 750 dwellings located on the A256 between Cliffsend and Westwood. Manston Green facilitates an opportunity to improve the existing A256 Haine Road corridor by providing enhanced junction arrangements. An improvement strategy for bus connectivity will also be necessary.

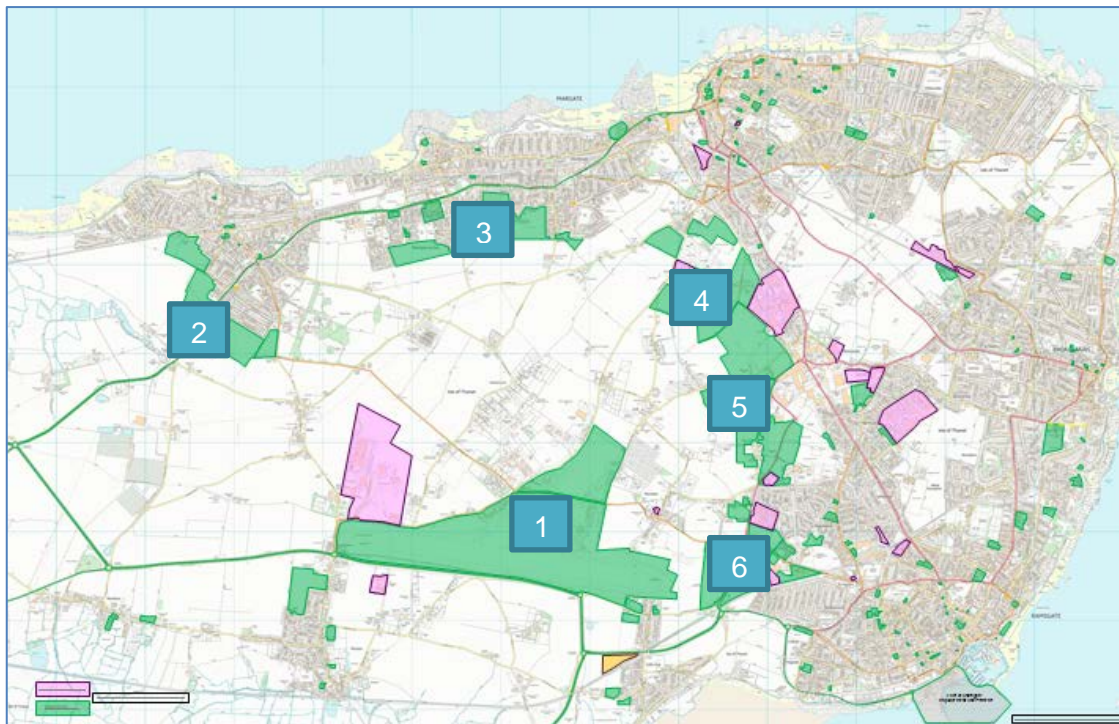


Figure 19 - Key Strategic Development Sites

9 The Action Plan

9.1 Addressing Challenges

- 9.1.1 The Thanet Local Plan identifies a need for 17,140 new homes and the creation of 5000 new jobs. In order to provide managed growth and affordable transport solutions, local plan allocations have been specifically considered in the context of the existing highway conditions. To support identified growth a number of objectives are proposed.

General Objectives

- Minimise the need to travel or use private cars to access services, employment and amenities.
- Inform the Local Plan in identifying and delivering sustainable development options.
- Focus development at sustainable locations to reduce the need to use private cars.
- Tackle congestion and reduce the impacts of transport pollution on air quality.
- More direct walking and cycling routes to reduce isolation and potential noise and pollution and improve public health and fitness in general.
- Efficient, convenient and safe public transport system alongside expansion of larger scale infrastructure.
- Promote the internalisation of trips and reducing the need to travel as well as measures to support modal shift away from the car.
- Enhanced integration of HS1 with the wider public transport network.
- A further decrease in rail journey time between Ramsgate and London.
- Enhance bus services to both built up and more rural areas.
- Ensure that car based journeys are as free as possible of congestion and direct as possible to maintain reliability of journey time

Place-Specific Objectives

- Improved traffic circulation and route choice around Westwood Cross.
- Delivery of further pedestrian links around Westwood Cross.
- Manage existing congestion hotspots along A28, A254 and A256 corridors.
- Improved accessibility for pedestrians, cyclists and public transport along Margate seafront.
- A car parking strategy for Broadstairs, Ramsgate and Margate town centres in order to maintain sufficient, quality and well located provision reflecting the needs of their business and residential communities.
- Further accommodation of visitor parking at Broadstairs during peak season.

9.2 Improving The Local Highway Network

- 9.2.1 Where possible proposed allocations are located in such a way that off-site highway infrastructure works are limited and on site infrastructure solutions are achievable. This enhances opportunities for provision of new highway infrastructure in a fair and realistic way.

- 9.2.2 Local peak hour traffic congestion is present at a number of junctions within the district and this is often due to the way that traffic is signed and moves around Thanet within the principal distributor routes. Thanet has other well used distributor routes forming an 'inner road circuit'; these are typically B and C classification routes that are of historic alignment and geometry. A number of junctions do not meet modern transport needs in terms of safety, capacity and amenity.
- 9.2.3 Whilst these alternative routes have the theoretical link capacity ability to carry more traffic (subject to improvement), they do not currently represent a viable alternative for many trips on the local highway network. This strategy seeks to address this specific issue by improving existing links to provide enhanced route choice for vehicle, walking and cycling journeys. This is referred to as the Inner Circuit Route Improvement Strategy (ICRIS)
- 9.2.4 This ICRIS will provide direct access to and from the A28 and the A299 major road network and local destinations such as Westwood, without traversing built up areas or causing additional congestion within the network. It will also reduce pressure and free up capacity on the existing Primary Road Network, particularly on the A28 (Birchington through to Margate) and the A254 corridor to and from Westwood. Improved highway infrastructure also provides the opportunity to review existing bus services to better serve rural communities.

9.3 The Inner Circuit Route Improvement Strategy (ICRIS)

- 9.3.1 The ICRIS encompasses a number of key highway interventions, which will be delivered in conjunction with the relevant strategic allocations. It is anticipated that infrastructure will also include appropriate off-road cycle and footway facilities where necessary, thus improving sustainable transport links within the district. The ICRIS links a number of key destinations within the district and integrates proposed development sites with existing settlements.

Birchington

- 9.3.2 The proposed land allocations at Birchington will incorporate new internal road connections from the A28. This strategy proposes a new junction at the top of Brooksend Hill in advance of the built up Birchington settlement. A new road to the north will be created through the proposed development to connect the A28 to Minnis Road. This will serve the whole of the Minnis, Grenham and Epple Bay areas, and provides the opportunity for traffic to avoid the busiest sections of the A28 within Birchington (particularly The Square) when accessing these settlement areas .
- 9.3.3 The new highway links will be constructed to Local Distributor standard, thus facilitating future bus access and enhancing opportunities to serve the site and link bus services to Birchington Station. New routes will incorporate good quality shared cycle and footway facilities.
- 9.3.4 In addition to the above, a new highway link would be created to the south east from the proposed junction on the A28 to connect to the B2050 at its junction with Acol Hill. It is anticipated that much of the new road would be through the new development area. Developers will be expected to fund the entire link to a point where it meets Shottendane Road.

- 9.3.5 This link would provide direct access from the Primary Road Network to Quex Estate (a popular mixed use leisure, retail and event destination) and would discourage existing rat running which is prevalent through Acol Village (via Crispe Road) from traffic currently avoiding queues on Brooksend Hill.

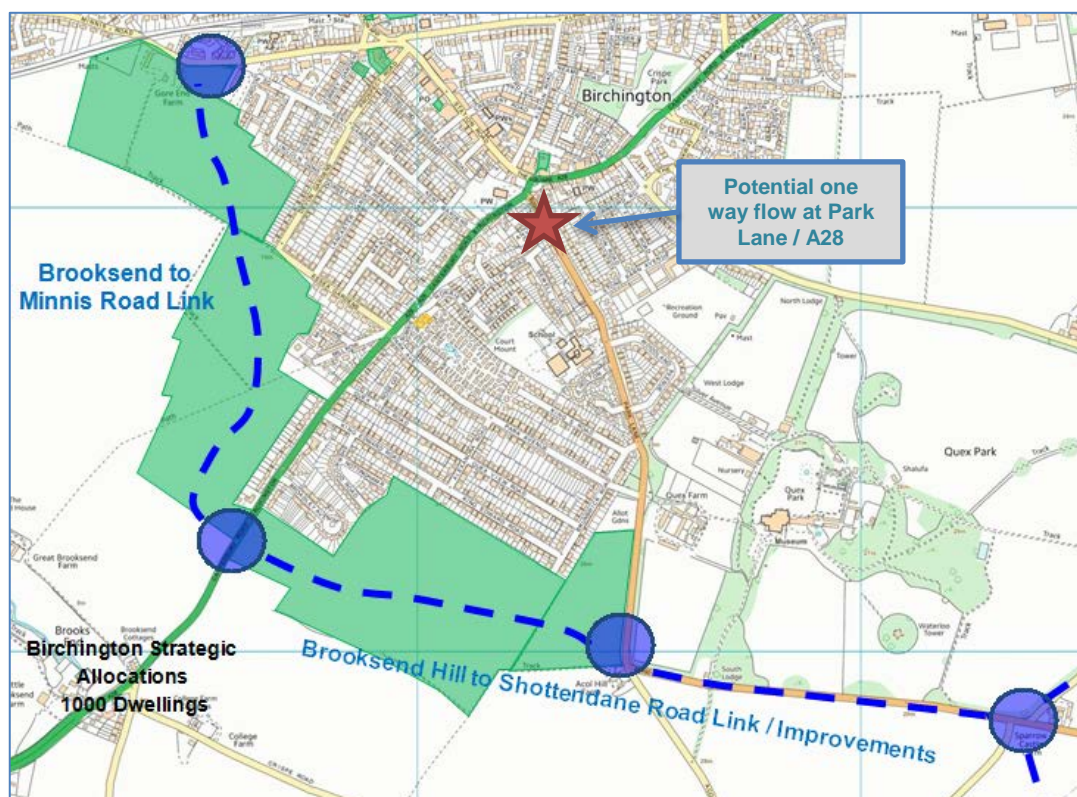


Figure 20 - A28 to Minnis Road & Manston Road New Road Links

- 9.3.6 These new highway links would divert a considerable amount of Minnis Bay and Quex bound traffic away from Birchington Square, an identified AQMA, and manage traffic impacts along the A28.
- 9.3.7 With the above highway routes secured, it may then be possible to provide additional benefits to the local road network, such as removing the mini roundabout in The Square and giving direct priority to the A28 corridor and addressing the way Station Road is served by traffic with options to improve pedestrian accessibility. This also facilitates a potential opportunity to introduce a one-way section of highway at the top of Park Lane, which would eliminate the impediment to traffic flow caused by vehicles waiting to turn right into and out of Park Lane on the A28.
- 9.3.8 The B2050 south of Quex Park would be widened and a new roundabout junction provided at Shottendane Road / Margate Hill, which accommodates a new link to Columbus Avenue on Manston Business Park.
- 9.3.9 The Columbus Avenue link improvement would enable traffic to access the A299 / A256 (Hengist Way and Richborough Way) from Thanet's northern coastal towns such as Birchington, Westgate, Garlinge and Westbrook, by-passing Acol village. Acol is currently regularly used by through traffic and its narrow roads, poor alignment and lack of pedestrian footways are a constant concern for residents of the village.

Westgate / Margate

9.3.10 The development allocation at Westgate and Garlinge will impact on the A28 route corridor with significant junction improvements necessary along the entire A28 route to offset additional trips. A package of improvements on Shottendane Road would be required, to include widening and junction improvements with Park Road, Minster Road and High Street, Garlinge will give an alternative distribution option for trips generated by the development. It would also be necessary to consider a reduction in the current speed limit to 40mph where appropriate.

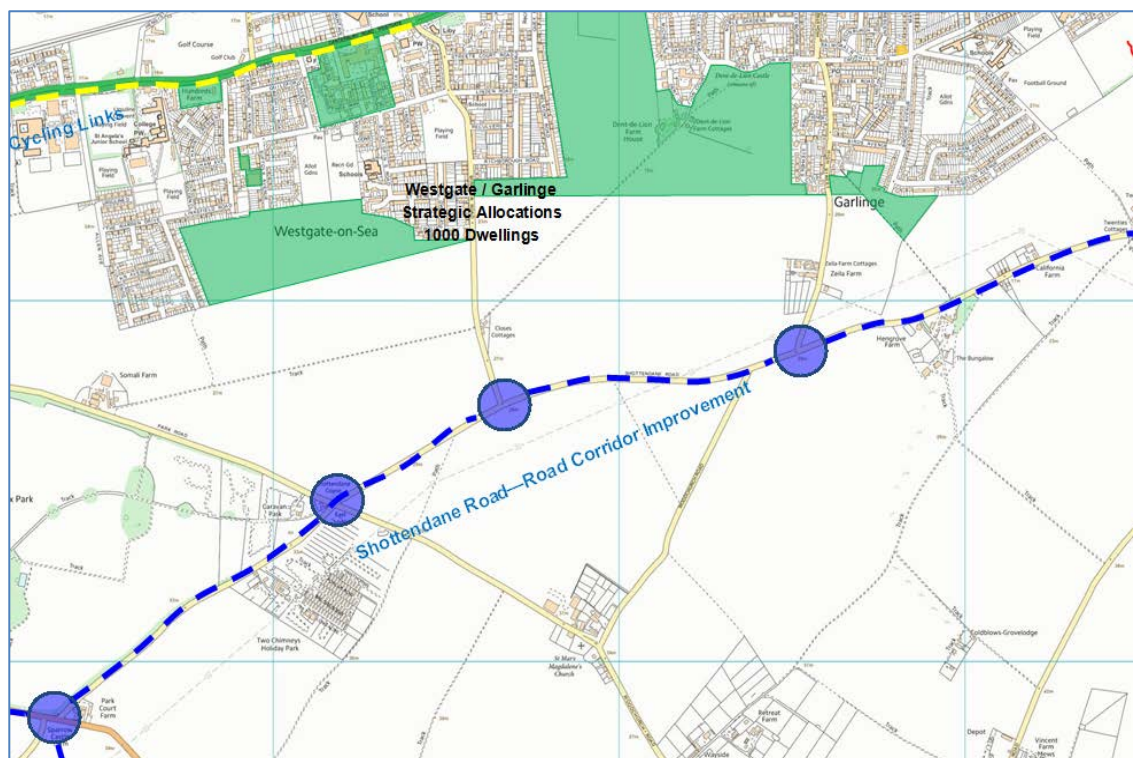


Figure 21 - Shottendane Road Corridor Improvements

9.3.11 It is widely recognised that Westwood is a primary attractor for trips in Thanet and Shottendane Road would represent a shorter journey to reach Westwood than the currently used A28 for trips from the north of the District..

9.3.12 Shottendane Road currently terminates at the Coffin House Corner junction, which is already subject to increased journey times during network peaks. In order to mitigate significant further impact, it is proposed to provide a new link between Shottendane Road and Manston Road through new development land adjacent to Firbank Gardens.

9.3.13 It is then possible to for Shottendane Road to become a cul-de-sac at the junction with Manston Road further east, consolidating efficient reconfiguration of this junction to achieve optimal capacity and improve highway safety for both vehicles and pedestrians.

- 9.3.14 This new connection is beneficial as a new roundabout junction is also proposed on Manston Road to support the allocation of land behind St Gregory's School and Salmestone Grange. This land allocation will provide a new primary road link through to Nash Road, which in turn will allow Nash Road to be closed at the Coffin House Corner junction (described in more detail under Margate Junctions).
- 9.3.15 This connection would allow traffic to access Westwood without being required to travel through Coffin House Corner, Victoria Traffic Lights or use the A254 corridor. This also has the potential to discourage rat running through existing rural lanes such as Flete Road and Vincent Road by providing enhanced links to Westwood.

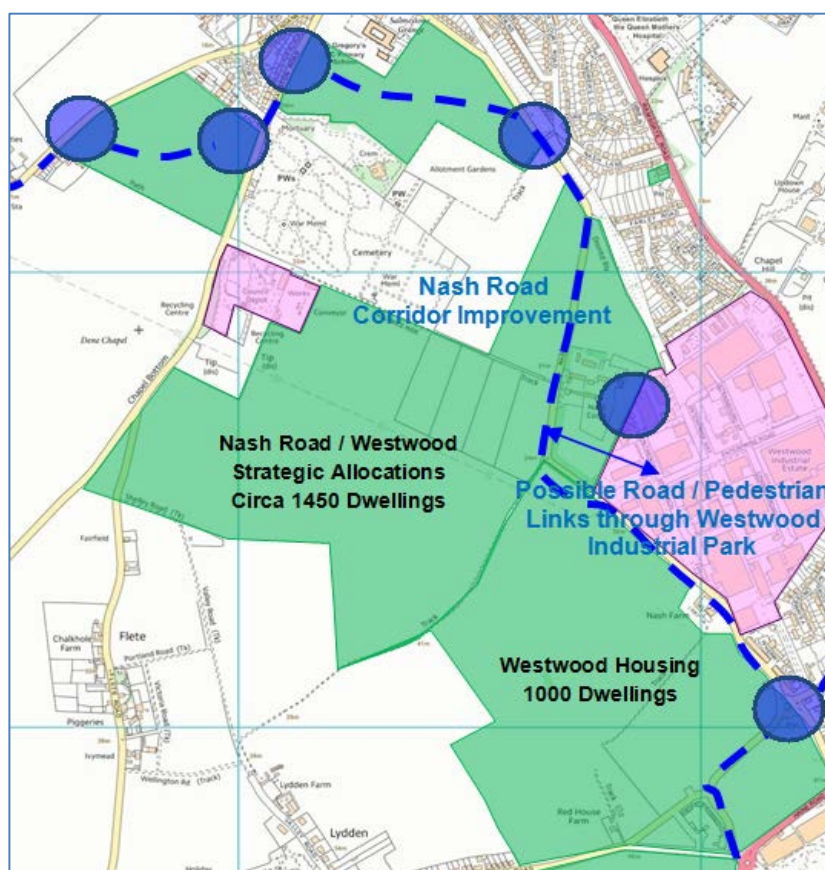


Figure 22 - Links between Shottendane Rd, Manston Rd, Nash Rd & Westwood

- 9.3.16 Land is also allocated along Nash Road (1450 dwellings) which is perfectly placed to accommodate the necessary widening of Nash Road to the new junction with Star Lane and Star Lane Link. Whilst some traffic could be diverted through the new residential development on Land North of Haine Road (1020 new homes), this development has not been historically planned with this purpose in mind. Therefore it is considered more appropriate to deliver widening along the existing alignment.

Broadstairs / Manston

- 9.3.17 The ICRIS continues along the newly constructed Star Lane Link and Haine Road to the Toby Carvery roundabout on the A256 corridor. Proposed development on Land Adjacent to Manston Court Road will be required to accommodate a new local distributor link road through the site, facilitating a new connection onto Manston Court Road. The section of Manston Court Road east of Valley Road could then be restricted. Further measures would be introduced to discourage the use of Vincent Road / Flete Road.
- 9.3.18 The remainder of Manston Court Road (between Valley Road and the B2050 Manston Road) will require significant improvements to widen the carriageway to form a local distributor road. It is anticipated that a new highway link would be created on the existing Northern Grassland (part of the Former Manston Airport Site allocation). The nature and route of this link will depend on the final masterplan for this allocation site.

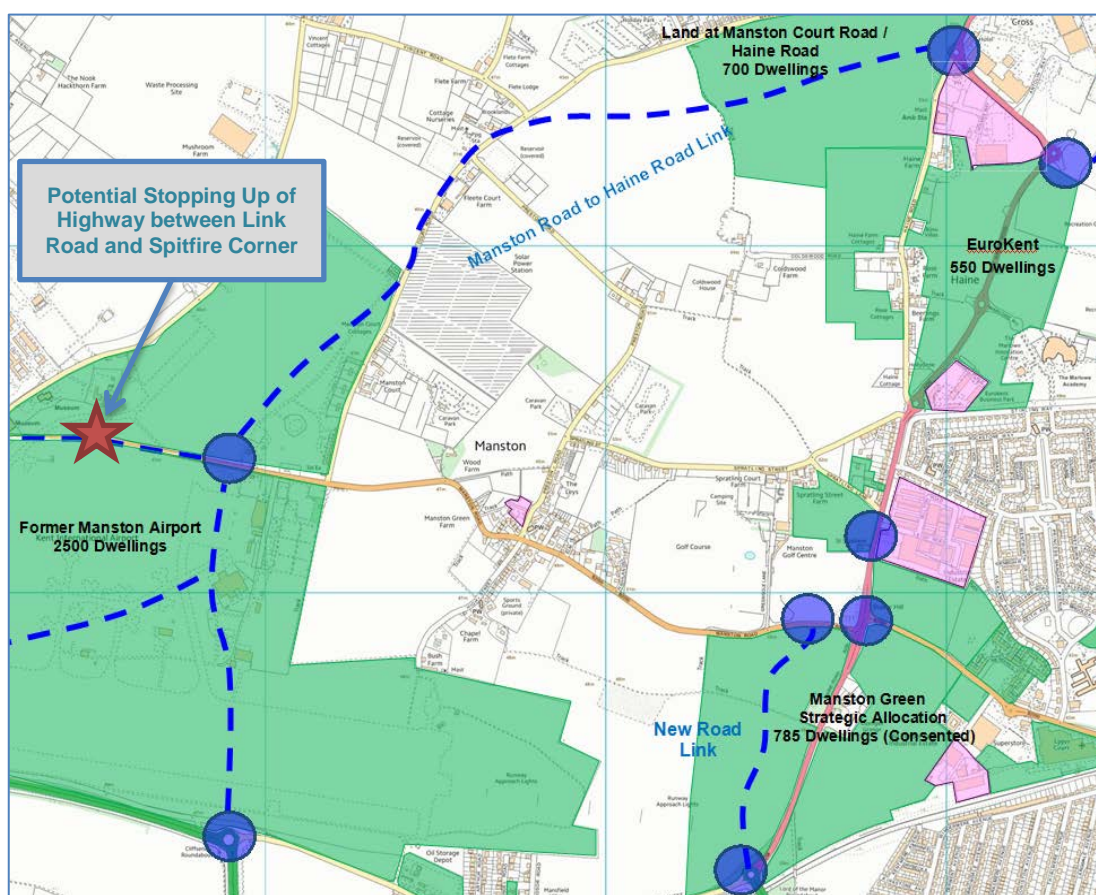


Figure 23 - Manston to Haine Road Links

- 9.3.19 It will be necessary for developers of both the Former Manston Airport Site and Land Adjacent to Manston Court Road to make significant improvements (or financial contributions if deemed appropriate) towards the road network surrounding the site allocations. These would include the upgrade of Manston Court Road as a direct link to and from Westwood and new / improved links to the existing dual carriageway on Spitfire Way fronting Manston Business Park

9.3.20 Spitfire junction will need to be reconfigured to address existing capacity and safety concerns and access to this junction from the A299 will need to be controlled or restricted to avoid excessive use of Manston Road for Margate Bound Trips. In addition, a direct connection would be made across the site to connect A299 Canterbury Road West to Manston Court Road (once upgraded) by-passing the existing A256 approach through Haine. The extension of Columbus Avenue to the B2050/Shottendane Road/Margate Hill junction would also be delivered (to by-pass Acol Village).

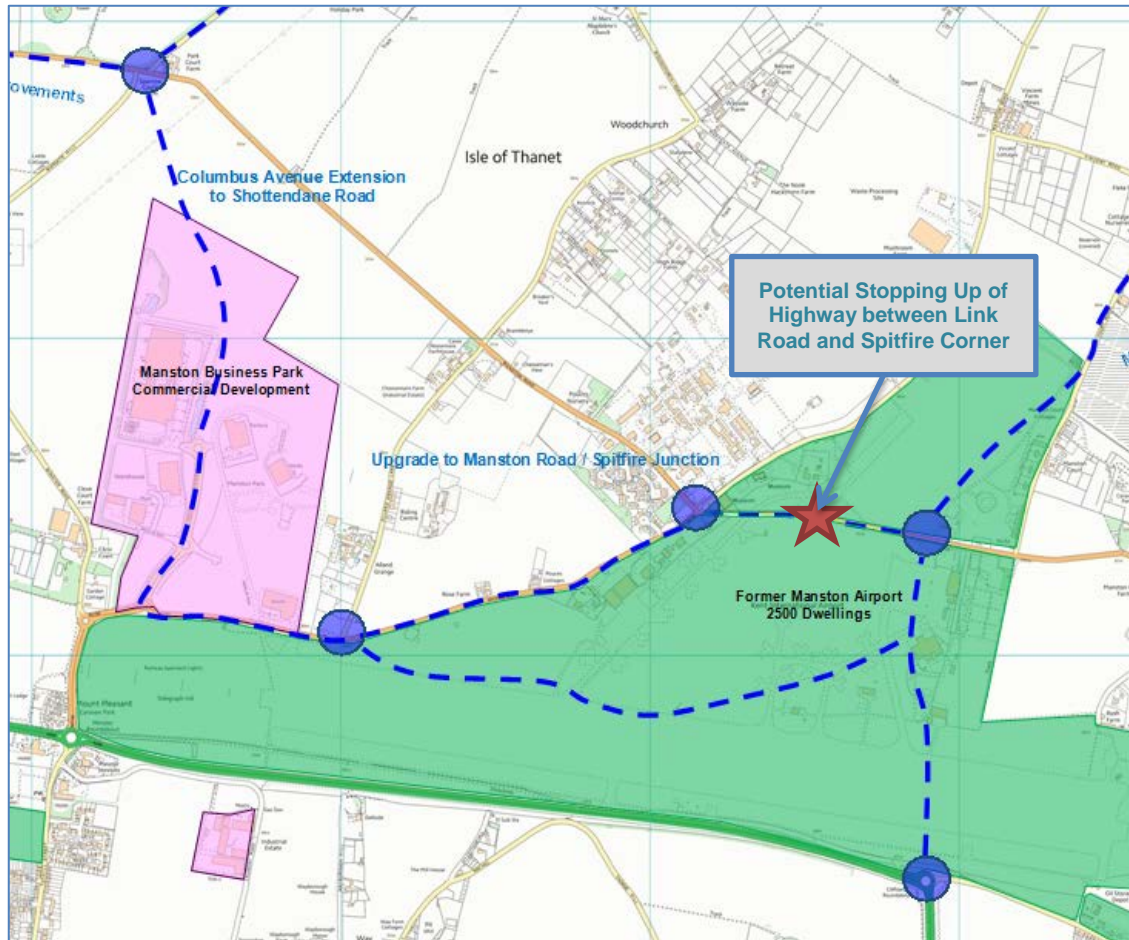


Figure 24 - Former Manston Airport & Columbus Avenue Extension to Manston Road

9.4 Westwood Relief Strategy (WRS)

- 9.4.1 Opportunities have been sought for the economic development of Thanet, with Westwood being one of the key successes during the last decade. The growth of Westwood Town Centre, with the Westwood Cross Retail Development has led to increased traffic congestion at peak times. Until recently Westwood Roundabout has been identified as the worst pinch point, as the intersection point of roads between Ramsgate, Broadstairs and Ramsgate and at the heart of Westwood Town Centre. Despite recent improvements, this roundabout is still subject to extended delays at times of peak demand.
- 9.4.2 Congestion at Westwood causes journey time delays to trips to the coastal towns of Ramsgate, Margate and Broadstairs. Vehicles wanting to access/leave Thanet, via Broadstairs, either have to travel through Westwood to gain access to the major road network or take an indirect and circuitous route along the coastal roads. Many vehicles travelling between Ramsgate and Margate also need to travel through Westwood; as such this generates a large amount of through traffic at Westwood Roundabout.
- 9.4.3 In order to manage this issue KCC have developed a congestion relief strategy for Westwood area. This is outlined in **Figure 24**.

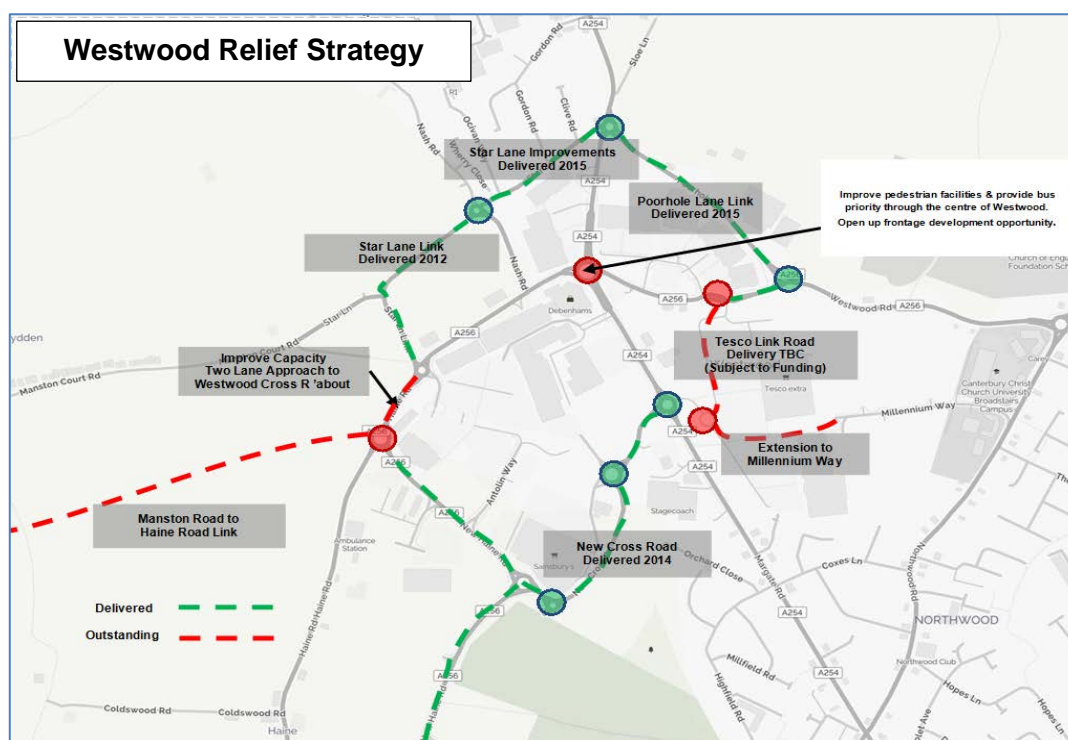


Figure 25 - Overview of Westwood Relief Strategy

- 9.4.4 In 2013 KCC were successful in securing Pinch Point Funding from Central Government, which together with developer contributions was sufficient to address Phase 1 of the Westwood Strategy. This scheme comprised of the widening of Poorhole Lane and provision of new roundabout junctions at either end (A254 & A256).

- 9.4.5 This important link forms part of an overall strategy for the Westwood area which takes account of new roads recently constructed, existing roads altered and proposed roads which will in due course provide a complete single carriageway ring road or “orbital route” around the fringes of the Westwood area.

Completed Schemes

New Haine Road

A new road constructed by East Kent Opportunities LLP (a joint venture between KCC/TDC) and Rosefarm Estates. – Between the roundabout junction adjacent to the new Sainsbury's store and Haine Road.

Star Lane Link

New road link constructed by developers through the first phases of strategic housing development (Land North of Haine Road), connecting Haine Road with Nash Road / Star Lane.

Star Lane

New roundabout junction constructed at the Junction with Nash Road end by developers and the carriageway has been widened to accommodate lay-by parking to the north side for existing residents.

Poorhole Lane

New roundabout junctions at either end with carriageway widening to 7.3m and new footway/cycle ways either side.

New Cross Road

Roundabout on Margate Road, Ramsgate has been increased in size and a new distributor road constructed to link Margate Road (A254) to New Haine Road (A256) including bus stops and new footway/cycleway facilities.

Outstanding Schemes

A256 Westwood Road to A254 Margate Road Link

Upgraded and adopted by KCC to provide a new distributor route connecting Westwood Road and Margate Road. Alternative links explored if necessary.

A256 Westwood Road to A254 Margate Road Link – Millennium Way Extension

Provision of new Road / Footway and cycleway link between new link road and Millennium Way, providing an alternative route to Westwood Road Via Northwood Road.

A256 Haine Road to A254 Manston to Haine Link Road (addition to original WRS)

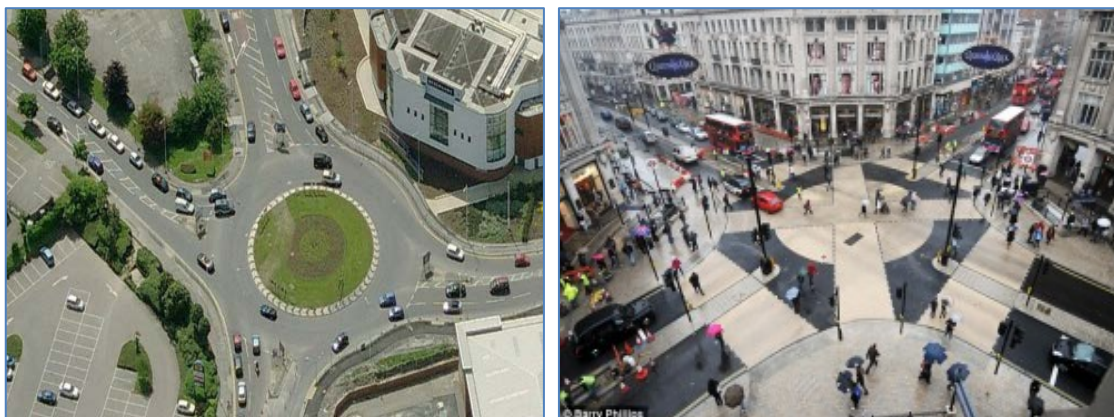
New Road / Footway and cycleway link between A299 and A256 Through prospective development sites. Providing an alternative access route avoiding the Haine Road Corridor.



Figure 26 - New Cross Road Link

9.5 The Future

- 9.5.1 With a new orbital route in place, improvements can be promoted at Westwood roundabout to accommodate more pedestrian and cycle movement honouring desire lines. This will encourage more sustainable access to the four retail quadrants that comprise the Westwood Town Centre. To keep the junction open at all times in order to maintain maximum accessibility of the area an approach similar to that implemented at “Oxford Circus” is currently under consideration. This would involve the removal of the existing roundabout and the introduction of traffic signals with a high level of pedestrian priority.



- 9.5.2 The junction would act to accommodate through traffic but the signals would be capable of prioritising pedestrian movement when required. A better pedestrian environment would also reduce current traffic flows generated by car-park hopping between the main retail quadrants.
- 9.5.3 In addition to the major road proposals to provide the “orbital link” a package of additional improvement measures are being sought to promote sustainable access opportunities into the Westwood area that can be funded via developer contributions. These include bus lanes on the approach to the Westwood roundabout junction along the A254 corridor and improved pedestrian and cycle connectivity with desire lines being acknowledged and accommodated.

9.6 Margate Junctions

- 9.6.1 A high level appraisal of the local road network and associated transport modelling has identified key congestion hotspots in the Margate area. Three major junctions were identified as being the worst affected and shown to be major constraints on the network at peak times.

The junctions are:

- **Coffin House Corner** – Hartsdown Road / Shottendane Road / Nash Road / College Road / Tivoli Road.
- **Victoria Traffic Lights** – A254 Ramsgate Road / B2052 College Road / B2052 Beatrice Road
- **Margate Clock Tower** – Marine Gardens / Marine Terrace / Marine Drive.

Coffin House Corner

- 9.6.2 To reduce traffic impact the existing A254 Ramsgate Road corridor, an alternative route to Westwood should be explored. The most obvious solution would be to widen Nash Road throughout its length to provide all road users another route option between Margate and Westwood.
- 9.6.3 In its current form, the Coffin House Corner junction could not have sufficient capacity to accommodate the potential increase in traffic flows that would ensue from an improved Nash Road corridor. KCC are exploring the potential closure of Nash Road at its junction with Coffin House Corner and routing traffic around the back of Salmestone Grange and St Gregory's Primary School to a new junction onto Manston Road. This would enable the existing traffic signals to be optimised, allowing increased green time on given approaches, since one phase would disappear completely and the Shottendane Road and College Road phases could operate together. Such a proposal would also provide enhanced pedestrian access the school and the wider highway network.
- 9.6.4 The promotion of this alternative route to Westwood, Ramsgate and Broadstairs would have a very positive impact on other parts of the road network, including Victoria Traffic Lights and Westwood Roundabout, which are geometrically constrained. This would be achieved by providing better quality alternative routes to local destinations.

Victoria Traffic Signals

- 9.6.5 This junction is currently optimised in terms of a traffic signal control junction with very little scope to increase the capacity and the rate of flow thorough the junction, without considerable loss of surrounding buildings, which in turn would have a significant impact on the locality.
- 9.6.6 Alternative options are currently being explored including the reconfiguration of traffic flows within the area to create some relief to the junction. As outlined above, growth is more realistically manageable through the implementation of the Coffin House Corner junction and Nash Road improvements, which would provide more appropriate alternative route options for journeys towards Westwood, Ramsgate and Broadstairs.
- 9.6.7 There may be some merit in providing a more formal road link utilising Yoakley Square and Perkins Avenue. This route currently operates as a rat run but would be unsuitable in its current form for vehicles wanting to head towards Cliftonville. Should such an option be explored in more detail, there are also environmental and amenity considerations to balance.

Margate Clock Tower

- 9.6.8 The Clock Tower junction itself is highly constrained as it sits within an area of listed buildings and has tunnels below the paved pedestrian area fronting Marine Gardens which cannot be disturbed. It is necessary therefore to attempt to control the flow of traffic through the junction by re-routing a quantum of vehicular traffic away from the junction.

- 9.6.9 Improvements would need to be made including making the roundabout junction safer at the junction of Queens Avenue / Tivoli Road / Eaton Road / Grosvenor Place and Grosvenor Gardens. This junction has recently been improved by making Queens Avenue one-way and realigning the carriageway approach from Queens Avenue to the roundabout to improve visibility for vehicles exiting Tivoli Road.

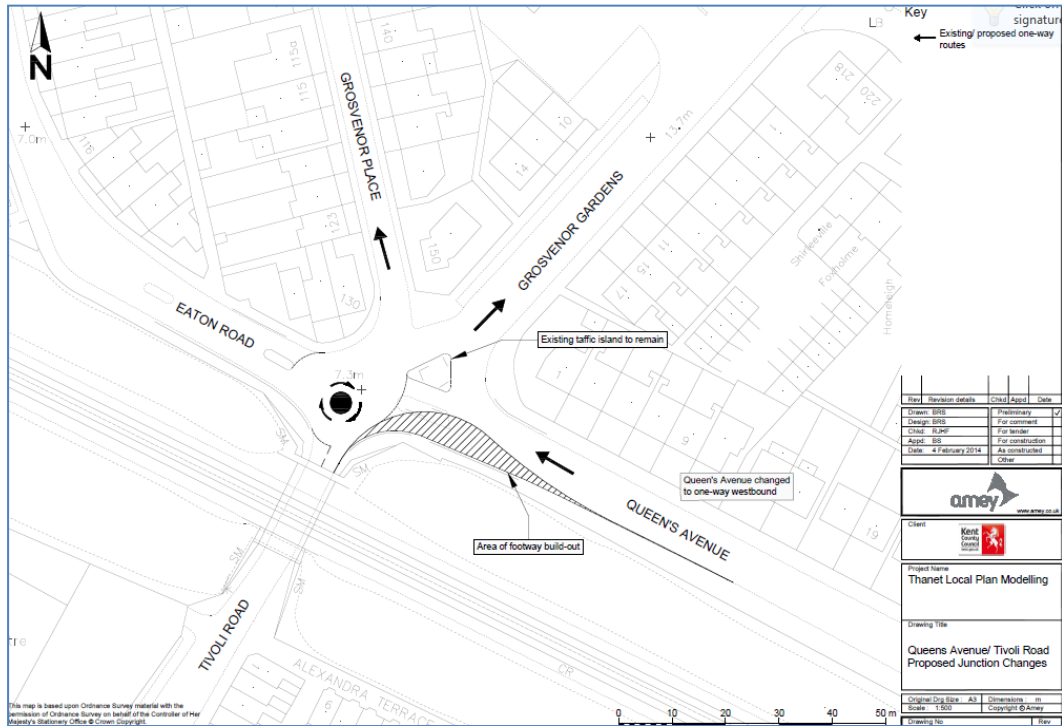


Figure 27 - Queens Avenue Junction Improvements

- 9.6.10 Network modifications are currently being explored to provide an alternative route for tourist traffic destined for Margate, away from Marine Terrace via the Tivoli area and into Margate using Eaton Road, Belgrave Road and Hawley Street. This approach would assist in managing traffic volumes along Marine Terrace, which in turn would facilitate further pedestrian improvements within the corridor in the future.



Figure 28 - Queens Avenue Junction Improvements

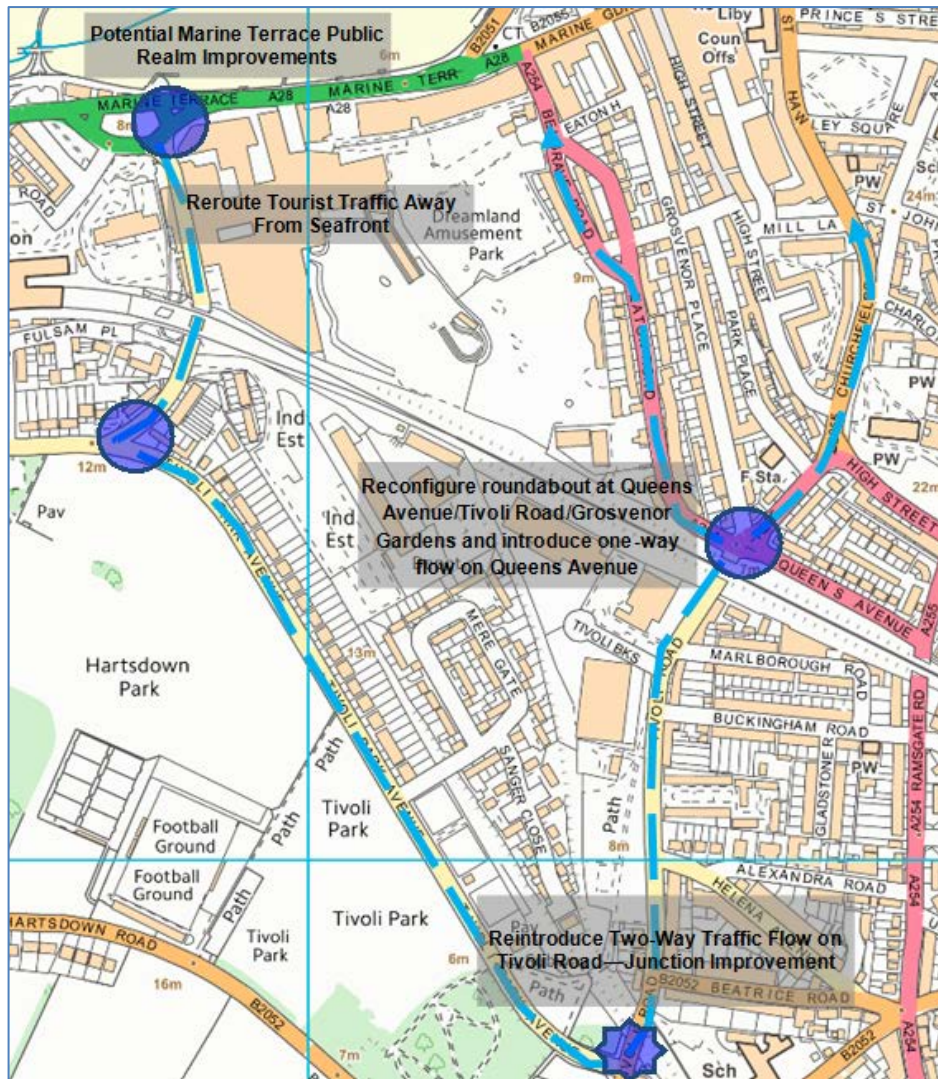


Figure 29 - Potential Future Access Strategy for Margate Town Centre

9.6.11 There are a number of amenity, land and engineering considerations to overcome before such a strategy could be implemented, however further detail and consultation on such an initiative would be forthcoming as the strategy develops further.

10 Sustainable Transport Interventions and Policies

10.1.1 Whilst the provision of new and improved vehicular routes is essential to the future prosperity of Thanet, it is equally important for a balanced strategy to make provision for non-motorised road users and public transport. Whilst the ICRIS will make provision for new and enhanced foot and cycle connections within the district, it is necessary to complement them with further measures to encourage sustainable travel.

10.2 Reducing the need to Travel

10.2.1 National trends suggest that private car trips are generally becoming longer and more frequent in nature. In many cases the car is the most convenient form of transport and for some road users is an essential for logistical reasons. Private cars do however inherently occupy a considerable amount of road space when measured per passenger.

10.2.2 The advent of new forms communication technology has seen an increase in the ability for people in certain work sectors to either work from home or from satellite offices / facilities. This has seen a general increase in home working over the last decade, with the most recent census suggesting that over 5% of working residents within the District primarily work from home.

10.2.3 Where working at home is not a feasible option, Public Transport, Cycling, Walking and Car Sharing all occupy less road space than single occupancy journeys. Therefore if more people used sustainable forms of travel, all road users who need to make a journey by vehicle are more likely to experience shorter and more reliable journey times.

10.2.4 A reduction in the need to travel will be achieved by encouraging the following:-

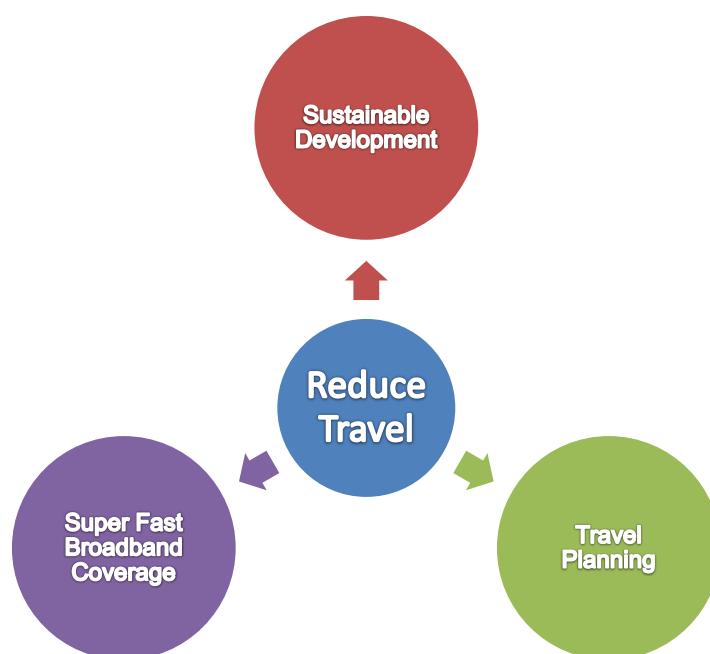


Figure 30 - Strategies for Reducing the Need to Travel

10.3 Sustainable Development & Travel

10.3.1 As specified within the National Planning Policy Framework (NPPF) land uses will be balanced to maximise the opportunity to minimise journey lengths for employment, shopping, education and leisure. TDC and KCC will work together within the framework of the planning process to encourage sustainable travel habits by seeking to:

- Locate development close to existing sustainable transport opportunities, or delivery of new connections / services through planning obligations
- Shape development to encourage walking and cycling through inclusive design.
- Promote mixed use developments where appropriate
- Deliver community infrastructure on larger scale developments (schools, local shops and other community based uses).

10.4 Travel Planning

10.4.1 Travel plans are an effective way of setting out measures and initiatives to encourage sustainable travel habits and reducing the reliance on the private vehicle. Whilst Travel Plans can be effective in managing the impact from residential development with a high level of car based commuting, they are especially suitable for large employers, either through planning obligations or through more proactive employers committed to encouraging good health and wellbeing within their workforce.

10.4.2 All development proposals that will generate a material increase in the need to travel will be required to implement sustainable travel statements, outlining a number of sustainable travel measures such as “Taster Cards” for local bus services, discounts on new cycles for residents / employees, electric charging points amongst others.

10.4.3 Development proposals that have a significant adverse impact on the local highway network which are unable to be fully managed through physical infrastructure provision, will be required to produce travel plans with ongoing monitoring mechanisms. Depending on individual circumstances, this may then provide an opportunity to manage residual impacts through positive measures. These instances will need to be assessed on a case by case basis taking into account the enforceability and feasibility of achieving the required travel mode targets over an extended period of time.

10.4.4 KCC offer support and guidance to anyone interested in developing a travel plan. Through a web-based Travel Plan Monitoring system (Jambusters), the county council provides free web based site audits and surveys which highlight current travel patterns and opportunities to bring about modal shift.

10.5 Bus Interventions / Strategies

10.5.1 Irrespective of the need to widen choice regarding means of travel, many people cannot drive and for some a car may be an unwarranted cost pressure. Continuing to widen the attractiveness and convenience of travel by bus can serve to advance the following:

- Potential reduction in vehicle movements thus facilitating walking and cycle travel
- Reduced pressure for use of land for car parking in urban centres thus supporting new development opportunities/better use of public space
- Reduced journey times making buses a more attractive means of travel.
- Reduced journey times for motorists who choose to drive

10.5.2 Bus services can also be predicted to improve as a consequence of the above factors. The Quality Bus Partnership allows all partners to influence these improvements. Stagecoach has given a commitment to:-

- Increase frequency of services as passenger numbers grow (subject to costs remaining the same)
- Increase frequency of services as journey times decrease (as one bus can cover more miles if it is delayed in traffic for less time)

10.5.3 The re-development of the bus route network in 2004 and the subsequent support for bus services through the QBP have established underlying growth in the bus network. Whilst the projected increases in passenger numbers in future years appear less dramatic in percentage terms they actually constitute greater absolute growth.

10.5.4 Key actions and initiatives to facilitate this growth are summarised below:-

- Investment commitments by the commercial operator (including commitments given by Stagecoach East Kent) to increase frequencies based on increased passenger numbers and improved journey times.
- Service delivery to be measured through a list of Targets supplied to the Quality Bus Partnership.
- Initiatives to achieve reduced journey times and punctuality improvements including measures to address areas of the network where buses are impacted, such as QEQM Hospital.
- Promotion of smart ticketing and advance payment to reduce dwell time at stops.
- Effective and considerate Streetworks coordination, with a strong emphasis on minimising the impact on bus routes
- Audits to identify and action potential micro-delay points along routes.
- Provide bus stops fully accessible to all users

10.5.5 Opportunities to expand the commercial network, providing improved services for the public (coverage/frequencies etc.) and also reduce reliance on KCC subsidies will be key aims across the plan period.

10.5.6 Stagecoach is committed to further developing the local network to support planned housing growth in Thanet. Outline discussions have been held already with a view to formalising proposals as the sites move closer to submission of applications. Naturally any solutions involving supported bus services will need to be considered in line with the policy position of the county council at the time of inception.

10.5.7 In principle the following outline solutions have been discussed:

- Manston Business Park – improvements to service 38* (Birchington – Ramsgate).
- Nash Road/Westwood – initial improvements to service 8 already agreed with developers and scope to improve.
- Westgate/Garlinge – there is adequate service provision along the key A28 corridor; Stagecoach will review service 32 (Dane Valley – Garlinge) to penetrate the proposed developments.
- Birchington Strategic – Stagecoach is reviewing the provision of services to Minnis Bay and is likely to propose a diversion to one of the current services using Station Road/Minnis Road to instead divert to serve the Brooksend – Minnis Road link. The allocation to the south east of the A28 would be covered by revisions to 38*.
- Manston Airport – the ultimate long term solution is likely to be a combination of an enhanced 9 to provide links both into Ramsgate and Westwood Cross and Canterbury and 38* as outlined above. An enhanced 9 would also provide a link to the proposed Thanet Parkway station.
- Manston Court Road / EuroKent / Manston Green – likely to be served by a combination of diversions/enhancements to Loop/8/34, again providing links to Thanet Parkway station.

*38 – this service is operated by Stagecoach South East under contract to Kent County Council. While Stagecoach can suggest enhancements to the service, it is ultimately the county council's decision whether to adopt these and the operation of the service is subject to the availability of funding at the time of inception.



10.6 Further Rail Improvements

- 10.6.1 KCC are working in partnership with Network Rail to deliver a 10-minute planned journey time improvement scheme on the existing line between Ashford International and Ramsgate Railway stations. If line speeds increase, then journey times would drop from 36 to 26 minutes, providing journey times from St Pancras to the prospective Thanet Parkway Station around an hour. This opens up enhanced tourism, regeneration and business opportunities.
- 10.6.2 More recent improvements to Rail services in the county include the Journey Time Improvement (JTI) scheme, between London, Ashford and Thanet. The aim of this project is to reduce the rail journey time between Ashford and Ramsgate through a package of engineering interventions.
- 10.6.3 The first phase of JTI, between Ashford and Canterbury West, was recently completed with journey time savings being realised within 2018. The second phase, between Canterbury West and Ramsgate, is due for completion by 2019/20. These improvements complimented by with the provision of a new Parkway Station would significantly enhance the accessibility of Thanet in relation to the rest of the County and London.
- 10.6.4 The delivery of a New Parkway Station within Thanet is a key component to improving access to Rail travel for existing and future residents within the District. The Thanet Parkway Project Plan expresses a commitment by the County Council, alongside Thanet District Council and Network Rail, to bid for capital funding contributions to secure delivery of the Parkway Station. It also acknowledges the need to integrate the Parkway with the bus network, walking and cycling routes supported by secure cycle parking, information and other facilities.

10.7 Walking & Cycling Interventions

- 10.7.1 Walking is a necessary mode of transport for nearly every journey that people undertake (if only in part for some journeys). It generally forms the most accessible form of transport available. Thanet is generally very urban in nature, therefore enjoys a relatively good network of footways, however given that some urban settlements are semi-rural in nature the links between these settlements are often more restricted in nature, which can discourage longer distance journeys by foot.
- 10.7.2 Pedestrians are a particularly vulnerable to hazards posed by traffic and other users of the highway and some of Thanet's semi-rural communities are far less accessible than others in terms of footway connections. Villages such as Acol and Manston and Minster are a good example of this.
- 10.7.3 It is the intention of this strategy to concentrate on areas of the network where new and improved pedestrian connectivity can be achieved in a joined up and cost effective way. Therefore it is intended that walking will be encouraged in all new development sites by providing a safe, direct and pleasant environment through positive design and master planning.

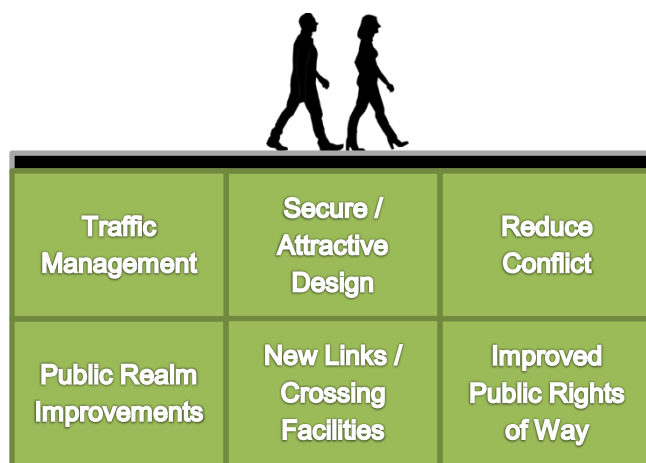


Figure 31 - The Foundations for Encouraging Walking Trips.

Public Rights of Way (PROW)

- 10.7.4 Thanet is fortunate to have a wide network of Public Rights of Way (PROW) and these play an important role in providing access to both urban and rural destinations. The role of this network is valuable not only providing a recreational outlet free to the public, but also helping to encourage sustainable travel choices which ultimately have an impact on traffic congestion and air quality.
- 10.7.5 Access to the countryside and walking, cycling and equestrian activities provides significant support to the local economy. Access to green space is a significant factor in enabling people to improve their health and well-being.
- 10.7.6 The KCC Countryside and Coastal Access Improvement Plan (CAIP) covers the period between 2013 -2017 and provides a policy basis for improved access and connectivity within the county. Development has a role to play in delivering key pieces of PROW infrastructure.
- 10.7.7 Whilst it is not the role of this Transport Strategy to replicate the contents of the CAIP, a number of priority schemes have been identified within the District which are directly related to proposed development.

Mobility Impaired Pedestrians


- 10.7.8 The needs of pedestrians can be very diverse, with physical ability, confidence judgement and self-awareness all contributing to challenges that road users face. What could be a relatively easy journey for one person could represent a significant struggle for another.
- 10.7.9 Mobility impaired pedestrians could include, Wheelchair Users, Elderly, Infirm, Children, visually impaired members of the community or parents with pushchairs. It is essential that development contributes towards making non-vehicular journeys as straightforward as possible, to build a truly inclusive highway network to serve all.
- 10.7.10 KCC and TDC recognise that the needs of all users is essential for new and existing highway infrastructure, to ensure that those with impaired mobility enjoy the same access and opportunities that most people take for granted.

- Provision of pedestrian ramps / aids at key crossing locations
- Provision of pram crossings and tactile paving where appropriate
- Removal and enforcement of obstructions present on the highway network.
- Reduction in street clutter including signs and other street furniture.
- Wayfinding signage to key destinations to provide people with confidence.
- Effective design of pedestrian routes to improve safety and security (overlooking, lighting etc.)
- Cater for desire lines thus reducing walking distances to key destinations.

It is essential that the above elements are considered for all new developments and highway schemes.

Cycling

10.7.11 The Cycling Strategy for the plan period will concentrate on eight main themes:



1. Expansion of Cycle Network	5. Encouragement and Promotion
2. Cycle Friendly Route Design	6. Education and Training
3. Cycle Storage, Parking and Other Workplace Facilities.	7. Dialogue & Consultation
4. Integration with Public Transport	8. Monitoring

Figure 32 - The Foundations for Encouraging Cycling.

10.7.12 Cycle friendly route design will improve safety and convenience for cyclists leading to safer and more attractive network for cycling linking to important destinations. High priority will be given to cyclists in all traffic management areas and in the design of new roads through development opportunities. The following policies and actions will be pursued:

10.7.13 New developments must consider the needs of cyclists and pedestrians in terms of design, layout and permeability. Where master planning and efficient use of available land allows, traffic free cycle and pedestrian networks should be encouraged to provide safe, direct and attractive environments, where pedestrians and cyclists have priority over vehicles and / or vehicle speeds are kept low. These principles, follow the methodologies outlined in the Kent Design Guide and will be used to secure high quality design for new development.

10.7.14 Cyclist and pedestrian needs are to be considered at an early stage of all new development proposals. There will be a presumption in favour of incorporating facilities to benefit cyclists in all schemes, thus:

1. Schemes involving new housing will incorporate in planning appropriate parking for cycles, road networks friendly to all users and links to existing cycle routes to ensure connectivity to schools, places of work and retail outlets.
 2. Where appropriate new internal estate roads within developments will be designed to encourage speeds of 20mph or lower. Local distributor roads will be designed with segregated cycle provision
 3. Where schemes involve signal junctions it is recommended that they will incorporate facilities such as cycle lanes and advanced stop lanes and lighting sequences that considers cyclists
 4. Segregated facilities or cycle lanes will be provided wherever possible as part of new road schemes, ensuring safe passage through junctions.
 5. Traffic calming will use cycle friendly measures.
 6. Cyclists will be generally exempted from all new road closures, one way restrictions and banned turns, except where there is a technical or safety case for not doing so.
 7. Cycle parking will be provided in appropriate locations in accordance with specified standards.
- 10.7.15 A Cycle Audit will operate in parallel with Road Safety Audits that are a statutory requirement of any new highway route, to ensure adherence to appropriate and high quality design standards.
- 10.7.16 A primary target of this strategy will be to provide the missing links in the existing routes to give connectivity and safety on the Thanet Cycle Network by the end of the Local Plan period. The already well developed longer distance network and National Cycle Network will link Thanet's towns to each other, to other towns in East Kent and to the countryside. While off-road paths have an important role in the networks, many routes use both major and minor roads. On main roads forming part of the cycle network, priority will be given to achieving continuous facilities where highway geometry or land availability allows.
- 10.7.17 Cycle network proposals will be further developed in consultation with the Thanet Cycling Forum and other interest groups as a matter of course.

10.8 New / Improved Walking & Cycling Links

- 10.8.1 Identified links to be addressed to support improved pedestrian and cycle linkage between proposed growth areas are as follows:-
1. Construct shared facility on Sloe Lane, Margate to complete a route between Dane Valley and Westwood.
 2. Improvements to Westwood main junction and adjacent roads to improve bus and cycle provision and improve accessibility and movement for pedestrians between different areas of Westwood Town Centre

3. Create shared facility on existing path to the rear of Bromstone School, Broadstairs to connect to Millennium Way to offer alternative to cycling on Rumfields Road between Broadstairs and Westwood.
4. Provide improved surface and widen Bridleway TM16.
5. Provide improved surface and widen Bridleway TM11.
6. Upgrade Footpath TM14 on edge of development to Bridleway.

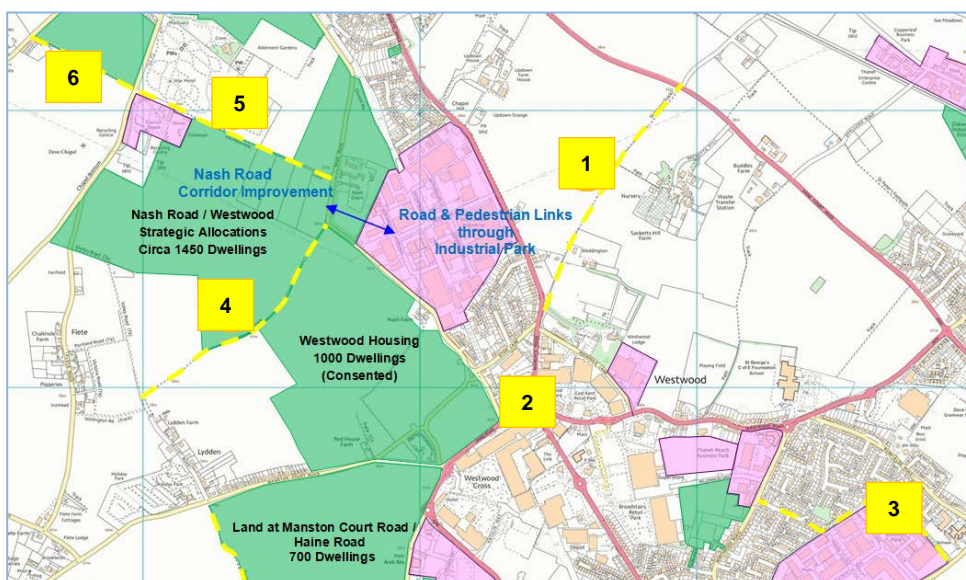


Figure 33 - Cycle Route Improvements around Westwood

7. Create shared facility on existing footpath between Ramsgate Road, Broadstairs and Dumpton Park Drive, Broadstairs to the side of former Holy Cross School. Then continue above shared facility between Ramsgate Road, Broadstairs and Rosemary Avenue, Broadstairs

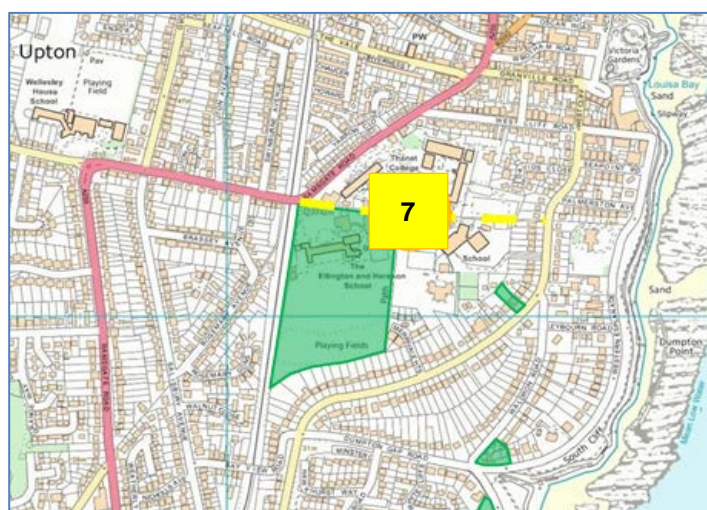


Figure 34 - Cycle Route Improvements - Ramsgate Road to Dumpton Park Drive, Broadstairs

8. From Ramsgate Railway Station create shared facility on existing footpath to Newington Road.
9. From east of Ramsgate Railway Station create shared facility on existing path to Margate Road, provide crossing facility to access Newlands Road and create link to Pysons Road using Newlands Lane.

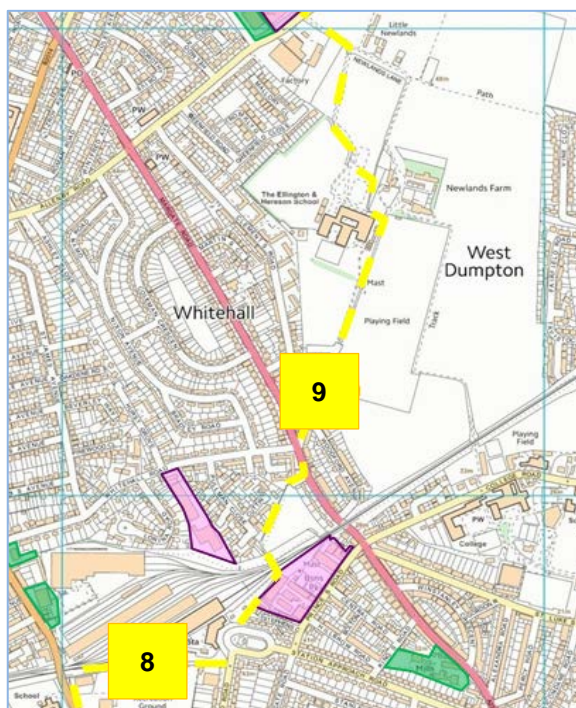


Figure 35 - Cycle Route Improvements - Ramsgate Rail Station to Newlands Lane

10. Provide a new off road cycle facility (on existing footpaths) to link Birchington to Margate including existing secondary schools, residential settlements and commuting destinations
11. Creation of shared facility on existing public rights of ways between Dent-de-Lion Road, Garlinge and Park Road, Birchington.
12. Improvement of Bridleway TM22 surface to width of 3m as part of Garlinge development.

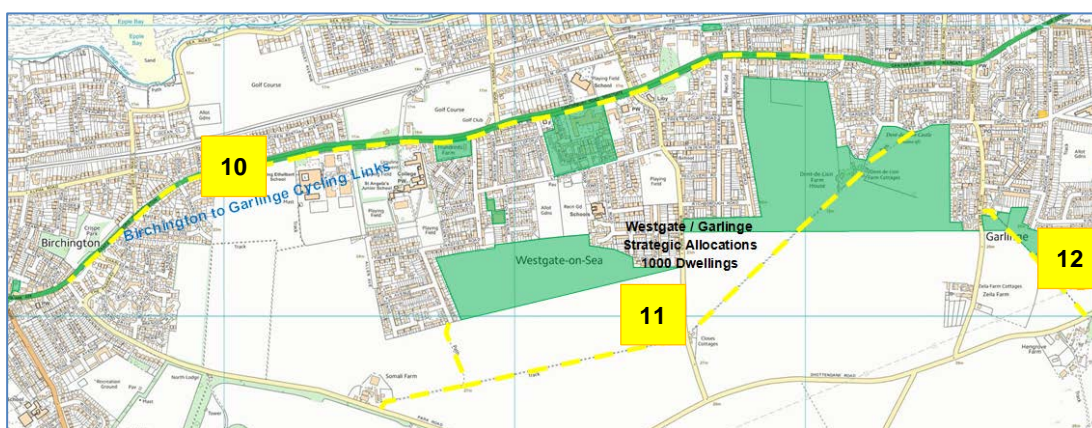


Figure 36 - Cycle Route Improvements - Birchington / Westgate / Garlinge

13. Off road section between Convent Road, Broadstairs and the existing off road shared facility further along Joss Gap Road (on edge of golf course).

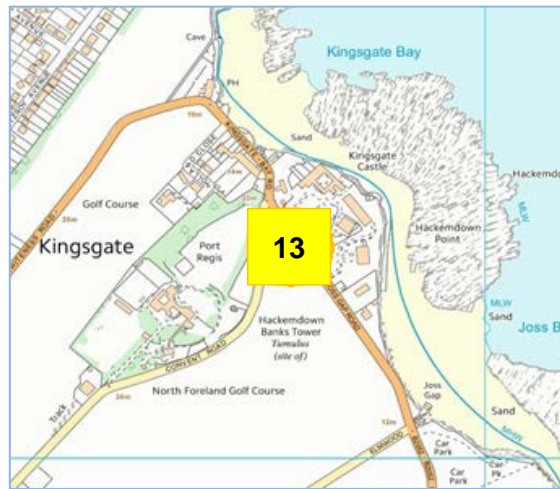


Figure 37 - Cycle Route Improvements - Convent Road, Broadstairs

14. Creation of shared facility on south east side of Dane Park, Margate to link Dane Valley cycle route with Northdown Road, via St Dunstan's Avenue.
15. Provide missing shared facility on SW side of St Peter's Road between Broadley Road and Lister Road, Margate

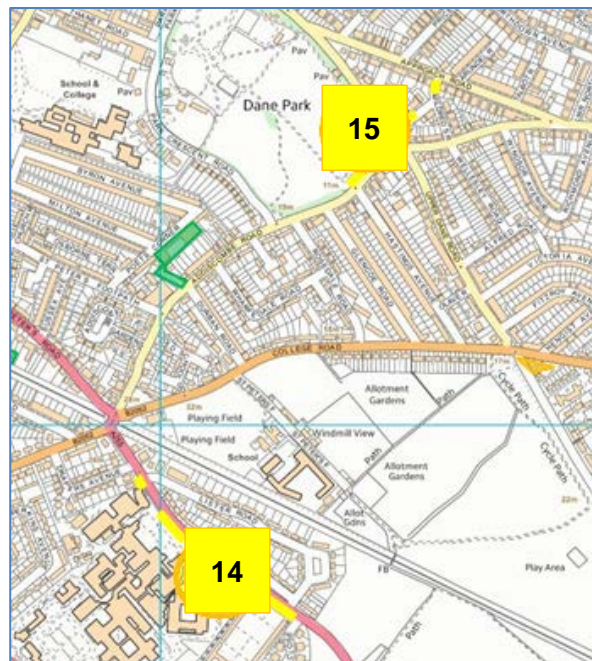


Figure 38 - Cycle Route Improvements - Dane Valley Road / St Peter's Road, Margate

16. Provide new shared facility between Durlock and Sevenscore as alternative to Grinsell Hill/ The Lanes/Foxborough Lane.

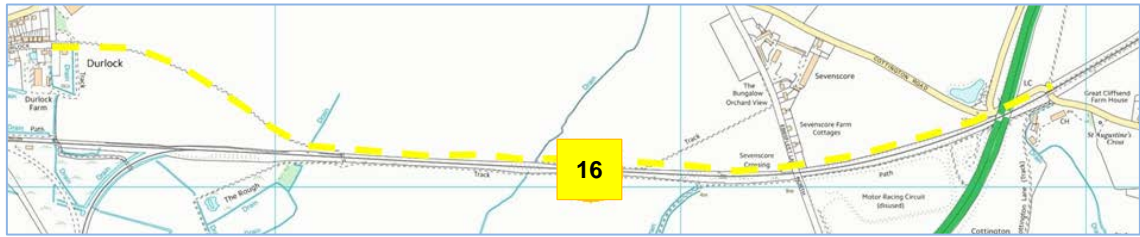


Figure 39 - Cycle Route Improvements - Durlock / Sevenscore

17. Upgrade Footpath TR24 to Bridleway - Crossing point required on Manston to Haine Road Link.
18. Upgrade Footpath TR9 to Bridleway.
19. Improve surface of Bridleway TR8 and widen to 3m.
20. Creation of new Bridleway and Improve TR32 to link development to future Parkway Station
21. Improve surface of Bridleway TR10 and widen to 3m

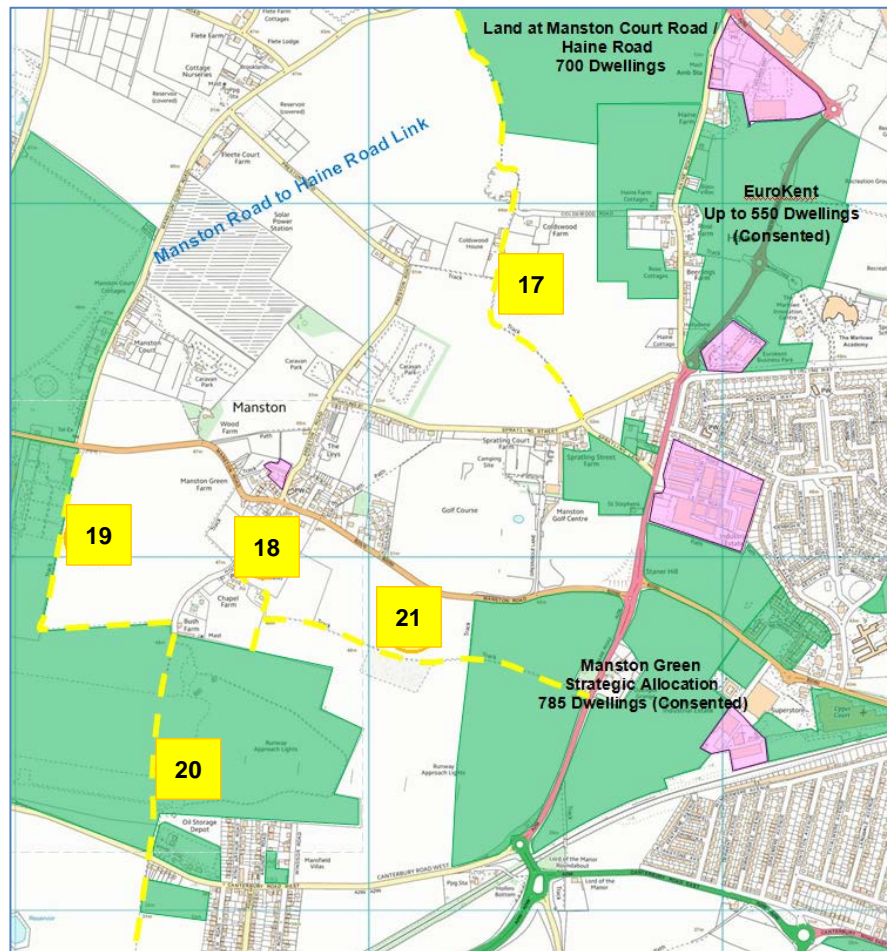


Figure 40 - Cycle Route Improvements – Manston / Cliffsend

22. Upgrade footpath TM31 to Bridleway to link to TE12A & Shottendane Road improvements to provide shared use pedestrian cycle route.

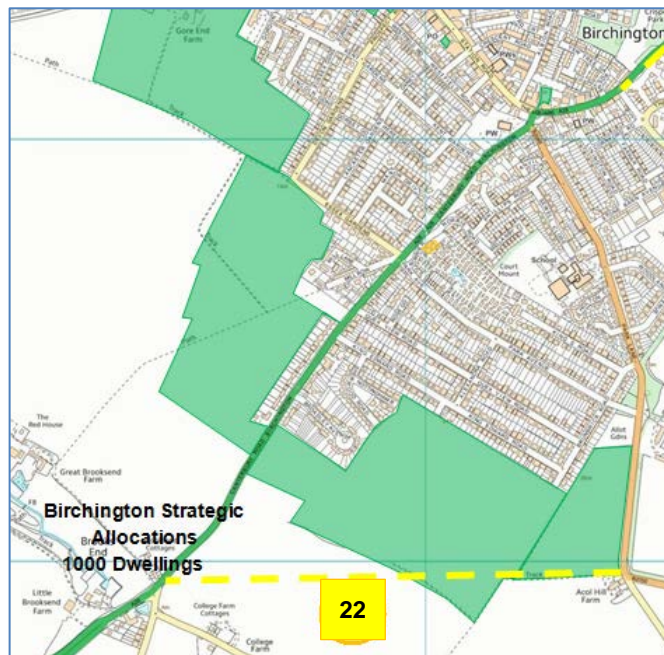


Figure 41 - Brooksend PROW Improvement

11 Informing Growth Options in the New Local Plan

- 11.1.1 The Local Plan will need to plan for growth, including land needed for business development and new housing, over the period to 2031. The Plan preparation process includes assessing options on how much development should be planned for and the most sustainable locations to accommodate it.
- 11.1.2 Government's National Planning Policy Framework (NPPF) states that transport policies have an important role to play in facilitating sustainable development and in contributing to wider sustainability and health objectives. Key messages include that the transport system needs to be balanced in favour of sustainable transport modes, giving people real choice about how they travel. Local Plans are therefore required to ensure that developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable modes will be maximised. Their policies are expected to aim for a balance of land uses to encourage people to minimise journey length for employment, shopping, leisure, education and other activities.
- 11.1.3 The NPPF recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable travel will vary from urban to rural areas.
- 11.1.4 In identifying the most suitable options for the location of new development in the Local Plan, it is important to assess locations in terms of ability of people to access services and employment, and where feasible to do so without the need to rely on private cars. Such assessment has been built in to the process applied to identify proposed housing land allocations.
- 11.1.5 Nonetheless people will still elect to use cars, and the capacity of the transport network for cars and other forms of transport will be an important factor in considering options for locating development and associated transport infrastructure requirements.

11.2 Thanet Transport Network Highway Model

- 11.2.1 The characteristics of Thanet's transport network are an essential starting point in considering the transport implications, opportunities and associated infrastructure requirements related to growth options. The strategy for addressing the likely impacts of strategic growth have firstly been appraised at a high level, taking into account known areas of congestion and how this might be managed by either upgrading or improving existing routes or making better use of underutilised infrastructure.
- 11.2.2 The process of identifying managed growth within the Thanet Area has taken some considerable time and has undertaken further iterations. As such the approach to appraising the impacts and testing proposed mitigation associated with local plan growth has evolved with it.

- 11.2.3 A strategic transport model was originally constructed in 2010, enabling Thanet's highway network capacity to be evaluated in a range of scenarios, from its 2011 baseline the model was capable of providing forecasts for any year up to 2033 based on variable options regarding the quantity and broad location of development. This model informed initial appraisals of the 2015 Preferred Options consultation.
- 11.2.4 The model covered a number of key routes into Thanet primarily focussed on the principal route corridors crossing the district. The core network was modelled in detail and focussed on the corridors in and around Westwood.
- 11.2.5 The first iteration of strategic modelling that was undertaken to appraise local plan options focussed on main routes within Thanet linking the key towns and a number of key locations generating/attracting trips. These included Westwood Cross shopping centre, several large supermarkets and the QEQM Hospital.
- 11.2.6 The 2011 baseline scenario indicated that travel demand and constraints in the highway network culminate in high levels of congestion and "rat running" at peak times and on Saturdays. This will potentially be compounded by natural and planned growth. It indicated that a number of junctions experience serious "worst turn" delays. However it is important to note that such classification may be triggered by a single recorded vehicle turn and therefore informed interpretation is required.
- 11.2.7 The model served to inform this Strategy by highlighting existing and potential pinch points in the network. This Strategy has identified the need to tackle capacity issues identified at Coffin House Corner, Victoria Traffic Lights, Margate seafront and Clock tower, and Tivoli Bridge/Queens Avenue.
- 11.2.8 To enable effective testing of the proposed local plan growth on the local highway network and potential strategic highway interventions, it was necessary for a wider Strategic Highway Model to be built to encompass a wider area of the district. The purpose of the model is to identify future highway traffic flow conditions (with and without proposed development) and assist in identifying potential solutions to future growth needs and to provide a more recent picture of highway conditions.

11.3 New Strategic Highway Model

- 11.3.1 Amey were commissioned by Kent County Council (KCC) to develop a strategic transport model for Thanet district for the purposes of testing forecast development and transport intervention scenarios for the emerging Local Plan to 2031.
- 11.3.2 When considering the coverage of the model a number of constraints needed to be considered. It is important to strike a balance between the time that the model takes to develop, the cost of the study against the outputs that are required.

Base Model

11.3.3 A 2017 base year model was initially developed using SATURN software. The area of focus for the model is the A28 and A254/A256 corridors and the area surrounding the former Manston Airport (FMA) site, as the proposed major allocation sites and infrastructure improvements within the Local Plan are located around this area. The figure below shows the detailed modelled area (purple) and area of interest (brown) for the model:

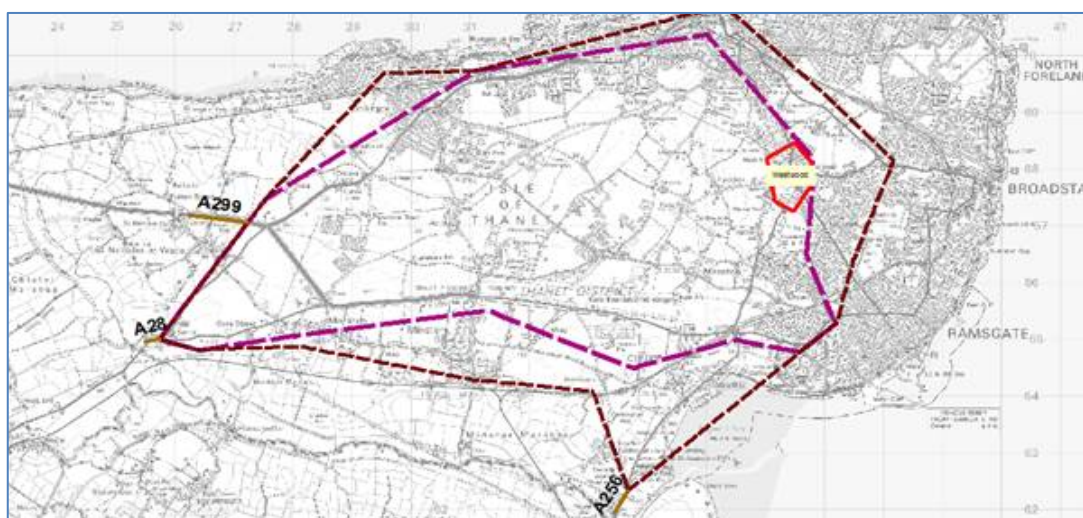


Figure 42 - SATURN Model Study Area

11.3.4 The model zoning system is based largely on the 2011 Census Lower Super Output Area (LSOA) boundaries and the Thanet area is made up of 93 zones. There is one notably large output area which encompasses the rural hinterlands of Thanet. This has been divided into three zones, including a bespoke zone for the Manston Business Park on Columbus Ave. The Westwood area (Westwood Cross shopping centre, two supermarkets and three retail parks) has also been designated as a specific zone.

11.3.5 The baseline traffic data underpinning the model comprises various datasets and sources. The principal source of origin/destination data was obtained from mobile phone data provided by Vodafone. The data was expanded from the sample using Census household population figures. In addition the following data was also used to develop, calibrate or validate the base model:

- Manual Classified Junction Turning Counts;
- Automatic Traffic Surveys;
- Queue Length Surveys;
- Average Journey Time data; and
- An ANPR survey around the Former Manston Airport site.

11.3.6 Based on the broad understanding of the likely options to be tested, the AM and PM peak base models were considered to provide an appropriate tool to form the basis of forecast assessments of the impact of potential development and infrastructure improvements on the local network to support the Local Plan.

Forecast Model

11.3.7 A number of forecast scenarios have been assessed for the forecast year 2031, which represents the end of the proposed Local Plan period. Fundamentally the forecast scenarios are based on a single spatial strategy for development and were intended to test the impacts of that development scenario with and without the proposed Transport Strategy interventions. The forecast scenarios are summarised in the table below:

Forecast Model		Model Summary
DN	2031 Do Nothing	<ul style="list-style-type: none"> 2031 forecast travel demand from committed/permitted development (including Manston Green and EuroKent); Committed highway improvements (e.g. Manston Green proposals)
DM	2031 Do Minimum	<ul style="list-style-type: none"> As per the Do Nothing scenario; plus Strategic allocation sites (including Stone Hill Park on the FMA site)
DS	2031 Do Something	<ul style="list-style-type: none"> As per the Do Minimum scenario; plus Proposed Transport Strategy interventions

11.3.8 The development strategy for the Local Plan is largely housing led, with employment land uses proposed to maintain the status quo in terms of the proportion of in/out commuting to/from the district. The breakdown of the housing allocations within the proposed Local Plan and included in the Do Nothing and Do Something scenarios is set out below:

Development	Housing (units)
Permitted/committed development	3,700
Windfall sites	2,700
Local Plan sites	9,200 (including 2,500 at FMA)
Total	15,600

11.3.9 The Transport Strategy interventions tested within the Do Something model scenario are highway only improvements consisting of a proposed 'inner circuit', comprising new and upgraded links, with the aims of providing more route choice options and relief to the existing A28 and A254/A256 corridors. An outline of the proposed 'inner circuit' proposals is shown alongside the principal Local Plan allocation sites in the **Figure 44**.

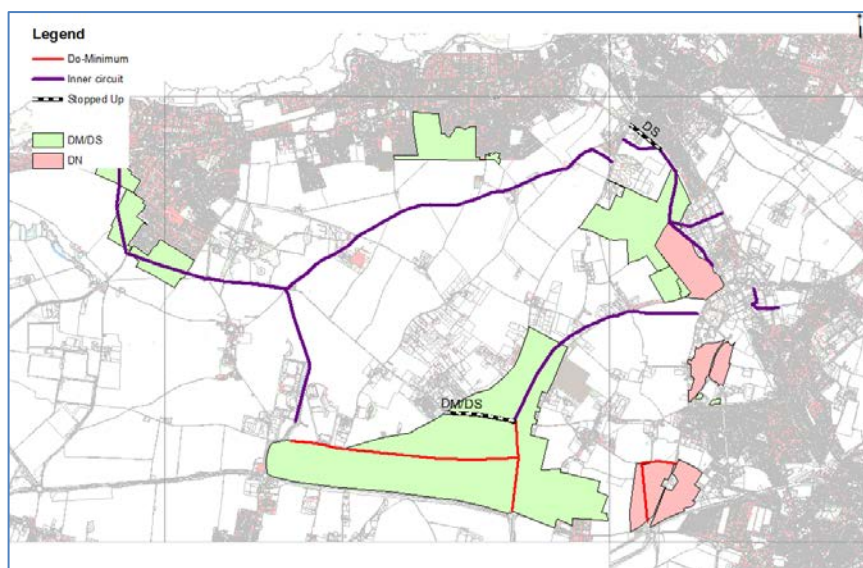


Figure 43 - Model Infrastructure Scenarios

A list of the proposed transport interventions included within each of the scenario is provided below:

Modelled Transport Interventions	2031 DN	2031 DM	2031 DS
Manston Green Proposals	Yes	Yes	Yes
Closure of B2050 from Spitfire Corner to FMA entrance		Yes	Yes
New links within FMA site		Yes	Yes
Increase of capacity at Cliffsend Roundabout from FMA			Yes
Manston-Haine link			Yes
Brooksend-Shottendane link			Yes
Columbus Ave extension			Yes
Enterprise Way link			Yes
Tesco link road / Millennium Way extension			Yes
Shottendane Road speed reduction (40mph from 60mph)			Yes
Nash Rd network inc stopping up at Coffin House Corner			Yes

11.4 Headline Model Outputs

11.4.1 The total number of trips within the modelled area (travel demand) provides an indication in terms of the overall traffic impacts of each forecast scenario. The level of travel demand is intrinsically linked to the level of proposed development within each scenario; as such the travel demand within the Do Minimum and Do Something scenarios is the same. The table below provides a summary of total travel demand in the AM peak (busiest period) compared with baseline conditions:

AM Peak	2016	2031 DN	2031 DM/DS (excl. FMA)	2031 DM/DS (incl. FMA)
Total	22,466	25,007	27,479	28,782
% increase over Base		11%	22%	28%
% increase over DN			10%	15%

11.4.2 In terms of more localised impacts, particularly on the A28 and A254/A256 corridors, the modelled scenarios indicate a general pattern, whereby, the peak hour traffic flows show an increase in the Do Minimum scenario versus the base; followed by a slight decrease in the Do Something scenario. This is not the case at all locations, however, and in some cases the Do Something scenario would observe no impact or an increase in flow when compared with the Do Minimum.

11.4.3 Graphs showing a comparison of AM peak (busiest peak) traffic flow at key links and junctions on the key corridors between the modelled scenarios are shown below:

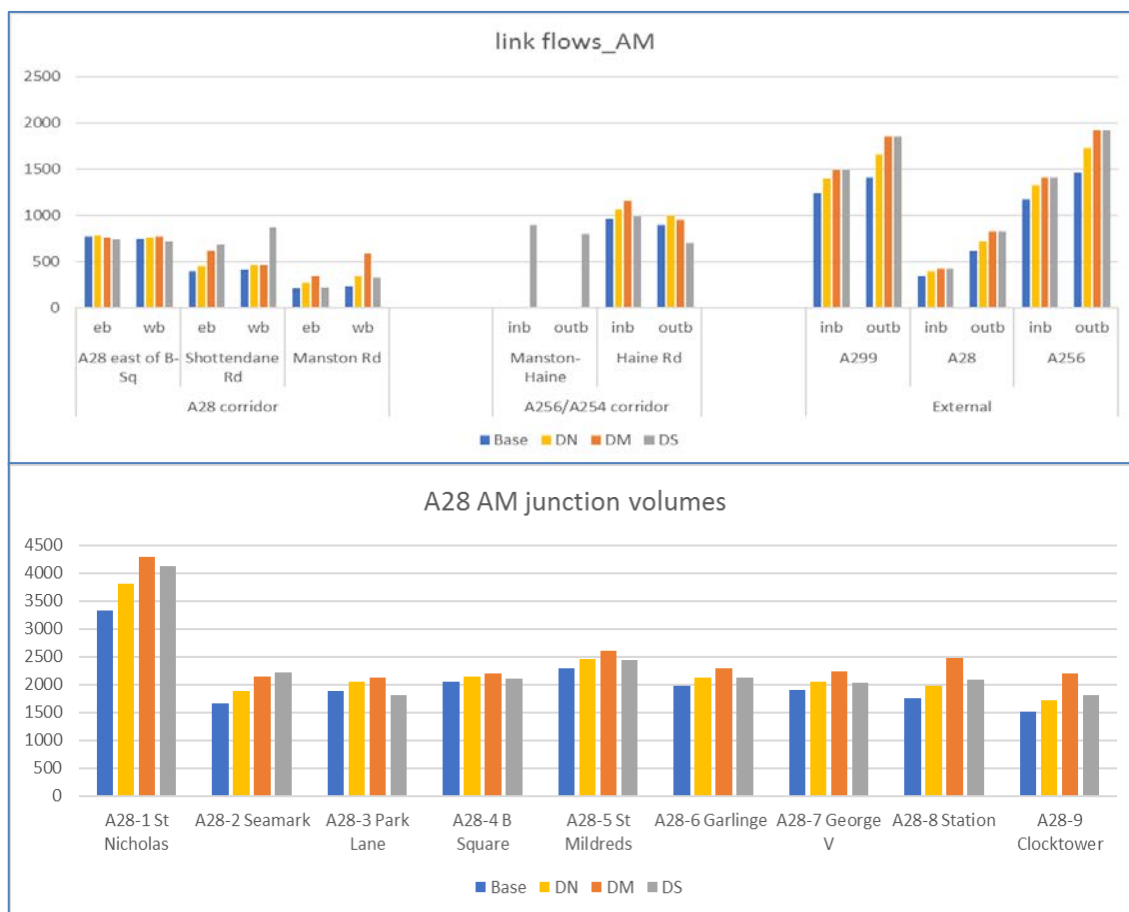


Figure 44 - Traffic Flow on the Local Highway Network

11.4.4 The provision of the ICRIS has a positive impact on flows within the A28 corridor through Birchington Square. There is also a reduction in flow through Park Lane (when compared to the do minimum scenario), which currently contributes towards a significant level of delay on the A28 through right turning traffic and blocking back. Flows at the A28 St Mildred's junction are reduced,

11.4.5 The impact of the Local Plan allocations within Margate Seafront are likely to be reduced by the ICRIS, however remain above the baseline, which suggests that despite these improvements junction performance will continue to be impacted by the Local Plan growth and that alternative routes avoiding this part of the network should be explored.

- 11.4.6 St Nicholas Roundabout will be subject to material increases in traffic flow, however a visual inspection of this junction suggests that a level of residual capacity exists, which with minor modifications is likely to be accommodated. This will be investigated in more detail within future route studies.
- 11.4.7 The provision of a new Road Link between The A256 and A299 provides significant reduction in flow to the existing Haine Road Corridor (A256) between Sevenscore and New Haine Road.

11.5 Conclusions

- 11.5.1 The future year forecasting stemming from the model notes that demand for travel on roads in Thanet will inevitably increase even if only as a consequence of an increase in car ownership and population over time, the flows on the principal road network will generally be managed by the provision of the ICRIS, however further detailed modelling of individual junctions will need to be undertaken as necessary.
- 11.5.2 It is important to note that this testing has been employed to inform broad options for disposition of development and possible need for junction improvements. Identification of preferred site allocations will be based on consideration of a range of factors in addition to transport considerations. Further modelling will be applied as necessary to test preferred site locations and explore solutions to address identified pinch points.

12 Potential Sources of Funding

The transport interventions outlined within this strategy are ambitious, however they are also considered to be realistic and achievable. There are a number of economic circumstances that can have an impact on the availability of funding for highway infrastructure. A draft Infrastructure Delivery Plan (IDP) is being prepared to support the forthcoming local plan, which will provide more detail on specific infrastructure elements and how they relate to specific development proposals within the district.

12.1 External Funding

- 12.1.1 There are a range of potential funding streams that can be accessed. With new funds being announced on a regular basis (often to very tight submission timescales), it is important for both KCC and TDC to be in a position to submit high quality bids at relatively short notice if required.
- 12.1.2 Such funds are available through Department for Transport (DfT), competitive funding through bodies such as South East Local Enterprise Partnership (SELEP) and Housing and Communities Agency (HCA), along with more direct funding from Developers through the planning process.
- 12.1.3 External funding streams are generally announced on a regular basis, normally through central government departments. Local Growth Fund (LGF) was one such fund and to date. Across the county, KCC have successfully secured nearly £120m from LGF. This demonstrates that certain elements of infrastructure may not necessarily need to be funded directly by developers.
- 12.1.4 Smaller Interventions such as cycleway or public rights of way improvements can be subject to consideration under annual Local Transport Plan funding within KCC. This fund is variable from year to year and is subject to set funding criteria in accordance with their contribution toward strategic priorities.

12.2 Developer Funding

- 12.2.1 Through the development planning process, contributions can be sought towards infrastructure under Section 106 (s106) of the Town and Country Planning Act 1990. Local Planning Authorities at both tiers of local government can enter into a legally binding agreements with the landowners / developers to financially contribute towards infrastructure or services required to make their development acceptable in planning terms. KCC / TDC then receive this funding to deliver infrastructure projects tied to development, for instance it may be used to support a public transport service or provide a proportionate contribution towards a new road link.
- 12.2.2 The Community Infrastructure Levy (CIL) is a similar methodology to s106, however this represents a fixed charge which is then applied to specific types of development for specific infrastructure projects (through a roof tax type approach). The nature and level of funding can be defined during the establishment of the CIL Charging Scheme.
- 12.2.3 Developer contributions can still be secured through s106 Agreements where a CIL charge also applies but the two mechanisms are not currently able to be used to fund the same infrastructure project.

- 12.2.4 An alternative method of delivering physical transport infrastructure is through direct delivery / construction by developers through planning obligations. A Section 278 or 38 (of the Highways Act 1980) agreement can be entered into which allows developers to either make modifications to or build new highway infrastructure for adoption by KCC.

Appendix A

Achievements from the Thanet Transport Plan 2005 – 2011

Measure	Timescale	Funding Source	Description/Progress
East Kent Access Phase 2 (A256/299)	2006 -2012	LTP	Completed - Improvement of the A299 between Minster roundabout and the Lord of the Manor junction, and improvement of the A256 from Lord of the Manor junction to the old Richborough Power Station site. The scheme cost £87m funded by the DfT with £5.75m from KCC. Work began on site in 2009 and the official opening took place on 23 rd May 2012.
Westwood Cross access study	2005	TDC	Part implemented then superseded by Westwood Relief Strategy.
Manston Access	2005	Developer/LTP funding	Superseded by Thanet Transport Strategy 2015. - Improved local access to Kent International Airport and environmental measures to protect Manston and other villages.
Stour Valley Line upgrade study	2005	EK Partnership	Study completed - Undertake a study into the feasibility and costs of upgrading the Stour Valley Line railway between Thanet, Canterbury and Ashford as an alternative to the A28.
Freight routes	2005-6	TDC/KCC	Not completed. As part of the Freight Action Plan for Kent the preferred freight routes will be mapped and distributed. - Identify, sign and publicise strategic freight routes within the District.
Seek further ferry operator(s)	Ongoing	Officer time	Not completed - Seek a ferry operator.
Review traffic management options for Military Road	2005-6	Officer time	Change of use – now more café culture and pedestrian area with better integration with the tourist industry
Review potential bus/coach link between port and station	2005	Officer time	Not currently required. Ferry service has since closed.
Update Airport Master plan	2005	Privately funded	Completed - In November 2009, Manston Airport produced a Master plan to consider the growth at the airport up to 2018. - However, following subsequent sale and closure of Airport in 2014 it is now intended to assessing alternative options for development of the airport land.
Update Airport Travel Plan	2005-10	Privately funded	Not completed due to several changes of operators and future proposals for airport not materialising.
Traffic management/reduction measures	2005-10	Joint private/public funding	Completed - On behalf of KCC, Stagecoach operate the route 38/38A services between the airport, Ramsgate, Broadstairs and Birchington.
Bus link to Ramsgate rail station	2005	Privately funded	The Stagecoach Thanet Loop bus service runs past Ramsgate Station (approx. every 10 minutes)
Promote, protect and enhance walking/riding network around KIA, Manston	Ongoing	Officer time and private funding	Part completed - No longer pursued as circular route. Improvements sought as part of general PROW enhancements.
Roadside infrastructure improvements on Quality Bus Corridors	2005-6	UBC?LTP funding	Mostly completed <ul style="list-style-type: none"> •Margate–Westwood–Ramsgate (A254) •Margate–Broadstairs–Ramsgate (A255) •Margate/Ramsgate–Canterbury (A28) Improvements to roadside infrastructure on the Quality Bus Corridors where not provided for the new Thanet Loop service.
Real Time Passenger Information and bus priority at traffic signals	2005	Developer funding	Not completed - RTI no longer favoured by bus operator. New information methods under review Extension of bus priority at traffic signals on all major corridors.

Measure	Timescale	Funding Source	Description/Progress
Super Low Floor vehicles for Thanet – Canterbury Quality Corridor	2006	Private/public funding	8/8A (the main routes from Broadstairs/Margate to Canterbury - every 15 minutes) went 100% low floor in early 2009
Continue discussions on C.T.R.L. Domestic Service	Ongoing to 2009	Officer time	Completed domestic services on the high speed line began in December 2009 under a franchise agreement with South-eastern. Passengers can now get from Ramsgate to St Pancras International in just 1 hour 16 minutes, and journey times from other Thanet stations similarly reduced. Continue discussions to ensure an appropriate CTRL Domestic service to Thanet.
Lobby for localised East Kent service	Ongoing to 2009	Officer time	Domestic services on the high speed line began in December 2009 under a franchise agreement with SouthEastern. Passengers can now get from Ramsgate to St Pancras International in just 1 hour 16 minutes, and journey times from other Thanet stations similarly reduced. Continue to lobby for a localised rail service for East Kent connecting into the CTRL DS.
Bus link to K.I.A	2005	Privately funded	Not completed - Encourage provision of an improved Local Bus Service between Ramsgate Station and Kent International Airport.
Investigate “Manston Parkway” station		Privately funded	Completed - Funding is largely secured and plans are being investigated for the Parkway station. An 8 week public consultation exercise is being undertaken in early 2015.
Review restriction controls (Government request)	2005	TDC	Review restriction controls after Government request on hackney carriage vehicles - an independent unmet demand survey was undertaken in 2007 by Halcrow Group Limited. As a result of that survey it was found that there was no unmet demand and the Licensing Board decided to continue restricting the number of hackney carriage vehicles
Encourage provision for taxis at out of town stores	2005	TDC	Encourage out of town supermarkets to provide specific facilities for taxis at out of town stores - there has been continuing dialogue with the Westwood Cross management company although these being private roads they are responsible for the provision of ranks within Westwood Cross
Review of Hackney Carriage Ranks	2005	TDC	A review of Hackney Carriage Ranks. (cost of signage) - this was included within the remit of the 2007 survey which concluded that there were sufficient ranks within Thanet.
25% of vehicles with disabled access	2005	Staff time	25% of vehicles suitable for disabled access. Gradual increase until 2013 to 50%
Implement ‘Turner – Dickens a Flagship Walking Route for Thanet’	Ongoing – 2007	TDC	Completed - The Turner and Dickens Walk is now open and promoted, connecting Margate and Broadstairs
Provide drop kerbs, tactile surfaces, etc.	Ongoing	LTP	Largely completed - continue to provide dropped kerbs and tactile surfaces, where appropriate, as part of the footway maintenance and renewal programme.
Promote walking	Ongoing	TDC/KCC/PCT	Promote walking as a healthy alternative to the car for short journeys, including investigating with the Health Authority, opportunities for the wider availability of pedometers.

Measure	Timescale	Funding Source	Description/Progress
Measures to encourage walking	Ongoing	Officer time	Implement measures to encourage walking such as street seats, improved street lighting, signage and removing obstacles and trip hazards.
Implement "Feet First" network	Ongoing to 2011	LTP and private funding	Progressively implement the network of multi-purpose walking routes detailed in "Feet First" through a series of "street audits" and engaging outside parties, where appropriate.
Implement the Dane Valley cycle route network	2004-7	LTP	The Dane Valley cycle route network has been expanded since the 1 st Transport Strategy.
Promote cycling	Ongoing	LTP	Continue to promote cycling as a healthy alternative to the car for work and leisure journeys.
Continue work with Thanet Cycling Forum	Ongoing	Officer time	Continue to work with the Thanet Cycling Forum to promote and encourage cycling.
Implement Thanet Cycling Plan	2005-11	LTP, DfT, private funding	Part completed - The network has been expanded but the planned network in the Cycling Plan has not been fully achieved, partly due to insufficient funding. Progressively implement the planned programme of new and improved cycle routes detailed in the Thanet Cycling Plan and this Transport Strategy through KCC's Local Transport Plan, various DfT initiatives and other public sources of funding. Also to pursue developer contributions, where possible, as part of the planning process.
Implement TDC Staff Travel Plan	2005		Not completed - Implement a Staff Travel Plan for T.D.C. bus concessions offered but not taken up by staff
Work with KCC and schools on School Travel Plans	Ongoing	Officer time	Ongoing - Work with KCC and local school communities to encourage the adoption of School Travel Plans for all Thanet schools.
Work with local businesses on Workplace Travel Plans	Ongoing	Officer time	Part Completed – KCC initiatives to encourage sustainable travel have been implemented such as FAXI and Workplace Challenge.
Require Travel Plans in support of planning applications	Ongoing	Officer time	Ongoing - Travel Plans are requested for significant developments. The smaller sites are required to produce a sustainable travel statement to show how they plan to encourage sustainable travel, and the larger sites must produce a Travel Plan that will be monitored by KCC.
Explore scope for sustainable events travel plan	2005 onwards	Officer time	Part completed - the scope for sustainable tourism and an events travel strategy. Continue to explore and develop
Produce new Parking Policy	2006	Officer time	Part completed - A major parking review was launched in Autumn 2012. Produce a new comprehensive parking policy, taking account of the issues facing Thanet, as outlined elsewhere in this strategy.
Assess demand and locations	2005 onwards	Officer time	Part completed - Assess demand and identify possible Home Zone locations, in conjunction with the local community.
Assess and prioritise requests for Homezones	Ongoing	Officer time	Part completed – very few if any applications received for home zones. Shared surfaces more commonly received.
Review existing schemes	Ongoing	Officer time	Completed - Review existing schemes
Evaluate new DfT regulations and guidance	2005	Officer time	Completed – new guidance adhered to.

Measure	Timescale	Funding Source	Description/Progress
Continue monitoring of Nitrogen Dioxide and PM10 at key locations	Ongoing	Officer time	Completed - The district has two junctions where nitrogen dioxide levels are recorded above the recommended level. This led to the declaration of an urban area Air Quality Management Area in 2011. - To continue monitoring of nitrogen dioxide and PM10 at key locations. The work to identify problem areas has yet to be completed. It is expected that the Detailed Assessment may confirm that there will be locations within Thanet where air quality standards are breached because of traffic related pollutants. Once these locations are identified appropriate transport Action Plans will need to be developed with the aim of reducing traffic emissions and achieving acceptable local air quality.
Explore future development and funding with Thanet C.T.	Ongoing	Officer time	Work with the Trustees of Thanet Community Transport to explore future funding sources and to encourage the development of the service.
Work with partners to promote rural Wheels 2 Work for East Kent	2005	East Kent Partnership	Not completed - Work with Action with Communities in Rural Kent, Thanet C.T., the East Kent Partnership and other partners to launch a Wheels 2 Work scheme for rural East Kent.
Implement "Feet First" and Thanet Cycling Plan	2005-11	See sections 10 and 11	The cycling network has been expanded but the planned network in the Cycling Plan has not been fully achieved, partly due to insufficient funding. Feet First – Part completed - Progressively implement the measures contained in the "Feet First" and Thanet Cycling Plan to improve safety/security for pedestrians and cyclists.
Work with rail operator to improve safety/security	Ongoing	See section 8	Part completed - Work with the rail operator to improve safety and security on and around Thanet's rail stations and on board trains.
Work with bus operators to improve safety/security	Ongoing	See sections 7 and 19	Completed - Working with commercial bus operators and Thanet Community Transport to improve safety/security on buses.
Safety audit of bus stops	2006-7 onwards	LTP and Officer time	Completed – "safety audit" of bus stops carried out to identify any improvements in location, street lighting, etc. to improve safety for bus passengers.
Implement and promote 'Manston Rides' project	2005-6	LTP/developer	Not completed. Local public right of way and permissive paths maintained and explored for expansion through new development
Identify a further network of riding routes	2005 onwards	Officer time	Not completed. - Identify a further network of on and off road routes.
Implement speed reduction measures	Ongoing	See section 16	Not completed - Implement speed reduction measures on appropriate rural roads used by riders.

Appendix B

Policy Context

National Policy

National Planning Policy Framework (March 2012)

Following the coalition government's publication in July 2011 of a 'draft for consultation' framework for the planning system, the final National Planning Policy Framework (NPPF) was published in March 2012. This document supersedes all Planning Policy Guidance Notes (PPG's) and Statements (PPS's).

The framework introduces a presumption in favour of sustainable development, summarised in paragraph 14 of the document:

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. Local planning authorities should positively seek opportunities to meet the development needs of their area" (para 14)

The objectives of transport policy are to:

- "facilitate sustainable development and its contribution to wider sustainability and health objectives" (para 29);
- "support reductions in greenhouse gas emissions and congestion, and support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport" (para 30);and
- "develop strategies for the provision of viable infrastructure necessary to support sustainable development" (para 31).

The framework provides guidance on the key transport issues which should be considered through the planning process for applications:

"All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure.
- safe and suitable access to the site can be achieved for all people; and

- Improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development. Subject to those considerations, development should not be prevented or refused on transport grounds unless the residual impacts of development are severe.” (para 32)

The framework supports the provision of Travel Plans to manage demand and the provision of sustainable facilities on site to reduce the need to travel where practical:

A key tool to facilitate this will be a Travel Plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan.” (para 36)

For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (Para 38)

With regards to parking standards, the NPPF states that:

“If setting local parking standards for residential and non-residential development, local planning authorities should take into account:

- the accessibility of the development;
- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- an overall need to reduce the use of high-emission vehicles”. (para 39)

Local Policy

Local Transport Plan 4 for Kent (2016-2016)

KCC adopted Kent’s Third Local Transport Plan (LTP3) in 2015 which sets out the authority’s policies and delivery plans for the management and improvement of the local transport network over a five-year period.

The plan identifies that key transport issues for Thanet are:

Thanet Corporate Plan 2015-2019

The Corporate Plan sets three key priorities:

Priority 1: A clean and welcoming environment

Priority 2: Supporting neighbourhoods

Priority 3: Promoting inward investment and job creation

A key element of Priority 3 is to prepare “a Local Plan which sets planning strategies and policies that support growth of the economy”. This involves the need to help establish the conditions for a prosperous local economy, including good transport links both within and to and from the district,

Thanet Local Plan

The District Council is preparing a new Local Plan to guide development and investment in the district over the period to 2031. This plan will establish the level of growth in the district over that period including the amount of new homes and job creating development to be planned for. It will also identify where development should take place and make appropriate land allocations.

In promoting sustainable development, the new Local Plan will need to take account of Thanet's existing settlement pattern and transport links which have established over a considerable time. It will also need to take account of or review as appropriate land allocations made in the previous Local Plan. For example that Plan allocated land for 1,000 new homes at Westwood, and following grant of planning permission that development is expected to start shortly.

The draft Local Plan allocates land for 17,140 dwellings at different locations across the district, and retains key employment sites, including Manston Business Park and parts of the EuroKent Business Park from the previous Local Plan.

Appendix C

Infrastructure Proposals

Type	Description	Reason	Potential Funding Source	Cost
Road	Create New Road Link Between A28 Brooksend Hill and Minnis Road.	To manage congestion at Birchington Square and offer alternative routes to Birchington seafront areas improving Air Quality	(S38)(S106)	On Site
Road	Create New Road link between A28 Brooksend Hill and Acol Hill/B2050.	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood	On Site (S38)(S106)	On Site
Road	Widen B2050 Manston Road between junction with Acol Hill and Shottendane Road.	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood	On Site (S38)(S106)	£5,000,000
Road	Widen / provide necessary localised Improvements to Shottendane Road as far as the vicinity of Firbank Gardens	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood.	S106 / External	£15,000,000
Road	Create new road link between Shottendane Road / Manston Road. Close off Shottendane Road at junction with Manston Road.	To manage traffic congestion at Birchington Square and A28 Corridor and form the start of major new road corridor to Westwood Avoiding Coffin House Corner Junction	On Site (S38)(S106)	On Site
Road	Create new road link between Manston Road and Nash Road behind Salmestone Grange and close off Nash Road at its junction of Coffin House Corner.	To manage traffic congestion in locality and form the start of major new road corridor to Westwood Avoiding Coffin House Corner Junction	On Site (S38)(S106)	On Site
Road	Reconfigure Coffin House Corner Signal Junction. Close off Nash Road Arm and improve capacity and pedestrian facilities.	To reduce journey time / congestion whilst providing safer access for children walking to school	S106 / S278	£500,000
Road	To reconfigure roundabout at Queens Avenue/Tivoli Road/Grosvenor Gardens and introduce one-way flow on Queens Avenue	To improve safety at junction and facilitate re-routing of tourist traffic bound for Seafront and Margate Old Town	S106	Completed
Road	Marine Terrace Public Realm Improvements (only if funded externally)	Environmental / regeneration - Improve pedestrian environment	External Funding (CCF...)	£16,000,000
Road	To re-route tourist traffic away from Margate seafront, by providing junction improvements and reintroducing two way flow to Tivoli Road.	To manage traffic congestion at Clock tower junction and reduce journey times	External Funding (CCF...)	£3,000,000

Type	Description	Reason	Potential Funding Source	Cost
Road	Reconfigure Victoria Traffic Signal junction	To manage journey times and relieve congestion	S106 / CIL	Nominal
Road	Widen Nash Road along its existing alignment to new LDR Standard	To manage traffic congestion on A254 Corridor by facilitating major new road corridor to Westwood Avoiding Coffin House Corner Junction	S278 / 38 On Site	On Site
Road	Connect Enterprise Road to Nash Road	To provide access to employment and retail destinations, and to manage traffic impact at Westwood and Victoria Traffic signals	S278 / 38 / S106	£1,000,000
Road	Upgrade Tesco internal link road to adoptable standard between Westwood Road and Margate Road. Extend Millennium Way to New Link Road	To relieve Westwood roundabout and A256 Westwood Road Corridor for journeys between Ramsgate and Broadstairs	External Funding	£8,000,000
Road	Create new road between Toby Carvery Roundabout (A256) and A299 to relieve Haine Road Corridor. Improve approach and roundabout at Westwood Cross to increase capacity	To provide enhanced access to Westwood, manage congestion and relieve the A256 Haine Road Corridor.	S106 / Part on Site	£12,000,000 (Off site Section)
Road	Improvements Spitfire junction.	To manage safety at this junction	S278	£500,000
Road	To extend Columbus Avenue to Manston Road Birchington.	Improve road capacity to meet increased surface transport movements associated with future development.	S106 / External	£6,000,000
Road	Improvements to Dane Court Road / Westwood Road Junction to improve journey time reliability.	To manage traffic congestion on the A256 / A255 road corridors	CIL / S106	£1,000,000
Road	To investigate High Street, St. Lawrence/ Newington Road junction to improve air quality and address congestion.	To manage congestion improve Air Quality (Signage Scheme)	S106	£50,000
Road	New Link Road through Manston Green Site and Junction improvements at Manston Road / Haine Road Roundabout	To provide access to development site and manage congestion on the A256 Haine Road Corridor	S106 / External	£3,000,000

Type	Description	Reason	Potential Funding Source	Cost
Cycle	Creation of a New Shared Cycleway on the A28 Between Birchington & Garlinge	To connect new communities and provide access to secondary schools.	S106 / CIL / LTP	TBC
Cycle	Improvements to Westwood main junction and adjacent roads to improve bus and cycle provision and improve accessibility and movement for pedestrians between different areas of Westwood Town Centre	To provide better bus access and a more walkable town centre.	S106 / CIL / LTP	TBC
Cycle	Construct shared facility on Sloe Lane, Margate.	Improve sustainable transport links between Dane Valley and Westwood to encourage cycle use.	S106 / CIL / LTP	TBC
Cycle	Create shared facility on existing path to the R/O Bromstone School, Broadstairs to connect to Millennium Way to offer alternative to cycling on Rumfields Road.	Improve sustainable transport links between Broadstairs and Westwood to encourage cycle use for retail, leisure and education trips.	S106 / CIL / LTP	TBC
Cycle	Create shared facility on existing footpath between Ramsgate Road, Broadstairs and Dumpton Park Drive, Broadstairs to the side of former Holy Cross School.	Improve cycle links to East Kent College	S106 / CIL / LTP	TBC
Cycle	From Ramsgate Railway Station create shared facility on existing footpath to Newington Road.	Improve cycle links to Ramsgate Station for surrounding residential catchments	S106 / CIL / LTP	TBC
Cycle	From east of Ramsgate Railway Station create shared facility on existing path to Margate Road, provide crossing facility to access Newlands Road and create link to Pysons Road using Newlands Lane.	Provide better linkage between local schools and Ramsgate Rail Station.	S106 / CIL / LTP	TBC
Cycle	Off road section between Convent Road, Broadstairs and the existing off road shared facility further along Joss Gap Road (on edge of golf course).	To complete missing section of Viking Coastal Trail - Improve attractiveness of this route and safety.	S106 / CIL / LTP	TBC
Cycle	Between Dent-de-Lion Road, Garlinge and Park Road, Birchington creating shared facility on existing public rights of ways.	Provide better cycle access / connectivity between new development site and wider PROW network.	S106 / CIL / LTP	TBC
Cycle	Creation of shared facility on south east side of Dane Park, Margate to link Dane Valley cycle route with Northdown Road, via St Dunstan's Avenue.	Improve cycle access to Dane Park and Retail and residential destinations in Cliftonville	S106 / CIL / LTP	TBC

Type	Description	Reason	Potential Funding Source	Cost
Cycle	Creation of a shared facility between Canterbury Road West, Ramsgate and Canterbury Road East using existing bridge facility to the east of Haine Road and north of Canterbury Road East.	To link Cliffsend to wider highway network. Improve access to Mixed use development on Former Manston Airport Site	S106 / CIL / LTP	TBC
Cycle	Provide missing shared facility on SW side of St Peter's Road between Broadley Road and Lister Road, Margate.	Improve Cycle links between Broadstairs including QEQM Hospital	S106 / CIL / LTP	TBC
Cycle	Provide new shared facility between Durlock and Sevenscore as alternative to Grinsell Hill/ The Lanes/Foxborough Lane.	Provide enhanced connectivity between Minster and Cliffsend to future Thanet Parkway Station	S106 / CIL / LTP	TBC
Cycle	Upgrade footpath TM31 to bridleway to link to bridleway TE12A & link to Shottendane Road improvements to provide shared use pedestrian cycle route.	Provide better connectivity between development settlements	S106 / CIL / LTP	£165,000
Cycle	Improvement of Bridleway TM22 surface to width of 3m as part of Garlinge development.	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£79,000
Cycle	Upgrade Footpath TM14 on edge of development to Bridleway.	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£61,000
Cycle	Provide improved surface and widen Bridleway TM11	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£89,000
Cycle	Provide improved surface and widen Bridleway TM16	Link Garlinge and Strategic Allocations to wider highway network	S106 / CIL / LTP	£140,000
Cycle	Upgrade Footpath TR24 to Bridleway —Crossing point required on Manston to Haine Road Link.	To Provide linkage between allocation sites and Westwood	S106 / CIL / LTP	£208,000
Cycle	Upgrade Footpath TR9 to Bridleway	To Link Former Manston Airport allocation to Manston Green and wider Highway network	S106 / CIL / LTP	£46,000
Cycle	Improve surface of Bridleway TR8 and widen to 3m	To Link Former Manston Airport allocation to wider highway network including Manston to Haine Road	S106 / CIL / LTP	£132,000
Cycle	Creation of new Bridleway and Improve TR32 to link development to future Parkway Station	To provide linkage between development site and Parkway Station	S106 / CIL / LTP	£98,000
Cycle	Improve surface of Bridleway TR10 and widen to 3m	To Link Former Manston Airport allocation to Manston Green and wider Highway network	S106 / CIL / LTP	£143,000

Type	Description	Reason	Potential Funding Source	Cost
Rail	Thanet Parkway – New station with 300 parking spaces to be located at Cliffsend	To relieve parking problems around existing stations and to serve future needs of Local Plan growth Discovery Park directly	External (LGF) Private Funding	£21,000,000