

Thanet District Council

**Thanet Local Plan**

Revised Options Sustainability  
Appraisal

REP/258960/0001

Draft | 25 June 2018

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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 258960-00

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# 1 Introduction

## 1.1 Introduction

This report is further information to the sustainability appraisal (SA) undertaken on the Revised Preferred Option of the emerging Thanet District Council (TDC) draft Local Plan. This sustainability appraisal of revised options is required as a result of Council Members voting in January 2018 not to progress the draft Local Plan, requiring Council planning officers to formulate alternatives to policies and supporting text within the draft Local Plan.

In order to expedite the finalisation of the draft Local Plan, Council planning officers have devised two further options that primarily vary the way that housing would be distributed and promoted throughout Thanet.

As these options represent strategic reasonable alternatives for the way in which the draft Local Plan delivers housing within Thanet, the options are required to be tested within the SA process, using the established framework. Previous options have been tested in this way; a summary of which is presented below

## 1.2 Previous sustainability appraisal of options

The Interim Sustainability Appraisal in May 2014 looked at broad spatial options for locating the greenfield element of the housing in Thanet. These options were

- Adjoining the Urban Area
- Adjoining the Villages
- Freestanding Countryside Sites
- In the Green Wedges
- Housing in the Form of a New Settlement

The option of adjoining the urban area and villages was chosen which is reflected in the selection of strategic sites identified in the Draft Preferred Options local Plan 2015 and the Proposed Revisions to the Preferred Options in 2017.

The objectively assessed need in 2014 was 12,000 dwellings based on migration trend based population projections and labour requirement. Following release of sub national population data, projections rose in January 2016 to 15,660 and again in September 2016 to 17,140. Following this increase it was decided that further SA work was required to look at the option of a new settlement and whether the negative effects could be mitigated against.

The New Settlement mitigation study<sup>1</sup> recommended a number of measures that could make a settlement more sustainable and also carried out an assessment of potential new settlement sites. It was concluded that the former Manston Airport represented the most appropriate site due to its size and nature as a brownfield site.

Subsequently the officer report to Council recommended an option of urban/village edge sites plus the new settlement in order to meet the housing requirement.

This option was not voted through by members at the Full Council meeting on 18th January 2018. The main concern was that this would potentially stifle aviation development at the airport.

A development consent process to acquire the site for aviation use as a Nationally Significant Infrastructure Project is currently underway. The proposal is to reopen Manston as a hub for international air freight which also includes passenger, executive travel and aircraft engineering services.

## 1.3 Revised options

In order to recognise the importance of the Development Consent Order application and that further sites would need to be identified to account for the shortfall in housing numbers if the airport site is not allocated, the Council have revisited the options.

This leaves the two strategic options for delivering the additional housing as “Option 1 and 2”. Option 1 is what was recommended to Full Council in January 2018, Option 2 is to not allocate the airport for a specific use and to reallocate 2,500 dwellings to site that were selected from sites submitted to TDC throughout the Local Plan process.

The selection of Option 1 was informed by:

- Advice in the New Settlements study;
- Selecting a brownfield site from the potential new settlement options;
- Delivering the entire transport strategy including link from Westwood to the A299 through Manston Court Road;
- Planning application from Stone Hill Park including masterplan and business case;
- Avoiding best and most versatile land where possible; and
- Avoiding flood risk areas.

The selection of Option 2 was informed by:

- The application to PINS for a DCO;
- Avoiding overload to the Haine corridor with additional sites as the relief link road cannot be delivered;
- Selecting sites that could deliver as much of the transport strategy as possible;
- The need to relieve pressure on Coffin House corner;
- Choosing sites in deliverable buoyant market areas;
- Inability to allocate sites too close to the airport site if it becomes a functioning airport;
- Avoidance of flood risk areas; and

<sup>1</sup> <https://democracy.thanet.gov.uk/documents/s53039/Annex%206%20-%20TDC%20New%20Settlement%20Study%20draft.pdf>

- There were no choices as such with best and most versatile agricultural land as the majority of Thanet's greenfield land is best and most versatile.

Further details of the context of Option 2 are reported in Table 1.

## 1.4 Sustainability appraisal process

In light of the recent changes and additions to draft local plan options, revised appraisals have been undertaken where deemed appropriate. The addenda associated with Option 2 were screened (Section 2) to determine whether specific addenda items only resulted in minor text changes that did not affect the policy intention, or whether addenda items were simply consequential amendments to another intervention. In this case, no further appraisal was undertaken and the existing appraisal matrix from the SA of the Revised Preferred Option was deemed valid. Where reappraisal was required, this has been summarised in Section 3.

The appraisal of the revised options has focused on amending existing policy appraisals in line with the revisions for Option 2, or creating new appraisal matrices for new policies, or other interventions that may give rise to significant effects. For ease, amendments and additions to the appraisal have been highlighted for identification purposes.

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Table 1: Option 2 Addenda Items

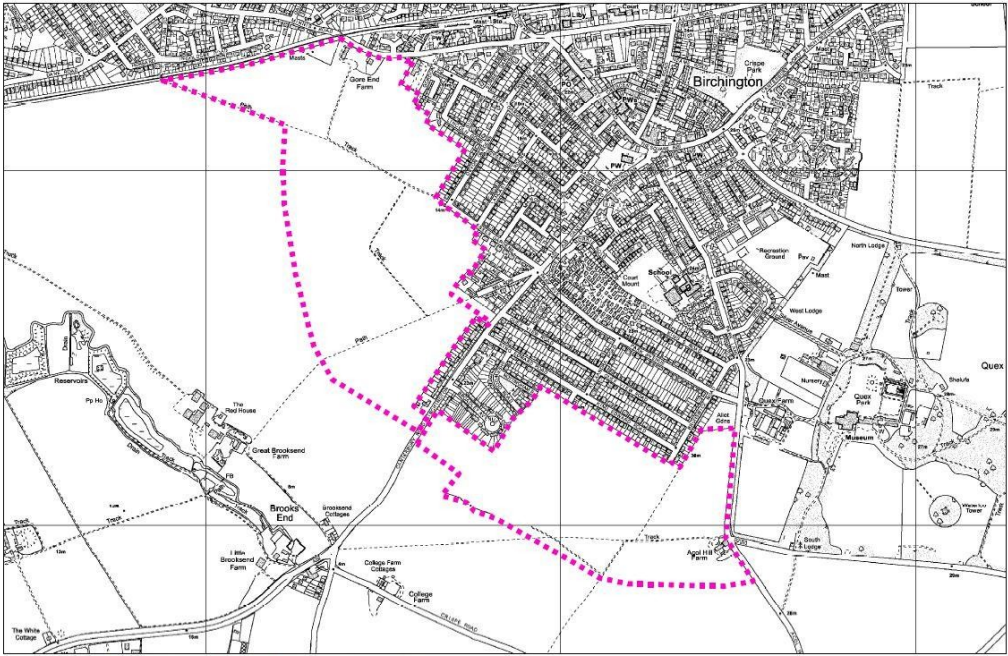
Addendum Number	Action	Change
AD01	Delete last bullet point as follows:	<del>Support the sustainable development and regeneration of the former Manston Airport as a mixed use development site that will deliver high quality housing and employment opportunities and a quality environment.</del>
AD02	Reword second paragraph of Policy SP02 Economic Growth, as follows:	<b>The aim is to accommodate inward investment in job creating development, the establishment of new businesses and expansion and diversification of existing firms. Sufficient sites and premises suited to the needs of business are identified and safeguarded for such uses. Manston Business Park and the former Manston Airport site will be is the key location for advanced manufacturing and large scale job creating development.</b>
AD03	Reword paragraph 1.32 as follows:	1.32 There is a need to keep a range of sites for cheap premises and business start ups. Thanet also needs to retain some sites that can accommodate uses such as paint spraying and tyre recycling. The range of sites include some in the rural area to support the rural economy. A “flagship” site for inward investment that can also accommodate growing indigenous businesses is provided for at Manston Business Park. <del>The former Manston Airport site presents a significant opportunity to accommodate advanced manufacturing companies identified as important in the Economic Growth Strategy for Thanet 2016.</del> There is also a need for “flexible” sites where alternative non Class B uses will be allowed. This reflects the current trend and ensures land is provided to meet all types of economic development.
AD04	Delete site 2 from the list in Policy SP03 and renumber accordingly:	<b>1. Manston Business Park, Manston 2. <del>Former Manston Airport site</del> 3. Eurokent (part)*, Ramsgate 4. Thanet Reach Business Park, Broadstairs 5. Hedgend Industrial Estate, St Nicholas</b>
AD05	Delete paragraphs 1.38 – 1.42 and replace wording as follows.	<b><del>New Settlement (Former Manston Airport Airport Site)</del></b>  <del>1.38 Following the closure of Manston Airport in May 2014 the Council has made significant efforts to support a functioning aviation use on the site and has explored its CPO powers in seeking an indemnity partner and has carried out extensive soft market testing to seek an airport operator to run the airport. 1.39 In order to satisfy the requirements of the National Planning Policy Framework (NPPF) which 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 the Council commissioned an airport viability study by Avia Solutions. This was to look at whether an airport was a viable option for the site within the plan period to 2031. This report took into account national and international air travel and transport and the way in which it is likely to develop over the next 15-20 years and looked at previous reports and developments in national aviation. 1.40 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. 1.41 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 1.42 mixed use development primarily focused on residential. 1.42 The policy seeks to create an attractive sustainable freestanding new settlement with a district centre and featuring all the amenities needed for a town. Development will also deliver important links across Thanet and improved access to and from the site and provide open space and community facilities that the whole of Thanet can access.</del>  <b>Following the closure of Manston Airport in May 2014, the Council has made significant efforts to support a functioning aviation use on the site and has explored its CPO powers in seeking an indemnity partner and carried out extensive soft market testing to seek an airport operator to run the airport. In order to satisfy the requirements of the National Planning Policy Framework (NPPF), the Council commissioned an airport viability study by Avia Solutions. This was to look at whether an airport was a viable option for the site within the plan period to 2031. This report took into account national and international air travel and transport and the way in which Strategic Partners for an air cargo operation at the site, and the fact that an application for a Development Consent Order (DCO) is to be submitted imminently/ has been submitted to the Planning Inspectorate (PINS) for consideration. A DCO is a consent by a Secretary of State for a Nationally Significant Infrastructure Project (NSIP). A DCO not only provides planning consent for a project, but may also incorporate other consents and include authorisation for the compulsory acquisition of land. To ensure that the NSIP-DCO process is not prejudiced, the Council is proposing not to allocate the Airport site for any specific purpose in the draft Local Plan. In the meantime, the site has an existing use for aviation, subject to other relevant legislation. If a DCO for aviation use at the site is granted, this would require a partial review of the Local Plan in relation to housing land supply provisions, aviation and environmental policies and other related matters. In the event that a DCO is not accepted or granted, or does not proceed, the Council will need to consider the best use for this site (including housing), in the next local plan review.</b>
AD06	Delete Policy SP05 – New Settlement Policy (former airport site)	<b><del>SP05 – New Settlement Policy (Former Airport Site) Land is allocated for a mixed use settlement at the site of the former Manston Airport as defined on the policies map. The site has the capacity to deliver at least 2,500 new dwellings, and up to 85,000sqm employment and leisure floorspace. The overarching principle of development of this settlement is the creation of a single sustainable settlement that can be easily served by public transport and with good, easily walkable access to central community services and other facilities. Contributions will be required to meet the following provisions and proposals will be judged and permitted only in accordance with a development brief and comprehensive masterplan for the whole site detailing:</del></b>

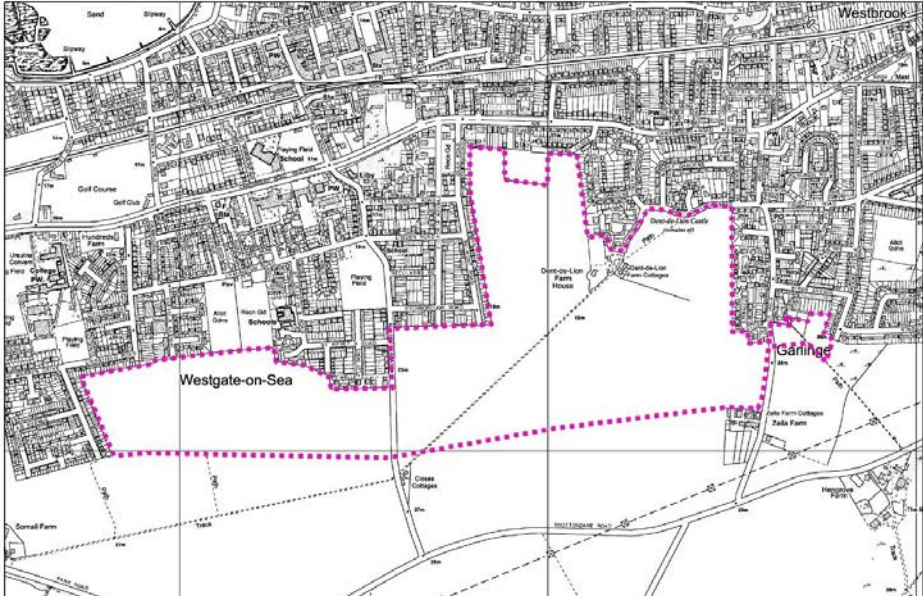
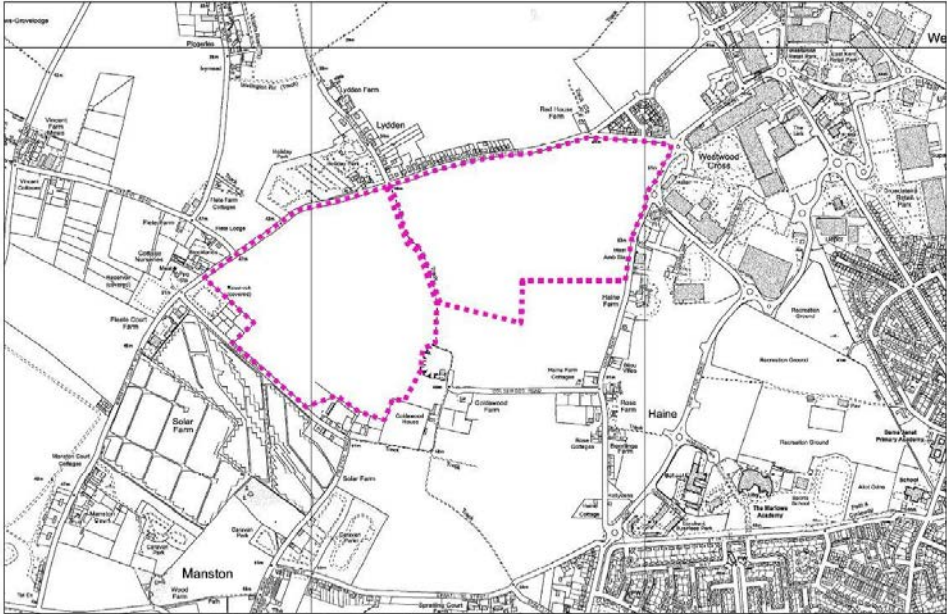


Addendum Number	Action	Change																				
AD07	Delete bullet point referring to a new settlement	Identification and allocation of housing land has been informed by assessment of the sustainability of individual sites through the Strategic Housing Land Availability Assessment alongside the strategy for the planned location of homes whose key principles are to: <ul style="list-style-type: none"><li>• optimise use of capacity from sites in the built up areas of the coastal towns;</li><li>• focus provision at sites abutting those areas; <b>and</b></li><li><del>• create a sustainable new settlement incorporating appropriate mitigation measures to ensure its sustainability; and</del></li><li>• make modest provision at rural settlements to meet identified need for affordable homes and to provide locational choice at a scale compatible with their character and access to services and facilities.</li></ul>																				
AD08	Amend housing distribution figures to reflect changes to housing sites	<b>Table 2 - Total Housing Distribution</b> <table><tr><th>Period</th><th>2011-2031</th></tr><tr><td><b>Strategic Sites (sites of 500+ dwellings)</b></td><td></td></tr><tr><td>Westwood</td><td>1,450</td></tr><tr><td>Birchington on Sea</td><td><del>1,000</del> <b>1,600</b></td></tr><tr><td>Westgate on Sea</td><td><del>1,000</del> <b>2,000</b></td></tr><tr><td>Manston Green</td><td>(planning permission granted so not counted in allocations)</td></tr><tr><td>Land at Manston Court/Haine Road</td><td><del>700</del> <b>1,200</b></td></tr><tr><td><b><u>Land North and South of Shottendane Road</u></b></td><td><u>550</u></td></tr><tr><td>New Settlement Site</td><td>2,500</td></tr><tr><td><b>Other Housing Sites/Areas</b></td><td><del>2,548</del> <b>2398</b></td></tr></table>	Period	2011-2031	<b>Strategic Sites (sites of 500+ dwellings)</b>		Westwood	1,450	Birchington on Sea	<del>1,000</del> <b>1,600</b>	Westgate on Sea	<del>1,000</del> <b>2,000</b>	Manston Green	(planning permission granted so not counted in allocations)	Land at Manston Court/Haine Road	<del>700</del> <b>1,200</b>	<b><u>Land North and South of Shottendane Road</u></b>	<u>550</u>	New Settlement Site	2,500	<b>Other Housing Sites/Areas</b>	<del>2,548</del> <b>2398</b>
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AD09	Housing supply table to be updated to reflect the results of the latest monitoring.	Table 3 – Total Housing Supply <table><tr><td><b>Local Plan requirement 2011-31 (857pa)</b></td><td><b>17,140</b></td></tr><tr><td>completions from 01/04/11 to 31/03/17</td><td>1944</td></tr><tr><td>empty homes brought back into use 2016/17</td><td>89</td></tr><tr><td>residual requirement</td><td>15,107</td></tr><tr><td><b>total allocations supply</b></td><td><b>9198</b></td></tr><tr><td><b>Planning permissions supply</b></td><td><b>3840</b></td></tr><tr><td>empty homes 27pa (27x14)</td><td>378</td></tr><tr><td>Windfall allowance of 225 units pa 225x11*</td><td>2475</td></tr></table>	<b>Local Plan requirement 2011-31 (857pa)</b>	<b>17,140</b>	completions from 01/04/11 to 31/03/17	1944	empty homes brought back into use 2016/17	89	residual requirement	15,107	<b>total allocations supply</b>	<b>9198</b>	<b>Planning permissions supply</b>	<b>3840</b>	empty homes 27pa (27x14)	378	Windfall allowance of 225 units pa 225x11*	2475				
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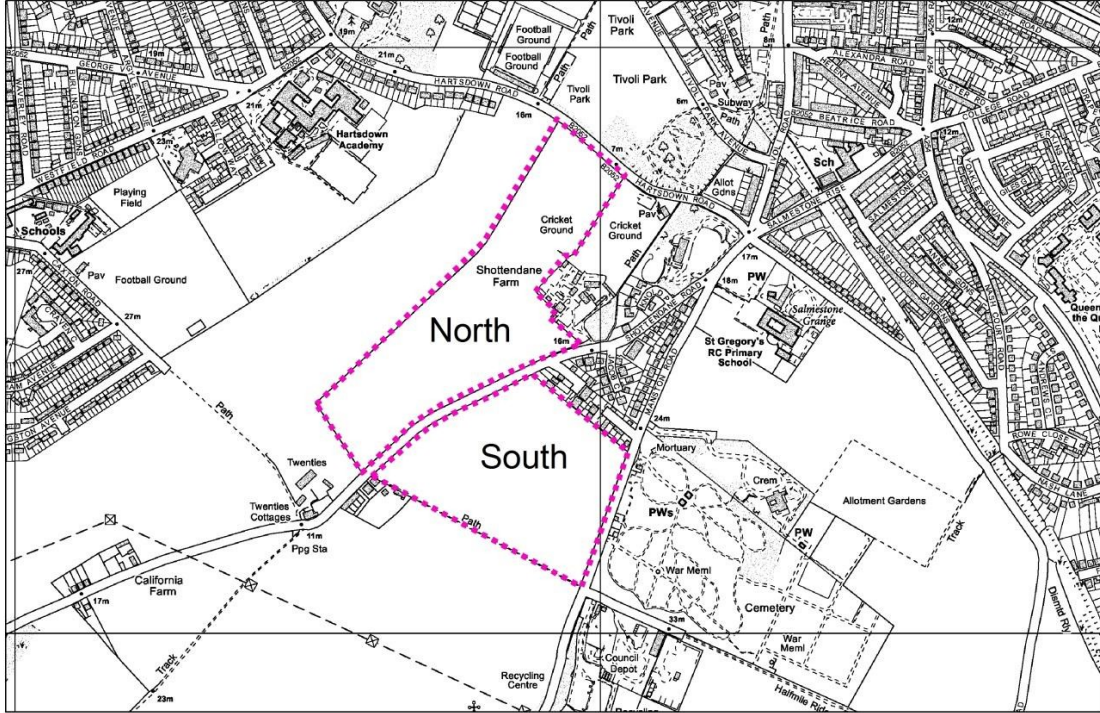



Addendum Number	Action	Change
AD10	Delete reference to allocation of brownfield site as a new settlement	3.17 The existing built up areas of the district will continue to deliver additional housing. However, a significant amount of greenfield housing land is required to meet the housing target. Assessment has revealed that some of the suitable and sustainably located greenfield sites identified are large and some are adjoining or in mutual proximity. These sites provide the opportunity to deliver development at a scale that will serve both to facilitate a step change in delivering the type of homes required to meet need and secure the infrastructure required to support them. Such large and clustered sites have been identified as strategic housing allocations that will be of particular importance in delivering the Plan's housing objectives. <del>A brownfield site has also been identified as a strategic allocation to provide a free standing, sustainable new settlement which will accommodate housing, employment and leisure facilities, a district centre and community facilities.</del>
AD11	Delete reference to SP05 and additional new policy	3.19 The sites listed below are identified as Strategic Housing Sites. Applications to develop such sites shall be accompanied by a detailed development brief including an illustrative site masterplan featuring all elements of the proposal and indicating phasing of development and supporting infrastructure. Applications will be determined in light of the following site specific policies: SP05 New Settlement Site SP13 Manston Green SP14 Birchington on Sea SP15 Westgate on Sea SP16 Westwood SP17 Land fronting Nash and Haine Roads SP18 Land at Manston Court/Haine Road <b><u>HO2 – Land north and south of Shottendane Road – TO BECOME A STRATEGIC POLICY IN THE FINAL VERSION OF THE LOCAL PLAN</u></b>
AD12	Amend Policy SP14 to increase housing provision to 1,600 and open space to 14ha and amend Policies Map. Policy now includes land fronting Park Lane	Policy SP14 - Strategic Housing Site – Birchington  <b>Land is allocated for up to <del>1,000</del> 1,600 new dwellings at a maximum density of 35 dwellings per hectare net at Birchington. Proposals will be judged and permitted only in accordance with a development brief and masterplan for the whole site including provision within the site of:</b> <b>1) a new link road to serve the development and extending from Minnis Road and the A28,</b> <b>2) access on to Park Lane and a footway connection to the entire frontage to connect to the existing footway in Park Lane near to the access with Brunswick Road</b> <b>3) multi-modal access, including footway and cycleway connections and an extended bus service accessible to the residential development</b> <b>4) a minimum of 14 ha of open space</b> <b>5) a fully serviced site of 2.05 ha (to be provided at the cost of the developer) for a two-form entry primary school,</b> <b>6) small scale convenience retail provision required to accessibly serve day to day needs of the development.</b>  <b>Phasing of development will be in accordance with Appendix B. The access road and serviced school site shall be programmed for delivery as agreed by the County Council as highway and education authority respectively.</b>  <b><u>Development will be expected to provide an appropriate contribution and land for the expansion of Birchington Medical Centre.</u></b>  <b>Masterplanning will be informed by and address:</b> <b>1) pre-design archaeological evaluation;</b> <b>2) assessment of the impact of development on the junction of Park Lane and the A28, and the junction of Manston Road/Park Lane and Acol Hill</b> <b>3) liaison with service providers to investigate the need to upgrade the capacity of any utility services and infrastructure including gas supply,</b> <b>4) the need to preserve the listed buildings on the site and respect the setting of Quex Park,</b> <b>5) the need for integration of development and landscaping to enable a soft edge between the site and open countryside.</b> <b>6) Appropriate noise mitigation for any development near the northern edge of the site which is adjacent to the railway line</b>

Addendum Number	Action	Change
AD12	Amend Policies Map to reflect new site boundary as shown in map extract.	 <p>© Crown copyright and database rights 2017 Ordnance Survey 100018261</p>
AD13	Amend Policy SP15 to increase housing provision to 2,000 units and increase open space to 11.1ha	<p><b>Policy SP15 - Strategic Housing Site – New Settlement - Westgate-on-Sea</b></p> <p><b>Land to the east and west of Minster Road, Westgate is allocated for up to <del>1,000</del> 2,000 new dwellings at a maximum density of 35 dwellings per hectare net. Phasing of development will be in accordance with Appendix B. Proposals will be judged and permitted only in accordance with a development brief and masterplan for the whole site including provision within the site of:</b></p> <ol style="list-style-type: none"><li><b><u>a minimum of 17.5 ha of open space to include a functional green corridor between existing urban edge and new development to preserve the more rural characteristics of existing urban edge dwellings</u></b></li><li><b><u>provision for small scale convenience retail provision required to accessibly serve day to day needs of the development, provision of a District Centre to meet the retail need of the development, fit with the retail hierarchy and serve the appropriate catchment</u></b></li><li><b><u>provision of community facilities as outlined in the Infrastructure Delivery Plan (IDP) including a fully serviced area of 2.05 ha (to be provided at the cost of the developer) to accommodate a new two-form entry primary school, and 1 ha of land for a new medical centre.</u></b></li></ol> <p><b>Development will be expected to provide an appropriate contribution to off-site highway improvements.</b></p> <p><b>Masterplanning will be informed by and address</b></p> <ol style="list-style-type: none"><li><b>1) a transport assessment (including modelling of junctions of the A28 with Minster Road, Briary Close and Garlinge High Street, the junction of Minster Road with Shottendane Rd the junction of Brooke Avenue with Maynard Avenue), and incorporate:</b><ul style="list-style-type: none"><li><b>• measures to promote multi-modal access, including footway and cycleway connections, and an extended bus service accessible to the new dwellings, <u>Link road through the site to link Shottendane Road to Dent de Lion Road/High Street Garlinge/A28</u></b></li><li><b>• <u>Upgrade of Shottendane Road to Local Distributor standard</u></b></li><li><b>• appropriate road and junction improvements and signaling,</b></li></ul></li><li><b>2) an archaeological evaluation,</b></li><li><b>3) the need to safeguard the setting of scheduled ancient monuments and the listed Dent de Lion Gateway,</b></li><li><b>4) liaison with service providers to investigate the need to upgrade the capacity of any utility services and infrastructure including gas supply,</b></li><li><b>5) appropriate arrangements for surface water management/sustainable drainage schemes in line with Margate Surface Water Management Plan,</b></li><li><b>6) a Landscape and Visual Impact Assessment to address any visual impact on views to and from the adjacent Green Wedge and protecting wide open landscapes and strategic views</b></li><li><b>7) the need for integration of development and landscaping to take account of public rights of way and enable a soft edge between the site and open countryside.</b></li></ol>

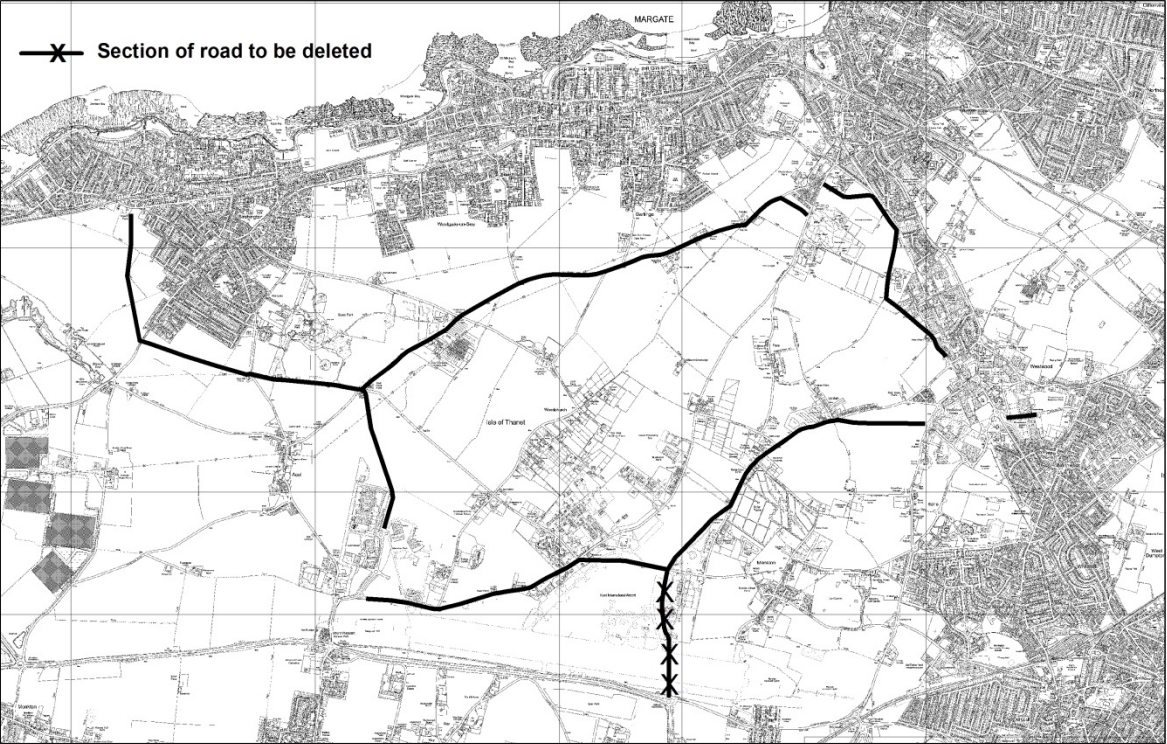
Addendum Number	Action	Change
AD13	Amend Policies Map to reflect new site boundary as shown in map extract.	 <p>© Crown copyright and database rights 2017 Ordnance Survey 100018261</p>
AD14	Amend policy to accommodate higher housing numbers	<p><b>Policy SP18 -Strategic Housing Site - Land at Manston Court Road/Haine Road</b></p> <p><b>Land is allocated for a mixed use development, comprising up to <del>700</del>1200 new dwellings at a maximum density of 30 dwellings per hectare net, and leisure uses. Proposals will be judged and permitted only in accordance with a development brief and masterplan for the whole site integrating with development at the adjoining sites. The Masterplan shall incorporate:</b></p> <ol style="list-style-type: none"><li><b>1. Contributions to provide an internal spine road laid out in accordance with the requirements identified in the draft Transport Strategy (<u>Manston / Haine Link. Improvements to Westwood Cross road access (Westwood Relief strategy))</u>)</b></li><li><b>2. A minimum of <del>9 ha</del>10.5ha of open space</b></li><li><b>3. <u>Provision of a secondary school</u></b></li><li><b>4. <u>Ecological surveys of breeding and wintering birds, ecological enhancements based on the results of these surveys and off site mitigation for any loss of ground nesting bird habitats</u></b></li></ol> <p><b>Phasing of development will be in accordance with Appendix B.</b></p>
AD14	Amend Policies Map to reflect new site boundary as shown in map extract.	 <p>© Crown copyright and database rights 2017 Ordnance Survey 100018261</p>

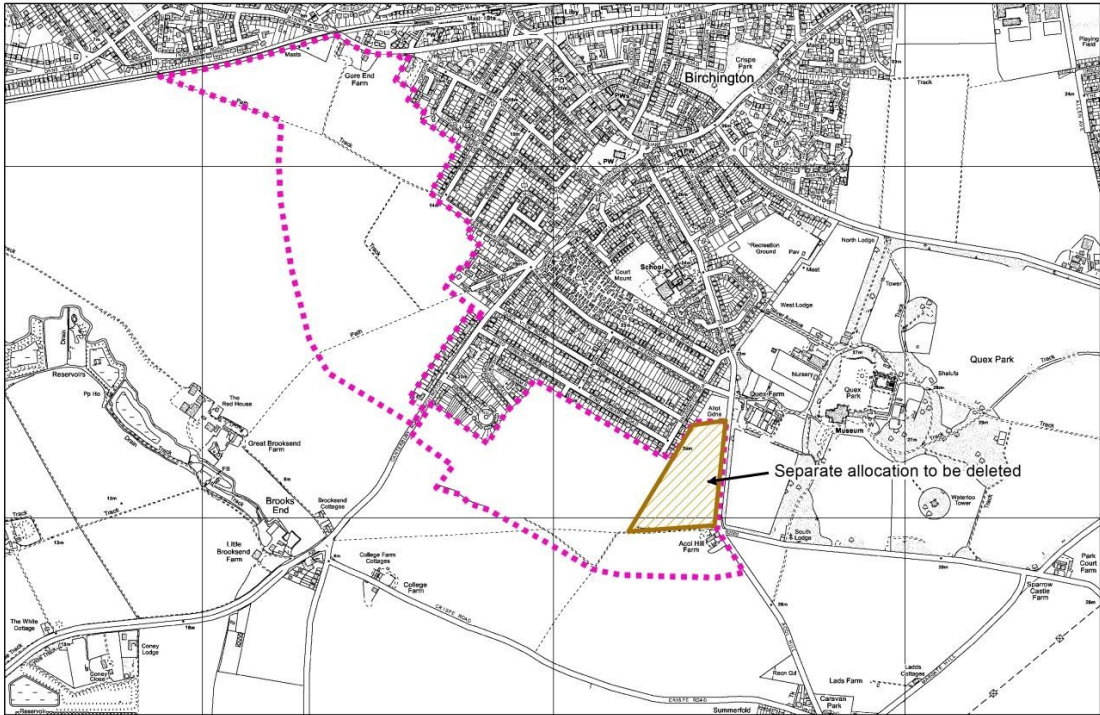


Addendum Number	Action	Change
AD15	Amend to refer to adjacent new allocation in Policy	<p><b>Land is allocated for up to 300 dwellings at land north of Shottendane Road, and up to 250 dwellings at land south of Shottendane Road, at a maximum density of 35 dwellings per hectare net. Phasing of development will be in accordance with Appendix B. Proposals will be judged and permitted only in accordance with a development brief and masterplan for the whole site. The masterplan should be informed by a transport Assessment and travel plan including an assessment of impact on the local road network and demonstrating measures to promote multi-modal access. Development will incorporate and provide for highways improvements identified in the Thanet Transport Strategy.</b></p> <p><b>Master planning will:</b></p> <ul style="list-style-type: none"> <li>• Provide for the integration of development and landscaping to enable a soft edge between the site and the open countryside</li> <li>• Provide pedestrian and cycle access between the two sites</li> <li>• Provide a minimum of 6.23 ha of open space – this may be spread over both sites but must be easily accessible by both sites</li> <li>• Provide off site mitigation for the loss of ground nesting bird habitats</li> </ul> <p><b>Master planning for the northern site will include:</b></p> <ul style="list-style-type: none"> <li>• a link road through the site to link Hartsdown Road and Shottendane Road.</li> </ul> <p><b>Improvements to Margate Cricket Club pitch and facilities Master planning for the southern site will include:</b></p> <ul style="list-style-type: none"> <li>• A Heritage Impact Assessment to assess effects on St Johns Cemetery and sites/memorials within it</li> <li>• Consideration of policies CSW16 and DM8 of the Kent Minerals and Waste Local Plan (or subsequent revision) to assess and mitigate any potential impacts on waste management capacity</li> <li>• Provision for the retention and/or upgrading of designated bridleways (TM13, TM14, TM23, TM28)</li> </ul>
AD15	Add site North of Shottendane Road as a strategic allocation	 <p>© Crown copyright and database rights 2017 Ordnance Survey 100018261</p>
AD16	Amend as follows and add new sites in bold:	<p>The Local Plan designates <del>44</del><b>19</b> Local Green Spaces which are protected under policy SP30. This follows an assessment of <del>43</del><b>49</b> proposals submitted by local groups, individuals, town and parish councils during the Revisions to Preferred Option consultation in 2017, and only those listed below were found to satisfy the criteria. Details of the assessment can be found in the report on Local Green Space. The Local Green Spaces designated in the Local Plan are:</p> <ul style="list-style-type: none"> <li>• Kitty's Green, Broadstairs</li> <li>• Culmer's Amenity Land Broadstairs</li> </ul>


Addendum Number	Action	Change
		<ul style="list-style-type: none"><li>• Holmes Park, Broadstairs</li><li>• Pierremont Park, Broadstairs</li><li>• Memorial Recreation Ground, Lawn Road Broadstairs</li><li>• St Peter’s Recreation Ground, Broadstairs</li><li>• Mocketts Wood, Broadstairs</li><li>• Westover Gardens, Broadstairs</li><li>• Village Green, Foads Lane, Cliffsend</li><li>• Meadow, Cliffs End Road Cliffsend</li><li>• Playground Foads Lane, Cliffsend</li><li>• Earlsmead Crescent, Cliffsend</li><li>• Dane Valley Woods, Margate</li><li>• Windermere Avenue, Ramsgate</li><li>• <b>Adrian Square, Westgate</b></li><li>• <b>Ethelbert Square, Westgate</b></li><li>• <b>Playing Field, Minster Road, Westgate</b></li><li>• <b>Recreation Ground, Lymington Road, Westgate</b></li><li>• <b>Local Park, Victoria Avenue/Quex Road, Westgate</b></li></ul>
AD16	<p>Amend Policies Map to add the following sites to the local green space designation as shown in map extract:</p> <ul style="list-style-type: none"><li>• <b>Adrian Square, Westgate</b></li><li>• <b>Ethelbert Square, Westgate</b></li><li>• <b>Playing Field, Minster Road, Westgate</b></li><li>• <b>Recreation Ground, Lymington Road, Westgate</b></li><li>• <b>Local Park, Victoria Avenue/Quex Road, Westgate</b></li></ul>	 <p>© Crown copyright and database rights 2017 Ordnance Survey 100018261</p>
AD17	Delete section 9 of draft Policy	<p><b>SP47 - Strategic Routes</b></p> <p>The following areas, as shown on the Policies Map, are safeguarded for the provision of key road schemes and junction improvements, to support the implementation of the Thanet Transport Strategy, including land at:</p> <ol style="list-style-type: none"><li>1) Birchington strategic housing site</li><li>2) B2050 Manston Road, Birchington</li><li>3) Shottendane Road (from Birchington to Margate)</li><li>4) Shottendane Road-Manston Road housing site</li></ol>



Addendum Number	Action	Change
		<div>5) Nash Road-Manston Road housing site</div> <div>6) Nash Road, Margate</div> <div>7) Nash Road-Westwood strategic housing site</div> <div>8) Manston Court Road/Star Lane (from Haine Road, Westwood to B2050 Manston Road)</div> <div><del>9) B2050 Manston Road (from Manston Court Road to Spitfire Junction)</del></div> <div>10) B2190 Spitfire Way (from Spitfire Junction to Columbus Avenue junction)</div> <div>11) From Columbus Way to Manston Road, Birchington</div> <div>12) Land between A254 Margate Road and A256 Westwood Road (including Millennium Way), Broadstairs</div> <div>13) Victoria Traffic Lights</div> <div>14) Coffin House Corner Traffic Lights</div> <div>The Council expects all new development to make a proportionate and appropriate contribution to the provision of this key infrastructure.</div>
AD17	Delete road link B2050 Manston Road (from Manston Court Road to Spitfire Junction)	<div></div> <div>© Crown copyright and database rights 2017 Ordnance Survey 100018261</div>
AD18	Delete policy as this site is now included within the Strategic allocation and covered by Policy SP14 – Birchington	<div><del><b>Policy HO5 Land fronting Park Lane, Birchington</b></del></div> <div><del><b>Land fronting Park Lane, Birchington is allocated for up to 90 new dwellings at a notional maximum density of 35 dwellings per hectare net. Proposals will be judged and permitted only in accordance with a development brief for the entire site. The development brief shall: –</b></del></div> <div><div><del>1) Be informed by a full Transport Assessment addressing the impact of development on the junction of Park Lane and the A28, and the junction of Manston Road/Park Lane and Aeol Hill</del></div><div><del>2) Demonstrate measures to promote multi-modal access, including footway and cycleway connections and an extended bus service accessible to the residential development.</del></div><div><del>3) Accommodate suitable access onto Park Lane and a footway connection to the entire frontage to connect to the existing footway in Park Lane near to the access with Brunswick Road.</del></div><div><del>4) Integrate development with that at the adjacent land which is allocated as a strategic housing site.</del></div><div><del>5) Reflect the need to consider and respect the setting of Quex Park and for disposition of development and landscaping to enable a soft edge between the site and open countryside.</del></div><div><del>Development will be expected to provide an appropriate contribution to off-site highway improvements including for Birchington Square/Park Lane.</del></div></div>

Addendum Number	Action	Change
AD18	Amend boundary as shown. This site is to be included within the Birchington strategic allocation (Also see AD12 for new boundary)	 <p>© Crown copyright and database rights 2017 Ordnance Survey 100018261</p>
AD19	Insert new Policy wording and supporting text, as follows to the end of chapter 11:	<p><b>The Council, with its key partners, is concerned about the impact of new foster homes, or similar facilities, being located in the district, and in particular, in the Cliftonville area.</b></p> <p><b>Parts of Margate and Cliftonville experience multiple layers of risk and significant deprivation, and are the subject of substantial inter-agency efforts to improve the environment and lives of people already resident in the area.</b></p> <p><b>The Margate Task Force was set up in 2010, and is a multi- award-winning, integrated team, co-located at the Council’s offices, made up of 14 different agencies and 30 staff, working in two of the most deprived wards in Kent (Margate Central and Cliftonville West). MTF aims to identify the most complex social issues and deliver a joint ‘street level’ service to respond to risk and vulnerabilities.</b></p> <p><b>There is evidence from Kent Police, the Clinical Commissioning Group, Kent County Council and others to suggest that the concentration of these premises in this area causes a range of problems, including:</b></p> <ul style="list-style-type: none"><li>• The children placed in these facilities being at increased risk;</li><li>• Significant impact on, and diversion of, the resources of key agencies, undermining the delivery of core services in the area; and</li><li>• Harm to the area in which these homes are located.</li></ul> <p><b>This policy is supported by Kent Police, the Clinical Commissioning Group and Kent County Council.</b></p> <p><b>Policy HO26</b></p> <p><b>Proposals for new foster homes, or similar facilities, will not be permitted within the area identified on the Proposals Map*.</b></p> <p><b>Proposals for foster homes elsewhere in the district will be considered in the light of the factors set out above, and in consultation with key service providers.</b></p> <p><b>(*Cliftonville West Ward)</b></p>



Addendum Number	Action	Change
AD19	Add new notation to policies map for Fostering Homes	 <p>© Crown copyright and database rights 2017 Ordnance Survey 100018261</p>
AD20	Add additional text referring to Sport England Sports Facility Calculator as recommended in the Sports Facility Strategy	12.17 The Council will seek financial contributions from developers for the provision of new facilities or the upgrade or renewal of existing facilities where on site provision of outdoor sports facilities is not possible. <b>For new provision, developers should have regard to the Sport England Sports Facility Calculator when preparing proposals to determine the need generated by their development.</b> The Planning Obligations & Developer Contributions Supplementary Planning Document gives details of how financial contributions can be made and how they will be calculated.
AD21	Increase dwelling capacity to 250	Amend Appendix B





2 Screening

In order to ensure that the appraisal of the revised options is proportionate and pragmatic, the addenda associated with Option 2 have been screened for the need to undertake further SA of that intervention. The following tables below (Table 3 and Table 4) present the findings of this screening process.

Table 3: Screening of Option 2 Addenda

Addendum No.	Screened In/Out	Justification
AD 01	Out	This is a consequential amend required as a result of the removal of SP05. Appraisal is therefore covered by the Appraisal of AD05 and AD06.
AD 02	In	Amendments to the appraisal of SP02 required as a result of the removal of SP05
AD 03	Out	This is a consequential amend required as a result of the removal of SP05. Appraisal is therefore covered by the Appraisal of AD05 and AD06.
AD 04	In	Amendments to the appraisal of SP03 required as a result of the removal of SP05
AD 05	In	AD05 and AD06 are the primary addenda items that remove the designation of the former airport site for new settlement development from the Local Plan. The removal of this policy, rather than a replacement policy, will be appraised.
AD 06	In	
AD 07	Out	This is a consequential amend required as a result of the removal of SP05. Appraisal is therefore covered by the Appraisal of AD05 and AD06.
AD 08	Out	Appraisal is covered by AD12, AD13, AD14 and AD15.
AD09	In	AD09 is the key addenda in terms of increasing the number of houses required in Thanet. The intervention, rather than a specific policy is being appraised.
AD 10	Out	This is a consequential amend required as a result of the removal of SP05. Appraisal is therefore covered by the Appraisal of AD05 and AD06.
AD 11	Out	This is a consequential amend required as a result of the removal of SP05. Appraisal is therefore covered by the Appraisal of AD05 and AD06.
AD12	In	Amendments to the appraisal of SP14 required as a result of the changing Total Housing Distribution
AD13	In	Amendments to the appraisal of SP15 required as a result of the changing Total Housing Distribution
AD14	In	Amendments to the appraisal of SP18 required as a result of the changing Total Housing Distribution
AD15	In	Amendments to the appraisal of HO2 (which will become a strategic policy) required as a result of the changing Total Housing Distribution
AD16	In	Additional sites designated as local green space may require amendments to the appraisal of SP30
AD17	Out	AD17 is a consequential amendment to strategic routes as a result of removing the new settlement designation from the former airport
AD18	Out	AD18 covered under the appraisal of AD12, which addresses the changes to SP14
AD19	In	HO26 is a new policy and therefore required appraisal.
AD20	Out	Minor text changes to policy
AD21	Out	Increase in density unlikely to change assessment included in the SA.

Addendum No.	Screened In/Out	Justification
AD22	Out	Changes to the key diagram are consequential of other changes

Those Option 2 addenda items reported as being screened in are assessed further in Section 4

### 3 Option 2 – Sustainability Appraisal

#### 3.1 AD 02 – Policy SP02 Economic Growth

Table 2: 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.	<b>Permanent. Indirect. ST/LT +</b> 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.	<b>Neutral. 0</b> A no policy option would not alter the status quo.	NA	-
4. To increase public safety and reduce crime and fear of crime.	<b>Permanent. Indirect. ST/LT + /?</b> 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.	<b>Neutral. 0</b> 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.	<b>Permanent. Indirect. Direct. /LT +</b> Opportunities for inward development will be focused on a range of development sites, with Manston Business Park being identified as the location for 'advanced manufacturing and large scale job creating development'. As such, competition for development at this key location may result in employment generating opportunities seeking suitable locations outside of Thanet.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. Indirect. LT +</b> Opportunities for inward development will be focused on a range of development sites, with Manston Business Park being identified as the location for 'advanced manufacturing and large scale job creating development'. As such, competition for development at this key location may result in employment generating opportunities seeking suitable locations outside of Thanet.	<b>Neutral. 0</b> 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.	<b>Neutral 0</b> The proposed changes to the policy as it relates to the addendum does not alter the status quo.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. Indirect ST/LT ?</b> The urban extensions required for residential developments at existing settlements will largely be located on greenfield land, providing limited opportunities for brownfield housing. However, employment opportunities may be directed towards brownfield land in	<b>Neutral. 0</b> 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.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	existing centres, depending on the scale of employment to be provided.			
11. To ensure that a sustainable pattern of development is pursued.	<b>Permanent. Direct. Indirect. ST/LT ?</b> The proposed policy has the potential to have a positive effect depending on how development occurs to meet future employment requirements. However, this will be dependent on how available sites are viewed by employment developers.	<b>Neutral. 0</b> A no policy option would not alter the status quo.	There are no likely significant effects on the sustainable pattern of development. 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.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	<b>Permanent. Direct. ST/LT ?</b> 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.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. ST/LT ?</b> 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.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. ST/LT ?</b> 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.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. ST/LT ?</b> 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.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. ST/LT ?</b> 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.	<b>Neutral. 0</b> 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	<b>Permanent. Indirect. ST/LT ?</b> 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.	<b>Neutral. 0</b> 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



SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
				facilities and the increased diversion of material from landfill.
18. To ensure development within the District responds to the challenges associated with climate change.	<b>Permanent. Direct. Indirect. ST/LT ?</b> 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.	<b>Neutral. 0</b> 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 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.	<b>Permanent. Direct. ST/LT ?</b> 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.	<b>Neutral. 0</b> 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.	<b>Permanent. Indirect. ST/LT ?</b> 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.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. ST/LT ?</b> 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.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. Indirect. LT +/-</b> 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.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. Indirect. LT +</b> 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.	<b>Neutral. 0</b> 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.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
<p>Summary</p> <p>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.</p> <p>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.</p>				

### 3.2 AD 04 – SP03 Land allocated for Economic Development

Table 3: 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.	<b>Permanent. Indirect. ST/LT -</b> 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. Given that Manston Business Park is the only identified likely location for large scale employment generation, pressure may additionally be placed on windfall sites in urban areas.	<b>Neutral 0.</b> This option is unlikely to have any direct or indirect effects on this objective.	NA	
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.	<b>Permanent. Indirect. ST/LT +/-</b> 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.	<b>Permanent. Indirect. ST/LT ?</b> 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.	<b>Permanent. Indirect. ST/LT +/-</b> 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.	<b>Neutral 0.</b> 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 good 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.	<b>Neutral 0.</b> 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.	<b>Permanent. Indirect. ST/LT ?</b> 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.	<b>Permanent. Indirect. ST/LT +/-</b> 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.	<b>Permanent. Indirect. ST/LT +/-</b> 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 the opportunity to secure appropriate paid employment.	<b>Permanent. Direct. ST/LT +</b> 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 areas where existing employment uses are present will also help to support the creation of internal completion for	<b>Permanent. Direct. ST/LT - /?</b> 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 this option might result in other development that	NA	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	employees which could also provide benefits for the District. However, due to the amount of land allocated for development under this policy, opportunities for employment development might not meet local demand.	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.	<b>Permanent. Direct. ST/LT +</b> The proposed policy 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. However, due to the amount of land allocated for development under this policy, opportunities for employment development might not meet local demand.	<b>Permanent. Direct. ST/LT - /?</b> 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.	<b>Permanent. Direct. ST/LT ?</b> 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.	<b>Permanent. Direct. ST/LT -/?</b> 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.	<b>Permanent. Direct. ST/LT +/-?</b> 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.	<b>Neutral 0.</b> It is unlikely that this policy proposal will have any direct or indirect effects on this objective.		NA	
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	<b>Neutral 0.</b> It is unlikely that this policy proposal will have any direct or indirect effects on this objective.		NA	
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	<b>Neutral 0.</b> It is unlikely that this policy proposal will have any direct or indirect effects on this objective.		NA	
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	<b>Permanent. Direct. ST/LT +/-?</b> 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



SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
				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.	<b>Permanent. Direct. ST/LT +/-?</b> 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	<b>Permanent. Indirect. ST -/?</b> 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 <sup>2</sup> . 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.	<b>Permanent. Direct, Indirect. ST/LT -/?</b> There is the potential for a minor 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.	<b>Permanent. Direct. ST/LT +</b> 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.
20. To conserve and enhance biodiversity.	<b>Permanent. Direct. ST/LT ?</b> 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	<b>Permanent. Direct. ST/LT ?</b> 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	-

<sup>2</sup> Based on data on landfill capacity in Kent from the Environment Agency.

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.	<b>Permanent. Direct. Indirect. ST/LT -/?</b> 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.	<b>Permanent. Direct. Indirect. ST/LT -/?</b> 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 under the socio and economic domains of the SA objectives, particularly in relation to job creation and supporting economic growth. There is however, uncertain effects relating to strategic objectives. Key to the proposed policy is the indirect minor adverse effects to housing objective 1. Economic growth at the former airport site was also proposed to deliver on jobs .</p> <p>With regards to the HRA there are no likely significant effects.</p>				

### 3.3 AD05 and AD06 – New Settlement Former Airport Site

Table 4: Appraisal of Former Airport site – designation and supporting text

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.	<b>Permanent. Direct LT -</b> The proposed policy requires the re-distribution of all housing, and the loss of associated mixed-use facilities (i.e. employment, affordable housing and social infrastructure) from the former site. It is likely to result in a minor negative possibly leading to an increase to the urban edges across Thanet. It is possible that additions to established strategic sites may create unsustainable demand for local services.	NA	NA	TDC should work collaboratively with developers in order to ensure that SA objectives are met. Master plans for future housing sites should be robust and mitigate the increase in new houses to the urban edge and should be designed to reflect the themes of improving the visual sensitivity, creation of how businesses and agreement of accessible transport and infrastructure to new development sites.
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	<b>Permanent. Direct LT -</b> The proposed policy presents the change of developments to possibly create excessive demand on local facilities and services, as a consequence of the proposed optimisation of sites that are both rural and urban in nature. This will be true of healthcare settings such as health centres where local services may not be able to meet demand based on increased patient numbers associated with additional housing on already established strategic sites. This policy is likely to create unsustainable demand.	NA	NA	TDC can forward plan and prepare and predict the labour market and delivery of health services, by working in collaboration with NHS England and local CCG on modelling and predicting potential patients and work-force required to meet potential health facilities demand.
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.	<b>Permanent. Direct ST/LT</b> The redistribution of new housing developments could create excessive demand on local community facilities such as schools, colleges and local apprenticeship schemes and thus reduce accessibility of the service that is being provided. Furthermore, local demand is unlikely to be met as areas grow in housing numbers and potentially increase in population. Thus, reducing access to education and opportunities for skills development for vulnerable groups in order to meet new local skills gaps. It is likely that a no policy approach would exasperate future skills improvement and development for vulnerable and welfare dependant workers	NA	NA	TDC should consider how it facilitates meeting the skills and employment needs of vulnerable people children and young people not in education or employment (NEET) and those who are dependent on welfare. Where the numbers of new businesses are to re-locate, TDC may wish to work with associated policies and plans (e.g. Thanet Economic and Regeneration Strategy) to support travel distances to educational facilities.
4. To increase public safety and reduce crime and fear of crime.	<b>Permanent. Direct. Indirect. ST/LT -/?</b> It is unknown whether the preferred policy will reasonably influence levels of crime within the identified strategic sites. However, new developments extending into established areas may increase the perception/fear of crime. In addition to this, new allocations within strategic sites have the opportunity to design out crime by delivering good Master Planning where possible. It is unclear how significant the magnitude of effects might be but it is likely to a minor negative for people living within those identified strategic sites.	NA	NA	To mitigate potential negative effects of the proposed policy, TDC may wish to consider reviewing and monitoring crime and perceptions of crime where new developments are likely to be situated. Where there is an opportunity to undertake good design principles, TDC should consider this as part of MP process.
5. To provide appropriate key facilities to support vulnerable	<b>Permanent. Direct ST/LT</b>	NA	NA	TDC could consider collaborative working across, developers, local

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
people and reduce the level of deprivation identified across the wards.	The redistribution of new developments could create excessive demand on local community facilities such as schools and thus reduce the quality of the service that is being provided or create a demand that cannot be met, thus facilitating vulnerable and children and young people not in education or employment (NEET) to travel distances to meet their educational needs.			organisations and the wider Council in order to take a strategic review of how policies and strategies support vulnerable people. Part of this will include implementing good design techniques are both inclusive and realistic for a future MP processes.
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	<b>Permanent. Direct. Indirect ST/LT - /?</b> The addition of several hundred new homes on strategic sites may alter the perception of those people already living in the area. People moving into new homes are likely to experience a strong sense of place but this may be put at risk to neighbouring homes where new developments have been built. However, extension to urban strategic sites could also create improved sense of place where areas are in need of improvements.	NA	NA	TDC could consider collaboration with developers and local communities within strategic sites to understand what the local perceptions of community are. Where new housing developments are proposed, good place-making that encourages connectivity should be included.
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.	<b>Permanent. Direct. Indirect. ST/LT - -</b> The deletion of the proposed policy will not restrict new employment opportunities being developed across Thanet. However, the loss of the site will mean the restriction of choice to secure different employment types. There is the possibility of a small number of aviation related employment as the site will still have permitted use for aviation, subject to other relevant legislation.	NA	NA	TDC to review sustainable employment opportunities for all across the District.
8. To ensure the sustainable development of the proposed economic growth and encourage employment development at key sites within the District to support priority regeneration areas.	<b>Permanent. Direct. Indirect ST/LT -</b> The proposed change in policy will potentially reduce the effectiveness of the range of employment development, leading to a minor negative as alternative employment sites will need to be created or identified. District level economic growth will continue and could potentially offer opportunities to residents, thus encouraging infrastructure to support economic growth locally.	NA	NA	TDC to review sustainable employment opportunities for all across the District.
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	<b>Permanent. Direct ST/LT -</b> The proposed policy change will potentially create a minor negative as any development that would have occurred on site is no longer available. This leaves other parts of the District open to new development leading to a less supportive approach to the tourist economy. However, existing legislation protects natural environments (such as SSSI and SPA) and it is unlikely that this would create a decline in natural and semi-natural areas and street scenes.	NA	NA	TDC could work collaboratively with partners and review all planning applications to ensure assets continue to attract visitors and enhance the natural and semi-natural street scene.
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.	<b>Permanent. Direct. ST/LT+</b> It is likely that the proposed policy will improve sustainability through the re-use of previously developed land. However, the removal of the former airport site did present an efficiency of land use and utilisation of existing buildings at one geographical location.		NA	TDC could review how development proposals will be met across Thanet through the re-use of previously developed land.
11. To ensure that a sustainable pattern of development is pursued.	<b>Permanent. Direct. Indirect. ST/LT -</b> The proposed policy change does have a minor negative impact on the pursuance of a sustainable pattern of development across Thanet in that site proposals will need		NA	TDC should consider how development proposals will be met across Thanet through the re-use of previously developed land.



SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	to be met elsewhere within the District. This includes meeting the housing target up to 2031 and future employment needs.			
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	<b>Permanent. Direct. ST/LT+</b> It is likely that the approach will remain the same for TDC and that sustainability credentials of the scheme will continue to be of a high standard. However, as increased employment areas and housing areas across the District is required, creating greater urban extensions, this could potentially reduce the quality of the areas and townscape.	NA	NA	TDC could monitor through planning applications and master planning processes that townscape and coastal areas are conserved and enhanced where possible.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	<b>Permanent. Direct LT -/?</b> Whilst the proposed policy creates opportunities for greater risk of future developments being planned that may put historic and archaeological important features at risk of being damaged or destroyed. This is because, the development objectives, such as housing, employment and health facilities will need to be met elsewhere in Thanet.	NA	NA	TDC could monitor planning applications and undertake appropriate assessments to ensure preservation and mitigation of future site development of any historic archaeological or architectural importance is protected.
14. To improve air quality in the District's Air Quality Management Areas.	<b>Permanent. Indirect. ST/LT --</b> The proposed policy is likely to create higher density urban extensions and more requirements for car movements and traffic to employment areas and social infrastructure such as health and educational facilities due to the deletion of key facilities. New developments for business is also likely to contribute to strategic GHG.	NA	NA	TDC could employ current legislation and guidance on a national and international level regarding the management of air pollution (Clean Air Act) will mitigate any new developments that may yield impacts. TDC can strive to ensure that walking and cycling opportunities are maximised and any future housing is built to relevant design standards
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	<b>Permanent. Direct. Indirect. ST/LT+</b> The removal of the policy does not affect sustainable transport across Thanet. However, if there are increased developments to urban fringes this is likely to trigger the requirement for improved and integrated sustainable transport networks.	NA	NA	TDC could monitor through planning applications and master planning processes ensuring that infrastructure adequately meets local and future needs. TDC will also need to work with public transport operators to deliver sustainable and appropriate services from new extensions to key employment, health, education and shopping facilities and sites
16. To develop key sustainable transport links between Thanet and the wider Kent region and beyond, including road, rail and air.	<b>Neutral. 0</b> Whilst there is guidance for the enhancement of transport links to reduce the reliance upon private vehicles, there is no local specificity in relation to the wider Kent regions. As such the objective is met in a neutral capacity due to its specific local context.	NA	NA	-
17. To reduce waste generation and disposal and achieve the sustainable management of waste	<b>Neutral. 0</b> Given that existing documentation and waste management strategies are in place, the proposed policy is likely to be minor as current practices will not change significantly.	NA	NA	Ensure that TDC maintain its collaborative approach and looks for ways to further enhance waste management within urban extensions and new employment areas.
18. To ensure development within the District responds to the	<b>Permanent. Direct. ST/LT. -/?</b>	NA	NA	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
challenges associated with climate change.	Strategically, new developments across the District may contribute to climate change due to the increase in dispersed and re-distributed housing and employment.			
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with PPS25.	<b>Permanent. Direct. ST/LT++</b> A collaborative approach that incorporated the NPPF would seek opportunities for proposals to enhance protection of natural assets which would allow coastal features to be protected and allow them to be further managed.	NA	NA	-
20. To conserve and enhance biodiversity.	<b>Permanent. Direct. ST/LT. -/?</b> Current legislation and directives already manage natural assets and sensitive areas and as such the deletion of the proposed policy would not create any significant difference. However, developments occurring across the District to meet the shortfall of SP05 (particularly in rural and coastal settings) may result in the proposed policy creating additional risks to the conservation and enhancement of biodiversity.	NA	NA	TDC can continue to monitor sensitive areas and undertake EIA where urban extensions propose a risk to biodiversity.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites	<b>Permanent. Direct. ST/LT -</b> There is a risk that the proposed policy will negatively impact on the objective as other options are considered in order to meet development need. However, there is existing legislation to meet the WFD and national plans to meet the requirements of the European Directive.	NA	NA	-
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	<b>Neutral. 0</b> A no policy option would yield neutral impacts as existing legislation and practices seek to increase sustainability practices and meet the SA objective	NA	NA	-
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	<b>Permanent. Direct. ST/LT +</b> The proposed policy could support an opportunity to increase energy efficiency and new methods of renewal sources across Thanet if housing and business developments are built out in different areas of Thanet. This is particularly true in larger urban extensions where housing allocation is up to 1000 new homes where CHP can be implemented	NA	NA	-
<b>Summary</b> Deletion of SP05 (removal of mixed use development in the former airport site) and the implementation of option 2 will mean greater dispersal of housing development across the District. This poses some pressures on existing strategic sites and could increase unsustainable development with regards to air quality and inefficient or increased pressure on public transport. Objective 8, creating a strong sense of place is particularly at risk as it is uncertain whether new communities will adopt a sense of place. TDC will need to ensure that sufficient and relevant assessments are conducted where required and that fostering a collaborative approach between applicants and the Council.				

### 3.4 AD 09 – Total Housing Supply

Table 5: Appraisal of increasing total housing supply

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.	<b>Permanent. Direct. ST/LT++</b> The proposed policy would help encourage a mixture of housing to reflect varying demands. By encouraging inward investment in residential schemes across the district, and seeking cooperation between the applicant and Thanet Council; higher levels of approvals should be attained in comparison to if the developers worked in isolation. This would help deliver choice within the residential market, which would help deliver affordable housing in the district.	<b>Permanent. Direct. Indirect ST/LT - -</b> No policy is likely to lead to housing demand not being met. This could lead to developments granted that does not encourage a sustainable housing supply.	NA	Ensure that the Local Plan and planning conditions are placed on developers to offer mixed use schemes including affordable housing.
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	<b>Permanent. Direct. Indirect ST/LT -</b> Increasing total housing supply is likely to create excessive demand on healthcare facilities and services. This will be true of healthcare settings such as health centres where local services may not be able to meet demand based on increased patient numbers associated with additional housing.	<b>Neutral. 0</b> No increase in housing supply would not alter the status quo.	NA	TDC to work in collaboration with NHS England and local CCG in order to forward plan the labour market and model future service requirements.
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.	<b>Permanent. Indirect. ST/LT++</b> It is likely that the proposed policy will lead to a collaborative approach that would aim to ensure housing schemes are designed to have good access to education and training services.	<b>Permanent. Direct ST/LT -/?</b> A lack of policy support could allow developments to be granted permission without the consideration for the impacts upon local services. As such the developments could create excessive demand on facilities and services such as schools and thus reduce the quality of the service that is being provided.	NA	TDC to work in collaboration with local educational facilities to support and understand where training centres are likely to be located in the District
4. To increase public safety and reduce crime and fear of crime.	<b>Permanent. Direct. Indirect ST/LT -/?</b> It is unclear whether the proposed policy will impact on public safety and reduce crime positively or negatively. However, it is likely that increased housing development will be additional to established sites and could create a greater sense/perception of crime amongst local residents. The potential impacts are not sufficient to warrant a positive effect as it is unclear how the new developments might harness natural surveillance.	<b>Neutral. 0</b> A no policy option would not alter the status quo	NA	TDC to monitor crime and fear of crime levels within areas that new housing developments are proposed.
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	<b>Permanent. Direct. ST/LT++</b> New housing developments are likely to create opportunities for affordable housing and houses that are flexible such as life-time homes or build in features for older people and/or people living with disabilities.	<b>Permanent. Direct. Indirect ST/LT -</b> A no policy option would mean that housing allocations and mixed tenures would be open to interpretation by developers and it is unlikely that it would support appropriate facilities for vulnerable people.	NA	TDC to work in collaboration with developers and key organisations to model the type and tenure of housing required across wards in the District.
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	<b>Permanent. Direct. ST/LT+/?</b> The proposed policy offers an opportunity to create local communities and promote good plan making. However, it is uncertain whether increased housing attached to and within urban and possibly rural settings, will provide established communities a continued sense of place.	<b>Permanent. Direct. Indirect ST/LT -</b> A no policy option would mean that housing allocations and mixed tenures would be open to interpretation by developers and it is unlikely that it would support vibrant and balanced communities.	NA	TDC to ensure good plan making is adopted and collaborative working with developers and local residents to ensure a sense of place is experienced.
7. To provide access to employment opportunities for all	<b>Permanent. Indirect. ST/LT+?</b>	<b>Neutral. 0</b>	NA	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.	The proposed policy will require infrastructure to enable a sense of place to be experienced by residents. It is anticipated that the policy will drive local infrastructure development including opportunities for employment. However, it is unlikely that the proposed policy will be able to offer employment that is tailored to meet need.	A no policy option would not alter the status quo in relation to economic growth.		
8. To ensure the sustainable development of the proposed economic growth and encourage employment development at key sites within the District to support priority regeneration areas.	Permanent. Direct. ST/LT+ Increasing housing developments across Thanet will need to work in tandem with improving local infrastructure. It is likely that this be a minor positive. However, it is unlikely that the proposed policy will be able to offer employment that is tailored to meet need.	Neutral. 0 A no policy option would not alter the status quo in relation to economic growth.	NA	-
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 is likely to put at risk natural and semi-natural areas within the District as increased housing may encroach on areas that support the tourist economy. For example, coastal areas due to increased housing on established sites.	Neutral 0. A no policy option could allow developments to sprawl across 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.	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+ Increased housing supply is likely to positively affect the re-use of previously developed land. A collaborative approach would help prioritise development on brownfield sites and seek to avoid development on versatile greenfield or agricultural land. The approach would ensure land is used efficiently by bringing vacant land back into use and retaining the openness of the countryside.	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.	NA	TDC will need to assess some housing allocations where brownfield or re-use is not possible for sustainable impacts and mitigate where possible.
11. To ensure that a sustainable pattern of development is pursued.	Permanent. Direct. ST/LT+/? The proposed policy is likely to deliver a sustainable pattern of development if development continues of brownfield land. There is a risk that meeting demand may require building on greenfield land which would be detrimental to maintaining sustainable development.	Neutral. 0 Adoption of no policy will not yield any positive or negative effects, as the status quo ensues.	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- Whilst a collaborative approach would help conserve and enhance the distinctive landscape and townscape environment. However, the proposed policy is likely to create pressure on already identified strategic sites and therefore, new housing developments may start to encroach on coastal areas and near town centres.	Unknown? By not adopting the policy it is unknown the character and quality of the local spaces would decline. It could be conceivable that the areas in question sustain their integrity. Yet similarly without protection decline could be possible due to a lack of safeguarding.	NA	TDC to work collaboratively with developers to encourage an approach that should enhance and promote the use of public spaces and preserve the countryside by encouraging redevelopment of urbanised sites.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	Neutral. 0 Existing national legislation and directive protect features of the historic and archaeological importance (e.g. listed buildings). Thus, the proposed policy is unlikely to have any effects on historic and archaeological settings.	Neutral. 0 Existing national legislation and directive protect features of the historic and archaeological importance (e.g. listed buildings). Thus, a no policy selection would still offer protection to the objective.	NA	-
14. To improve air quality in the District's Air Quality Management Areas.	Unknown? It is unknown whether the proposed policy is likely to encourage further infrastructure. Additional houses that may be developed in the AQMA will not improve air quality.	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	NA	-



SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
		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.	<b>Permanent. Indirect. ST/LT++</b> As increase in housing supply is likely to promote improved transport network as developers design and promote sustainable modes of transport. Connectivity is likely to be enhanced and improved access to key facilities and services encouraged as public transport supports new developments	<b>Permanent. Direct LT -/?</b> 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 would be unlikely to meet local need such as times and frequency of services.	NA	TDC to work collaboratively with public transport operators to ensure that services are appropriate and meet the timing and frequency need of new housing developments.
16. To develop key sustainable transport links between Thanet and the wider Kent region and beyond, including road, rail and air.	<b>Neutral. 0</b> Whilst policy adoption provides guidance for the enhancement of transport links to reduce the reliance upon private vehicles, there is no local specificity in relation to the wider Kent regions. As such the objective is met in a neutral capacity due to its specific local context.	<b>Neutral. 0</b> 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	<b>Permanent. Direct. ST/LT-</b> The proposed policy would have a direct effect on waste generation and disposal as more housing numbers would require waste management.	<b>Permanent. Direct. ST/LT. -/?</b> A lack of policy support could allow developments to be granted permission without the consideration of the impacts upon the local services and infrastructure. As such waste management facilities could end up exceeding capacity and not functioning at their optimal level. However, given that existing documentation and waste management strategies are in place the effects are likely to be minor as current practices could potentially cope with the added effects of new developments.	NA	Ensure that TDC maintain its collaborative approach and looks for ways to further enhance waste management within urban extensions.
18. To ensure development within the District responds to the challenges associated with climate change.	<b>Permanent. Direct. ST/LT++</b> A collaborative approach would help ensure development is adapted or can be adapted to future climatic conditions, by ensuring sustainable development. A collaborative approach to developing proposals would help provide solutions to ensure that the existing built and natural environment is not more vulnerable to future climatic conditions.	<b>Unknown ?</b> It is not possible to say if a no policy choice would restrict the objective as the details of future developments are not known.	NA	-
19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with PPS25.	<b>Permanent. Direct. ST/LT++</b> A collaborative approach that incorporated the NPPF would seek opportunities for proposals to enhance protection of natural assets which would allow coastal features to be protected and allow them to be further managed.	<b>Neutral. 0</b> Existing national legislation and directive protect features of the coast. Thus, a no policy selection would still offer protection to the objective.	NA	-
20. To conserve and enhance biodiversity.	<b>Permanent. Direct. ST/LT++</b> The proposed policy would be required to support the conservation and enhancement of biodiversity by not developing within protected areas. The commitment within this option to work proactively with applicants to find solutions to secure developments planning permissions would improve environmental conditions would ensure that designated sites are protected or enhanced, that proposals contribute to greater connectivity in the biodiversity network, that biodiversity is enhanced	<b>Neutral. 0</b> The no policy option is unlikely to affect the biodiversity either way. Current legislation and directives already manages natural assets and sensitive areas and as such the addition of a new policy would only strengthen existing practices.	NA	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	and protected in the district and provide opportunities to enhance or create new features.			
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites	<div>Permanent. Direct. ST/LT++</div> <div>Fostering a collaborative approach between the applicant and TDC would ensure that the sustainability credentials of schemes are of the highest standard. A collaborative approach would help ensure the conservation and enhancement of the fluvial and coastal sites including those of European designation.</div>	<div>Neutral. 0</div> <div>The no policy option would not impact the objective. There is existing legislation to meet the WFD and national plans to meet the requirements of the European Directive.</div>	NA	-
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	<div>Neutral. 0</div> <div>Whilst policy adoption provides guidance for the enhancement of sustainable practices and design, there is no specific guidance on the products that must be used and if they should be local. As such due to the objectives specific local context the impact will only be neutral.</div>	<div>Neutral. 0</div> <div>A no policy option would yield neutral impacts as existing legislation and practices seek to increase sustainability practices and meet the SA objective.</div>	NA	-
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	<div>Permanent. Direct. ST/LT++</div> <div>Fostering a collaborative approach between applicants and TDC would ensure that the sustainability credentials of schemes are of the highest standard. A collaborative approach would help increase energy efficiency and promote renewable energy sources by ensuring proposals promote renewable energy and consider small scale and large scale renewable energy where appropriate.</div>	<div>Neutral. 0</div> <div>A no policy option would not alter the status quo.</div>	NA	-
<div>Summary</div> <div>The proposed policy, through support for the promotion of NPPF, would undoubtedly meet the Districts housing need and enhance the positive impacts seen across the majority of the SA objectives. Commonly, a no policy option would yield neutral impacts or negative as uncontrolled developments could over saturate local services and place too high a demand upon them. As such by incorporating the NPPF sustainable practices and designs will be created whereby developers and TDC work together to create a development that sustainably meets the needs of the local population whilst also been considered for its socio-economic and environmental implications.</div>				

### 3.5 AD12 – Policy SP14 – Strategic Housing Sites at Birchington

Table 6: 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.	<b>Permanent Direct LT ++</b> The proposed policy inherently provides for additional housing within the District, by proposing up to 1600 new dwellings on site.	<b>Permanent Direct. ST/LT -</b> The omission of this policy in isolation would adversely affect the position of other strategic housing sites creating additional spread of an extra 1600 housing allocation.	Development of housing sites at Birchington are achievable without significant effects on designated sites, assuming the implementation of Policy SP26 and the SPA mitigation strategy.	-
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	<b>Permanent Direct ST/LT -</b> The proposed policy has the potential to significantly affect established urban development in Birchington by increasing the population covered by healthcare facilities. Implementation of the proposed policy is likely to place additional burden on community facilities, including local healthcare provision.	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	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.	<b>Permanent Direct ST/LT +</b> The proposed policy stipulates 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.	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	-
4. To increase public safety and reduce crime and fear of crime.	<b>Temporary/Permanent Indirect ST/LT +?</b> The proposed policy would encourage the development of new homes which could contribute to the reduction of crime and fear of crime through the better design/layout of residential areas. However, it is uncertain whether this will be the case for neighbouring houses along the east and south east of the development	<b>Neutral 0</b> 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.	<b>Unknown ?</b> 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.	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	As part of the master planning 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.	<b>Permanent Indirect ST/LT +</b> 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	<b>Neutral 0</b> 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 SP26 and the SPA mitigation strategy.	It would be important for a future master planning 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	<b>Neutral 0</b>	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
everyone who wants to work has the opportunity to secure appropriate paid employment.	Whilst the policy includes provision for small-scale retail provision within the development, this is unlikely to significantly contribute towards achieving this objective.			
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.	<b>Permanent Direct ST/LT -</b> Implementation of the proposed policy would require the use of greenfield land and would therefore not directly support this sustainability objective.	<b>Permanent Direct. ST/LT -</b> A no policy option would mean that housing need would be required elsewhere within the District.	Development of housing sites at Birchington are achievable without significant effects on designated sites, assuming the implementation of Policy SP26 and the SPA mitigation strategy.	-
11. To ensure that a sustainable pattern of development is pursued.	<b>Permanent Direct ST/LT -</b> Due to the location of the site that forms the proposed policy, there is potential for not achieving sustainable development patterns as the proposed policy advocates development adjacent to the existing settlement, whilst developing on greenfield land. However, the new development will ultimately lead to a sustainable approach to plan making	<b>Temporary/Permanent Direct ST/LT -</b> By limiting development in this location the numbers of proposed development would need to be sought somewhere else, therefore not supporting a sustainable pattern of development.	Development of housing sites at Birchington ensuring a sustainable pattern are achievable without significant effects on designated sites, assuming the implementation of Policy SP26 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.	<b>Permanent Direct ST/LT -</b> 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. However, it is likely that the 1600 homes to be built is likely to adversely affect the areas landscape.	<b>Neutral 0</b> 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 SP26 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.	<b>Unknown ?</b> 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.	<b>Neutral 0</b> 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.	<b>Temporary/Permanent Direct ST/LT -</b> 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.	<b>Temporary/Permanent Direct ST/LT +</b> The no policy option potentially limits the increase of vehicle journeys within the Districts Air Quality Management Area.	N/A	Master planning to maximise connectivity for alternative forms of transport (e.g. walking and cycling) and extending bus service provision and promotion of multi-modal access.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	<b>Permanent Direct ST/LT +</b> 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. However, there is provision within the proposed policy for improved multi-modal connections for the site and to assess the potential for bus service extensions	<b>Neutral 0</b> 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.



SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	<b>Permanent Direct ST/LT +</b> 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.	<b>Neutral 0</b> 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.	<b>Permanent Direct ST/LT -</b> The proposed policy will facilitate housing development, which has the potential to increase the amount of domestic waste produced in the district.	<b>Neutral 0</b> 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.	<b>Permanent Direct ST/LT +</b> The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises.	<b>Neutral 0</b> 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"> <li>Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy.</li> <li>Mitigating against climate change by reducing emissions.</li> </ul> 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.	<b>Permanent Direct ST/LT +</b> The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises.	<b>Neutral 0</b> 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 SP26 and the SPA mitigation strategy.	-
20. To conserve and enhance biodiversity.	<b>Permanent Direct ST/LT -</b> The proposed policy designates a site for housing that has potential for ecological effects. The site will develop on greenfield land and therefore the necessary assessments will need to be conducted to ensure that , impacts on habitats could be minimised, assuming the allocated sites ecological value is low.	<b>Unknown ?</b> 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 SP26 and the SPA mitigation strategy.	
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	<b>Neutral 0</b> The proposed policy does not affect the protection and improvement of quality of fluvial and costal water resources.	<b>Neutral 0</b> A no policy option would not alter the status quo.	Development of housing sites at Birchington are achievable without significant effects on designated sites.	
22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.	<b>Unknown ?</b> Effects against this objective are unknown at this stage as the policy does not include explicit reference to sustainably produced and local products.	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	<div>Unknown ?</div> <div>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.</div>	<div>Neutral 0</div> <div>A no policy option would not alter the status quo.</div>	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.
<div>Summary</div> <div>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 increase in capacity of the 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 with existing urban settlements, though good 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.</div> <div>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 SP26 and the SPA mitigation strategy.</div>				

### 3.6 AD13 – Policy SP15 – Strategic Housing Sites at Westgate-on-sea

Table 7: 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.	<b>Permanent Direct LT ++</b> The proposed policy provides for additional housing within the District, by proposing up to 2000 new dwellings on site.	<b>Permanent Direct. ST/LT -</b> The omission of this policy is likely to significantly affect other housing sites as local housing need would need to be met from other strategic sites, possibly creating further pressures on other facilities and existing developments.	Development of housing sites at Westgate-on-Sea are achievable without significant effects on designated sites, assuming the implementation of Policy SP26 and the SPA mitigation strategy.	-
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	<b>Permanent Direct ST/LT -</b> Implementation of the proposed policy is likely to place additional burden on community facilities, including local healthcare provision. 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.	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	TDC will need to collaborate with NHS England and local CCG to forward plan potential patient capacity and workforce capacity.
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.	<b>Unknown ?</b> It is unknown whether the proposed policy will require further educational facilities and add to the training offer as the policy does not state this.	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	-
4. To increase public safety and reduce crime and fear of crime.	<b>Temporary/Permanent Indirect ST/LT +</b> Development of new homes could contribute to the reduction of crime and fear of crime through the better design/layout of residential areas. However, it is uncertain whether this will be the case for neighbouring houses along the east and south east of the development	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	TDC to monitor crime and fear of crime within new development and established site.
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	<b>Unknown ?</b> 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.	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	As part of the master planning process, mitigation in the form of further studies will be required to ensure positive outcomes against this sustainability objective.
6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.	<b>Permanent Indirect ST/LT +</b> 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.	<b>Neutral 0</b> 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 SP26 and the SPA mitigation strategy.	It would be important for a future master planning 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.	<b>Permanent Direct St/LT +</b> The proposed policy offers the provision of a District Centre to meet retail need of the development, therefore offering some opportunities for employment.	<b>Permanent Direct. Indirect ST/LT -</b> A no policy option would require that a small amount of employment will need to be met elsewhere within the District.	N/A	-
8. and 9	N/A		N/A	N/A

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
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.	<b>Permanent Direct ST/LT -</b> Implementation of the proposed policy would require the use of greenfield land and would therefore not directly support this sustainability objective.	<b>Permanent Direct. ST/LT -</b> A no policy option would mean that housing need would be required elsewhere within the District.	N/A	-
11. To ensure that a sustainable pattern of development is pursued.	<b>Permanent Direct ST/LT -</b> Due to the location of the site that forms the proposed policy, there is potential for not achieving sustainable development patterns as the proposed policy advocates development adjacent to the existing settlement, whilst developing on greenfield land. However, the new development will ultimately lead to a sustainable approach to plan making once connectivity and integration to the wider settlement is in place.	<b>Temporary/Permanent Direct ST/LT +</b> 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 SP26 and the SPA mitigation strategy.	Consider how future master planning process for this site will support connectivity and links to the rest of Thanet.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	<b>Unknown ?</b> 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.	<b>Neutral 0</b> 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 SP26 and the SPA mitigation strategy.	
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	<b>Unknown ?</b> 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.	<b>Neutral 0</b> 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.
14. To improve air quality in areas where air quality (pollutant) levels exceed national standards.	<b>Temporary/Permanent Direct ST/LT -</b> 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.	<b>Temporary/Permanent Direct ST/LT +</b> The no policy option potentially limits the increase of vehicle journeys within the Districts Air Quality Management Area.	N/A	Master planning to maximise connectivity for alternative forms of transport (e.g. walking and cycling) and extending bus service provision and promotion of multi-modal access.
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	<b>Permanent Direct ST/LT +</b> The proposed policy allocates new housing development that will require sustainable public transport. This will offer connectivity to established areas and links to employment i.e. District Centre and other community facilities.	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	TDC to work in collaboration with developers and transport operators to ensure sustainable transport networks connect new site with established settlement.
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	<b>Permanent Direct ST/LT +</b> The proposed policy will result in improvements to junctions and roads, particularly link road to A28. Improvements to this strategic route will help facilitate additional traffic movement towards the A299.	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	-



SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	<b>Permanent Direct ST/LT -</b> The proposed policy will facilitate housing development, which has the potential to increase the amount of domestic waste produced in the district.	<b>Neutral 0</b> 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.	<b>Permanent Direct ST/LT +</b> The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises. In addition, Policy SP35 states that new development must take account of: <ul style="list-style-type: none"> <li>Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy.</li> <li>Mitigating against climate change by reducing emissions.</li> </ul> These measures will help enhance effects relating to this sustainability objective.	<b>Neutral 0</b> A no policy option would not alter the status quo.	N/A	Ensure related policies within the Local Plan are discharged.
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.	<b>Permanent Direct ST/LT +</b> The proposed policy designates a site for housing that is more than 100m from the coastal area, minimising risks from sea level rises.	<b>Neutral 0</b> 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 SP26 and the SPA mitigation strategy.	-
20. To conserve and enhance biodiversity.	<b>Permanent Direct ST/LT +</b> 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.	<b>Unknown ?</b> 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 SP26 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.	<b>Neutral 0</b> It is likely that the proposed policy will not have an effect on this objective	<b>Neutral 0</b> 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 SP26 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.	<b>Unknown ?</b> A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.	<b>Neutral 0</b> 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"> <li>Adapting to climate change by minimising vulnerability, providing resilience to the impacts of climate change and complying with the Government's Zero Carbon Policy.</li> <li>Mitigating against climate change by reducing emissions.</li> </ul>

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.	<div>Unknown ?</div> <div>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.</div>	<div>Neutral 0</div> <div>A no policy option would not alter the status quo.</div>	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.
<div>Summary</div> <div>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 District Centre. There is also potential for additional community facilities improvements, such as inclusion of a functional green corridor to not only offer better connectivity to established site but to the new urban edge 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 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.</div> <div>With regards to the HRA implications there are no likely significant effects on designated sites. This policy provides for master planning being informed by and addressing the implementation of Policy SP26 and the SPA mitigation strategy.</div>				

### 3.7 AD14 – Policy SP18 – Land at Manston Court Road / Haine Road

Table 8: Policy SP18 - Land at Manston Court Road/Haine Road

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.	<b>Permanent. Direct. LT ++</b> The proposed policy provides for an additional housing within the District, by proposing up to 1200 new dwellings on site at a density of 30 dwellings per hectare net.	<b>Permanent Direct. ST/LT -</b> The omission of this policy is likely to significantly affect other housing sites as local housing need would need to be met from other strategic sites, possibly creating further pressures on other facilities and existing developments	N/A	To ensure no significant effects as a result of recreational pressure on designated sites, the policy should cross-refer to Policy SP26 and the SPA mitigation strategy.
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	<b>Permanent Direct ST/LT -</b> Implementation of the proposed policy is likely to place additional burden on community facilities, including local healthcare provision. The proposed policy, does not identify local healthcare capacity or indicate the level of increased provision that may be required.	<b>Neutral. 0</b> A no policy option would not alter the status quo.		TDC to work in collaboration with local health and community services to ensure capacity and demand for health services can be met
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.	<b>Permanent. Direct LT ++</b> The proposed policy provides for an secondary school which will serve local community. There is an opportunity for these facilities to double up to offer community based learning for vulnerable and welfare dependent workers.	<b>Neutral. 0</b> .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.		TDC to maximise the opportunity to utilise the new provision of a secondary school to improve local skills and employment.
4. To increase public safety and reduce crime and fear of crime.	<b>Permanent. Diirect. ST/LT +</b> Development of new homes could contribute to the reduction of crime and fear of crime through the better design/layout of residential areas, as the development is not adjacent to established settlements.	<b>Neutral. 0</b> 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 deprivation identified across the wards.	<b>Unknown ?</b> 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. However the policy does provide for a minimum of 9ha of open space to be provided.	<b>Neutral. 0</b> A no policy option would not alter the status quo.		TDC to undertake 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.	<b>Permanent. Direct. ST/LT ++</b> 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. The link to the internal spine road offers connectivity to other parts of Thanet	<b>Neutral. 0</b> 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 fully integrate development within the existing community.  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.
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.	<b>Permanent. Direct/Indirect. ST/LT -</b> The proposed policy does not state employment. However, given the number of new dwellings in is likely that the Transport Strategy laid out in the requirements may facilitate access and opportunities to work.	<b>Neutral. 0</b> A no policy option would not alter the status quo.		-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
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.	<b>Permanent. Direct. ST/LT -</b> Implementation of the proposed policy would require the use of greenfield land and would therefore not directly support this sustainability objective.	<b>Neutral. 0</b> A no policy option would not alter the status quo.		-
11. To ensure that a sustainable pattern of development is pursued.	<b>Permanent Direct ST/LT -</b> Due to the location of the site that forms the proposed policy, there is potential for not achieving sustainable development patterns as the proposed policy advocates developing on greenfield land. However, the new development will ultimately lead to a sustainable approach to plan making once connectivity and integration to the wider settlement through the link road.	<b>Temporary/Permanent. Direct. ST/LT +</b> By limiting development in this location, separation of settlements is maintained, which might help focus development in previously developed areas.		TDC to ensure adequate connectivity through the Transport Strategy and ensure good access to public transport by working in collaboration with transport operators.
12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.	<b>Unknown ?</b> 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.	<b>Neutral. 0</b> A no policy option would not alter the status quo.		-
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	<b>Neutral. 0</b> 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.	<b>Permanent Direct. Indirect ST/LT -</b> The proposed policy promotes development that is likely to result in an increase in car journeys within the District's Air Quality Management Areas. Inward migration and daily travel across to other parts of Thanet is likely to increase and not improve air quality. 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.	<b>Temporary/Permanent. Direct. ST/LT +</b> The no policy option potentially limits the increase of vehicle journeys within the Districts Air Quality Management Area.		-
15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.	<b>Permanent. Direct. ST/LT +</b> 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.	<b>Neutral. 0</b> A no policy option would not alter the status quo.		TDC will need to consider how multi-modal connections for the site will be integrated within the site and wider Thanet.
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	<b>Permanent. Direct. ST/LT +</b> The provision of a highway improvements identified within the draft Transport Strategy will help with identification of frequency and timings of public transport network to serve the new development.	<b>Neutral. 0</b> A no policy option would not alter the status quo.		TDC to identify with transport operators the specific need for the development.
17. To reduce waste generation and disposal and achieve the sustainable management of waste.	<b>Permanent. Direct. ST/LT -</b> The proposed policy will facilitate housing development, which has the potential to increase the amount of domestic waste produced in the district.	<b>Neutral. 0</b> 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.



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.	<div>Unknown ?</div> <div>It is not known how the proposed policy will respond to challenges with climate change. However, given the potential for high car and public transport usage it is possible that the extra new dwellings and associated infrastructure may contribute to climate change in the short-term.</div>	<div>Neutral. 0</div> <div>A no policy option would not alter the status quo.</div>		
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>Neutral. 0</div> <div>The proposed policy is unlikely to alter the status quo regarding this objective.</div>			.
20. To conserve and enhance biodiversity.	<div>Permanent. Direct. ST/LT --</div> <div>The proposed policy designates a site for housing that has potential for major ecological effects, given that development is on greenfields as a strategic site. This has the potential to be mitigated through the policy’s provision of ecological surveys of breeding and wintering birds.</div>	<div>Unknown ?</div> <div>A no policy option would prevent development on existing greenfield land that may have minor benefits for local ecology.</div>		<div>TDC to ensure ecological surveys are undertaken to mitigate potentially negative effects.</div>
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.	<div>Unknown ?</div> <div>The effects against this objective are unknown at this stage as the policy does not include explicit reference to the use of local products or sustainably produced resources</div>	<div>Neutral. 0</div> <div>A no policy option would not alter the status quo.</div>		
23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.	<div>Unknown ?</div> <div>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.</div>	<div>Neutral. 0</div> <div>A no policy option would not alter the status quo.</div>		<div>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.</div>
<div>Summary</div> <div>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 a Transport Strategy and whilst this likely to increase car usage (enabling connectivity) it is likely to maximise public transport use. 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.</div> <div>With regards to the HRA implications there are no likely significant effects on designated sites. This policy provides for master planning being informed by and addressing the implementation of Policy SP26 and the SPA mitigation strategy.</div>				

### 3.8 AD15 – Policy H02 – Land north and south of Shottendane Road

Table 9: Policy H02 Land at Manston Road/Shottendane Road, 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.	<b>Permanent. Direct. ST/LT ++</b> The proposed policy has allocated for up to 300 dwellings at the north of Shottendane Road and 250 dwellings south of Shottendane Road. This policy will now be a strategic policy in the final version of the Local Plan	<b>Permanent Direct. ST/LT -</b> The omission of this policy is likely to adversely affect other housing sites as local housing need would need to be met from other strategic sites.		TDC to work in collaboration with local health and community services to ensure capacity and demand for health services can be met
2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.	<b>Permanent Direct ST/LT -</b> Implementation of the proposed policy is likely to place additional burden on community facilities, including local healthcare provision. The proposed policy, does not identify local healthcare capacity or indicate the level of increased provision that may be required.	<b>Neutral. 0</b> 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.	<b>Unknown ?</b> It is not known how the proposed policy will respond to educational facilities as this is not stated in the policy. The development's contribution to this objective depends upon the ultimate design of the site and housing allocation. And tenure.	<b>Neutral. 0</b> A no policy option would not alter the status quo.	N/A	-
4. To increase public safety and reduce crime and fear of crime.	<b>Permanent. Direct. ST/LT +</b> Development of new homes could contribute to the reduction of crime and fear of crime through the better design/layout of residential areas, as the development is not directly adjacent to established settlements. Therefore adopting good place-making through master planning will improve perception of public safety.	<b>Neutral. 0</b> A no policy option would not alter the status quo.	N/A	TDC to ensure through the master planning process support the designing out of crime.
5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards.	<b>Permanent. Direct. ST/LT +?</b> It is likely that the new dwellings will support the reduction of deprivation. However, as the ultimate design and housing allocation has not been determined it is uncertain that the policy will support vulnerable people.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. ST/LT ++/?</b> It is likely that as a new development, TDC will adopt appropriate master planning process that creates a 'sense of place'. The policy states that master planning will support and provide linkage via soft landscaping, link road and improvements to the Margate Cricket club pitch supports this objective.	<b>Neutral. 0</b> A no policy option would not alter the status quo.	NA	TDC to ensure that master planning incorporates good place-making design and collaborative working is adopted to deliver a positive sense of place.
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.	<b>Permanent. Direct. ST/LT +/?</b> The proposed policy must demonstrate multi-modal access and via the Transport Strategy improvements to the highways have been identified. These improvements will provide access to employment across the District.	<b>Neutral. 0</b> A no policy option would not alter the status quo.	N/A	TDC to ensure highway improvements supported by the Transport Strategy supports access to key employment sites across the District.
8. To ensure the sustainable development of the proposed economic growth and encourage	<b>Unknown ?</b> It is not known how the proposed policy will respond to supporting sustainable economic growth. The development	<b>Neutral. 0</b> 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.	will potentially enable improved access to other parts of the district but it is unclear how this will support key employment sites.			
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	NA		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.	<b>Permanent. Direct. ST/LT -</b> The proposed policy does not improve efficiency in land use as development will occur on green fields. Hence, the provision of mitigation for the loss of ground nesting bird habitats has been highlighted within the policy	<b>Neutral. 0</b> A no policy option would not alter the status quo.	N/A	TDC to ensure environmental assessments are conducted in order to adequately mitigate adverse affects from development.
11. To ensure that a sustainable pattern of development is pursued.	<b>Permanent Direct ST/LT -</b> Due to the location of the site that forms the proposed policy, there is potential for not achieving sustainable development patterns as the proposed policy advocates developing on greenfield land. However, the new development will ultimately lead to a sustainable approach in line with the NPPF in order to sustain and enhance the vitality of rural settlements.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. ST/LT ++/?</b> It is uncertain how the development will affect the enhancement of the areas landscape and townscape. However, within the proposed policy of the southern site it is proposed that the master plan will include a Heritage Impact Assessment	<b>Neutral. 0</b> A no policy option would not alter the status quo.	NA	TDC to undertake a Heritage Impact Assessment.
13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.	<b>Permanent. Direct. ST/LT ++/?</b> It is uncertain how the development will affect the enhancement of the areas historic archaeological and architectural. However, within the proposed policy of the southern site it is proposed that the master plan will include a Heritage Impact Assessment to assess effects and preservation on St Johns Cemetery and sites and memorials within it.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. ST/LT ++/?</b> 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.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. ST/LT ++/?</b> The proposed policy is supported by highways improvements identified within the Transport Strategy and through the master planning process multi-modal measures will be promoted. However, it is still uncertain the extent of private vehicles usage without housing tenure and site design confirmed.	<b>Permanent. Direct. LT -/?</b> 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	TDC to work collaboratively with public transport operators to ensure transport timetables and routes support key facilities within the District.

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
16. To develop key sustainable transport links between Thanet and the wider Kent district and beyond, including road, rail and air.	<b>Permanent. Direct. ST/LT ++/?</b> The proposed policy is supported by highways improvements identified within the Transport Strategy and through the master planning process multi-modal measures will be promoted. However, the scale of impact is unknown as details of the proposed developments are unknown at this stage.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. ST/LT -</b> The proposed policy will facilitate housing development, which has the potential to increase the amount of domestic waste produced in the district.	<b>Neutral. 0</b> 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.	<b>Unknown ?</b> It is not known how the proposed policy will respond to challenges with climate change. However, given the potential for car and public transport usage it is possible that the extra new dwellings and associated infrastructure may contribute to climate change in the short-term.	<b>Neutral. 0</b> 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.	<b>Neutral. 0</b> The proposed policy is unlikely to alter the status quo regarding this objective.		N/A	
20. To conserve and enhance biodiversity.	<b>Permanent. Direct. ST/LT ++/?</b> Policy adoption would help ensure the conservation and enhancement of the district's natural habitats, by ensuring new developments protect designated nature conservation sites.	<b>Permanent. Direct. ST/LT++/?</b> 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	TDC to ensure that statutory assessments are applied to the proposed policy. As above – Heritage Impact Assessment and adequate mitigation for ground nesting bird habitat.
21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites.	<b>Permanent. Direct. ST/LT ++</b> Policy adoption would ensure new housing developments will not contaminate water resources or coastal features.	<b>Permanent. Direct. ST/LT ++/?</b> 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.	<b>Permanent. Direct. ST/LT ++</b> Policy adoption would ensure that developments do not undermine other policies. However, the effects of this policy propodal	<b>Neutral. 0</b> 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.	<b>Unknown ?</b> 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.	<b>Neutral. 0</b> A no policy option would not alter the status quo.	N/A	-
<p><b>Summary</b></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 ensuring that appropriate assessments and mitigation is undertaken. The policy supports many of the SA objectives, however utilisation of the NPPF guidance will be paramount to develop within rural settings and demonstrate vibrancy and sustainability.</p> <p>With regards to the HRA, polices H02, H05 and H09 need to include a cross-reference to Policy SP26 and the SPA mitigation strategy, demonstrating how these are being met in order to protect European sites from recreational space.</p>				



### 3.9 AD16 – Policy SP30 – Local Green Space

Table 10: 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.	<b>Permanent. Indirect. ST/LT +/-?</b> This proposed policy contributes to the Districts green spaces and add a further 5 local green spaces. In order to ascertain whether public safety is enhanced or decreased, designated parks will need to be designed and managed to local needs.	<b>Neutral. 0</b> 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.	<b>Permanent. Direct. ST/LT +</b> 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.	<b>Permanent. Indirect. ST/LT -</b> 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.	<b>Permanent. Direct. ST/LT +</b> By allowing developments protecting and enhancing Local Green Spaces, this policy will have positive effects on the natural environment.	<b>Permanent. Indirect. ST/LT -</b> If development proposals in Local Green Space do not protect or 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.	<b>Neutral. 0</b> The proposed policy would not alter the status quo as green spaces are protected under SP30	<b>Neutral. 0</b> 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.	<b>Permanent. Indirect. ST/LT ++?</b> This policy aims to protect or enhance the Local Green Spaces. Whilst greenspaces are good environment for biodiversity, it is unlikely that all the spaces will conserve and enhance biodiversity in order to ensure variety and choice for local residents.	<b>Permanent. Indirect. ST/LT -</b> 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
<b>Summary</b> This policy will have positive effects on the biodiversity and the natural environment, promoting a sense of place and possibly guarding against the fear of crime. 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 could occur in greenspaces without implementing measures to enhance or protect the greenspaces. It would also have an adverse effect on local communities that have contributed to local green spaces designation thus demonstrating that green spaces are valued.				

### 3.10 AD19 – (New Policy) Policy H026 – Fostering Homes

Table 11: (New Policy) H026 Fostering Homes

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+ The collaborative approach taken by TDC enhances the ability for children and young people in foster care to access health care provision and other services. This is not undermined by environmental factors such as living in areas of deprivation.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
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 supports the creation of opportunities to access education and training, throughout Thanet rather than being confined to Cliftonville. This will be helped by the collaborative working on key services to support vulnerable children and young people.	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. Direct. ST/LT+ The proposed policy will prevent ghettoization to ensure that vulnerable children and young people are not subject to areas of deprivation, which often have rates of the fear or crime and reduced public safety.	Neutral. 0 A no policy option would not alter the status quo.	NA	-
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 supports the collaborative approach with key organisations to ensure that vulnerable children and young people are not housed solely in areas of deprivation.	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. Direct. ST/LT+ The policy promotes the location of foster homes in areas that are not deprived therefore enabling vulnerable children and young people to develop a sense of place in safety and without fear of stigma or crime.	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 enables vulnerable children to access the a wider variety of jobs within the district, thus contributing to the reduction of disparities traditionally seen by children in care.	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 employment development at key sites within the District to support priority regeneration areas.	Permanent. Direct. ST/LT+ The proposed policy underlines TDC's commitment to pursuing a positive socio-economic approach in terms of development. This is in line with the requirements contained within the National Planning Policy Framework. A positive approach to development and a commitment by TDC to work with the development applicant would aid economic growth within the district and thus become more attractive to investors. This would directly promote economic growth and regeneration	Neutral. 0 A no policy option would not alter the status quo in relation to economic growth.	NA	-

SA Objective	Proposed Policy	No policy	HRA implications	Mitigation and enhancement measures
	within the district and with the increased attractiveness to investors, it would also help create job growth.			
9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.	<b>Permanent. Direct. ST/LT+</b> Through the proposed policy, proposals that secure development that improves the economic, social and environmental conditions of Cliftonville would be encouraged. This therefore has the potential to create wealth in the District as the policy signals that Thanet Council would engage positively with all planning applications to make the area attractive which would help promote the tourist industry by assisting natural, semi-natural and street scene opportunities. Such protection would prevent the damaging of assets that attract visitors both in the long term and short term.	<b>Neutral 0.</b> A no policy option could allow developments to sprawl across 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.	<b>NA</b>	<b>-</b>
10.	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
11. To ensure that a sustainable pattern of development is pursued.	<b>Permanent. Direct. ST/LT+</b> Fostering a collaborative approach between applicants and TDC would ensure that the sustainability credentials of schemes are of the highest standard. A collaborative approach would help prioritise development in a sustainable manner placing it at the core of all plans and developments for the Thanet district. Access to facilities services and also housing demand would be met whilst considering the social, environmental and economic impacts to create a sustainable agenda.	<b>Neutral. 0</b> Adoption of no policy will not yield any positive or negative effects, as the status quo ensues.	<b>NA</b>	<b>-</b>
12. to 23	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>Summary</b> The proposed policy, will have significant positive effects on residents of foster homes as it designates an 'exclusion zone' where homes will not be permitted. Future planning will enable children who are placed in areas of deprivation and risks and fear of crime will now be allocated a safer environment that may offer a sense of place.  With regards to the HRA there are no likely significant effects.				

## 4 Summary

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### 4.1 Option 2

Option 2 addendum items are predominantly related to the removal of Strategic Priority 1 of the Local Plan, namely the designation of the former Airport site as a mixed-use, new settlement development. The Option 2 addendum items would result in a permanent redistribution of housing allocation and changes to how inward investment and employment opportunities are realised, thus effecting the development of sustainable locations (Objective 11). This has socio-economic implications for Thanet (Objective 6 and Objective 8) in that it is likely to affect diversity of employment types, particularly the opportunities for more Class B businesses, coming forward. Option 2 addendum items are likely to reduce employment provision (Objective 7) in the short-term due to the additional pressure based on developable land from housing.

Whilst aspects of the Option 2 addendum items meet the SA Framework in promoting housing development (Objective 1), potential conflict exists between the need to prioritise the redevelopment of brownfield land for economic growth and continue to remain on track to meet local housing need and associated infrastructure. Development pressures are likely to be placed on existing health (Objective 2) and education (Objective 3) services unless a critical mass for additional services is met at expansion locations or there is an existing availability of service provision. The sites identified either as strategic sites or an alternative to the former Airport site as a new settlement are likely to place short to medium term pressure on local social infrastructure. Achieving sustainability would therefore depend on how well these new sites link to neighbouring established developments and rural settings (Objective 20).

There is also a risk that increased urban edge developments would encroach on European designated sites (Objective 21). Robust infrastructure requirements that reduce the need to travel to key facilities and services (Objective 15) would be required in order to maximise social and economic sustainability associated with urban edge developments.

The addition of new Policy HO26 (Fostering Homes) supports sustainable development and meets the social objectives of the SA by improving access to health care facilities and provision (Objective 2). New housing for foster homes will ensure that vulnerable people are supported by living in mixed communities and therefore able to foster a sense of community (Objective 6).

The increased designations associated with Policy SP30 (Local Green Space) are likely to increase and improve access to local green space for residents of Westgate. This is likely to have benefits with respect to resident's health, which may go some way in ensuring that pressures on healthcare provision and facilities (Objective 2) are limited.