

Thanet District Council

Questionnaire

Draft Thanet Local Plan to 2031
Preferred Options Consultation



Draft Thanet Local Plan to 2031 – Preferred Options Consultation

We are seeking your views on the preferred options for Thanet's new Local Plan.

We have prepared a consultation document which is available to view at <https://consult.thanet.gov.uk>. Paper copies are also available to view at Thanet's Gateway Plus, Cecil Street, Margate, and at public libraries in the district.

The quickest and easiest way of responding is electronically, through our consultation portal. To comment this way, please go to <https://consult.thanet.gov.uk>

If you are unable to respond this way you can complete the following questionnaire. Please send completed questionnaires to local.plans@thanet.gov.uk or to Strategic Planning, Thanet District Council, PO Box 9, Cecil Street, Margate, Kent, CT9 1XZ.

Please make sure we receive your comments by **Friday 6th March 2015**.

Please note that any comments need to be made in writing. Please be advised that comments submitted to us will be made public along with your name and the name of the organisation you are representing (if relevant). Your address and any other personal details you provide us with remain confidential.

Things to consider before responding using this questionnaire

The Local Plan is split into two sections – strategic proposals and development management policies. Strategic Proposals are the overarching policies which underpin the Plan's strategy. This section sets out the overarching strategies for delivering sustainable development and the overall levels of development and growth which are needed in Thanet. It includes strategies for the economy, town centres, housing, environment, communities and transport, including strategic site proposals.

The district wide development management policies are detailed and wide ranging policies which may be relevant to all new development proposals in Thanet. The section is set out in topic areas, and covers issues including climate change, design and heritage

The Plan covers four topic areas:

1. Economy
2. Housing
3. Environment and Quality of Life
4. Transport

There is a consultation question for each of the draft policies. You are not required to complete the whole questionnaire, you may respond to as many or as few of the policies as you want.

Part 1 – Your Details

Name	Brian Lloyd
Address	Queens Head House, Ashford Road, Charing, Ashford, Kent, TN27 0AD
Organisation/ Company	CPRE Kent (the Kent Branch of the Campaign to Protect Rural England)
If representing a group or body please state their name	
Telephone/ Email	01233 714543 Brian.lloyd@cprekent.org.uk

Strategic Proposals

1 - Economic Strategy

SP02 - Economic Growth

Do you agree with the level and approach to encouraging economic growth in Thanet?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent does not support Policy SP02 as we consider that an employment target of 5,000 additional jobs by 2031 is overly optimistic and highly aspirational with no clear evidence that the jobs can be delivered. It is based on evidence that is not up-to-date and which was drawn up prior to the closure of Manston Airport which, in the evidence supporting the Plan, is seen as the catalyst for regeneration and employment growth in the district (see para. 9.22 of the Employment Land Review).

Contrary to the optimistic picture presented in the Local Plan about economic growth, the Employment Land Review (ELR) paints a markedly different picture of Thanet highlighting what it describes as a series of '*economic woes*'. As a consequence of this the ELR describes Thanet as a district with uncertain prospects of economic growth, and this is despite the emphasis it places on the airport as a catalyst for growth. With the removal of this catalyst, it is difficult to see how the aspirations of the Plan for the scale of employment growth proposed can be achieved.

Clearly the plan needs to give support to and promote employment growth, but setting a target of 5,000 jobs is unrealistic. This also places an unnecessary upward pressure on the need for additional housing, which in turn will create further issues about delivery of housing in accordance with the requirements on the NPPF (i.e. the need to maintain a five-year supply of deliverable housing sites).

Instead of aiming to provide 5,000 new jobs we consider that the plan should aim to deliver 3,100 new jobs in accordance with the base-line economic scenario as presented in the 2013 Strategic Housing Market Assessment review. We believe that this is a more realistic and deliverable target, which builds on that achieved in the past – especially as it is peripheral locations such as Thanet that are likely to continue to struggle for longer as the economy recovers from recession. We believe it would be better for the Council to focus its efforts on what can be achieved rather than what might optimistically be achieved.

We are also concerned that a significant amount of new land is allocated in the plan for employment generating development – at least 65ha. We consider that this is a clear over provision of land and the Council needs to critically review this to ensure that, in particular, greenfield land is not being unnecessarily identified for development.

SP03 - Land allocated for economic development

Do you agree with the allocations?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent accepts that these are all existing allocated employment sites.

SP04 - Manston Business Park

Do you agree with the proposals for this site?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent accepts that this is an existing allocated employment site.

SP05 - Manston Airport

Do you agree with the approach taken for this site?

Yes

No

Not sure

Please enter any additional comments

CPRE Kent does not agree with the approach taken for this site, and we are concerned that this policy does not resolve the future of Manston Airport but leaves it to another plan to resolve. Consequently, any development that may be accommodated here will be in addition to the development targets set in the Local Plan and at the expense of significant areas of greenfield and grade 1 agricultural land that are proposed for development in the plan. Seemingly, the airport has gone from being the catalyst for the economic regeneration of the district to a site that is non-essential to the delivery of the plan strategy. It cannot be right that the future of such a major site is not addressed in the Local Plan, and that this is not considered alongside the need for development elsewhere.

SP05 - Manston Airport2

Do you think this area should be subject to an area action plan?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

See comments above

2 - Town Centre Strategy

SP06 - Thanet's Town Centres

Do you think we have the right approach to the development of Thanet's town centres?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent generally agrees with this approach, but see our comments on Policy SP07 below.

SP07 - Westwood

Do you agree with the approach taken to the development of Westwood town centre?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent acknowledges that Westwood has grown as a major retail centre and that this has been designated for some time as a town centre in planning terms. We consider, though, that it functions as an out of town shopping destination rather than as a town centre. However, because it is designated as a town centre we consider that it is appropriate to direct new retail development to within the defined town centre area as proposed in the Policy, rather than onto surrounding land. It will, though, be necessary to properly define the town centre area and the proposed primary and secondary retail frontages on the Policies Map – Map 7 presented in the plan is inadequate to show where the Policy will apply.

Because Westwood does not function as a town centre, we consider it is inappropriate to try and justify it as such by proposing a new residential community around it. This will only serve to push the urban area further into the countryside and will go a long way to infilling the 'horseshoe' of coastal urban development that is described in the plan as being characteristic of Thanet. We do not consider that such further expansion of Westwood to create a new residential community is justified.

SP07 - Eurokent

Do you agree with the proposals for the Eurokent site?

Yes

No

Not sure

Please enter any additional comments

This part of Policy SP07 has been over taken by events and should reflect the planning permission granted on appeal (application no. OL/TH/11/0910). In particular this will see 550 dwellings built here rather than the 350 stated in the Policy. The quantity of housing for this site presented in Appendix B also needs to be amended.

SP07 - Thanet Reach

Do you agree with the proposals for the Thanet Reach site?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent generally agree with the approach proposed, though the Policy should indicate the number of dwellings proposed, i.e. 80 as stated in Appendix B.

SP08 - Margate

Do you agree with the approach taken for the development of Margate?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent generally agrees with the approach proposed for Margate. However, we consider that the Policy needs to be more explicit about the opportunity sites proposed and the potential number of dwellings that these brownfield sites could contribute to supply. The opportunity sites and their yields need to be included in the Policy and in Appendix B.

SP09 - Ramsgate

Do you agree with the approach taken for the development of Ramsgate?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent generally agrees with the approach proposed for Ramsgate. However, we consider that the Policy needs to be more explicit about the opportunity sites proposed and the potential number of dwellings that these brownfield sites could contribute to supply. The opportunity sites and their yields need to be included in the Policy and in Appendix B.

SP09 - Ramsgate Port

Do you agree with the approach taken to the development of Ramsgate Port?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment

SP10 - Broadstairs

Do you agree with the approach taken for Broadstairs?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed for Broadstairs.

3 - Housing Strategy

SP11 - Housing Provision

Do you agree with this approach including the proposed quantity and notional delivery of housing provision?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects most strongly to the proposed housing target of 12,000 dwellings because:

1. It is based on an unrealistically high target for new jobs, as we explain in our comments on Policy SP02. We consider that the jobs target should be 3,100 in line with the base-line included in the 2013 Strategic Housing Market Assessment (SHMA) review. The higher jobs target is based on an assessment of future economic growth potential that assumed that Manston Airport would be a catalyst for economic regeneration. With the airport now closed, and an unclear strategy for its future, this will no longer be the case.
2. The original 2009 SHMA and the 2013 review of the SHMA are based on out of date demographic information, and are thus unreliable as a basis for determining the level of housebuilding.
3. In part allied with the above point, full regard has not been given to housing proposals in neighbouring districts which serve the same general housing market. We would in particular point to the situation in Dover District where in addition to the housing it is proposing in its local plan the Council has resolved to grant planning permission for significantly more housing than planned for. For example it has resolved to grant planning permission for around 600 dwellings at Farthingloe (Dover) and 550 at the Discovery Park (Sandwich). Whilst the granting of planning permission for these dwellings has been justified because Dover district does not have a five-year supply of housing, they are nonetheless in addition to the high growth target set in the Council's plan and are intended only to meet the short-term shortfall. Dover is still committed to delivering the full housing target set in its local plan, and has only just recently adopted its land allocations plan to this end. It can only be assumed, therefore, that more houses in Dover district will be delivered than planned for in its local plan. Given the close relationship between Thanet and Dover Districts, especially in regard to the Discovery Park, there can be every expectation that housing in Dover District will in part meet the needs of those currently living in Thanet and that the additional houses permitted by Dover District Council will serve to meet these needs. This has not been factored into either the SHMA for Thanet or the target included in the Plan.
4. The target fails to give proper regard to the constraints that prevail in the district. In particular we consider that the plan is wrong to identify such large, and so many, greenfield sites that comprise grade 1 agricultural land. Such good quality land is a national asset and the Council should not simply accept that it is appropriate to use it for development in order to meet objectively assessed housing needs. Such good quality agricultural land is in Thanet a significant constraint to development. The National Planning Practice Guidance (NPPG) makes it clear that a SHMA is just the first stage in developing a Local Plan and councils can take account of constraints which indicate

that development should be restricted in setting the housing target included in the Plan. This point was emphasised in the well-publicised letter from the Planning Minister to the Chief Executive of the Planning Inspector of 19 December 2014 (see:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/390029/141219_Simon_Ridley_-_FINAL_SIGNED.pdf.

A further significant constraint in Thanet which is highlighted in the Plan, but seemingly not having any moderating effect on the housing target, is that of water supply and quality (for example as highlighted in paragraphs 16.12–16.17 and Policy SE04 of the Plan). We consider that high quality agricultural land and issues around water supply and quality are particular and serious constraints in Thanet that must have a moderating effect on the amount of housing that can be accommodated.

5. We do not believe that the house builders will be able to sustain a build-rate of 600 dwellings a year for the plan period. For the last five years (2008-2013) the average rate of delivery has been 530 dwellings, whilst for the last ten years (2003-2013) the average has been 513. In support of our view we would again point to neighbouring Dover district where a housing target of 14,000 dwellings is set in its local plan (adopted in 2010), at 700 dwellings a year. However, in the four years since the plan was adopted only 849 dwellings have been built, at an average of 212 per year, well short of that required by the target. Consequently, as we have explained above, additional houses not included in the plan have now been permitted in order for the Council to demonstrate a five-year supply of housing in accordance with the requirements of the National Planning Policy Framework (NPPF). We believe that the same situation will arise in Thanet, meaning that yet more valuable high quality agricultural land will be vulnerable to development pressure. The Council, therefore, must set a more realistic and deliverable housing target.

Having regard to the above points, and based on the 2013 SHMA review (notwithstanding our point 2 above), we consider that a target in line with base-line employment growth should be included in the Plan. This would be circa 9,500 dwellings (475 dwellings per year).

Location of Housing

Do you agree with the approach to the distribution of proposed housing land allocations?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent does not agree with the proposed distribution of housing land allocations. In general we support the proposed settlement hierarchy as shown in Map 11, but this should also be presented in tabular form in the plan with more explanation of the respective roles of the various tiers in the hierarchy. We support the use of the hierarchy in steering development to the most sustainable locations. This, in particular, should seek to make maximum use of brownfield sites in the coastal towns (urban area) and other settlements before identifying greenfield sites. In this regard we welcome the allowance made for windfalls, though the figure of 1,644 dwellings from this source given in Table 2 is at odds with the figure of 2,480 given in Appendix B – which itself is different from the figure of 2,800 dwellings presented by officers at the public meeting in Minster. The table needs to be amended accordingly.

However, because the plan is based on a target of 12,000 dwellings it proposes a swathe of greenfield sites that will see the creep of the urban area from Birchington all the way round to Ramsgate ever further into the countryside. We do not support this approach to locating development, and consider that with the lower housing target that we propose in response to Policy SP11 above, such extensive use of greenfield land is not needed, and could be avoided altogether. Indeed, even with the proposed target of 12,000 dwellings we would seriously question the need for the scale of greenfield allocations proposed, because the plan fails to give specific regard to the potential from:

- Manston Airport opportunity area (Policy SP05);
- The opportunity areas identified in policies SP08 and SP09; and
- Empty homes, which the plan describes as 'substantial' (the housing topic paper, May 2013, explains that there are 1,322 dwellings that have been vacant for more than six months).

Consequently, therefore, we consider that further consideration needs to be given to the extent of the greenfield allocations proposed.

Area Specific Objectives

Do you agree with the area specific objectives?

Please select one option.

Yes

No

Don't know

Please enter any additional comments

CPRE Kent generally accept the area specific objectives, but we object to the promotion of Westwood as a new mixed business and residential community and this should be deleted as an objective. Also we consider that the plan over emphasises the need for family housing contrary to the findings of the SHMA review, i.e. conclusion HC2 which recognises a growing need for smaller units and advocates a balanced approach to new housing provision recognising that there is also a need for more family housing .

SP12 - Strategic Housing Site Allocations

Do you agree with the proposed locations for Thanet's strategic housing sites?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent strongly object to the proposed strategic housing allocations as we do not believe they are necessary to meet the housing requirements of the district as we explain in response to the questions on Policy SP11 and the 'location of development'. The sites should be removed from the Local Plan. In addition we do not consider that:

- it is appropriate to promote further development at Westwood in order to promote it as a new residential community, as we have explained elsewhere in our response;
- the three unrelated sites promoted at Birchington can be regarded as a single 'strategic housing site'. They presumably would progress independently of each other; and
- the two unrelated sites promoted at Westgate on Sea can be regarded as a single 'strategic housing site'. They presumably would progress independently of each other.

We note that the 700 houses proposed at 'Manston Green' are the subject of a current planning application and we would urge the Council to refuse planning permission.

Perhaps the greatest failure of the Plan is not including Manston Airport as a strategic site and to give detailed consideration as to what the future of this major site is.

SP13 - Strategic Housing Sites - Manston Green

Do you agree with the approach for housing at Manston Green including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site and it should be deleted from the Plan – see response to Policy SP12.

SP13 Manston Green 2

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site and it should be deleted from the Plan – see response to Policy SP12.

SP13 Manston Green 3

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site and it should be deleted from the Plan – see response to Policy SP12.

SP14 - Strategic Housing Sites - Birchington

Do you agree with the approach for housing at Birchington including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of these sites and they should be deleted from the Plan – see response to Policy SP12.

SP14 Birchington 2

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of these sites and they should be deleted from the Plan – see response to Policy SP12.

SP14 Birchington 3

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of these sites and they should be deleted from the Plan – see response to Policy SP12.

SP15 - Strategic Housing Site - Westgate on Sea

Do you agree with the approach for housing at Westgate including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of these sites and they should be deleted from the Plan – see response to Policy SP12.

SP15 Westgate 2

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of these sites and they should be deleted from the Plan – see response to Policy SP12.

SP15 Westgate 3

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of these sites and they should be deleted from the Plan – see response to Policy SP12.

SP16 - Westwood Strategic Housing

Do you agree with the approach for housing at Westwood including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of these sites and they should be deleted from the Plan – see response to Policy SP12.

SP16 Westwood 2

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of these sites and they should be deleted from the Plan – see response to Policy SP12.

SP16 Westwood 3

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of these sites and they should be deleted from the Plan – see response to Policy SP12.

SP17 - Land fronting Nash and Haine Roads

Do you agree with the approach for housing at Nash and Haine roads including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

We understand that this site has already received planning permission.

SP17 Nash and Haine Roads 2

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

We understand that this site has already received planning permission.

SP17 Nash and Haine Roads 3

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

We understand that this site has already received planning permission.

SP18 - Type and Size of Dwellings

Do you agree with the approach to the size and type of dwellings?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent consider that the plan over emphasises the need for family housing (3 & 4 bed) contrary to the findings of the SHMA review, i.e. conclusion HC2 which recognises a growing need for smaller units and advocates a balanced approach to new housing provision recognising that there is also a need for more family housing.

SP18 Type and Size of Dwellings 2

Do you agree with the approach to the proportion of houses and flats?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent generally agrees with the split between houses and flats.

SP18 Type and Size of Dwellings 3

Do you agree with the approach regarding the loss of dwellings?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

SP19 - Affordable Housing

Do you agree with the approach taken in respect of affordable housing and the expectation of a 30% element of affordable housing?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent considers it reasonable to expect a minimum 30% of provision to be affordable. However, the policy needs to be expanded to set the site size threshold to which this requirement relates, which we would expect to be lower on greenfield sites than on brownfield. The Policy also needs to set out the instances where off-site financial contributions could be made, i.e. in lieu of on-site provision and for sites falling below the site size threshold for on-site provision.

4 - Environment Strategy

SP20 - Development in the countryside

Do you agree with the approach taken for controlling development in the countryside?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent generally agree with the approach advocated in Policy SP20, but we consider that the Policy should be expanded to make it clear that the only exceptions are those listed in the first four bullet points of paragraph 4.4. These bullet points should be incorporated into the Policy. By stating that permission will be allowed where the need for development overrides the need to protect the countryside the Policy is open to interpretation and potential abuse. It would therefore be clearer if the policy listed the exceptions more specifically.

We assume that the urban and village confines, as referred to in the policy, will continue to be shown on the Policies Map so it is clear to where the policy will apply.

SP21 - Safeguarding the identity of Thanet's settlements

Do you agree with the approach taken for safeguarding the identity of Thanet's settlements?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent supports the retention of the Green Wedges and the intention of Policy SP21 to safeguard them from inappropriate development. However, we are extremely concerned that the spatial strategy of the plan, which will see the significant outward expansion of the urban area into the countryside, fundamentally alters these longstanding designations. Rather than being wedges between urban areas, they will in future be areas of open space within an enlarged urban area. They will not provide any physical or visual linkage with the wider countryside beyond. This is one reason why we believe the spatial strategy of the plan is wrong. Consequently, the Green Wedges are only of value if they actually provide that direct and open link to the countryside. If the Council continue with the spatial strategy as promoted in the draft plan, we consider that these areas will require enhanced protection as they will be even more important than they are now. We would suggest, therefore, that they be designated in the Local Plan as Local Green Spaces as promoted in the NPPF and in Policy SP26 of the draft plan.

SP22 - Protection and Enhancement of Thanet's Historic Landscapes

Do you agree with the approach taken to protect and enhance Thanet's landscapes?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agree with the approach advocated in the policy, but reflecting the final paragraph of the vision of the plan (page 16) we would ask that tranquillity is specifically recognised in the policy. Pioneering work undertaken by CPRE nationally shows that the rural part of Thanet shows a high degree of tranquillity – see: <http://www.cpre.org.uk/resources/countryside/tranquil-places/item/download/325>. We would refer you to how Swale Borough Council addresses the issues of tranquillity in its pre-submission plan (see pages 219-220 of http://swale-consult.limehouse.co.uk/events/24481/3235702_accessible.pdf).

SP23 - Green Infrastructure

Do you agree with the approach for creating and enhancing Thanet's green infrastructure network?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

SP24 - Biodiversity Enhancements

Do you agree with the approach to protect, maintain and enhance biodiversity?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

SP25 - Protection of European Sites, SSSI and NNR

Do you agree with the approach for protecting important nature conservation sites?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

SP26 - Protection of Open Space

Do you agree with the approach for controlling development on open space?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed. As we have said elsewhere, we consider that the Green Wedges should be designated as Local Green Spaces under this Policy. We also consider that the Council should be more proactive in actually identifying and designating Local Green Spaces and that areas for potential designation should be sought from Parish and Town Councils and other local groups.

SP27 - Provision of Green Space, Parks, Gardens, Recreation Grounds

Do you agree with the approach to ensuring that the recommended provision of natural and semi-natural green space, parks, gardens and recreation grounds is provided for?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed. However, we consider that paragraph 4.52 and 4.53 provide unnecessary detail in a local plan and should be deleted.

SP28 - Quality Development

Do you agree with the approach to ensuring that new development is built to a high quality?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

Whilst we note that design issues are covered by a number of the development management policies and that Policy SP28 is intended to provide the overarching policy approach, we consider that Policy SP28 is scant of detail. We would suggest that Policy QD01 be elevated as a strategic policy to replace Policy SP28.

SP29 - Conservation and Enhancement of Thanet's Historic Environment

Do you agree with the approach taken to conserve and protect Thanet's historic environment?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed. We particularly welcome the reference to local lists in point 5 of the policy.

SP30 - Climate Change

Do you agree with the approach to mitigation against, and adapting to climate change?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent generally agrees with the approach proposed, as an overarching objective. However, we consider that specific mention should be made in the policy to reducing water usage, as water supply is a particular issue in Thanet.

SP31 - Healthy and Inclusive Communities

Do you agree with the approach to contribute towards healthy and inclusive communities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

SP32 - Community Infrastructure

Do you agree with the approach to provide sufficient community infrastructure?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed. However, we consider that the plan should give a full definition of what comprises community infrastructure.

SP33 - Expansion of Primary and Secondary Schools

Do you agree with the approach to accommodate the expansion of schools?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

6 – Transport Strategy

SP34 - Safe and Sustainable Travel

Do you agree with the approach to delivering safe and sustainable travel?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

SP35 - Accessible Locations

Do you agree with the approach for guiding development to, and for creating, accessible locations?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

SP36 - Transport Infrastructure

Do you agree with the approach to securing relevant transport infrastructure?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

SP37 - Connectivity

Do you agree with the approach to improve Thanet's connectivity?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

SP38 - Strategic Road Network

Do you agree with the approach regarding the strategic road network?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed. It should also be acknowledged in paragraph 6.14 that junction 5 (Stockbury) on the M2 is also operating close, if not beyond, capacity. This is a key junction on the strategic highway network being the first point in the network where traffic from Thanet can connect with the M20.

SP39 - New Rail Station

Do you agree with the approach for a new railway station, including the criteria set out in the proposed policy?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the proposed new rail station and the associated car parking. We understood that the original purpose of this proposal was to provide a parkway station serving Manston Airport for travellers from both within Thanet and from further afield. However, given the closure of the airport we are unclear now what the purpose of the station is and this is not explained in the plan. Apart from itself involving development in the countryside, at the expense of yet more prime agricultural land, the idea now seems to be that people will drive to it to commute out of Thanet. Whilst we note the comments about integrating it with public transport, we believe that it will essentially attract car-borne traffic, hence why it is proposed next to the East Kent Access Road. It, therefore, will essentially encourage more car journeys and encourage out commuting which cannot be of any real benefit to the local economy. This in turn will increase the demand for housing because Thanet may be seen as a dormitory for London commuters. We are also concerned that it could have a detrimental impact on the train services that currently call at Ramsgate and Minster, for example it could result in fewer services stopping at these stations. A full justification of the need for and purpose of the new station needs to be provided, as well as details on how and when it will be provided.

Development Management Policies

7 - Economy

E01 - Retention of Existing Employment Sites

Do you agree with the approach taken with these sites with regard to retention and flexibility of use?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed, but an addition is needed at the end of the Policy which states that alternative uses will be refused.

E02 - Home Working

Do you agree with the approach to home working?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

E03 - Digital Infrastructure

Do you agree with the approach for digital infrastructure?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

8 – Town and District Centres

E04 - Primary and Secondary Frontages

Do you agree with the uses permitted within the primary and secondary frontages?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment

E05 - Sequential Impact Test

Do you agree with the sequential and impact test, particularly the thresholds set?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

E06 - District and Local Centres

Do you agree with the approach to district and local centres?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed. However, the smaller local centres referred to in paragraph 8.8 need to be defined so that it is clear to which centres the policy applies. It would also be helpful for the supporting text to cross-reference to Policy CM02 and state that existing shops will be retained.

9 – Tourism

E07 - Serviced Tourist Accommodation

Do you agree with the approach to allowing new serviced tourist accommodation?

Please select one option.

- Yes
- No
- Not sure

Please enter any additional comments

CPRE Kent supports the provision of new tourist accommodation, but clause 3 of the policy should be deleted as hotel development is not one of the acceptable exceptions allowed under Policy SP20.

E08 - Self Catering Tourist Accommodation

Do you agree with the approach to allowing self catering tourist accommodation?

Please select one option.

- Yes
- No
- Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

E09 - Protection of Existing Tourist Accommodation

Do you agree with the approach to protect existing tourist accommodation?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

E10, E11, E12 - Thanet's Beaches

Do you agree with the approach taken to the development and protection of Thanet's major holiday, intermediate and undeveloped beaches?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent in principle accepts that Thanet's beaches are a major tourist asset. However, in regard to the major holiday beaches (Policy E10) and the intermediate beaches (Policy E11) we are concerned that significant development could be supported under these policies. For example, would the Council accept proposals for tourist accommodation on the beaches? We would ask the Council to review the wording of these policies.

E13 - Language Schools

Do you agree with the approach for language schools?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment

E14 - Quex Park

Do you agree with the approach for the development of Quex Park?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed, but would ask that impact on surrounding highways be acknowledged as a consideration in the Policy. We also consider that much of the detail included in the supporting text could be deleted.

10 – The Rural Economy

E15 - New build development for economic development purposes in rural areas

Do you agree with the approach to allowing development for economic development purposes in rural areas?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

E16 - Conversion of rural buildings for economic development purposes

Do you agree with the approach to the conversion of rural buildings for economic development purposes?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed but there is some overlap between this policy and policy E17 and so it may be helpful to combine the two policies. We consider that most farm diversification projects would (and should) involve the re-use of existing buildings and this point needs to be emphasised in the combined policy.

E17 - Farm Diversification

Do you agree with the approach to farm diversification?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed but there is some overlap between this policy and policy E16 and so it may be helpful to combine the two policies. We consider that most farm diversification projects would (and should) involve the re-use of existing buildings and this point needs to be emphasised in the combined policy.

E18 - Best and Most Versatile Agricultural Land

Do you agree with the approach to best and most versatile agricultural land?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent does not agree with the policy approach proposed. We would wish to see the policy re-worded along the following lines:

“Development on agricultural land will only be permitted when there is an overriding need that cannot be met on land within the urban and village confines as shown on the Policies Map. Development on best and most versatile agricultural land (specifically Grades 1, 2 and 3a) will not be permitted unless:

- 1. The site is allocated for development by the Local Plan; or*
- 2. There is no alternative site on land of a lower grade than 3a or that use of land of a lower grade would significantly and demonstrably work against the achievement of sustainable development; and*
- 3. The development will not result in the remainder of the agricultural holding becoming not viable or lead to likely accumulated and significant losses of high quality agricultural land.”*

E19 - Agricultural Related Development

Do you agree with the approach to agricultural related development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

The policy needs to be expanded to include criteria which provide more guidance on the matters highlighted. As currently drafted the policy is too vague and general.

11 - Housing

H01 - Housing Development

Do you agree with the approach and criteria regarding whether housing development will be granted?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

H01 - 2

Do you agree with the location of strategic and non-strategic sites allocated for housing and their indicative phasing? (The list of sites and indicative phasing - notional delivery period - are featured in appendix B)

Please select one option.

Yes

No

Not sure

Please enter any additional comments

For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. Consequently we do not agree with all the proposed strategic and non-strategic sites outside the urban area for housing, and the following sites listed in Appendix B in these categories should be deleted:

Strategic Sites

Westwood (S511, S553, S447)
Birchington (S515, S498, S499)
Westgate (ST1, ST2)
Manston Green (SS33)

Non-strategic Sites

South of Canterbury Rd, Ramsgate (S415)
Land fronting Park Lane, Birchington (ST3)
Land south east of Brooke Avenue, Westbrook (S505)
Land west of Old Haine Road, Ramsgate (S535, S549)

We accept the mixed use sites and the non-strategic urban area sites listed in Appendix B, though as noted elsewhere the capacity of the Eurokent site (S522) should be increased to 550 to reflect the planning permission now approved.

H01 – 2 (cont.)

We do not agree that the following rural sites listed in Appendix B should be allocated:

Tothill Street Minster (S512, S436, S85)

Land at Manor Rd, St Nicholas (S488, R25-146)

Builders Yard south of 116-124 Monkton Street, Monkton (S543)

Jentex site Canterbury Rd West, Cliffsend (S426)

Site South side of A253, Cliffsend (S468, 435(1) – though this latter number seems to be wrong)

Land north of Cottington Rd (west of Beech Grove) (S435(2))

South side of Cottingham Rd, Cliffsend (S416, S561)

We accept the Cliftonville sites listed in Appendix B.

H01 - 3

Do you think the housing allocations will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

This should certainly be the case and the inclusion of an infrastructure delivery plan with the draft plan would have been helpful to demonstrate that this will be the case. This can only be truly determined at planning application stage.

H01 - 4

Do you agree with the approach regarding non allocated sites including residential gardens?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed. In particular we support the proposed windfall allowance of 2,480 dwellings from this source, though the accuracy of this figure needs to be checked – see our response to ‘location of housing’.

H01 - 5

Do you agree that alternative development should not be permitted on sites allocated for residential development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

HO2A - Land on west side of Old Haine Road, Ramsgate

Do you agree with the approach for housing at Old Haine Road including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

H02A2 - Land on West Side of Old Haine Road, Ramsgate

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

H02A3 - Land on West Side of Old Haine Road, Ramsgate

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO2B - Land fronting Nash Road and Manston Road

Do you agree with the approach for housing at Nash Road and Manson Road including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent accepts the allocation of this site.

HO2B2 - Land fronting Nash Road and Manston Road

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment

HO2B3 - Land fronting Nash Road and Manston Road

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

See response to question H01 - 3

HO2C - Land fronting Park Lane, Birchington

Do you agree with the approach for housing at Park Lane, Birchington, including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO2C2 - Land fronting Park Lane, Birchington

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO2C3 - Land fronting Park Lane, Birchington

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO2D - Land south of Brooke Avenue Garlinge

Do you agree with the approach for housing south of Brooke Avenue, Garlinge, including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO2D2 - Land south of Brooke Avenue, Garlinge

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO2D3 - Land south of Brooke Avenue, Garlinge

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO2E - Land at Haine Road and Spratling Street, Ramsgate

Do you agree with the approach for housing at Haine Road and Spratling Street including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent accepts the allocation of this site.

HO2E2 - Land at Haine Road and Spratling Street, Ramsgate

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment

HO2E3 - Land at Haine Road and Spratling Street, Ramsgate

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

See response to question H01 - 3

HO2F - Land south of Canterbury Road East, Ramsgate

Do you agree with the approach for housing south of Canterbury Road East including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

H02F2 - Land south of Canterbury Road East, Ramsgate

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

H02F3 - Land south of Canterbury Road East, Ramsgate

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

H02G – Land at Melbourne Avenue, Ramsgate

Do you agree with the approach for housing at Melbourne Avenue, Ramsgate, including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent accepts the allocation of this site.

HO2G2 - Land at Melbourne Avenue, Ramsgate

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment

HO2G3 - Land at Melbourne Avenue, Ramsgate

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

See response to question H01 - 3

HO3 - Cliftonville West and Margate Central

Do you agree with the approach for Cliftonville West and Margate Central?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed.

HO4 - Housing at Rural Settlements

Do you agree with the approach to the level of housing development appropriate at different rural settlements, the housing allocation sites proposed and the policy criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent does not agree that the following rural sites listed in Table 6 and Appendix B should be allocated:

Tothill Street Minster (S512, S436, S85)

Land at Manor Rd, St Nicholas (S488, R25-146)

Builders Yard south of 116-124 Monkton Street, Monkton (S543)

Jentex site Canterbury Rd West, Cliffsend (S426)

Site South side of A253, Cliffsend (S468, 435(1) – though this latter number seems to be wrong)

Land north of Cottington Rd (west of Beech Grove) (S435 (2))

South side of Cottingham Rd, Cliffsend (S416, S561)

HO4A - Land at Tothill Street, Minster

Do you agree with the approach for housing at Tothill Street, Minster, including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4A2 - Land at Tothill Street, Minster

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4A3 - Land at Tothill Street, Minster

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4B - Land at Manor Road, St Nicholas at Wade

Do you agree with the approach for housing at Manor Road, including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4B2 - Land at Manor Road, St Nicholas at Wade

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4B3 - Land at Manor Road, St Nicholas at Wade

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4C - Land at 71-75 Monkton Street, Monkton

Do you agree with the approach for housing at 71-75 Monkton Street, including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent accept the allocation of this site

HO4C2 - Land at 71-75 Monkton Street, Monkton

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment

HO4C3 - Land at 71-75 Monkton Street, Monkton

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

See response to question H01 - 3

HO4D - Land at Walter's Hall Farm

Do you agree with the approach for housing at Walter's Hall Farm, including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent accept the allocation of this site

HO4D2 - Land at Walter's Hall Farm

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment

HO4D3 - Land at Walter's Hall Farm

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

See response to question H01 - 3

HO4E - Land at south side of A253, Cliffsend

Do you agree with the approach for housing south side of A253, including the proposed location and amount of development?

Please select one option.

- Yes
- No
- Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the ‘location of housing’ we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4E2 - Land at south side of A253, Cliffsend

Do you agree with the policy requirements and criteria?

Please select one option.

- Yes
- No
- Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the ‘location of housing’ we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4E3 - Land at south side of A253, Cliffsend

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4F - Land North of Cottington Road, Cliffsend

Do you agree with the approach for housing north of Cottington Road, including the proposed location and amount of development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4F2 - Land North of Cottington Road, Cliffsend

Do you agree with the policy requirements and criteria?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4F3 - Land North of Cottington Road, Cliffsend

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4G - Land south side of Cottington Road, Cliffsend

Do you agree with the approach for housing south side of Cottington Road, including the proposed location and amount of development?

Please select one option.

- Yes
- No
- Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4G2 - Land south side of Cottington Road, Cliffsend

Do you agree with the policy requirements and criteria?

Please select one option.

- Yes
- No
- Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO4G3 - Land south side of Cottington Road, Cliffsend

Do you think the housing allocation will be adequately supported by community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent objects to the allocation of this site. For the reasons we explain in response to the questions on Policy SP11 and on the 'location of housing' we consider that the housing target should be reduced and the approach to allocating sites should be reviewed to reduce the amount of greenfield land allocated for development. This site should be deleted from the Plan.

HO5 - Rural Housing Need

Do you agree with the approach to rural housing need?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed, but in the opening paragraph of the policy the word '*outside*' should be replaced with '*adjacent to*'.

HO6 - New Agricultural Dwellings

Do you agree with the approach for new agricultural dwellings?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

HO7 - Care and Supported Housing

Do you agree with the approach for care and supported housing?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent considers that the policy needs to provide locational guidance as to where such housing should be provided. In particular the policy should state that such housing should only be located within the defined settlement confines or adjacent to a settlement boundary if it justified as an exception under Policy H05.

HO8 - Accessible Homes

Do you agree with the approach for the provision of accessible homes including the proposed target elements of lifetime and wheelchair accessible living?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

HO9 - Non self-contained residential accommodation

Do you agree with the approach to non self-contained residential accommodation including the threshold criteria regarding maximum number of Houses in Multiple Occupation within a specific radius and frontage?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment

H10 - Accommodation for gypsy and travelling communities

Do you agree with the approach and criteria relating to accommodation for gypsy and travelling communities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

H11 - Residential use of empty property

Do you agree with the approach regarding residential use of empty property?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed. We consider that effective re-use of long-term vacant dwellings will make a significant contribution towards meeting the future housing needs of the district.

H12 - Retention of existing housing stock

Do you agree with the approach to retention of existing housing stock?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

12 – Green Infrastructure

GI01 - Locally Designated Wildlife Sites

Do you agree with the approach taken to protect Local Wildlife Sites?

Please select one option.

- Yes
- No
- Not sure

Please enter any additional comments

CPRE Kent does not agree with the proposed policy approach. The policy does not provide the necessary robust protection for these designated wildlife sites. In particular the exception given to strategic development is inappropriate because it is the purpose of this plan to identify such strategic development that will come forward during the plan period. Consequently development claimed to be strategic should not come forward outside of the local plan process.

GI02 - Regionally Important Geological Sites

Do you agree with the approach to preserving Regionally Important Geological Sites?

Please select one option.

- Yes
- No
- Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

GI03 - Protected Species and Other Significant Species

Do you agree with the approach to protecting species?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

GI04 - Amenity Green Space and Equipped Play Areas

Do you agree with the approach to ensuring the sufficient provision of amenity and children's play space?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

GI05 - Protection of Playing Fields and Outdoor Sports Facilities

Do you agree with the approach to resisting the loss of playing fields and outdoor sports facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

GI06 - Landscaping and Green Infrastructure

Do you agree with the approach for the inclusion of landscaping and green infrastructure in new developments?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

GI07 - Jackey Bakers

Do you agree with the approach to promoting Jackey Bakers as Thanet's long term primary sports venue?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

13 – Quality Development

QD01 - General Design Principles

Do you agree with the approach to ensuring new development respects and enhances local character?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

QD02 - Living Conditions

Do you agree with the approach for new development to contribute towards better living conditions?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

QD03 - Advertisements

Do you agree with the approach for permitting advertisements?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

QD04 - Telecommunications

Do you agree with the approach for telecommunications?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

14 - Heritage

HE01 - Archaeology

Do you agree with the approach to archaeology?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

HE02 - Development in Conservation Areas

Do you agree with the approach to development in conservation areas?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

HE03 - Local Heritage Assets

Do you agree with the approach to local heritage assets?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent supports the approach advocated in the Policy, especially the commitment given to preparing a local list of heritage assets. However, reflecting what is said in the supporting text, it would be helpful if the policy also said that the Council will make Article 4 Directions where it is considered necessary to remove permitted development rights from local heritage assets.

HE04 - Historic Parks and Gardens

Do you agree with the approach for historic parks and gardens?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

HE05 - Works to a Heritage Asset to address climate change

Do you agree with the approach for enhancing the environmental performance of heritage assets?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

15 - Climate Change

CC01 - Fluvial and Tidal Flooding

Do you agree with the approach to ensuring that development is not put at risk by flooding?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent considers that the Policy does not go far enough to ensure that development does not take place in flood risk areas or that development that does occur in flood risk areas is resilient. We would suggest that the Policy be re-worded as follows:

“Development will not usually be appropriate or acceptable in areas identified as being at risk of flooding.

Where there is no alternative to developing in an area identified as being at risk of flooding, the sequential test and exception test as set out in the NPPF will be applied. Development proposals in these areas will need a Flood Risk Assessment to be carried out by the developer.

Any development that takes place in a flood risk area will be expected to incorporate appropriate flood resilient measures.”

CC02 - Surface Water Management

Do you agree with the approach to managing surface water run-off?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed, but there does seem to be an overlap between this Policy and policy SE04. Consideration should be given as to whether there is merit in combining them, or at least providing a cross-reference.

CC03 - Coastal Development

Do you agree with the approach to ensuring that new development is not put at risk from coastal erosion?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

CC04 - Sustainable Design

Do you agree with the approach for sustainable design?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the policy in principle, but we consider that it needs to provide specific guidance on expectations about future water usage given that water supply is an acknowledged issue in Thanet. The Policy should be amended to include a requirement for new development to achieve a maximum daily water usage of 105 litres per person.

CC05 - Renewable Energy Installations

Do you agree with the approach to encourage the use of renewable energy installations?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent considers that the policy should be more positively written so that opportunities for renewable energy are incorporated in all new developments where possible. We would suggest re-wording the Policy as follows:

“All proposals for new development should seek to incorporate renewable energy installation subject to viability considerations and there being no unacceptable detrimental visual or environmental impact.”

Proposals for retrofitting existing buildings with renewable energy installations will be permitted subject to there being no unacceptable detrimental visual or environmental impact.”

CC06 - District Heating

Do you agree with the approach to encourage district heating schemes?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent considers that the policy should be more positively worded to make sure that district housing schemes are actually considered. We would suggest re-wording the Policy as follows:

“All proposals for new development should consider the provision of a district heating scheme appropriate for the type and size of development proposed. Major development proposals should be supported by an Energy Statement to demonstrate why district heating can or cannot be delivered.”

CC07 - Solar Parks

Do you agree with the approach to the development of solar parks?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

Whilst we agree with the caveats and considerations listed in the Policy, we consider that it needs to be amended to give clear guidance on where solar parks should be located. To this end, the Policy should make it clear that in accordance with the Government's guidance and the good practice drawn up by the industry itself:

- preference will be given to proposals that are located on brownfield land or on the rooftops of buildings;
- proposals located on grade 1 or 2 agricultural land will not be permitted; and
- proposals located on other agricultural land will only be accepted if it is demonstrated that no other opportunities are available on land of lower quality. It should be made clear that the search for alternative sites should not be limited just to the land within the same ownership of the proposed site, and should if necessary extend beyond the district boundary.

CC08 - Richborough

Do you agree with the approach for the development of renewable energy facilities at Richborough?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

16 – Safe and Healthy Environment

SE01 - Potentially Polluting Development

Do you agree with the approach to potentially polluting development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

SE02 - Landfill Sites and Unstable Land

Do you agree with the approach to development at landfill sites and unstable land?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

SE03 - Contaminated Land

Do you agree with the approach to enabling development on contaminated sites?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

SE04 - Groundwater Protection

Do you agree with the approach to protecting Thanet's groundwater?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed, but there does seem to be an overlap between this Policy and policy CC02. Consideration should be given as to whether there is merit in combining them, or at least providing a cross-reference.

SE05 - Air Quality

Do you agree with the approach to air quality?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

SE06 - Noise Pollution

Do you agree with the approach to minimising the impact of noise sensitive development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent generally agrees with the approach proposed. However, the Policy and supporting text should acknowledge the impact of noise on tranquillity and the enjoyment of the countryside for this reason.

SE07 - Noise Action Plan Important Areas

Do you agree with the approach to minimising the impact of noise generated by roads and railways?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

SE08 - Aircraft Noise

Do you agree with the approach to aircraft noise?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

SE09 - Aircraft Noise and Residential Development

Do you agree with the approach to aircraft noise and residential development?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed. However, the Policy should also acknowledge the importance of undisturbed sleep to residents and should prohibit the take-off and landing of aircraft between the hours of 11pm and 6am, should Manston Airport re-open.

SE10 - Light Pollution

Do you agree with the approach to minimising light pollution?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed. However, the importance of 'dark skies' should be acknowledged in the Policy and its supporting text and we would urge the Council to work towards developing a dark skies policy along similar lines to that adopted by Ashford Borough Council – see:
<http://www.ashford.gov.uk/download.cfm?doc=docm93jijm4n5016.pdf&ver=7592>.

17 – Community Facilities

CM01 - Provision of New Community Facilities

Do you agree with the approach to the provision of new community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

CM02 - Protecting of Existing Community Facilities

Do you agree with the approach to protecting existing community facilities?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent generally agree with the policy approach advocated, but we consider that the Policy and/or the supporting text should state that the listing of a building as an Asset of Community Value will be a material consideration in considering proposals affecting buildings so listed.

CM03 - Expansion of Margate Cemetery

Do you agree with the allocation and safeguarding of land to accommodate the expansion of Margate cemetery?

Please select one option.

- Yes
- No
- Not sure

Please enter any additional comments

No comment

CM04 - Extension of land for Minster Cemetery

Do you agree with the provision of land to accommodate the extension of Minster cemetery?

Please select one option.

- Yes
- No
- Not sure

Please enter any additional comments

No comment on the need for a new cemetery, but CPRE Kent objects to the allocation of the housing site for the reasons we explain elsewhere in our response. We do not consider that the need for new cemetery space should be used as a justification for the housing site.

18 – Transport

TP01 - Transport Assessments and Travel Plans

Do you agree with the approach for requiring transport assessments and travel plans?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

TP02 - Walking

Do you agree with the approach to facilitate safe and convenient walking?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

TP03 - Cycling

Do you agree with the approach to facilitate safe and convenient cycling, including the cycle parking standards referred to?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

TP04 - Public Transport

Do you agree with the approach to facilitate the use of public transport?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

TP05 - Coach Parking

Do you agree with retaining the areas identified for coach parking?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment

TP06 - Car Parking

Do you agree with the approach to car parking including the indicative guidance on levels of car parking provision?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

TP07 - Town Centre Public Car Parks

Do you agree with the approach to town centre public car parks in Margate, Ramsgate and Broadstairs?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

TP08 - Freight and Service Delivery

Do you agree with the approach to off-street servicing?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment

TP09 - Car Parking Provision at Westwood

Do you agree with the approach to car parking at Westwood?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

CPRE Kent agrees with the approach proposed

TP10 - Traffic Management

Do you agree with the approach to traffic management?

Please select one option.

Yes

No

Not sure

Please enter any additional comments

No comment
