

**A01**

**R/TH/23/0156**

**PROPOSAL:** Application for the reserved matters of outline permission OL/TH/16/1765 "Outline application for residential development of up to 250 dwellings and alterations to the surrounding highway network, including details of Access with all other matters reserved" for the approval of appearance, landscaping, layout and scale

**LOCATION:** Land Adjacent To Salmestone Grange Nash Road MARGATE Kent

**WARD:** Salmestone

**AGENT:** Mr Graham Wilson

**APPLICANT:** Mr J Goodban

**RECOMMENDATION:** Approve

Subject to the following conditions:

1 The proposed development shall be carried out in accordance with the submitted application as amended by the revised drawings numbered:

P21-2467\_DE\_15 Sheet 21 and P21-2467\_DE\_15 Sheet 22 Rev A received 27 June 2023

P21-2467\_DE\_09\_05, P21-2467\_DE\_09\_B\_01, P21-2467\_DE\_09\_B\_02, P21-2467\_DE\_021\_01, P21-2467\_DE\_14\_C\_12, P21-2467\_DE\_14\_E\_06, P21-2467\_DE\_14\_E\_11, P21-2467\_DE\_14\_E\_13, P21-2467\_14\_G\_05, P21-2467\_DE\_14\_H\_02, P21-2467\_DE\_14\_J\_10, P21-2467\_DE\_15\_32\_BD, P21-2467\_DE\_15\_33\_BD, P21-2467\_DE\_15\_34\_WB, P21-2467\_DE\_15\_A\_13\_BD, P21-2467\_DE\_15\_A\_35\_BD, P21-2467\_DE\_15\_B\_01\_BD, P21-2467\_DE\_15\_B\_06\_BD, P21-2467\_DE\_15\_B\_07\_BDH, P21-2467\_DE\_15\_B\_08\_BDH, P21-2467\_DE\_15\_B\_09\_BD, P21-2467\_DE\_15\_B\_11\_WBH, P21-2467\_DE\_15\_B\_12\_WB, P21-2467\_DE\_15\_B\_14\_BD, P21-2467\_DE\_15\_B\_15\_WB, P21-2467\_DE\_15\_B\_16\_WB,, P21-2467\_DE\_15\_B\_17\_BD, P21-2467\_DE\_15\_B\_18\_B, P21-2467\_DE\_15\_B\_20\_WB, P21-2467\_DE\_15\_B\_22\_BD, P21-2467\_DE\_15\_B\_24\_WB, P21-2467\_DE\_15\_B\_25\_BD, P21-2467\_DE\_15\_B\_26\_B, P21-2467\_DE\_15\_B\_27\_BD, P21-2467\_DE\_15\_B\_28\_B, P21-2467\_DE\_15\_B\_29\_WBC, P21-2467\_DE\_15\_B\_30\_WBHC, P21-2467\_DE\_15\_C\_19\_BD, P21-2467\_DE\_15\_C\_31\_WB, received 08 November 2023

BHNASHROAD.1/TK45 Rev P2 23 received November 2023

P21-2467\_DE\_14\_C\_22, P21-2467\_DE\_020\_B\_01, P21-2467\_DE\_20\_B\_03 and P21-2467\_DE\_20\_B\_04 received 05 December 2023

SL/BHNASHROAD-LD.2/LIGHT-01 Rev P3, 3041-APA-ZZ-XX-SK-L-0001 Rev P01 and 3041-APA-ZZ-XX-DS-L-4100 Rev P05, LR1 Rev P3 (spine road) and LR2 Rev P3 (residential) received 14 December 2023

P21-2467\_DE\_020 \_C\_02, P21-2467-DE-14\_\_17, P21-2467\_DE\_15\_\_36\_BDH, P21-2467\_DE\_15\_\_37\_WBH Received 15 January 2024

P21- 2467-DE-23\_A\_01 received 24 January 2024

3041-APA-ZZ-XX-LA-L-1001 Rev P06, 3041-APA-ZZ-XX-SK-L-0002 Rev P00.01 and P21-2467\_DE\_14\_V\_01 Received 01 February 2024,

P21-2467\_DE\_14\_J\_03 received 05 February 2024.

BHNASHROAD.1/TK47 Rev P1 BHNASHROAD.1/TK46 Rev P2, BHNASHROAD.1/93 Rev P1 BHNASHROAD.1/94 Rev P1 BHNASHROAD.1/95 Rev P1 BHNASHROAD.1/96 Rev P1 BHNASHROAD.1/97 Rev P1 received 06 February 2024

**GROUND;**

To secure the proper development of the area.

2 Prior to the construction of the external surfaces of the development hereby approved samples the materials to be used in the construction of the building(s) shall be submitted to, and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved samples unless otherwise agreed in writing by the Local Planning Authority.

**GROUND**

In the interests of visual amenity in accordance with Policy QD02 of the Thanet Local Plan

3 Prior to the first occupation of any dwelling within the development hereby permitted, the vehicle parking spaces relating to that dwelling, including the garage, car port and adjacent visitor parking spaces, as shown on the approved plan numbered P21-2467\_DE\_14\_J\_10 shall be provided and permanently retained.

**GROUND:**

In the interests of highway safety in accordance with the advice contained within the NPPF

4 The vehicle turning areas shall be carried out in accordance with drawing numbered P21-2467\_DE\_14\_C\_12. The relevant vehicle turning areas will be provided prior to the occupation of the associated dwellings.

**GROUND;**

In the interests of highway safety in accordance with the advice contained within the NPPF.

5 Visibility and pedestrian visibility splays shall be provided to the access roads and parking areas in accordance with the submitted plan numbered BHNASHROAD.1/95 Rev P1

prior to the use of the respective access road/parking. The visibility splays shall thereafter be maintained.

**GROUND:**

In the interest of highway safety in accordance with the advice contained within the NPPF

6 Prior to the first occupation any dwelling within the development hereby permitted, the secure cycle parking facilities, as shown on approved drawing no. P21-2467\_DE\_14\_J\_10 shall be provided and thereafter maintained.

**GROUND**

To promote cycling as an alternative form of transport, in accordance with Policy TP03 and SP43 of the Thanet Local Plan.

7 Prior to the first occupation units 91-101 and 226-236 within the development hereby permitted, details of the proposed secure cycle parking facilities within the area shown on approved drawing no. P21-2467\_DE\_020\_C\_02 shall be submitted to, and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

**GROUND**

To promote cycling as an alternative form of transport, in accordance with Policy TP03 and SP43 of the Thanet Local Plan.

8 A landscape management plan (including long term design objectives), management responsibilities and maintenance schedules for all landscape areas, other than small, privately owned, domestic gardens, shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the development or any phase of the development, whichever is the sooner, for its approved use. The amenity areas shall be managed in accordance with the approved landscape management plan in perpetuity.

**GROUND**

In the interests of the visual amenities of the area and to adequately integrate the development into the environment in accordance with Policies QD02 and GI04 of the Thanet Local Plan

9 The play space as identified on the open space plan numbered P21-2467\_DE\_14\_V\_01 shall be provided in accordance with the plan numbered 3041-APA-ZZ-XX-LA-L-1001 Rev P06 and The Landscape and Public Realm Strategy and made available for use prior to the first occupation of any dwelling hereby permitted.

**GROUND:**

To provide equipped playspace in accordance with Policy GI04 of the Thanet Local Plan

10 All hard and soft landscape works, including ecological enhancement features, shall be carried out in accordance with the submitted plan 3041-APA-ZZ-XX-LA-L-1001 Rev P06 and The Landscape and Public Realm Strategy. The works shall be carried out prior to the

first occupation/use of any part of the development, or in accordance with a programme of works to be agreed in writing with the Local Planning Authority.

Following completion of the landscape and enhancement works, photographic evidence of implementation shall be submitted to and approved in writing by the Local Planning Authority in order to verify the works have been completed in accordance with the approved plans, and to enable the full discharge of this condition. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of a similar size and species as those originally planted, unless written approval to any variation is provided by the Local Planning Authority. All ecological enhancement features shall thereafter be maintained.

**GROUND:**

In the interests of the visual amenities of the area, biodiversity enhancement, and to adequately integrate the development into the environment in accordance with Policies QD02, SP30 and GI04 of the Thanet Local Plan

11 Prior to the first occupation of any dwelling on Street 02 or Street 03, the 12 school drop off spaces and the pedestrian route from the spaces along street 02 and 03 to the north east corner of the site shall be provided and available for use as shown on P21-2467\_DE\_14\_C\_12 and thereafter maintained.

**GROUND:**

In the interests of highway safety in accordance with the advice contained within the NPPF.

12 Prior to the first occupation of any dwelling on Street 02, details of any road markings and signage relating to the 12 school drop off spaces shown on P21-2467\_DE\_14\_C\_12, shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of any dwellings on Street 02 and thereafter maintained.

**GROUND:**

In the interests of highway safety in accordance with the advice contained within the NPPF.

13 Prior to the first occupation any dwelling within the flat blocks hereby permitted, the refuse storage facilities, as shown on approved drawing no. P21-2467\_DE\_020\_C\_02 shall be provided and thereafter maintained.

**GROUND:**

In the interests of visual amenity and highway safety in accordance with Policy QD02 of the Thanet Local Plan and the National Planning Policy Framework.

14 Prior to occupation of any dwelling on street 02, details (including a detailed site plan) of the footpath and any gate adjacent to the school boundary of the site shall be submitted to and approved in writing by the Local Planning Authority. The footpath and gate shall be provided in accordance with the approved details concurrently with the landscaping of the area in question.

**GROUND:**

In the interests of pedestrian and highway safety in accordance with the advice contained within the NPPF.

15 Prior to the commencement of development hereby approved details of the existing and proposed land levels within the site shall be submitted to and approved in writing by the Local Planning Authority. The development shall be completed in accordance with the approved details.

**GROUND:**

In the interests of visual amenity in accordance with Policy QD02 of the Thanet Local Plan and the National Planning Policy Framework.

16 Prior to the commencement of development hereby approved a Stage 1 Road Safety Audit for the crossing on the link road shall be submitted to, and approved in writing by, the Local Planning Authority. Any recommendations of this report shall be implemented prior to the first operation of the crossing.

**GROUND:**

In the interests of highway safety and to mitigate any adverse transport impact in accordance with Policy TP01 of the Thanet Local Plan and the advice contained within the NPPF.

17 Prior to the first occupation of the dwellings hereby permitted, details of the electric vehicle charging points to be provided within the development, including their location and design, shall be submitted to and approved in writing by the Local Planning Authority. The electric vehicle charging points shall be in the form of one active charging point per allocated parking space, and one active charging point per ten unallocated parking spaces. The electric vehicle charging points shall be provided prior to the first occupation of the development and thereafter maintained.

**GROUND:**

To protect air quality, in accordance with Policy SE05 of the Thanet Local Plan and the advice as contained within the NPPF

**INFORMATIVES**

Thanet District Council recommends that all developers work with a telecommunication partner or subcontractor in the early stages of planning for any new development to make sure that Next Generation Access Broadband is a fundamental part of the project. Access to superfast broadband should be thought of as an essential utility for all new homes and businesses and given the same importance as water or power in any development design. Please liaise with a telecom provider to decide the appropriate solution for this development and the availability of the nearest connection point to high speed broadband.

It is the responsibility of the applicant to ensure, prior to the commencement of the development hereby approved, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highway and Transportation to progress this aspect of the works prior to commencement on site

A formal application for connection to the public sewerage system is required in order to service this development. Please contact Southern Water, Southern House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or [www.southernwater.co.uk](http://www.southernwater.co.uk).

A formal application for connection to the water supply is required in order to service this development. Please contact Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire S021 2SW (Tel: 0330 303 0119) or [www.southernwater.co.uk](http://www.southernwater.co.uk).

The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this act. Trees and scrub are likely to contain nesting birds between 1st March and 31st August inclusive. Trees and scrub are present on the application site and are to be assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period and has shown it is absolutely certain that nesting birds are not present.

The spine road, pedestrian footways and cycle paths as shown indicatively on adoption plan BHNASHROAD.1/93 Rev P1 shall be offered to the Local Highway Authority for adoption as per the Section 106 agreement on the outline planning permission.

A Traffic Regulation Order may be required for road markings and signage for the proposed drop off bays. The applicant shall use their best endeavours to progress this application.

## SITE, LOCATION AND DESCRIPTION

The application site is located adjacent to the southern settlement boundary of the town of Margate. The site lies to the south of Margate town centre and the commercial centre of Westwood lies some 2km to the east.

The site itself is irregular in shape and measures approximately 9.3 hectares. The site is currently in agricultural use and it appears that the land has historically been intensively cultivated and is open with narrow field margins and perimeter hedgerows and trees which are mostly off site landscaping. The site slopes towards its northern boundary and there is a difference in levels of some 5 metres across the site.

The site has two direct road frontages. The frontage to Nash Road is 175m in length and set behind a grass verge. The site is currently served by an agricultural access from Nash Road. To the north west of the site and bordering Nash Road and the adjoining school, lies the Grade II\* Salmestone Grange (which is now a tourist and wedding venue). The Grange is also a Scheduled Ancient Monument. The site has a frontage of 345m to Manston Road to the west. This frontage is set behind a brick wall and at this point the ground level is some 1.5m above the Manston Road frontage. Both Nash Road (to the north) and Manston Road (to the west) are each residential roads comprising post war semi detached houses and bungalows.

There is a 1980s development of houses in Sycamore Close beyond the south west boundary of the site. The application site is adjoined to the southern boundary by Thanet Crematorium and the Margate Cemetery which contains listed memorials, chapel buildings, gates and walls. The Council's refuse facility lies beyond this point further to the south. St Gregory's Primary School lies to the northwest boundary of the site and there are allotments to the south east.

### RELEVANT PLANNING HISTORY

OL/TH/16/1765 - Outline application for residential development of up to 250 dwellings and alterations to the surrounding highway network, including details of Access with all other matters reserved (Appearance, Landscaping, Layout, Scale). Granted 02 February 2022

OL/TH/99/0546 - Erection of 40 houses and associated access and landscaping. Application withdrawn.

OL/TH/94/0540 - Outline application for residential development and 8 acre public open space incorporating a woodland of remembrance. Refused September 1994.

OL/TH/91/0596 - Outline application for residential development. Refused January 1992.

### PROPOSED DEVELOPMENT

The principle of developing the site for up to 250 no. dwellings, and the access into the site, along with all off-site highway works and the securing of the financial contributions and affordable housing, was approved through the previous outline application (Application reference OL/TH/16/1765).

This is an application for the reserved matters of the outline permission for the approval of appearance, landscaping, layout and scale for 250 no dwellings.

A local distributor road is proposed to run east west through the centre of the site joining Nash Road to Manston Road. A roundabout is proposed at the western end of the site to connect with Manston Road and Nash round would be realigned. Secondary roads would provide access to the proposed housing either side of the link road.

The layout consists of a mix of detached, semi-detached and terraced buildings at 2 and 3 storeys in height, consisting of 12no. 1-bed flats, 16no. 2-bed flats, 29no. 2-bed houses, 111no. 3-bed houses, and 82no. 4-bed houses.

Parking is provided in the form of one or two spaces per dwelling depending upon size, with an additional 105no. no visitor parking spaces. One electric charging point per dwelling has been provided.

The design of the dwellings is traditional, with the use of pitched and hipped roofs and the incorporation of gables and bay windows. The palette of materials consists of red and buff brick, red, grey and brown roof tiles, and light and dark grey cladding.

An area of public open space is proposed at the north of the site adjacent to Nash Road and would include a Locally Equipped Area of Play (LEAP) and smaller areas of soft landscaping would be included across the site.

## DEVELOPMENT PLAN POLICIES

SP01 - Spatial Strategy - Housing  
SP13 - Housing Provision  
SP14 - General Housing Policy  
SP22 - Type and Size of Dwellings  
SP23 - Affordable Housing  
SP24 - Development in the Countryside  
SP26 - Landscape Character Areas  
SP27 - Green Infrastructure  
SP28 - Protection of International and European Designated Sites  
SP29 - Strategic Access and Management and Monitoring Plan (SAMM)  
SP30 - Biodiversity and Geodiversity Assets  
SP34 - Provision of Accessible Natural and SemiNatural Green Space, Parks, Gardens and Recreation Grounds  
SP35 - Quality Development  
SP36 - Conservation and Enhancement of Thanet's Historic Environment  
SP37 - Climate Change  
SP38 - Healthy and Inclusive Communities  
SP41 - Community Infrastructure  
SP42 - Primary and Secondary Schools  
SP43 - Safe and Sustainable Transport  
SP44 - Accessible Locations  
SP45 - Transport Infrastructure  
SP47 - Strategic Routes  
CC01 - Fluvial and Tidal Flooding  
CC02 - Surface Water Management  
CC04 - Renewable Energy  
HE01 - Archaeology  
HE03 - Heritage Assets  
H01 - Housing Development  
H03 - Land fronting Nash Road and Manston Road, Margate



GI01- Protection of Nationally Designated Sites (SSSI) and Marine Conservation Zones (MCZ)  
GI03 - Regionally Important Geological Sites (RIGS)  
GI04 - Amenity Space and Equipped Play  
GI06 - Landscaping and Green Infrastructure  
QD01 - Sustainable Development  
QD02 - General Design Principles  
QD03 - Living Conditions  
QD04 - Technical Standards  
QD05 - Accessible and Adaptable Accommodation  
SE05 - Air Quality  
SE06 - Noise Pollution  
SE08 - Light Pollution  
TP01 - Transport Assessments and Travel Plans  
TP02 - Walking  
TP03 - Cycling  
TP04 - Public Transport  
TP06 - Car Parking  
TP10 - Traffic Management

## NOTIFICATIONS

Letters were sent to neighbouring property occupiers, site notices were posted close to the site and an advert was posted in the local paper.

25 letters of objection have been received from individuals and St Gregory's Primary School raising the following concerns (summarised below):

- Impact of the development upon Elliots Close
- Highway safety
- Out of date plans
- Loss of outlook
- Loss of privacy
- Noise and disturbance
- Noise and disturbance during construction
- Loss of trees
- Loss of hedgerows and planting
- Alterations to the access to the school
- Location of the proposed school access
- Impact upon the school
- Developer should pay for alterations in the school
- Distance from drop off bays
- Lack of consultation
- Loss of agricultural land
- No requirement for more houses
- Impact upon community facilities
- Lack of affordable housing

- Impact upon the character and appearance of the area
- Development in the countryside
- Will the inner ring road be completed
- Increased traffic
- Surface water
- Flood risk
- Drainage
- Impact upon biodiversity
- Air pollution
- Location of the proposed roundabout
- Where do the footpaths lead
- Impact upon health
- Increase in vermin
- Proximity of development to the school
- Safeguarding of children
- Lack of health and safety plan
- Conditions are not being complied with
- Pedestrian link is not being provided
- Contributions are not being provided to the school
- Additional noise assessments required
- Works to pedestrian bridge on Nash Road
- Drawings failed safety audit

## CONSULTATIONS

### **KCC Highways** - Updated comments received 21 December 2023

Further to my previous response, the applicant has engaged directly with the local highway authority to address the concerns and points raised. The submitted Highways Letter and drawings are the result of these discussions. Having reviewed these I have the following comments to make

#### Spine Road

The proposed speed cushions (which act as a speed attenuation feature) have been replaced with two central islands, that deflect drivers. Plans demonstrating tracking have been submitted and these are acceptable.

There are still 14 direct accesses onto the spine road, but having reviewed this we are content to accept this.

#### Bus Stops/Zebra Crossing

We note the submitted Stage 1 Road Safety Audit, and the comments submitted by the applicant, along with two alternate layouts for the siting of the bus stops. Having reviewed this, we feel that Option 1 (Drawing 85) is an acceptable alternative, and will address the

issues raised. As such a Stage 1 Road Safety Audit along with a Designers Response should be carried out to confirm there are no further issues with these locations. Given my comments above, we also feel the Zebra Crossing could be upgraded to a Toucan Crossing, which would be a more positive form of traffic control.

#### Visibility splays

For the Copenhagen style crossing points, visibility splays have been shown setback from the rear of these. However, we need to see visibility splays demonstrated with a 2.4m setback from the main carriageway edge. In addition any trees do have to be setback behind the visibility splay envelope, especially for all accesses entering onto the main spine road

#### Layout

We do require a General Arrangement plan, that demonstrates the road hierarchy and details road and footway dimensions, as set out in the Kent Design Guide. The build out in front of Plot 18 - based on the layout we assume this is a shared space area and this has been incorporated to ensure low driven speeds. As such we would prefer this to be hard landscaped and included as part of the area offered for adoption, so we can maintain it.

#### Pedestrian Link to St Gregory's School

Further to my previous comments this has been revised so that a 2.5m wide footway is now provided and the parking layout here has been amended so that there are less vehicle crossover points. Lighting has also now been included. However, we would like to see the footway behind the drop off parking spaces widened, and the hard standing enlarged in front of the proposed gate. This will future proof this area, and provide a suitable area for parents with pushchair's etc to access the school, should this proposed access come forward.

#### Adoption Plan

I note that the footway in front of Plots 189-193 has not been indicated as being offered for adoption - is this an oversight?

In addition we would want to adopt the cycle route that starts opposite Plot 197, and circumnavigates the public open space on the western side, up to its connecting point with Nash Road. This is to ensure cycle connectivity is fully maintained. This will need to be a bound surface and in addition this will also need to have appropriate lighting. I could not locate a hard landscaping plan - this is required so that we can ensure the materials proposed within the adoptable area's are from our specified pallet. Whilst this can be agreed at the S38 Agreement stage, it is better to have an understanding of what is proposed at this stage, so that if any changes are needed these can be addressed at this stage. I note a number of trees are proposed in the verges and if these are to be adopted then commuted sums would be required for their ongoing maintenance.

#### Lighting Plan

The Street Lighting team had the following comments based on the submitted plans:

I have been in contact with consultant in relation to the appropriate lighting levels / column heights on the spine road. I am glad to see that my comments were taken on board and the lux levels have been increased.

In terms of the landscaping, assuming that the tree locations shown on the lighting drawing are accurate, then direct conflicts have been avoided. The columns are located in verge to bring them forwards and closer to the carriageway which is a sensible option in densely planted areas. The lighting levels onto the footways will be adversely impacted by the tree placement relative to the light source, but I believe the proposals (again assuming these are accurate and not indicative locations) are about the best balance that can be achieved between the safety of road users and the aesthetic aspirations of the developer.

### Tracking

A plan has been submitted demonstrating refuse tracking and there are a few area's we have concerns with:

Outside flats Plots 226-236 - it looks like wheel overrun of the pedestrian footway

Outside Plots 14 & 9 - the vehicle appears to overrun a post and rail fence here - the fencing could potentially be moved back to accommodate this.

Outside Plot 161 - the tracking is very tight, could the entrance be widened slightly to accommodate this better?

I could not see a plan demonstrating tracking for a Fire Tender, given the amendments to the layout especially in the north east corner. This will be required to ensure it is demonstrated that a Fire Tender can access all plots within the development.

### Parking

I am happy to accept the parking provision as demonstrated on the Parking Strategy Plan - visitor parking has been spread more evenly around the site as much as is possible. Electric Vehicle charging points are proposed for each dwelling, which future proofs the use of the site.

### Bicycle storage

Sheffield stands area proposed for the two blocks of flats. However the layout demonstrated makes it impossible for the bikes to be removed, especially those located further away from the door. If the space cannot be improved, then I would suggest an upright storage system is provided. But I do need to see details to ensure the storage system proposed will fit in the limited space available.

### Waiting restrictions

Unfortunately the plan that has been submitted does not have any yellow markings indicating the location of the proposed waiting restrictions.

*Updated comments received 21 August 2023*

Further to our previous comments revised information has been submitted. Having reviewed this I have the following comments to make:

Concerns have been raised regarding the proposed highway improvements on Manston Road and Shottendane Road, (which will result in a change of priority at the Manston Road/Shottendane Road junction), and more especially to the proposed amendments to the existing school access.

These measures were assessed and approved as part of the Outline application that was approved (OL/TH/16/1765) and as such have been deemed appropriate. The applicant has submitted a document that addresses these concerns and states that these improvements have been through the required Road Safety Audits. The applicant has co-operated fully with KCC to ensure these improvements meet the necessary standards required.

A new pedestrian access is proposed to serve St Gregory's School, which is located on Street 02. This is accompanied by 10 on-street parking bays to enable parents to park vehicles, and compensates for the loss of on street parking on Manston Road as a result of the necessary highway improvements for the junction of Shottendane Road and Manston Road.

A revised plan has been submitted that proposes a pedestrian footway to link the proposed parking bays directly with Manston Road, via Street 02 and Street 04. A new footway will link the end of Street 04 with Manston Road, this passes to the north of Plots 230-237 (a block of flats).

We have a number of concerns with this proposal as follows:

no dimensions have been detailed for the width of the footway, and the scale on the parking strategy is too small to make a proper assessment. We would require this to be a minimum of 2m from the parking bays, up to the point it joins Manston Road.

this route requires parents to walk across a large group of parking bays, which are all sited adjacent to each other. Visibility splays would need to be maximised to ensure that any driver exiting these parking spaces can clearly see any pedestrians using the footway within the vicinity. A number of trees are proposed and these should be set well back to ensure they do not interfere with visibility (next to parking space 222, 225, 226 and 229)

lighting would be required for this footway - this will need to be added to the lighting strategy plan.

A covering letter has been submitted to address the highway points we raised. I have reviewed this and the comments follow the setting out of this document by the applicant:

1. An adoption plan has now been submitted (Plan 58), however this does not include footways, service margins, on street visitor parking bays. In particular does not include the proposed new footway near the flats (plots 230-237), which has been proposed to serve as a pedestrian access from the additional parking bays on Street 02 to the main school entrance via Manston Road. I note a number of trees are proposed in the verges and if these are to

be adopted then commuted sums would be required for their ongoing maintenance. Footways should be indicated in a separate colour for clarity.

2. The submitted drawing demonstrating the dimensions of the roundabout is acceptable, and any slight alterations required can be made as part of the S38 Agreement technical approval process.

3. I note the applicant has revised the number of direct accesses onto the spine road, and has reduced this from 17 to 14. However we still have concerns that this is too many given that this Spine Road forms part of Policy SP47 - Strategic Routes in Thanet District Councils Adopted Local Plan and the ICRIS ( Inner Circuit Route Improvement Strategy). In addition the design will necessitate a reversing manoeuvre to be used by future residents to ingress/egress these spaces. Having discussed this with our Agreements Engineer, we would be happy to accept no more than 10 direct accesses and would ask the applicant to review this.

4. I am pleased to note that Visitor Parking bays have been removed from the spine road and re-allocated through the site, although there are still some area's that are top heavy (for example plots 138-141 has 6 visitor bays for 4 houses, on a private shared access).

5. Speed Cushions are now proposed on the main spine road. However, on consulting with another team regarding this arrangement, I have been advised that these would not be supported by KCC, given that this spine road will form part of the above mentioned ICRIS, which is being implemented to improve traffic flow within this area. Our Highway Improvements team advised me that speed cushions are not generally not supported on A and B class roads, which is the proposed classification of this spine road once constructed.

6. One raised table is proposed to serve a pedestrian zebra crossing. Having consulted with our Highway Improvement team I have been advised that a raised table would not be appropriate, given that this road will form part of the ICRIS. As such this provision will need to be revised.

7. As a result of the above, the positions of the bus stops may potentially need to be revised, There needs to be appropriate pedestrian/vehicle visibility for vehicles overtaking a bus that has stopped at either of these stops. These stops could be set back slightly further from the proposed crossing, with the provision of double yellow lines behind them to prevent inconsiderate parking, or incorporating the side accesses into the approach to the bus stop, as they will prevent any parking behind the bus stop markings itself Once the locations have been decided/agreed a Stage One Road Safety Audit will be required to confirm their suitability.

8. Refuse vehicle tracking - the applicant has submitted details confirming the length of the refuse vehicle is 11.1m long. However I have contacted the Refuse Services team at Thanet District Council and whilst the vehicle is 11.1m long, they travel around developments with the barrier arms out and a slave bin on the back, which makes the vehicles 13m long. As such the refuse vehicle tracking needs to be amended to demonstrate a 13m long vehicle, a scale bar should be included on this drawing.

9. Plans have been submitted demonstrating the tracking for a 12.2m long bus along the spine road. These would appear acceptable, however no scale bar has provided against which to check the dimensions and fully assess these.

10. Nash Road - the applicant has submitted a drawing proposing 30mph gateway signs at the southern end of the spine road, prior to entering the development. The speed limit on Nash Road is currently derestricted, however this is to be reduced to 30mph as part of highway mitigation works for a development to the south of this site. As such we are happy to accept the drawings as proposed, and they can be amended as part of the S38 technical drawings that will be required.

11. Visibility splays - the submitted plan is in general acceptable, however no scale bar has been included against which I can verify the dimensions shown .I note a number of visibility splays will pass directly through proposed trees on the main spine road which is not acceptable - there should be no obstruction over 0.6m within the length of these splays. Full assessment of the visibility splays cannot be provided until a revised adoption plan has been submitted.

12. The footway on the eastern side has now been extended and an uncontrolled pedestrian crossing is now proposed at the southern end of the site, which will provide a link between both sides of the development - this addresses the Road Safety Audit comment point 3.2

13. A lighting plan has been submitted, which has been reviewed by our Street Lighting team in conjunction with the Master Landscape Plan. They have made the following comments:

I note that the internal spine road is proposed for a P3 class, which based on the number of properties at this site is about where I would expect. However, as I understand it there are proposals for a further 1200 dwellings on Nash Road, in addition to the proposed changes at Brooksend Hill which will result in additional traffic heading towards Manston Road. As such, I do not believe that lighting class will be adequate when these other elements are taken into consideration. The applicant will need to consider these elements and adjust the lighting class accordingly. I should think a C / M class would be more appropriate given the volume of traffic this road will carry.

One of the selected luminaires - CU Phosco P863-16-P4-NW-E0700-37W - is not approved for use, so an alternative luminaire will need to be selected from the attached appendix A document.

The landscaping drawings show far more trees than the lighting drawings, though it is not clear if the tree placement on the lighting drawings is indicative or accurate. The landscaping should be designed in conjunction with the lighting to ensure there are no conflicts. The BSEN 5489 states: 'In new streets where trees are to be planted, the lighting should be designed first and the planting sites fixed afterwards'

A thorough assessment of the function of the footway and carriageway is essential before taking the decision to plant trees. It is important that trees are located appropriately where

they will not unduly interfere with the functions of other items of street furniture, particularly those related to safety, such as traffic signs and street lights.

Trees planted within close proximity to street lights can create areas of shadow leading to a poor lighting scheme that is potentially not to the required lighting standards. This can increase risks for road users and pedestrians. Trees can also cause damage to the lighting due to branch movement and residue deposits.

14. Zebra crossing provision - comments in point 6  
Secondary access Roads

15. see point 8

16. see point 11

17. See point 1 - Adoption plan requires revision

18. A plan has been submitted showing indicative waiting restrictions. These are acceptable and can be further reviewed as part of the required S38 Agreement.

19. see point 17  
Parking layout

20. The applicant has clarified the visitor parking provision being 105 spaces which is two more than is required (50 for visitor parking and 53 for tandem parking provision). This is acceptable.

21. noted

22. see point 4

23. The applicant has revised the visitor parking layout, and I am content to accept this as proposed. There are still a few areas that are top heavy, for example Plots 7-12 have 6 visitor bays for 6 houses and Plots 138-141 have 6 visitor spaces to serve 4 dwellings off a shared private access.

24. School drop off parking - I accept the points raised by the applicant and am content for the parking layout to remain as proposed on the parking layout plan.

25. I note that Electric Vehicle (EV) points have now been indicated on the Parking Strategy Plan. However in some of communal parking areas/front parking courts the EV charging point is shown as being located behind the footway, which would potentially result in cables trailing across a footway, which would not be acceptable. The Plots that require revision or further clarification are as follows: 15-17, 23, 25, 26, 68-75, 78, 80-87, 96-101, 104-106, 114-123, 125, 126, 162, 163, 167-171, 188-191, 208-210, 212-214, 223, 224, 226-229, 247-249.

26. I note the submitted information regarding the bicycle storage and in general this is acceptable. However, I do need to see the proposed storage system for the two blocks of flats (Plots 94-101 and 230-237). Given the restricted space this should be clarified at this



stage, as revisions to the space allocated may necessitate in a further planning application. Having checked the proposed sheds, I note a number of plots do not have direct access from the highway to the rear garden, which are as follows: 26,49,80,83,172 208/209, 210 223 & 224 (they would rely on 222 not blocking access with their cars parked in their allocated parking space) This will need to be revised, it is not acceptable to expect residents to have to take bicycles through any house.

#### Pedestrian and cycle access

I note the applicant's comments regarding pedestrian and cycle connectivity within the site and the proposed 3m wide shared cycle footway on the southern side of the development. However no cycle links are shown to improve connectivity to the east/north of the site. A link should at least be provided to Nash Road. Further revision and commentary is required to clarify how this site will connect to existing footway and cycle networks in the vicinity.

We are content to accept the Copenhagen style crossing points, which will give priority to pedestrians and cyclists.

Initial comments received 05 April 2023

An outline planning application has already been approved for this site (OL/TH/16/1765), which considered the access and assessed the impact of traffic movements from the development on the local highway network. As such the principle of development has already been approved.

This proposal was also subject to pre-application discussion with Kent County Council Highways and Transportation.

Access to the site will be served by a new roundabout on Manston Road, whereby a new spine road will link through the site to Nash Road. Nash Road will be re-configured at this point to provide a priority junction from the proposed spine road to serve Turners Close and 1-59 Nash Road.

This new road is proposed to make up part of the Thanet District Councils Transport Strategy which is referred to as the Inner Circuit Route Improvement Strategy (ICRIS)

Having assessed the submitted information and drawings, I have the following comments to make:

#### Spine Road

1. No plan has been submitted demonstrating the extent of the proposed adoptable highway. This is required to assess landscaping, tracking, lighting, visibility splays amongst others, and as such a number of drawings cannot be assessed at present.

2. Whilst the roundabout has been approved under the outline application, a detailed plan should be submitted demonstrating the widths of the proposed arms along with tracking for vehicles using this roundabout. It should conform to standards set out in the Design Manual

for Roads and Bridges. I note the comments in the Road Safety Audit regarding signs and tactile paving, these can be reviewed as part of the Technical drawings that will be required for the S278 Agreement.

3. The spine road should be constructed to local distributor standard, in accordance with guidance detailed in The Kent Design Guide, I note a width of 7.3m is proposed and this is acceptable. The applicant was advised in pre-planning application discussions that direct access to single dwellings would not be acceptable for a local distributor road. I note that plots 49-55, 62-66, 182-183 and 207-211 all have direct access into the spine road. Access to a shared driveway, which facilitates forward entry and exit onto this spine road would be acceptable, as such the above plots require revision. In addition this spine road forms part of Policy SP47 - Strategic Routes in Thanet District Councils Adopted Local Plan and the ICRIS, and as such should be designed in accordance with guidance for a local distributor road.

4. There are a number of visitor parking bays located with direct access off the spine road - we have advised in pre-planning discussions that these should be located on secondary roads.

5. I can find no details confirming the proposed speed limit on the spine road. this has a bearing on the spacing of speed attenuation features. A 30mph speed limit requires measures every 150m, whereas a 20mph speed limit requires measures every 60m (as detailed in the Kent Design Guide). We would prefer to see a speed limit of 20-25mph on the spine road.

6. At present the applicant has indicated raised tables to reduce driven speeds along the spine road. However these would not be appropriate for a route that will eventually support buses, as they would require a significant level of maintenance, and Stagecoach are generally unsupportive of this type of speed reduction measure. Raised cushions would be more appropriate.

7. The location of proposed bus stops has been indicated on the submitted drawings. The cage should measure 25m in length (as per guidance detailed in Stagecoach's Bus Services and New Residential guidance document). I would highlight at this stage that these bus stops would be required to form part of any S106 Agreement so we can secure a contribution for the provision and maintenance of these. I also note that a number of on street visitor parking bays are located in close proximity, this is not acceptable as highlighted in point 3.

8. Tracking has been demonstrated for an 11.1m long refuse vehicle - however TDC use vehicles that are 13m in length, as such the drawings require revision. An adoption plan is required to fully assess the tracking.

9. In addition, tracking should be demonstrated for a 12.2m long bus, to show that two vehicles of this size can pass each other along the length of the spine road. This also needs to clearly demonstrate that the front offside corner of the bus should never normally need to perform an excursion over the marked carriageway centre line.

10. No details appear to have been submitted on measures to reduce the speed limit on Nash Road which approaching from the south towards the new spine road. At present this road has a derestricted speed limit, and appropriate measures are required to ensure this speed is reduced prior to entering the development.

11. Plans demonstrating visibility splays have been submitted, however these have a setback of 4.5m on all accesses joining the spine road. A setback of 2.4m is required so this can be properly assessed against any proposed landscaping. I note a length of 70m is being shown, which would be robust if the speed limit along here will be 30mph, though this would only need to be 43m. The full extent of the visibility splays for the shared access serving Plots 132-135 and the new priority junction for Nash Road needs to be shown, so they can be properly assessed. This plan cannot be fully assessed until an adoption plan has been submitted.

12. Road Safety Audit point 3.2 - no pedestrian crossing is proposed at the eastern end of the spine road at it's tie in with Nash Road. The applicant states that there is lack of available land to provide this, however if the pedestrian footway running along the eastern side of the spine was extended this would potentially assist in resolving this issue. This should be explored further, as safe pedestrian links to neighbouring developments should be provided to encourage sustainability.

13. A lighting plan should be considered now in conjunction with the proposed highway trees, as the current layout along the spine road will likely lead to significant shadowing/interference with street lighting.

14. A pedestrian footway is proposed along the eastern side of the spine road, and a 3m shared footway cycleway is proposed along the western side of the spine road. A raised table is proposed as a crossing feature at two points, however in light of my comments in point 6 this could be provided in the form of a zebra crossing.

#### Secondary access Roads

15. Widths of 4.8m - 6.8m are proposed for the secondary access and shared roads, with shared driveway being slightly narrower, which is acceptable.

16. As stated in point 8, tracking has been shown for an 11.1m long refuse vehicle, however TDC use 13m long vehicles, so these plans need to be resubmitted, along with an adoption plan to enable them to be fully assessed.

17. Visibility splays of 2m x 33m are acceptable within the side roads, and forward visibility plans have been submitted, but again these cannot be fully assessed until an adoption plan is submitted.

18. Waiting restrictions should be provided within the turning heads in certain locations, to ensure these area's are kept clear and on-street parking is restricted. A single yellow line prohibiting parking between 7am and 7pm would be considered appropriate.

19. Additional waiting restrictions would be required along Street 02 to prevent ad hoc parking by parents when all the proposed parking spaces are in use.

## Parking layout

20. Whilst I note that the parking allocation means that nearly all dwellings have access to 2 parking spaces, a large number of these have been provided in a tandem formation. Past experience has taught us that this type of parking layout is often under utilised, which results in on-street parking, creating pinch points. As such we request additional visitor parking spaces to address this at the ratio of 0.5 spaces per dwelling. I note that approximately 142 dwellings have tandem parking. Some of these are located on private driveways, and as such we may be accepting of these, however those that have direct access onto proposed adopted roads we would want additional visitor spaces provided.

21. Double and single garages are proposed for a number of dwellings. Whilst these do not count towards the parking provision, I am pleased to note the proposed dimensions would enable a vehicle to be parked within these.

22. There are a number of visitor parking bays located with direct access off the spine road - we have advised previously that this would not be acceptable and that these should be located on secondary roads.

23. Whilst the proposed number of visitor parking spaces meets the TDC standards, these have not be allocated evenly over the site, and there are a number of area's that are top heavy whilst other areas have a distinct lack of visitor parking provision. - plots 108-131 and 144-152 only have 2 visitor parking bays - 7 would be required. - No visitor parking has been allocated for Plots 155-160 on Nash Road. - 35-46, 68-75 and 79-89 only served by 2 visitor spaces - Visitor parking needs revision for Plots 205-247.

24. I am pleased to note that 10 parking spaces have been allocated for the dropping off/collection of children from St Gregory's Primary School. There may be the ability to provide a greater level of parking by utilising a chevron layout. This would also negate the need for drivers to have to reverse park into a parallel space. However some form of waiting restriction will need to be implemented to prevent this parking being used by nearby residents, especially given the proposed tandem parking for plots 219-222 opposite. Can the applicant also confirm that a pedestrian access has been secured with St Gregory's School in the location indicated on the plans, as this has a bearing on the proposed parking spaces.

25. Electric Vehicle (EV) points are required for each dwelling. In a communal parking area, if the spaces are allocated then an EV charging point will be required for each space. If the parking spaces are to be unallocated, then 10% active and 90% passive EV charging is required.

26. I could see no information regarding bicycle storage. Secure, enclosed storage is required for each dwelling, on a ratio of one space per bedroom. This can be in the form of a shed in the rear garden, however direct access from the rear garden to the highway will be required. For plots 230-237 I note a cycle storage area has been indicated but I would need to see details of this to ensure it was of appropriate size to store 8 bicycles (1 space per flat). I would note this is located to the side of the building and as such may not be well overlooked, which can present security issues.

Pedestrian and cycle access

27. A plan has been submitted demonstrating pedestrian and cycle links within the site. The applicant should confirm how these accord with LTN 1/20 Cycle Infrastructure Design guidance, and how the proposed cycle path will be given priority over side roads.

**Environment Agency** - *Updated comments received 31 July 2023*

We have no further comments to make on this planning application, Beyond those in our previous comments at the outline stage, dated 16/01/2017.

*Initial comments received 03 March 2023*

We have assessed this application as having a low environmental risk. We therefore have no comments to make

**KCC Biodiversity** - Comments on the discharge of condition 7

We advise that additional information is required prior to the discharge of the condition.

Condition 7 states:

Prior to the submission of any reserved matters, an updated ecological scoping survey, to include breeding bird survey shall be submitted to, and approved in writing by the Local Planning Authority. The survey(s) shall include detailed mitigation strategies if required and details of how the development will enhance biodiversity, and the agreed details should be included in any relevant reserved matters submission.

We have reviewed the preliminary ecological appraisal and the breeding bird survey and advise that we are satisfied with the results of the submitted survey.

The preliminary ecological appraisal and breeding bird survey has made recommendations for ecological /mitigation and enhancements including

42 bird boxes, (with a mixture of 11 small hole bird boxes 10 large hole nest box and 11 open fronted boxes provided along with 10 sparrow nest boxes)

2 bat boxes

Enhancement of site boundaries

Use of nectar rich planting in the landscaping

Creation of wildflower areas.

We advise that more features to benefit biodiversity can be incorporated to the site include integrated bat, bird and bee bricks in to the dwellings and the creation of log piles/hibernacula within the site boundary.

We advise that the detail of the ecological enhancements can be provided for via detailed reserved matters application 23/0156.

We note that ground nesting birds have been recorded within the site and no information has been provided detailing how the farmland fields within the surrounding areas will be enhanced to support the skylark population. We advise that additional information on this point must be provided as part of this condition discharge.

Regarding the above point we acknowledge that the report has detailed that the skylarks have likely to have used the field during 2022 due to the relaxation of the intensive farmland management. However this suggest that the skylark population within the immediate areas will utilise areas when the habitat is available - therefore the loss of this farmland habitat will impact the skylark population. As such we are off the opinion that mitigation should be implemented for skylark.

*Updated comments received 30 November 2023*

We have reviewed the updated site plan and we advise that it has not changed the comments we provided in August 2023.

We advise that the following comments provided in August 2023 are still valid.

We advise that additional information is required prior to determination of the planning application.

Condition 7 states: Prior to the submission of any reserved matters, an updated ecological scoping survey, to include breeding bird survey shall be submitted to, and approved in writing by the Local Planning Authority. The survey(s) shall include detailed mitigation strategies if required and details of how the development will enhance biodiversity, and the agreed details should be included in any relevant reserved matters submission.

Condition 7 has been submitted to be discharged under application CON/TH/23/1086. However only a breeding bird survey has been submitted as part of that application. The submission does not include an ecological scoping survey. The breeding bird survey alone is not sufficient to fully consider if appropriate mitigation and enhancements have been incorporated into the site. We will provide detailed advice on condition 7 via application CON/TH/23/1086.

We recommend that the updated ecological survey is submitted as part of this current reserve matters application. The results of the updated survey may require changes to be made to the proposed layout or landscaping.

We note that the landscaping plan has designed the open space areas to include habitats which will benefit biodiversity. However we highlight that more measures could be implemented including the planting of hedgerows along all the site boundary. We will provide further comments on the layout once the updated ecological report has been submitted.

A lighting plan has been submitted but the plans only appear to show the light spill on the road not what the light spill levels will be within the wider area (such as the open space). We recommend that the lighting plans are updated to demonstrate the anticipated light spill across the whole site not just the roads. We recommend that the lighting is dimmed over night to further reduce any impact of lighting on nocturnal animals.

*Updated comments received 16 August 2023*

We advise that additional information is required prior to determination of the planning application.

Condition 7 states: Prior to the submission of any reserved matters, an updated ecological scoping survey, to include breeding bird survey shall be submitted to, and approved in writing by the Local Planning Authority. The survey(s) shall include detailed mitigation strategies if required and details of how the development will enhance biodiversity, and the agreed details should be included in any relevant reserved matters submission.

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*Initial comments received 14 March 2023*

We advise that additional information is required prior to determination of the planning application.

Condition 7 states: Prior to the submission of any reserved matters, an updated ecological scoping survey, to include breeding bird survey shall be submitted to, and approved in writing by the Local Planning Authority. The survey(s) shall include detailed mitigation strategies if required and details of how the development will enhance biodiversity, and the agreed details should be included in any relevant reserved matters submission.

We recommend that the updated ecological survey is submitted as part of this current reserve matters application. The results of the updated survey may require changes to be made to the proposed layout or landscaping.

We note that the landscaping plan has designed the open space areas to include habitats which will benefit biodiversity. However we highlight that more measures could be implemented including the planting of hedgerows along all the site boundary. We will provide further comments on the layout once the updated ecological report has been submitted.

#### **KCC Flood and Water Management** - Updated comments received 09 January 2024

Kent County Council as Lead Local Flood Authority have reviewed the additional information provided and are satisfied that the proposed layout will suitably accommodate the drainage scheme within the proposals. The infiltration testing and modelling provided suggest there is sufficient space for the required soakaways. As such we raise no further objection to the approval of the reserved matters application.

However, as part of detailed design submission (condition 23) we would require further information:

1. Further clarification will be required regarding pollution mitigation of those areas of highway not drained via permeable paving. These areas do not appear to have any pollution mitigation prior to runoff entering the soakaway. The LLFA would seek for the CIRIA SuDS Manual guidance to apply, notably Section E Chapter 26. This would require all runoff to pass through either SuDS features or proprietary treatment to remove pollutants, prior to the soakaway, to ensure that groundwater is protected.

2. Full network modelling to be undertaken, rather than the source control provided. This should include:

Simulations against the varying storm events that include the 1 or 2, 30 and the 100 year events.

Appropriate application of 'upper end' climate change percentages for both the 30 and 100 year events. The climate change rates to be applied can be found at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

The utilisation of the FEH 2013 or 2022 rainfall dataset where possible. Should FEH not be used, the LLFA would request the M5-60 value is uplifted to 26.25mm.

The outputs as presented should also contain the pipe/ manhole schedule to illustrate the design modelled through the simulations (the identification of pipes and manholes in the calculations should be reflected on the accompanying drainage layout drawings).

Inclusion of the critical summary events within the outputs.

No surcharging of the network should be experienced for the 1 or 2 year events, unless where unavoidable at features such as flow controls, and no flooding for the 30 year event.

*Updated comments received 21 August 2023*

We have no further comment to make on this proposal and would refer you to our previous response (23/03/2023).

*Initial comments received 23 March 2023*



Kent County Council as Lead Local Flood Authority have reviewed the information submitted in relation to the reserved matters application and have the following comments:

The LLFA understand from the Site Layout (P21-2467\_DE\_14\_J\_20) that the arrangement of the proposed development is similar to that previously approved as part of outline permission. Before the approval of the reserved matters application, the LLFA would seek to confirm that drainage arrangements to serve the site can be accommodated within the proposed layout.

At outline stage, proposals were for a combination of individual plot soakaways, permeable paving and swales. To support the preliminary design, infiltration testing was undertaken at 5 locations across the site, concluding that the permeability of underlying geology and superficial deposits to be highly variable but infiltration still being a viable option.

Since that outline application, KCC held pre-application discussions in regards to changing the surface water drainage strategy to three large infiltration basins. It is apparent from the Planning Statement that a single attenuation basin is proposed within the public open space to the north of the site. The layout and size of the basin from the proposed layout is not clear. We would request accompanying drainage layout drawing and supporting calculations to demonstrate that the drainage can be delivered within the proposed layout.

**KCC Public Rights of Way** - There are no recorded Public Rights of Way affected by the site, reference the red line boundary. The PROW network in the wider area come under other local development sites.

KCC PROW and Access would however, under our remit of Countryside Access, comment on concerns regarding the percentage of green space shown on the application plans. We would advise that green space is broken up throughout the development so not concentrated in one area alone. There should be more pedestrian, cycle and all user separate links to the open space, particularly with regard to the housing layout south of the link road. The development should ensure that the open green space is of high quality with points of interest provided, ie. outdoor facilities, to encourage use.

**Kent Police** - We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We request a condition for this site to follow SBD Homes 2019 guidance to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998.

1. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people. These must be subject to surveillance but sited so that residents will not suffer from possible noise pollution, in particular the green spaces surrounding the site and the any parking areas/ courts to the rear of the properties. These areas must be well lit and covered by natural surveillance from neighbouring properties.

2. Perimeter, boundary and divisional treatments must be 1.8m high. Any alleyways must have secure side gates, which are lockable from both sides, located flush to the front building line.

3. Parking - To help address vehicle crime, security should be provided for Motorbikes, Mopeds, Electric bikes and similar. SBD or sold secure ground or wall anchors can help provide this. We advise against the use of parking courts as they can create an opportunity for crime. Where unavoidable, the areas must be covered by natural surveillance from an "active" window e.g. lounge or kitchen and sufficient lighting - the same recommendations apply to on plot parking bays. In addition, we request appropriate signage for visitor bays to avoid conflict and misuse.

4. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.

5. Corner properties require defensible spaces to avoid desire lines that can cause conflict. This can be provided by planting of prickly plants or knee rails/ fences, for example.

6. Lighting. Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Homes 2019 states: "18.3 Bollard lighting is purely for wayfinding and can be easily obscured. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime. It should be avoided." Lighting of all roads including main, side roads, cul de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.

7. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation and locks) including folding, sliding or patio doors to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.

8. Windows on the ground floor or potentially vulnerable e.g. from flat roofs or balconies to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes.

9. Bedroom windows on the ground floor require a defensive treatment to deflect loitering, especially second bedrooms often used by children.

10. We recommend "A GUIDE FOR SELECTING FLAT ENTRANCE DOORSETS 2019" for buildings featuring multiple units, any covered access must deflect loitering that can stop residents and their visitors from using it without fearing crime. Entrance doors must be lit and designed to provide no hiding place.

11. For the main communal doors audio/visual door entry systems are required. We strongly advise against trade buttons and timed-release mechanisms, as they permit unlawful access and have previously resulted in issues with Crime and ASB.

12. Cycle and Bin Stores must be well lit and lockable, with controlled access for the residents within the flats. We advise on the use of ground/ wall SBD or sold secure anchors within the cycle storage area and sheds of dwellings.

13. Mail delivery to meet SBD TS009 are strongly recommended for buildings with multiple occupants along with a freestanding post box of SBD/Sold Secure approved Gold standard. For the houses, we recommend SBD TS008. If mail is to be delivered within the lobby, there must be an access controlled door leading from the lobby to the apartments/ stairs on the ground floor to prevent access to all areas.

14. CCTV is advised for all communal entry points and to cover the mail delivery area.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

**Natural England** - No objection subject to securing appropriate mitigation.

This advice relates to proposed developments that falls within the 'zone of influence' (ZOI) for the following European designated site[s], North Kent Special Protection Area (SPA). It is anticipated that new residential development within this ZOI is 'likely to have a significant effect', when considered either alone or in combination, upon the qualifying features of the European Site due to the risk of increased recreational pressure that could be caused by that development. On this basis the development will require an appropriate assessment.

Your authority has measures in place to manage these potential impacts in the form of a strategic solution Natural England has advised that this solution will (in our view) be reliable

and effective in preventing adverse effects on the integrity of those European Site(s) falling within the ZOI from the recreational impacts associated with this residential development.

This advice should be taken as Natural England's formal representation on appropriate assessment given under regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 (as amended). You are entitled to have regard to this representation.

**NHS Kent and Medway** - NHS Kent and Medway has responsibility for planning healthcare services in Kent and Medway and reviews planning applications to assess the direct impact on healthcare.

I refer to the above full planning application which concerns the proposed residential development comprising up to 250 dwellings.

NHS Kent and Medway has assessed the implications of this proposal on delivery of healthcare services and is of the opinion that it will have a direct impact which will require mitigation through the payment of an appropriate financial contribution.

Healthcare services provided in the community - £216,000. Towards refurbishment, reconfiguration and/or extension of existing general practice and other healthcare premises covering the area of development or new premises for general practice or healthcare services provided in the community in line with the healthcare infrastructure strategy for the area.

#### Justification for infrastructure development contributions request

This proposal will generate approximately 600 new patient registrations in general practice based on the dwelling mix provided in Appendix 1. The proposed development falls within the current practice boundaries of Northdown Surgery and The Limes Medical Centre. The proposal will also increase demand on other healthcare services provided to the local population and will be considered as part of the integrated models of care that will be developed along with the infrastructure strategy for the East Kent Health and care partnership area.

There is currently limited capacity within existing healthcare premises to accommodate growth in this area. The need from this development, along with other new developments, will therefore need to be met through the creation of additional capacity in general practice and other healthcare premises. Whilst it is not possible at this time to set out a specific premises project for this contribution we can confirm that based on the current coverage of health care services and location of this application, we would expect the contribution to be utilised as set out above. Any premises plans will include the pooling of S106 contributions where appropriate.

In addition to the above we request that any S106 agreement regarding a financial contribution recognises the following:

Supports the proactive development of premises capacity with the trigger of any healthcare contribution being available linked to commencement or at an early stage of development.

Allows the contribution to be used towards new premises in the area serving this population in line with the Infrastructure Strategy and priorities for the East Kent Health and Care Partnership area.

Allows the contribution to be used towards professional fees associated with feasibility or development work for existing or new premises.

**Southern Water** - *Updated comments received 17 August 2023*

The comments in our response dated 23/03/2023 remain unchanged and valid for the amended details.

*Initial comments received 23 March 2023*

Southern Water have no objections to the reserved matters application for appearance, landscaping, layout and scale.

Our investigations indicate that Southern Water can facilitate foul sewerage disposal to service the proposed development. Southern Water requires a formal application for a connection to the public foul sewer to be made by the applicant or developer.

Under current legislation, Southern Water can consider the adoption of SuDS if they are to be designed and constructed in line with the Design and Construction Guidance ([water.org.uk/sewerage-sector-guidance-approved-documents/](http://water.org.uk/sewerage-sector-guidance-approved-documents/)). No new soakaways, swales, ponds, watercourses, associated attenuation tanks or any other surface water retaining or conveying features should be located within 5 metres of a public or adoptable gravity sewer, rising main or water main.

All other comments in our response dated 31/01/2017 remain unchanged and valid.

**TDC Conservation Officer** - Following a review of the proposed application I would consider there to be enough of a buffer of undeveloped space and the immediate setting of the nearby Grade II\* monastic grange, as such harm is considered to be less than significant and I do not object to the application proposed.

**TDC Crematorium and Cemeteries** - The crematorium is located adjacent to this proposed development and the impact of both the development stages and occupancy of properties on the provision of a tranquil and peaceful environment to lay loved ones to rest and grieve is of huge concern.

I note from the plans that there is an area on site left for open space, if this could be relocated to the otherside of the site closest to the crematorium this would greatly reduce the impact of the site on the operation of the crematorium.

An acoustic barrier would also go further in reducing the impact especially in the development stage, I am sure you can appreciate that those grieving do not want the sounds of a construction site during their services.

**TDC Environmental Health** - *Updated comments received 28 April 2023*

Thank you for consulting Environmental Health on the technical note dated 24th April in relation to condition 5 and the noise impacts associated with the new road layout on existing dwellings along Manston Road.

The assessment has been undertaken by a competent acoustic consultant using appropriate guidance and methodologies to assess the future impacts of the new roundabout. The conclusions are accepted.

*Initial comments received 15 March 2023*

A noise assessment has been undertaken in accordance with condition 5 of the outline consent. The report follows guidance of good acoustic design principles set out in ProPG guidance and make a number of recommendations including acoustic glazing, trickle vents and mechanical ventilation. At reserved matter stage Environmental Health require a supporting statement that the acoustic design recommendations have been incorporated into the development including consideration of ventilation and overheating compliance with Approved Doc O.

An air quality assessment was undertaken at outline - Condition 6. The emissions mitigation assessment calculated significant damage costs which are required to go to offsetting measures. In addition to this is a requirement (SE05) for standard electric charge points:

Electric Vehicle Charge Points:

Prior to the occupation of the development hereby permitted, details of the electric vehicle charging points to be provided within the development, including their location and design, shall be submitted to and approved in writing by the Local Planning Authority. The electric vehicle charging points shall be in the form of one active charging point per allocated parking space, and one active charging point per ten unallocated parking spaces. The electric vehicle charging points shall be provided prior to the first occupation of the respective units that they serve and thereafter maintained.

**TDC Housing** - *Updated comments received 10 August 2023*

Upon further review of the reserved matters application for the above site the market sales housing mix does not appear reflective of the overall housing target mix for the district. The Strategic Housing Market Assessment (SHMA) (updated August 2021) recommends the appropriate mix of affordable and market homes. This takes into account the ageing demographic and changes within households over a long term 20 year period

The proposed scheme indicates a disparity between the number of 2 bed and 4 bed units.

Although the housing mix figures are not necessarily prescriptive, to ensure a future balanced delivery of units within the district, it would be advisable to closely align the housing mix against these figures, particularly on a large strategic site such as this one; therefore, it would be prudent to use these as a set of guidelines and where a housing mix significantly differs from these figures, it requires appropriate justification.

Upon review of the affordable housing mix against the SHMA (Updated 2021) recommendations, this mix is more closely aligned with the recommendation.

Upon review of the Site Layout drawing, prepared by Pegasus ref no: P21\_2467\_DE\_14\_P\_01, dated 13/06/23, the accommodation schedule only identifies two M4(3) units. The Local Plan Policy QD05 Accessible and Adaptable dwellings requires 10% of units to be M4(2) compliant and 5% of units to be M4(3) compliant; it would be advantageous to provide information identifying all units that comply with this requirement.

*Updated comments received 28 July 2023*

On the 24th April 2023, TDC's Strategic Housing department provided comments on the reserved matters application; these comments are still relevant to this application. Upon review of the Covering Letter sent by Savills on behalf of Bellway Homes (Kent) dated 27/06/23

The amended tenure plan, prepared by Pegasus ref no: P21\_2467\_DE\_14\_F\_03, dated 22/06/23, does not clearly indicate the number of units provided against each tenure and it does not indicate the mix of units. It would be advantageous to provide a housing tenure and housing mix table to identify the affordable housing provision precisely, this would assist in identifying how many units are now offered as 1 bedrooms and how many are 3 bedrooms along with their tenure.

*Initial comments received 24 April 2023*

Upon review of the submitted Planning Statement, dated February 2022, prepared by Savills on behalf of Bellway Homes, 18% Affordable Housing will be provided on site (which equates to 45 dwellings) in accordance with the S106.

The proposed affordable housing mix is not particularly reflective of the SHMA, mostly due to a lack of one bedroom units overall; however, I appreciate evidence has been provided which justifies the disparity.

It would be prudent at this stage to indicate the proposed type of units aligned with the tenure. The majority of the affordable housing is congregated. It would be advantageous to consider integrating the affordable housing throughout the site.

## COMMENTS

This application has been called to the planning committee by Cllr Leo Britcher, to allow members to consider the impact on highway safety and the layout of the development.

## **Principle**

This application is a reserved matters application, for consideration of layout, scale, appearance and landscaping only. The principle of the development, along with the access, was assessed and approved through the original outline application ref: F/TH/16/1765.

Accesses to the site from Manston Road and Nash Road along with amendments to the surrounding highway network outside the site were agreed as part of the outline application. Another agreed parameter was that the development will be two storeys with development integrated into the roof slope in places throughout the development site. As these matters were agreed as part of the outline permission they cannot be reconsidered or amended through this application.

## **Character and Appearance**

Policy QD02 of the Thanet Local Plan states that 'the primary planning aim in all new development is to promote or reinforce the local character of the area and provide high quality and inclusive design and be sustainable in all other respects. Development must:

- 1) Relate to the surrounding development, form and layout and strengthen links to the adjacent areas.
- 2) Be well designed, respect and enhance the character of the area paying particular attention to context and identity of its location, scale, massing, rhythm, density, layout and use of materials appropriate to the locality. The development itself must be compatible with neighbouring buildings and spaces and be inclusive in its design for all users.
- 3) Incorporate a high degree of permeability for pedestrians and cyclists, provide safe and satisfactory access for pedestrians, public transport and other vehicles, ensuring provision for disabled access.
- 4) Improve people's quality of life by creating safe and accessible environments, and promoting public safety and security by designing out crime.

External spaces, landscape, public realm, and boundary treatments must be designed as an integral part of new development proposals and coordinated with adjacent sites and phases. Development will be supported where it is demonstrated that:

- 5) Existing features including trees, natural habitats, boundary treatments and historic street furniture and/or surfaces that positively contribute to the quality and character of an area are should be retained, enhanced and protected where appropriate.
- 6) An integrated approach is taken to surface water management as part of the overall design.
- 7) A coordinated approach is taken to the design and siting of street furniture, boundary treatments, lighting, signage and public art to meet the needs of all users.
- 8) Trees and other planting is incorporated appropriate to both the scale of buildings and the space available, to provide opportunities for increasing biodiversity interest and improving connectivity between nature conservation sites where appropriate'.

## *Layout and Landscaping*



Residential development is proposed across the site arranged north and south of a road that extends from east to west linking Manston Road with Nash Road. This road would form part of the "Inner Circuit" as part of the Thanet Transport strategy and Local Plan to 2031 and is proposed to be constructed as a Local Distributer road. A roundabout would be formed at the western end of the site to provide a junction at Manston Road and Nash Road would be reconfigured to form a side road serving the existing dwellings on the northern side of the and eight new dwellings. Six other junctions would be formed within the site to serve the proposed dwellings, three on the northern side and three on the southern side of the new link road.

All development across the site would have street frontage. Dwellings facing the central link road would have landscaping to the front and would be set behind a footpath/cycleway. Further landscaping would be located between the footpath/cycleway and the highway. Some dwellings would be accessed directly from the highway and others would be set further back and accessed from shared driveways. Dwellings accessed from the side roads would have front gardens and would either be set behind shared surfaces or pavement. Areas of soft landscaping are also located throughout these smaller roads.

Planting throughout the site would be primarily native species with some ornamental features. Orchard trees are proposed for the two pocket parks on the northern side of the link road and alongside the side road and footpath at the centre of the site. Front gardens of the dwellings would comprise low to medium height shrubs and hedges. Details of the proposed species and the areas they will be located are included in the landscape and public realm strategy.

The main carriageway and footpaths will be built to adoptable standards and surfaced in tarmac with junctions built in contrasting block paving. Shared access roads/drives, parking courts and private drives will be a mixture of block paving and tarmac and footpaths in the open space will be a combination of resin bound gravel and mown grass paths. Amended plans have altered boundary treatments in visible areas to be brick walls with timber fencing providing internal division to gardens and timber rails and bollards would protect grass verges.

Dwellings would be arranged as a variety of detached, semi-detached or terrace houses set over two storeys or three with the second floor located in the roof. Two blocks of flats are also proposed, one in the north western corner of the site adjacent to Manston Road and St Gregory's School and one in the centre of the site on the southern side of the link road. All dwellings would benefit from private amenity space that would be considered to be secure doorstep playspace and the playspace for the flat blocks has been moved adjacent to these buildings to comply with policy GI04 through amendment received.

It is considered that the layout would provide a visually attractive development with effective landscaping, in keeping with surrounding development, whilst encourage walking and cycling, in accordance with the requirements of the outline permission, the Local plan and the NPPF.

*Open Space*

Policy GI04 of the Thanet Local Plan requires that new residential development make provision for appropriate amenity green space and equipped play areas to meet the standards set in tables 10, 11 and 12 within the policy.

Conditions 9, 11 and 12 required details of the local play space on the site, an area of open space adjacent to Salmestone Grange in the same location and no smaller than that shown on the indicative layout plan no.P001B received 23 December 2016 and vegetation within the area of open space to screen the development in views from Salmestone Grange.

A landscape masterplan and landscape and public realm strategy has been provided during the application process. These plans and documents show an area of open space adjacent to Salmestone Grange no smaller than shown on the December 2016 plan and include details of the proposed local play space. The landscape and public realm strategy indicates that the LEAP has been designed to meet the Fields in Trust guidance, providing a minimum active zone of 400m<sup>2</sup>, 6 play experiences and 20m buffer zone to dwellings. The existing vegetation would be retained on the boundary with Salmestone Grange and additional native planting would be created along the western boundary of the open space to screen views of the development from this neighbouring site. This open space would comprise a variety of formal and informal footpaths as well as a mix of open grassland, wildflower meadows, wetland meadow grass to the swale and native planting.

Some other smaller areas of open space are distributed throughout the site on the corners of roads, footpaths and along the highway.

The large area of open space with its various areas and the smaller areas of open space proposed throughout the development area are considered to provide an acceptable space for residents and would sufficiently break up the areas of hard surfacing, in line with the requirements of the outline permission, policies GI04 and QD02 of the Thanet Local Plan and the National Planning Policy Framework.

### *Scale and Height*

Houses across the site would primarily be two storeys in height with pitched roofs. 36 houses are proposed to have a second floor with these rooms located within the roof and served by dormers to the front and rear. Houses with hipped roofs are less prevalent than those with pitched roofs but would be present across the site. Features such as two storey projecting gables, variations in materials, projecting canopies and bay windows would be used to break up the mass of the houses and all dwellings on corner plots would have openings in all elevations visible from the public realm. Dwellings along Manston Road opposite the site are pairs of two storey semi-detached houses with hipped roofs and detached and semi-detached bungalows with pitched roofs. There are some examples of front dormers and to the north and south of this section of the road there are some dwellings with different designs. Dwellings along Nash Road facing the site are primarily two storey semi-detached dwellings with hipped roofs.

The proposed flat blocks have been amended during the application process to alter the design and arrangement. Both blocks would now have the same design. These flats would have an 'L' shaped footprint and would be set over three storeys with the second floor set in

the roof. They would have a hipped roof and projecting gabled sections and stepped elevations.

Site sections have been provided showing the relationship between the proposed flats at the western end of the site and the existing dwellings on Manston Road. Whilst there is a change in levels and the flat block would be taller than the existing development, given the distance across the road and spacing around the new building, the new development would not appear overly dominant or incongruous in scale in this location. The relationship between the proposed and the existing dwellings is therefore not considered to be significantly harmful to the character and appearance of the area.

At the Nash Road end of the site, sections have been provided with spot heights confirming that the height of dwellings 153 to 158 would follow the slope of the land in this section of the site and would be set at the height of the existing road. Given that these dwellings would follow the slope of the road, their street frontage and the separation to the dwellings on the western side of Nash Road these dwellings are not considered to be significantly harmful to the character and appearance of the area.

Given the relationship with the existing neighbouring properties, the height and scale of the proposed dwellings and the flat blocks is considered to be in keeping with the requirements of the outline permission and the character and appearance of the area, in line with policy QD02 of the Thanet Local Plan and the National Planning Policy Framework.

### *Design*

The existing dwellings along Nash Road include gabled front projections, bay windows and whilst primarily constructed from red brick, there are examples of cladding, render and tile hanging. Dwellings along Manston Road include hipped and pitched tiled roofs, dormers and bay windows and are primarily constructed from brick, painted brick and render.

Indicative street scenes have been provided for the Nash Road, Manston Road and part of the new spine road sections of the site. These street scenes show a variety of detached, semi-detached and terraced dwellings with varying roof heights and forms. Design elements include gabled projections, bay windows and porch canopies which will integrate the development into the existing form of dwelling in the area.

In terms of the palette of materials, the proposal includes a mix of red brick, red multi brick and buff brick, grey red and brown/red tiles along with two shades of grey and one shade of white cladding. These materials would be used in variations across the 14 different housing types and the flat blocks. These different materials and dwelling types are considered to provide enough variety and to be in keeping with the area.

The design of the development is considered to be appropriate, and in keeping with the character and appearance of the area, in accordance with Policy QD02 of the Thanet Local Plan and section 12 of the NPPF.

### *Impact on Landscape Character Area*

This development proposes a density of 26.9 dwellings per hectare

The site lies within the Chalk Plateau Landscape Character Area, which is characterised as a generally flat or gently undulating landscape, with extensive, unenclosed fields under intensive arable cultivation. This open landscape is fragmented by the location of large scale developments such as the former airport, Manston Business Park and a sporadic settlement pattern to the north of the airport. The character of this area is also defined by the proximity of the edges of the urban areas. This character area contains the highest point on the island at Telegraph Hill. The elevated plateau results in long distance panoramic views to the south over Minster Marshes and across Pegwell Bay and, in the west, across the Wantsum. The elevated central chalk plateau also forms a skyline in many views back from lower landscapes in Thanet, including the coast and marshlands. Policy SP26 of the Thanet Local Plan states that development proposals should demonstrate how they respect and respond to the character, key sensitivities, qualities and guidelines of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA), and that all development should seek to avoid skyline intrusion and the loss or interruption of long views of the coast and the sea.

A Landscape Appraisal was submitted with the outline application. This appraisal outlines that the site is located at the northern edge of the Landscape Character Area adjacent to the existing settlement boundary and is separated from the main plateau due to the topography to the south. This assessment concludes that there would be a change in character of the site due to the alteration from agricultural to urban development, however due to its location on the edge of the existing urban area and the location of the crematorium and allotments to the south as well as the change in topography there would be no significant impact upon the wider Landscape Character Area.

For the reserved matters application, the submitted landscape plan identifies existing vegetation in the adjoining crematorium, school and Salmestone Grange sites that would be retained and would provide a large area of open space on the northern boundary of the site, along with smaller areas throughout the site. The existing site was previously used as an agricultural field and whilst it has not been used recently, there are no significant trees or hedgerows in the centre of the site. The existing hedgerows, trees and soft landscaping along Manston Road and the Nash Road sections of the site would be removed to facilitate the proposed development. Along Manston Road the planting is limited in nature with the exception of one tree that is located adjacent to the boundary wall and opposite 14 Manston Road. This tree is large in size and prominent, however, it is multi stemmed and appears to have previously undergone works to provide clearance from the adjacent cables. It is therefore considered that whilst this tree does provide some amenity value, it is not suitable for a tree preservation order and its removal would not result in significant harm to the amenity of the area. The trees and hedgerows along the Nash Road boundary are smaller in scale, although they do have group amenity value, their individual value is limited. The impact of the loss of the existing trees, hedgerows and planting is therefore not considered to result in significant harm to the wider landscape character area.

Given the edge of urban area location and the existing crematorium and allotments to the south that will separate the site from the open countryside and the wider landscape

character area, the detailed plans in this reserved matters submission is considered to comply with the principles of Policy SP26 of the Thanet Local Plan, and the NPPF

## **Living Conditions**

Policy QD03 of the Thanet Local Plan states that 'all new development should be compatible with neighbouring buildings and spaces and not lead to the unacceptable living conditions through overlooking, noise or vibration, light pollution, overshadowing, loss of natural light or sense of enclosure; be of appropriate size and layout with sufficient usable space to facilitate comfortable living conditions and meet the standards set out in QD04; include the provision of private or shared external amenity space/play space, where possible; provide for clothes drying facilities and waste disposal or bin storage, with a collection point for storage containers no further than 15 metres from where the collection vehicle will pass'.

### *Impact on Neighbouring occupiers*

The site shares boundaries with dwellings fronting Manston Road and Nash Road and the rear boundaries of dwellings on Eliots Close. Salmestone Grange, St Gregory's School, Thanet Crematorium and allotments also border the site. The neighbouring properties are primarily one and two storeys in height.

The submitted building heights plan shows development to be primarily two storeys in height, with the two proposed flat blocks being three storeys, with the second floor located in the roof. 11 dwellings with a second floor located in the roof would be located close to the new roundabout on Manston Road and 25 other dwellings with a second floor located in the roof would be located on the southern side of the proposed spine road. Single storey garages are also proposed across the site.

There is a change in levels between the site and the surrounding properties. The submitted sections indicate that the site would be 1.7m above Manston Road and at the eastern end of the site the neighbouring properties on Eliots Close are set below the level of Nash Road.

At the closest point across Manston Road there would be a separation distance of 22m from the front elevation of the new dwellings to the front elevation of the existing dwellings. Given this distance and that these dwellings would face the front elevations and gardens of these existing properties, they are not considered to result in any significant overlooking into private amenity areas or windows.

Plots 129 and 139 would be sited closest to the dwellings on Eliots Close with a separation of 16.2m from plot 129 and 19m from plot 139 to the boundary with these existing dwellings.

Plot 129 would be set at an angle to 3 Eliots Close and there would be a separation of 19m to the boundary with 3 Eliots Close. Given this separation distance and the angle of the property this dwelling is not considered to result in any significant overlooking to these existing properties.

Permission was granted for six dwellings on the north eastern side of Nash Road under application F/TH/23/0194. These dwellings would have rear gardens abutting the boundary

of the site and plots 152 to 158 would face this neighbouring site with a minimum separation distance of 17m.

A section plan has been provided along with spot heights demonstrating that the proposed dwellings would be set at a similar level to Nash Road. Whilst the separation distance doesn't meet the guide 21m, the separation distance and relationship across the road is not considered to result in a significantly harmful level of overlooking to warrant refusal.

Given these separation distances the proposed dwellings are not considered to result in any significant loss of light or outlook to the neighbouring properties.

Condition 5 of the outline permission required the submission of an assessment of road traffic noise to ensure that the dwellings on Manston Road were suitably protected due to the addition of the roundabout which would result in vehicles slowing and/or stopping before accelerating again. This report has been submitted and reviewed by the Council's Environmental Health Department. The report concludes that due to the existing background noise levels, there would be no significant increase in noise and disturbance and no additional mitigation measures are required. The Council's Environmental Health Department agree with the conclusions of this report.

Concern has been raised regarding the potential for increased noise and disturbance to the existing dwellings at the eastern end of the site due to the reconfiguration of Nash Road, however due to the new junction of Nash Road being set away from the boundary of the site and as traffic would continue to flow freely from the spine road onto Nash Road, it is considered that there would be no significant increase in noise and disturbance from road noise as a result of the development.

The use of the site for residential purposes would introduce a level of activity above that of the existing agricultural use, however the dwellings are either separated from the existing dwellings by roads, or set away from the boundaries with the existing dwellings. The proposed uses are therefore not considered to result in a significant increase in noise and disturbance.

Concern has been raised regarding the impact of construction upon the existing neighbouring property occupiers, including the school and crematorium. Noise and disturbance during construction is considered to be temporary in nature and would be controlled by legislation outside of the planning system. Condition 25 of the outline permission requires the submission of a construction method statement prior to commencement of development and will be required to include additional measures to safeguard the amenity of the existing neighbouring property users.

The impact upon the existing neighbouring occupiers of the development is therefore considered to be acceptable, and in accordance with paragraph 135 of the NPPF and policy QD03 of the Thanet Local Plan.

*Impact on Future occupiers*

In terms of the impact upon future occupiers, following the submission of amended plans each dwelling has been provided with doorstep playspace, in accordance with Policies QD03 and GI04 of the Thanet Local Plan.

Within the proposed development the units have been assessed against Policy QD04, which states the minimum space requirements of the units in relation to the nationally described space standards. The smallest 1-bed unit is 52sqm, which meets the minimum requirement of 50sqm; the smallest 2-bed is 67sqm, which exceeds the minimum requirement of 61sqm; the smallest 3-bed is 86sqm, which exceeds the minimum requirement of 84sqm; and the smallest 4-bed unit is 103sqm, which exceeds the minimum requirement of 97sqm. Each of the units therefore achieves the nationally described space standards as set out within Policy QD04 of the Thanet Local Plan.

There is space within each garden area for refuse storage and clothes drying facilities, including the flats, as well as private amenity space for each units where required.

The impact upon the future occupiers of the development is considered to be acceptable, and in accordance with paragraph 135 of the NPPF and Policies QD03 and QD04 of the Thanet Local Plan.

### **Highway Safety**

The principle of 250 dwellings on the site, the proposed accesses and off site highways works have been agreed through the outline application to mitigate potential increased traffic. Off site mitigation includes the closure of the Nash Road arm of the Coffin House Corner Junction and changes to the Shottendane Road/Manston Road junction. A contribution of £15,000 towards new bus stops was also secured as part of the legal agreement.

### *Layout and Parking*

Through this reserved matters application, consideration is to be given to the internal road layout and parking provision proposed. The Spine Road would traverse the centre of the site. Along this road dwellings would front the highway and would be set behind footpaths, soft landscaping and shared driveways. There would be seven secondary roads, four shared driveways and 14 dwellings with direct access to this central road. Street two would contain the school drop off bays and would be the only street with two accesses onto the central spine road.

The Spine Road would extend from Manston Road where a new roundabout would be formed. This roundabout would provide access into the site and north and south along Manston Road. The spine road would extend east west across the site and join Nash Road at the eastern end of the site. Nash Road would be reconfigured so that the northern section would become a secondary road accessed from a 'T' junction on the Spine Road. Following the closure of Nash Road at the Coffin House Corner junction, this would be the only access to this section of Nash Road. The Spine Road would curve to the south east at the rear of the properties on Eliots Close to join the remaining section of Nash Road and to continue to provide access towards Westwood Cross.

A 3m wide shared footpath and cycle way would extend along the southern side of the spine road and at the centre of the site a toucan crossing would be provided to allow pedestrian and cyclist access to the northern section of the site and the public open space. Two other pedestrian cross islands would be provided along the spine road.

Trees would line the spine road and would be located in the areas of soft landscaping between the highway and the foot/cycle paths. Trees would also line the secondary roads and smaller areas of soft landscaping would be located throughout these areas.

An adoption plan has been provided demonstrating that the spine road, secondary roads, footpaths, cycle paths and verges would be offered for adoption to the highway authority. The shared parking courts and driveways would remain in the ownership of the freeholders.

KCC Highways initially raised concerns about the number of direct dwelling accesses to the spine road, the siting of visitor parking bays on this road, the location and form of the proposed crossings and the speed attenuation features. Following the submission of amended plans removing visitor parking bays from the spine road, reducing the number of direct accesses to 14, adding Copenhagen Crossings to the secondary roads and a Toucan Crossing to the main road, along with central islands, KCC Highways have raised no objection to the layout and arrangement of the spine road.

Following the submission of the initial plans, amended plans have been submitted removing trees from the spine road demonstrating that suitable visibility can be achieved from the secondary roads onto the spine road. These trees have been relocated elsewhere in the site.

All of the roads within the site would be two way and tracking plans have also been provided demonstrating that cars, a 13m long refuse vehicle and fire tender can access and turn within the site.

One or two allocated parking spaces are provided for each dwelling across the site dependent upon the size of the dwelling. The parking would be provided as a mixture of parking courts, tandem parking and street frontage parking. Garages are also provided for 93 dwellings as either single, double or shared double garages, in addition to the allocated parking spaces. This parking provision for new dwellings is considered to be acceptable against the adopted standards of KCC.

105 visitor parking spaces are also provided across the site and following the submission of amended plans these are considered to be adequately distributed across the site.

Dedicated cycle stores provided for the flats and sheds provided in the rear gardens of those houses without garages

Along the northern boundary of the site with St Gregory's School and accessed from street 02, 12 drop off bays would be provided which could be used by parents of pupils of the school. A footpath/cycleway would be provided to the boundary of the school to the west of these spaces and a pedestrian route has also been provided via street 03 to Manston Road



around the flat block at the north western corner of the site. From the south eastern drop off space adjacent to plot 202, there would be a distance of approximately 303m to the entrance of the school on Manston Road. Amended plans submitted during the application process have increased the width of the footpath and altered the location of the flat block to improve visibility for pedestrian movements between the main entrance of the school and the parking area. In addition, the parking in the north western corner of the site has been altered from rows of parking bays to small parking courts to minimise the number of vehicular accesses in this area. This walking route does not require any roads to be crossed and is not considered an unreasonable distance for parents and children to travel a maximum of 303m from the furthest drop off bay to the main school entrance gate.

Comments have been submitted indicating that street 02 should be one way, however given the residential context a two way street is not considered to result in any significant harm to highway safety.

Condition 16 of the outline permission states:

Details pursuant to condition 1 shall include details of a new pedestrian access into St Gregory's through the development site.

The submitted plans show details of a pedestrian footpath to the southern boundary with the school and details of a gate have been submitted as an additional plan. Concern has been raised that an access in this location would require additional works within the school to facilitate the use of this access. The ground for this condition is "In the interests of highway safety and to facilitate the use of alternative means of transport." This access would provide the opportunity for an alternative pedestrian access to the school if required. There is no obligation for the school to use this access or undertake works within their property, nor is there a requirement for the developer to provide/carry out works within the school site to facilitate pedestrian access at this point. The proposed arrangement would not result in any significant harm to highway safety and would provide additional opportunity for pedestrian access if required. It is considered that the maximum works that can be provided within the scope of this application to comply with this condition have been provided. Works outside of the red line and additional contributions cannot be secured or required as part of this reserved matters application, and access points into the site have been approved as part of the outline permission. The Council therefore considers that this arrangement would comply with condition 16.

Condition 21 requires a highways work phasing plan to be submitted prior to the commencement of development. This condition would work in combination with with condition 22 which requires full and final details of the closure and reconfiguration of the signalised junction at Hartsdown Road, Shottendane Road and Nash Road, reconfiguration of Manston Road/Shottendane Road junction, revised access arrangements at the St Gregory's school access on Manston Road and the provision of an informal crossing point and cycle connections close to the new priority junction. These plans are required to be provided prior to the commencement of development and are required to be agreed by the Highways authority through the relevant process within the Highways act (Section 278 agreement).

Concern has been raised regarding the arrangement and condition of the pedestrian bridge on Nash Road. The pedestrian footpath on the northern side of Nash Road to the bridge would remain in place and a new footpath would be created within the site along the front of the proposed dwellings on the southern side of Nash Road. The bridge is located opposite plot number 158 and could therefore be accessed from this footpath across the road, therefore the layout of the development will connect to the existing pedestrian network. Whilst the use of the bridge may increase, there is no evidence that the layout of the proposed development would result in damage to the bridge to result in a closure or impact on the network, with the impact of the principle of housing on the highway network considered at outline stage. The maintenance of the bridge is a matter for the owners.

Following the submission of the amended plans it is considered that the proposed development would provide a suitable link road through the site as well as access and parking for the proposed dwellings. A new pedestrian access to the school would also be available for use if required by the school, along with a number of additional drop off bays. It is therefore considered that the amended development would provide suitable access and parking for vehicles and would not result in any significant harm to highway safety in consideration of the layout of the development.

### **Size and Type of Housing**

Policy SP22 of the Thanet Local Plan states that proposals for housing development will be expected to provide an appropriate mix of market and affordable housing types and sizes having regard to the Strategic Housing Market Assessment (SHMA) recommendations as may be reviewed or superseded. It further states that the Council will encourage proposals for residential development to incorporate a higher ratio of houses to flats (as recommended in the SHMA).

In terms of market housing provision the application originally proposed 21 two bedroom houses, 111 three bedroom houses and 73 four bedroom houses. When considering the proposed provision against the SHMA recommendations, the provision is closer to the need identified through the 2021 Local Housing needs assessment, where there is a greater need for larger family units, and as such it can be considered that the proposed unit mix size addresses current need. A revised schedule of accommodation has been submitted (to address the concerns raised below), with the ratio changing slightly to 24 two bedroom houses, 102 three bedroom houses and 79 four bedroom houses. This slight change raises no concerns.

In terms of affordable housing the application originally proposed 2 one bedroom flats, 14 two bedroom flats, 8 two bedroom houses, 17 three bedroom houses and 4 four bedroom houses. The SHMA seeks a higher number of smaller affordable units. Concerns were also raised by the Council's Strategic Housing Officer regarding the lack of smaller affordable units within the scheme. An amended schedule of accommodation has been submitted to address the concerns raised. The proposal now offers 12 one bedroom flats, 16 two bedroom flats, 5 two bedroom houses, 9 three bedroom houses and 3 four bedroom houses.

A mix of flats, terraced units, semi-detached units, and detached units have also been provided, achieving a good mix across the site. The proposal is therefore considered to comply with Policy SP22 of the Thanet Local Plan.

The proposal offers 3no. M4(3) accessible units and 25no. M4(2) accessible units, with the units identified on the proposed site plan. This complies and exceeds the requirements of Policy QD05 of the Thanet Local Plan.

### **Affordable Housing**

31 Affordable Rent dwellings (12no 1 Bed Flats, 16no 2 Bed Flats, 2No 3 Bed Houses and 1No 4 Bed House.) and 14 Shared Ownership dwellings (5No 2 Bed Houses, 7No 3 Bed Houses and 2No 4 Bed Houses) are proposed across the site. This would result in a total of 45 affordable dwellings (18% affordable housing across the site). The proposed affordable housing would comply with the requirement set out within the legal agreement submitted and agreed as part of the outline application.

### **Biodiversity**

An Extended Phase 1 Habitat Survey was submitted as part of the outline application and did not identify any protected species, suitable sites for foraging or community bats or suitable reptile habitats and considered the site to have poor sustainability to be used by wintering birds. Recommendations were given for the planting of native tree and shrub species where possible to create new habitats and pollen rich plants.

KCC previously raised no concerns subject to conditions requiring the submission of an updated ecological scoping survey (Condition 7) and the recommended site specific species surveys to be completed prior to the submission of the reserved matters. It was confirmed that in 2017 the cropping regime and the intensive management of the site meant that the site has limited potential for protected/notable species and was unsuitable for breeding birds. KCC also indicated that a sensitive lighting scheme would be required and details of ecological enhancements would be required.

An updated Preliminary Ecological Appraisal Report has been submitted during the application process to address condition 7. This report indicates that the site conditions have not changed since the initial assessment, however the site has been taken out of arable management. The previous arable use of the site and the planting of the site at the start of 2022 was considered to provide suitable conditions for ground nesting birds as part of the completed breeding birds survey. KCC Biodiversity have reviewed the submitted assessments and are satisfied with the information that has been provided.

Recommended ecological enhancements and mitigation include:

42 bird boxes, (with a mixture of 11 small hole bird boxes 10 large hole nest box and 11 open fronted boxes provided along with 10 sparrow nest boxes)

2 bat boxes

Enhancement of site boundaries

Use of nectar rich planting in the landscaping

Additional biodiversity features recommended by KCC include bat, bird and bee bricks and log piles to the boundaries. The applicant has submitted additional information identifying the location of planting and boxes for birds and bats.

Further mitigation for the Skylark population has also been suggested for the surrounding fields by KCC Biodiversity. The applicant has provided an ecology note in response to these comments. This note states that the previous farming of the land would not have lent itself to Skylark Habitat, and only six areas have been identified where Skylarks have been present on the site. No Skylarks were directly witnessed on the site by the breeding bird survey. The applicant has indicated that sufficient space could not be provided on the site for the required habitat and to achieve a viable development. No contributions or off site mitigation was not secured through the outline permission. This point is outlined through the breeding bird survey, which states that "Due to the scale of the site, the proposed allocated development, and the future use of the site, it is not possible or feasible to recreate habitat suitable for skylarks within the site, given the large area of land that would be required and the level of disturbance it would receive".

Whilst the principle of residential development has been established on the site, the agricultural use is the extant use of the land and could recommence at any time, albeit subject to the restrictions of the Wildlife and Countryside Act. The current habitat created on the site has resulted from a delay in the housing development coming forward, rather than the site having been established as a habitat for protected species when the outline application came forward.

The breeding bird survey considers that "the residual impacts to breeding birds are considered to be a long term major adverse effect of significance at a Neighbourhood Level for skylark and a long term major beneficial effect of significance at a Site Level for the overall diversity of species. The residual impact based on the balance of these two is therefore a neutral adverse effect significant at the Neighbourhood level". The site is an allocated housing site, including a key infrastructure link as part of the Thanet strategic routes Policy SP47, and it has previously been established through the outline application that viability has reduced the amount of affordable housing provided by the development, meaning onsite provision would not be achievable without affecting the delivery of the scheme. Therefore, it is considered that whilst the development will have a neighbourhood level impact on bird species, this impact would not be a significantly harmful effect on biodiversity when considering the appropriateness of a positive contribution to biodiversity under Policy SP30, and the proposed enhancements/mitigations offered. Therefore, despite the impact, the mitigation and enhancement proposed by the applicant, is considered appropriate for the development to comply with the aims of Policy SP30, with any adverse impacts outweighed by the identified positive benefits from the development of the allocated site identified in the development plan.

## **Drainage**

When determining planning applications, Local Planning Authorities should ensure flood risk is not increased elsewhere and only consider development in areas at risk of flooding where, informed by a site specific flood risk assessment that within the site, the most vulnerable development is located in areas of the lowest flood risk and development is appropriately

flood resilient and resistant and that any residual risk can be managed and which gives priority to the use of sustainable drainage systems.

The application site lies in flood zone 1 - low probability of flooding - as defined by the Environment Agency flood maps. A detailed flood risk assessment was submitted as part of the outline permission and conditions were applied requiring the submission of a detailed sustainable surface water drainage scheme (Condition 23) and scheme for sewage disposal (Condition 24) prior to the commencement of development.

KCC Flood and Water Management have reviewed the application and following the submission of an additional drainage note they are satisfied that the proposed layout will suitably accommodate the drainage scheme. Further information is required regarding the detailed design of the drainage scheme, however this would be submitted as part of condition 23.

It is therefore considered that given the details secured through the outline permission and following the details submitted as part of this application, that the proposed layout would make suitable arrangements for surface and foul drainage and would not significantly increase the flood risk within the area.

### **Air Quality**

Condition 6 of the outline permission required an emissions assessment. An assessment has been submitted through a conditions discharge application. This report outlines that this development would generate additional traffic on the local road network, but there will be no significant effects on human health. The provision of electric vehicle charging points, the setback of dwellings from the highway and the reduction in congestion provided through the provision of the link road and reconfiguration of the Coffin House Corner junction have been considered to contribute to the 'not significant' impact upon air quality. The report concludes that given the overall effect upon air quality, no further mitigation measures are required. This report and its conclusions have been confirmed as acceptable by Environmental Protection.

Electric vehicle charging points are shown on the submitted parking strategy and would be provided for each dwelling. This would comply with condition 13 of the outline permission.

### **Heritage**

The outline permission, through conditions 11 and 12, required an area of open space to be provided adjacent to Salmestone Grange and additional planting to screen views of this development from the listed building. The open space provided as part of this application is no smaller than the space shown on the indicative layout plan submitted as part of the outline permission and additional planting is proposed along the boundaries of the site with Salmestone Grange. The Council's Conservation Officer considers that sufficient open space is provided to limit the harm to the grade II\* listed building and does not object to the application.

The alteration and development of the surrounding agricultural fields for housing and residential uses would result in some harm to the setting of the listed building through the introduction of additional built development and intensification of the use of this area. However, Salmestone Grange is somewhat separated from the site and the provision of the open space and additional planting is considered to create a sufficient buffer. The public benefits of the proposal, from the provision of strategic road infrastructure and the provision of 250 houses in an area with an identified need, is considered to outweigh this moderate harm.

### **Archaeology**

A programme of archaeological works on the site was secured as part of condition 26 of the outline permission and must be implemented prior to the commencement of development. The most sensitive area of the site, adjacent to Salmestone Grange, has been retained for public open space as indicated during the outline permission. Within this area footpaths, landscaping and a LEAP are proposed. On the basis of this area being retained as open space and the features proposed in this area are not likely to cause harm to archaeology, the impact upon archaeology is considered to be acceptable, and in accordance with Policy HE01 of the Thanet Local Plan.

### **Special Protection Area Mitigation and Appropriate Assessment**

European sites are afforded protection under the Conservation and Habitats and Species regulations 2010 (as amended the Habitat Regulations) and there is a duty placed upon the competent authority (in this case TDC) to have regard to the potential impact that any project may have on those sites.

The Council undertook a Habitat Regulations Appropriate Assessment with the outline application, and a contribution was secured towards the SAMM to mitigate the harm.

Natural England raised no objections to the assessments and therefore the proposed development, subject to the mitigation measures that were secured. In addition, the breeding bird survey undertaken does not identify the presence of any special protection area species on the site in its current condition. Therefore the development would not adversely affect the integrity of the SPA and Ramsar site subject to the proposed mitigation secured through the outline permission. The application is therefore not restricted by the Conservation of Habitats and Species Regulations 2017.

### **Other Matters**

Concern has been raised regarding the use of out of date plans and information. The Council considers the sufficient and relevant plans and information has been provided to determine the application.

Concern has been raised regarding the loss of the agricultural land. The loss of the agricultural land was considered and found acceptable through the outline permission and cannot be reconsidered through this application.

Concern has been raised regarding the impact of the development upon community facilities and the level of affordable housing. The impact of the development upon community facilities and proposed level of affordable housing was considered through the outline permission. Contributions to mitigate the impact of the development upon community facilities and 18% affordable housing was secured through the submission of a legal agreement. The provision of contributions and the level of affordable housing cannot be reconsidered through this application.

Health and safety during the development is covered by other legislation outside of the planning system and does not form a material planning consideration.

Concern has been raised regarding the impact of the development upon health and the potential increase in vermin. The use of the site for residential purposes is not considered to present any significant health risk nor is it considered to result in a significant increase in vermin.

Concern has been raised regarding the safeguarding of children at the school both during development and following completion. The construction and use of dwellings is not considered to result in any significant safeguarding risks.

Concern has been raised regarding the lack of compliance with conditions of the outline permission. Whilst it is disappointing that the applicant has not submitted the information required by conditions 5, 6 and 7 prior to the submission of the reserved matters application, this information has been submitted during the application process and has been found to be acceptable, with the aim of the conditions to ensure that the scheme as designed accounts for the relevant matters. The submission of this information has not prejudiced the consideration of this reserved matters application.

Concern has been raised regarding the completion of the inner ring road. This development would provide part of the "inner circuit" network as part of the Local Plan, however other sections are located outside of the site and are not under consideration as part of this application.

Concern has been raised regarding the lack of consultation with neighbouring property occupiers and St Gregory's School. Letters were sent to all neighbouring properties that immediately abut the red line of the site, including the school, two site notices were erected, one on Manston Road and one on Nash Road and an advert was posted in the local paper. Following the submission of amended plans and documents letters were sent to all neighbouring properties and all parties that had commented on the application providing an additional opportunity to comment on this application. This consultation would accord with the The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Council's Constitution.

Concern has been raised regarding the lack of financial contributions to St Gregory's School. Whilst KCC initially indicated that a contribution to St Gregory's School was required for the outline planning application, this request was withdrawn, as they considered that on the basis that the highways improvements, when delivered, will allow the expansion of St Gregory's school. Financial contributions to mitigate the impact of this development were

considered as part of the outline permission and were considered to be acceptable. These contributions cannot be reconsidered as part of this application as outside the scope of the reserved matters application.

The management of the construction for this development is controlled by conditions 21 (Highways work phasing plan), 22 (final details of the proposed highways works), 25 (Construction Method Statement) and 29 (Manston Road/Shottendane Road Priority Shift). Conditions 21, 22 and 25 require information to be submitted prior to the commencement of development. An application to discharge condition 21 (Application reference CON/TH/23/1180) has been submitted and is under review. Given the measures secured through these conditions at outline stage, it is considered that no further information is required regarding construction management within this reserved matters submission.

Concern has been raised regarding the location of the proposed school drop off point in terms of distance from the entrance to the school on Manston Road, with an alternative location suggested fronting Manston Road on the site. There are no changes to the capacity of the school as a result of this development and existing drop off and collections for the school are completed via the on street parking on Manston Road and Shottendane Road. There is no requirement for a closure of the existing vehicular entrance to the school site from Manston Road as a result of the works required to the highway network in the outline permission. The on street parking on Manston Road and Shottendane Road is not allocated or reserved for the school and whilst there are alterations to the highway at the junction of Shottendane Road and Manston Road approved through the outline permission which will remove parking immediately in front of the school, the change in on street parking capacity has been approved through the outline planning application and agreed by the Highways Authority in consideration of that application. The proposed drop off point would therefore be in addition to the existing arrangements further along Shottendane Road and Manston Road and add to the options for parents of children at the school. The position of the drop off is considered to be suitable and would have no significant impact on highway safety or traffic flow as it increases drop off options.

Concern has been raised regarding the road safety audit being failed. An initial road safety audit was failed, however amended plans were submitted and found acceptable by KCC Highways. The reference to plan 14-011-002B in condition 18 was an administrative error as the acceptable version 14-011-002C was received on 24th May 2017 and the further work required by both planning conditions and the Section 278 process are on the basis of Rev C.

This application is a reserved matters application, for consideration of layout, scale, appearance and landscaping only. The principle of the development, along with the access, was assessed and approved through the original outline application ref: F/TH/16/1765. Accesses to the site from Manston Road and Nash Road along with amendments to the surrounding highway network outside the site were agreed as part of the outline application. Another agreed parameter was that the development will be two storeys with development integrated into the roof slope in places throughout the development site. Whilst there may have been changes in the needs and requests of external parties, the parameters agreed through the outline permission cannot be reconsidered or amended through the consideration of this reserved matters application.



## Conclusion

This application comprises a site allocated for up to 250 dwellings under policy HO3 of the Thanet Local Plan and the principle of development has been established through the approval of the outline permission, application reference OL/TH/16/1765, in February 2022. The outline permission also established the access to the site and agreed the required off site highways works. This application for reserved matters requests approval of appearance, landscaping, layout and scale for 250 no dwellings.

The Council has achieved a measurement of 73% for housing delivery against the identified housing targets in the 2022 Housing Delivery test results, which falls below the requirements set by the government under paragraph 79 and footnote 8 of paragraph 11 of the National Planning Policy Framework (NPPF). On this basis the Council are in presumption under paragraph 11 of the NPPF, which means when considering the planning application, planning permission should be granted "unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or specific policies in this Framework indicate development should be refused".

The level of affordable housing was agreed as part of the outline permission and this would be provided in a suitable mix along with a suitable mix of market housing.

Amended plans have been submitted during the application process to address a number of concerns that have been raised by residents, Councillors and Officers. These plans have altered the arrangement and design of the proposed dwellings to ensure that there is sufficient mix and variety of designs and materials to avoid a significant impact upon the character and appearance of the area and to ensure that both existing neighbouring property occupiers and the proposed residents of the site would have acceptable living conditions.

A large area of open space would be provided on the northern part of the site adjacent to Salmestone Grange and this area would include a variety of planting as well as a children's play area. Other smaller areas of landscaping are provided throughout the site and trees would line the main road and would be included along the smaller side roads.

The off site highways works were agreed through the outline permission and conditions on the outline permission require the submission of further information regarding these works prior to the commencement of development. The onsite highways arrangements under consideration as part of this application have undergone a number of revisions during the process of this application. The final layout is considered to provide a suitable layout that allows the central link road, part of the Thanet Inner Circuit, to be formed as well as providing access to the new dwellings provided on the site. There are a variety of pedestrian and cycle routes included throughout the site that provide access to the new dwellings and the existing properties surrounding the site. Drop off spaces for the school and a footpath from these spaces to Manston Road is provided within the site. A footpath and gate would also be provided to the boundary of the school allowing for an additional access to be formed and utilised if required.

Additional information has been provided during the application process to confirm the potential impacts upon drainage and biodiversity in the area. When considering the consultation responses and submission of the applicant, the proposed layout and landscaping would not result in a significantly harmful effect on biodiversity under Policy SP30, with proposed enhancements/mitigations offered considered to be appropriate. Full details of the proposed drainage scheme will be provided prior to the commencement of development, however the consultees are satisfied that a suitable scheme can be achieved within the site.

Following the submission of the amended plans it is considered that this application would provide an acceptable arrangement for the site and would comply with the requirements of the outline permission. When considering the framework as a whole, the proposal constitutes sustainable development, and any harm is outweighed by the significant economic and social benefits from the proposal. The amended development would therefore comply with the Thanet Local Plan, Thanet Transport Strategy and the National Planning Policy Framework, and it is recommended that members approve this application.

**Case Officer**

Duncan Fitt

TITLE:

R/TH/23/0156

Project

Land Adjacent To Salmestone Grange Nash Road MARGATE Kent

