Thanet Local Plan Issues and Options

Consultation - 3rd June to 14th August 2013

Summary of Responses
Economy Issue 1: What level of employment growth should be planned for?

Q 1.1

There was no consensus in relation to the amount of employment growth we should plan for, with a fairly even spread between all three growth options. However high growth was the most popular answer and lower growth was the least popular. The respondents supporting baseline growth thought that this option was the most realistic given the current economic climate and the need for growth to be sustainable.

Q 1.2

The majority of respondents either agreed or strongly agreed that we should plan for additional employment growth at the airport although a fair amount disagreed. Some of those in favour stated that it would be a stimulus to the economy and with air travel increasing we are in a position to exploit this as Manston is currently underutilised. Some of those not in favour said that the airport has not proven to be a success in delivering job growth in the past as it is in a peripheral location and will never be favoured as a viable regional airport. Some said that infrastructure must be improved otherwise it will not be a success. Other concerns raised included environmental impacts including impact on wildlife as well as noise and night flight disturbance.

Q 1.3

The majority of people (just over half) opted for the airport low growth option which plans to deliver 240 jobs over the plan period. The rest of the responses were evenly spread between airport high growth and no growth. Many believed that growth at the airport was positive and key to Thanet’s economic success and job growth but some thought that based on past performance we should take a cautious approach. Many thought that low growth was most realistic to plan for but had ambitions for the high growth scenario. A number of respondents suggested a level between low growth and high growth.

Representations included the following points:

- Regeneration of Margate with the restoration of dreamland will encourage jobs to the area
- Tourism alone will not deliver the jobs. Tourism and the green economy is too narrow. We need a wider economic base including manufacturing (we have a service economy), export and entrepreneurs are an important consideration
- The geographical location of Thanet is an economic disadvantage
- High speed rail will increase the commuter zone for London and may offset the decline in manufacturing
- Improved rail links to the airport may create jobs and will enable the tourism sector to expand.
- Why the need for in migration of workers?
- Many people mentioned Thanet’s unemployment and deprivation indicators
- Fewer jobs are available due to technology.
- We need local support for our airport and port to succeed.
• Discovery park will generate jobs for people living in Thanet and should be included in the employment growth strategy
• The report does not consider job increases in London and its effects such as on home working
• Expansion of Westwood Cross, Manston Airport and Port Ramsgate and faster travel links with help achieve the higher economic growth figure.
• Council should be positive and aim for higher economic growth based on specialisms.
• There has been a failure to consider international and national importance
• Night flights and noise at the airport are glossed over
• High growth must span all sectors including industry
• Investment in tourism and the green economy will boost jobs and the airport may compromise this
• Growth should not degrade the overall quality of life
• There are no real signs of economic recovery
• Difficult to predict. No crystal ball
• A wait and see approach should be applied to economic growth
• As much of the growth will be focused around the central island Westwood Cross/Manston area it is important that employment proposed within agricultural land should investigate the value of this land for farmland and migratory bird species and provide mitigation if necessary
• Climate change will inevitably mean less air travel in the future
• We should consider alternatives to the airport and port in the plan
• Increase “quality” of jobs and wage levels
• Thanet will continue to be a retirement area but this creates jobs for others
• We must support skills and training
• The airport will make Thanet less attractive to investors, it will devalue property and could make the area less attractive for tourism
• Air pollution is an issue with airport expansion
• No further land reclamation should occur at Ramsgate port
• The employment growth targets are underwhelming and should be aspirational, and they fail to acknowledge Manston
• We should take account of the East Kent Growth Plan Feb 13 especially the 12 spatial priority areas
• Employment growth scenarios should reflect the airport masterplan – the low growth scenario as proposed is not commercially viable
Economy Issue 2 – How much employment land is needed and where?

Q 2.1

The evidence indicates there is a need for between 3 and 15 hectares of employment land (for office, industrial, storage and distribution) to 2031, with Thanet’s current supply of vacant allocated employment land totalling approximately 74 hectares.

The majority of respondents either agreed or had a neutral opinion that the plan should allocate the amount of employment land that the evidence indicates. Some respondents thought the allocation should reflect the evidence that only 30% of future employment growth is expected to be within the B use classes. When considering whether this evidence based provision should include an additional amount of land as a buffer there was no clear consensus.

When asked if we should consider using some existing allocated land for alternative purposes most people either agreed or had a neutral opinion.

No clear consensus was recorded when considering whether we should maintain the existing supply of allocated employment land with some saying that it could accommodate the growth in the green economy.

Many felt strongly that we should use the employment land we currently have allocated before allocating any more land and many felt that there was a lack of demand for more employment floorspace in the plan period.

Some respondents said that as local economies are likely to change in the next 15 years we need to be flexible and reactive. Uses that are allowed on employment sites should be relaxed to allow for expansion plans of existing businesses.

Some considered that the current oversupply of employment land could be used for housing, green open space or reverted back to farmland and that unutilised land should be de-allocated, especially given the presence of Discovery Park. Others considered that protecting employment sites was important to sustain high employment growth and so that further greenfield land is not required. Given new change of use flexibilities for B1 uses and guidance in the NPPF, some felt that de-allocating sites could leave them open to inappropriate development.

There were concerns regarding over-development and increased road use with allocating more employment land and we need to consider other employment generating uses such as home working, arts, leisure, tourism and education uses. Some mentioned that the oversupply could accommodate these other employment generating uses although a few disagreed with the principle flexible uses on employment land.

Q 2.2

Most respondents either agreed or strongly agreed that we should provide a variety of sites in a range of locations across the District and most respondents either disagreed or strongly disagreed that we should provide all employment land in a single location or cluster.

There was clear consensus that Thanet’s need for employment land can be accommodated by a selection of sites from the existing supply and that we should be flexible and allow other employment creating development on our business parks.
The majority of people either agreed or strongly agreed that we should protect the existing developed employment sites which are currently protected in the Thanet Local Plan 2006, although some thought that the existing employment land allocations are outdated and need reviewing.

Some respondents considered that some employment land will need to be located outside of the built settlements. Although others felt that sites should be provided within town centres and villages.

Representations included the following points:

- Being an island puts pressure on agricultural land to provide homes – the centre of the island could become a centre of excellence for the growing industry (hydroponics) – for example land at the airport
- Land allocations for development need to be founded on solid evidence and reasonable expectations. Over ambition on land for growth leads to flexibility and detracts from development control being a truly plan led system.
- Overall consideration needs to be given to the total land in use for agriculture as food security is a necessity nationally.
- We should avoid the loss of further greenfield sites. Brownfield sites should be cleared and used before allocating new ones on good agricultural land.
- We should have flexibility, if there is no flexibility in the plan it will constrict change forcing businesses to evolve in different directions.
- What do we do to encourage businesses to locate here in terms of marketing?
- If airport growth could be sustained in line with the airport Masterplan then there would be a strong case for an industrial area closely linked to the airport but not at present.
- Companies active in the green economy will prefer new science park type locations rather than existing sites.
- We should be supporting new places like Discovery Park, Sandwich.
- Thanet does not need a lot of employment land. The care industry, tourism and farming have their own sites.
- It is good that employment areas are split, as it gives the opportunity to work near homes cutting down on travelling.
- Many regional airports have allied business activities and such activities could be expanded at Manston.
- Allow employment land as and when needed – just make sure parking is possible too.
- The existing should be consolidated – such as Arlington House and the various empty High Streets
- A change of use for the Airport and Ferry Port would provide for future needs
- The retail areas of Westwood Industrial Estate should be de allocated
- The re use of other sites left over from other businesses such as Pysons Road Do It All should be prioritised
- There is huge development potential on a lot of the sites. Given successful use of land throughout Thanet for solar farms etc., innovative use of land should be sought.
- Some of the smaller developed employment sites may end up as housing sites but the larger ones should remain
- There are too many vacant business premises in Thanet, for example Eurokent Business Park.
- The Jentex site should be allocated for housing with some sheltered housing for the elderly
- Home based employment will grow in the future and work-live spaces should be encouraged especially in town centres for the creative sector.
- Eurokent must be retained as a strategic employment site.
- The creeping expansion of retail use on business parks is not favoured
- Businesses like retail benefit from being in clusters so that they can feed off each other
- Applications such as the golf range on a business park need to be allowed otherwise these jobs will go elsewhere
- Smaller sites would encourage small enterprises, we are not going to get many large industries in this area
- The buffer is needed so that the plan can respond to changes in the economic climate
- Richborough Power Station should be allocated for development including employment compatible with energy processes
- The Council needs to be flexible to allow employment opportunities to be bought forward that are not on B use class land
- The Wyevale Garden Centre site in Ramsgate was suggested as a flexible employment allocation
- The Jentex site should no longer be retained for employment use as it is not viable
- Suggested allocations for East Northdown Farm include visitor accommodation as well as additional business units. It is requested that the site is rescored in the employment land review
Economy Issue 3 - How can we promote our Economic Infrastructure Assets?

Q 3.1

These was some consensus that we should continue to support the development, expansion and diversification of the airport subject to environmental criteria, as well as protecting particular land for airport related development (62%), However, 30% of people either disagreed or strongly disagreed with this policy approach.

Some said that expanding the airport could make Thanet a hub rather than peripheral which would benefit the whole economy and that if we don’t exploit the potential then we are missing an opportunity as it is a major underutilised resource and a convenient alternative to the London airports. Many said that supporting the airport is important for employment generation in the district. It was suggested that with sensitive planning to protect the environment and quieter planes the airport could be a success.

Some concern was raised over projections in the airport masterplan with many pointing out that the airport has not been successful at attracting growth in the past and that success depends on airline operators rather than the airport itself. Others said that the airport is not viable simply due to its limited catchment. The main concerns raised were over noise and disturbance particularly from night flights as well as air pollution, groundwater and wildlife. A suggestion was to relax designations on the airport for other employment uses.

Q 3.2

There was no clear consensus in relation to providing a new station designed to serve commuters and/or the airport, with the majority of people either strongly agreeing or strongly disagreeing. Generally people agreed that we should increase the use of existing stations, including providing increased capacity at Ramsgate Station.

Some of those in favour thought that a parkway station would make Manston airport more viable, would attract a different demographic and improve economic prosperity of the area.

Many thought that a parkway station would be expensive and there was some concern that it would be of detriment to the other existing stations and Ramsgate in particular. Some respondents were worried about the effect on Ramsgate town centre and suggested a shuttle bus should be provided. Some thought that a parkway is not necessary until the airport is successful and until then it would just be a car park. Other concerns were the amount of land a parkway station would require and the environmental impacts of this in a countryside location.

Many thought there should be better links between existing stations and those stations with the towns.

Representations included the following points:

- It is essential to upgrade the road capacity adjacent to the retail core at Westwood, including St Peters to Westwood
- High-speed broadband internet access to all employment sites should be a priority
• Consents and permissions required for start-up should be fast-tracked wherever possible
• Is the port necessary? It is not a realistic prospect. Maybe it should be entirely yacht marina
• Ramsgate Port could have greatly benefited from what was due to be proposed a few years ago, catamarans to France, this would be profitable and good for tourism
• We have done well with roads and rail service
• The countryside is an asset, especially to Thanet's tourism industry. People who cycle, or walk, in Thanet, are amazed at the attractiveness of the rural areas.
• Some of the villages could benefit from minor controlled growth, especially the establishment of very small industries and people working from home. A step towards growing those communities (e.g. post offices survive in such locations, rather than in 'dormitory towns').
• The airport needs to be turned into something that makes money and brings real jobs to the area. A Centre Parcs on that site would provide infinitely more jobs and bring tourists to our area.
• Investment in the roads has certainly improved access to Thanet and further work will improve this further around Westwood Cross.
• Most people in Thanet want a reliable bus service, a reliable train service and to be able to drive or get a bus to a local airport where we can get a flight to somewhere we want to go.
• A station is needed in Dane Valley to serve St Peters
• There was concern over the future of Minster station if there is a Parkway station built
• Kent International Airport is not achieving its stated 2009 Masterplan proposals and as the airport is a private concern the promotion of this should be primarily by the company themselves.
• Finding a replacement ferry service for Ramsgate Port should be a priority. Restoring a cross channel service from Ramsgate to Belgium is likely to generate significant sustainable business growth. It is a major freight asset and this should be encouraged.
• Thanet shouldn’t just be reliant on green energy.
• 110 people are employed in the wind farm industry.
• It is unlikely Ramsgate port will re build a thriving passenger service.
• The High Speed train is the greatest asset to Thanet at present, encouraging a greater number of visitors to the area and attracting London commuters to settle here.
• The HS1 line from Ashford to Ramsgate needs to be upgraded so that Ramsgate to St Pancras is possible in around 60 minutes.
• There could be recognition of the employment role that the Hospital plays in the economic infrastructure
• The clause within the current Ramsgate Port policy that no further land reclamation will be permitted is welcomed. Further land reclamation would be likely to disrupt the coastal processes and could have far reaching impacts on coastal habitats.
• Ramsgate sorting office was suggested as a suitable site for extra parking at Ramsgate station
• Thanet needs to strive to secure an improvement to all its infrastructure needs if expansion targets are to be met.
• Signage needs to link the industrial estates
• Economic infrastructure assets need to be preserved and encouraged.
• Improved bus services are needed between Thanet and other districts which could promote tourism.
• There is a need for additional runway space at the airport
• A high speed link between Ramsgate and Faversham is needed more than the parkway
• A driverless tram system should operate locally with smaller more accessible stops to suit commuters
• Use land at Ramsgate swimming pool for parking at Ramsgate station
Economy Issue 4 – How should Thanet’s town centres develop?

Q 4.1

There was clear consensus in agreement that the coastal towns should adopt a stronger role in providing convenience shopping as this is beneficial for communities and reduces the need to travel. The coastal towns need to be able to compete with Westwood Cross but there was some concern that the convenience offer should be at the appropriate scale and not in the form of large supermarkets and supermarkets should be allowed in town centres only to increase footfall.

There was no clear consensus in relation to growth at Westwood.

In relation to Westwood maintaining its existing market share most either agreed or had a neutral opinion. There was an even spread of responses regarding the option of planning for additional growth at Westwood to increase its market share. Many were concerned about the effects of the coastal town centres if Westwood is to expand further and also further traffic congestion.

Q 4.2

There were a range of views in relation to what uses should be planned for at Westwood, Margate, Broadstairs and Ramsgate, but there was some consensus that we should have a range of facilities in all town centres.

Quite a few thought Westwood Cross lacked financial and professional services such as banks. In the coastal town centres many thought that restaurants and cafes should be encouraged along with financial and professional services to a lesser extent. Many commented that the coastal town centres should contain a greater range of facilities to remain competitive and encourage tourism. Some felt that none of these facilities should be provided at Westwood and some felt that there was already an adequate mix of facilities in all the town centres.

Q 4.3

There was clear consensus that we should be flexible in town centres in order to enable leisure development which could re energise the town centres making them more viable, encourage tourism and increase footfall.

A number considered that this flexibility should not be afforded to gambling establishments and a few thought that the most appropriate location for leisure facilities were the seafront locations and specific sites and that town centres should be for retail use.

Q 4.4

In relation to accommodating Thanet’s need for town centre development, there was clear consensus that in Margate and Ramsgate town centres the existing vacant floorspace should be used to accommodate the need.

There was some consensus that at Westwood the existing retail areas can be used to accommodate the need through redevelopment and reconfiguration. However, many had an neutral opinion.
There was no clear consensus in relation to how we should accommodate need for town centre development in Broadstairs.

The majority disagreed or had neutral view that town centre need should be accommodated on the edge of Broadstairs town centre or at Westwood Cross due to insufficient space in the town centres. Some felt that Westwood taking Broadstairs’ need would be inappropriate and unsustainable. However, a number agreed that Westwood should accommodate Broadstairs’ need.

A common view is that existing facilities should be maximised before any more development is proposed.

Q 4.5

There was clear consensus that we should continue to support small scale development in Thanet’s District and Local Centres. Many thought that small scale independent retail creates a community feel and is sustainable whilst also appealing to tourists. A few mentioned that this small scale retail should be local shops and not supermarkets.

Q 4.6

Most respondents either agreed with or had neutral opinions in relation to the size thresholds proposed for the town centre impact test.

Representations included the following points:

- Town centres should be run like a business with a strategic vision and a masterplan for ongoing regeneration and development.
- Parking fees in coastal town centres should be waived to give all towns an even playing field.
- Parking charges should be equal for all town centres.
- Ramsgate needs an identity possibly based on its Royal Harbour and build on the success of the harbour.
- There is a lack of banks in Northdown Road Cliftonville and none at all at weekends apart from cash points.
- Takeaways lead to litter.
- Westgate needs a bank. There used to be 3 here and now elderly residents have to go to Birchington or Margate.
- Margate needs a vibrant eating scene on the back of the Turner. Existing bars and restaurants are doing well and it is encouraging to see how thriving Market Square is starting to look on summer afternoons.
- To allow Wetherspoons in to Ramsgate would be a mistake.
- Appropriate sites in Ramsgate should be identified for commercial leisure and tourism purposes.
- Ramsgate Royal Pavilion should be put back into commercial use.
- Restaurants and cafes could bring the upper end of Ramsgate High Street to life.
- Sites for leisure and tourism development should be identified.
- There are insufficient amenities in Broadstairs for youth.
- Sports, Sports therapy/ massage should be considered as leisure and encouraged.
- Creative arts businesses should be supported.
- Disagree with flexibility if it means holiday homes and caravans.
- More leisure at Westwood could kill the town centres.
- Be careful with uses that may detract from town centres such as pubs, payday loans companies and charity shops.
- We should not risk town centres becoming no go areas at night.
- Use of existing seafront properties should be encouraged but other appropriate sites should not be ruled out.
- Business rates need to be appropriate to encourage more smaller businesses.
- It is important to recognise the realities of how people choose to shop in the 21st century. Small scale retail is a largely a 'luxury' or convenience option, not for everyday purchases.
- The same rules (size thresholds) should be applied everywhere. There are enough big shed stores in Westwood if not too many.
- All development should be based on need, evidenced by clear supporting information. To an extent, a size threshold is irrelevant; but if one is needed, then the minimum should apply.
- A definition of town centre boundary should include Westwood Gateway Retail Park and Westwood Retail Park. Any threshold has to be clear in terms of its reference to net or gross floorspace. Flexibility should be applied to allow for the nature of the proposed use to be taken into account and the extent of impact assessment required in each case.
- Development needs to be judged against its appropriateness for the character of the area.
- Need projections are unlikely to be robust over the long term, especially with fluctuating macroeconomic conditions and online shopping.
- There should be centralised parking at Westwood with easy walking routes incorporating bridges and tunnels.
- If Westwood is considered the primary centre then you condemn the other towns. They should be complementary in nature and not hierarchical.
- Ramsgate should concentrate on nautical and heritage roots.
- St Lawrence is its own place with its own high street and should be recognised as such.
- Other locations (i.e. not town centres) around the district are also suitable for leisure, tourism and cultural uses potentially around heritage assets.
- The Wyevale Garden centre site in Ramsgate was suggested as a potential retail/commercial leisure site.
Economy Issue 5 – How can we support the rural economy?

Q 5.1

There was consensus that we should support farm diversification projects, protect existing and support the development of new villages shops and services, protect best and most versatile agricultural land, support agricultural related development including farm retail units, support the conversion of existing rural buildings for economic development purposes and support the need for agricultural related dwellings.

There was no clear consensus regarding supporting new build development for economic development within the existing villages.

Many thought that there should be as much diversification as possible providing that rural identity is retained and that the focus is on making farms viable. A few noted that additional development in rural areas such as conversion of farm buildings to commercial and residential can make them more sustainable and should be encouraged, and it was pointed out that this is a view supported by national policy. Many respondents said that the rural economy in Thanet should be protected and encouraged and specifically targeted at strengthening rural communities.

The majority thought that best and most versatile land should be protected. Most supported farm shops in rural areas and some thought that village shops provide villages with a sense of life and community. Some thought that new build development should be supported but only where it is not harmful to the unique rural character.

Quex was cited as an example of a good diverse employer covering agriculture, culture, leisure and retail.

Q 5.2

The availability of water was considered to be a barrier to the food production industry. Also the threat from development especially housing was mentioned as a barrier. Some mentioned that climate change is a barrier to the food production industry and that no more solar farms should be allowed on agricultural land, along with anaerobic digesters.

Representations included the following points:

- Kent is the most water stressed area of the UK, with Thanet being very susceptible to low rainfall and drought. The Local Plan could perhaps recognise this and give special attention to the need to conserve water wherever it is used.
- Airport fuel pollution of the ground has never been tested, this may be a barrier to the food production industry
- Subsidy, education, marketing and practical advice and the promotion of existing successful small producers. The local plan could provide support and advice, workshops and facilitate linking local producers together.
- All agricultural land should be protected as it safeguards our aquifer and biodiversity which has been destroyed by parasitic development
- Thanet has few original barns left especially tithe Barns. the new plan should safeguard these old buildings
Surely item (b) should be to protect all agricultural land any overview of recent planning blight would show that development has taken away our best land.

Where housing or employment sites are located on the best and most versatile agricultural land, the benefits of the development proposals must be assessed against the amount of land lost.

In instances where there is an opportunity to achieve sustainable development, this should override agricultural land considerations. We support the conversion of existing rural buildings for economic development purposes, especially where they are no longer necessary for a rural use and provide benefits in respect of economic development.

Supporting new build development for economic development purposes within the existing villages can allow for economic growth within the region.

Modest residential development in villages in the District will serve to maintain the vitality and viability of rural settlements through the provision of additional households to support existing services and facilities. This is in the interest of sustaining the economy of the rural area. It may even be the case that additional housing would provide the critical mass that is necessary to support new services and facilities.

Most villages do not have room for expansion.

There was a concern that farm intensification could impact on the rich farmland bird population.

The importance of farming to the area should be recognised.

The rural economy should cover more industrial uses rather than just agriculture and horticulture.
**Economy Issue 6 – How can we support the visitor economy?**

**Q 6.1**

There was no clear consensus when asked if we should support hotel developments in areas outside of town centres. There was a significant mix of opinion. Some thought that town centres were the most sustainable locations for hotels and that this could lead to harmful development in the countryside, and others thought that we should not be placing unnecessary restrictions on hotel development or that seafront locations could be appropriate for hotel development.

In relation to continuing support for touring and static caravan parks in rural locations most respondents either agreed or had a neutral opinion. Most respondents agreed that we should continue to restrict touring and static caravan parks at the coast. Some thought that caravan parks are detrimental to the landscape and should not be supported at all especially at the coast and particularly static caravan parks.

Most respondents either agreed or had a neutral opinion in relation to restricting the redevelopment of existing self-catered accommodation where necessary, to maintain a reasonable choice of tourist accommodation in Thanet.

There was some consensus that there should be a range of good quality accommodation available in order to support the visitor economy.

**Q 6.2**

There was consensus in agreement to support new tourist facilities where this would extend or upgrade the range of tourist facilities, increase the attraction of tourists to the area or extend the season. There was no consensus when asked whether we should identify particular sites outside town centres that would be suitable for tourism. There was a concern that tourist facilities may be in remote locations.

**Q 6.3**

There was no clear consensus in considering how to protect existing tourist facilities, with a diversity of opinion. Most thought that we should only allow the loss of an existing tourist facility where it has been demonstrated that it is no longer viable. Some thought that we should protect all facilities and restrict their loss; others that we should only protect identified sites that are of particular importance to Thanet’s visitor economy. There was general concern about the loss of facilities but there was uncertainty over the definition of viable and the fact that this could be down to poor management. Some thought that applications should be dealt with on a case by case basis.

**Q 6.4**

There was consensus in support for continuing to zone Thanet’s beaches as “major holiday,” “intermediate” and “undeveloped” depending on their character and level of facilities available, and many people believed that the beaches are Thanet’s greatest asset.

There was consensus that we should continue to support language schools subject to their local impact, their positive benefit on the local economy was generally welcomed. However a few concerns were raised regarding anti social behaviour and confrontation with local youths.
There was consensus that we should continue to only support amusement arcades in certain seafront locations in Margate and Ramsgate. There was no clear consensus in relation to continuing to allow amusement centres in town centres. Those disagreeing thought that town centres were inappropriate locations for gaming. There was a mix of opinions regarding amusement uses with some commenting that they contribute to the tourist economy and others suggesting that are outdated and had negative associations.

Representations included the following points:

**General comments**
- Develop Thanet as a destination for overseas visitors.
- We need more rainy day tourist facilities and to extend the season,
- The plan should support proposal for tourist development where a good business case can be provided and encourage innovation
- The tourist market is the one hope for employment and the more that can be done to encourage out of season the better.
- The emphasis should be on improving tourism in the towns. We want tourists to walk around not drive around.
- There was some concern about tourism development on farmland.
- Policy should clarify that tourism development in Thanet should not only be supported in town centres (as set out in the NPPF) as there are other locations in Thanet where tourism development can be beneficial. Tourism development should therefore also be supported in sea front locations.
- Little is made of Thanet’s countryside
- Thanet’s heritage assets need better promotion
- Tourism should be encouraged. The airport would naturally increase traffic and should be a key part of this plan.
- Cleanliness of the area has a direct effect on tourism
- Airport growth will have an impact on tourism in Thanet
- Thanet’s heritage has the potential to play a significant role in it’s’ visitor economy e.g. the district has numerous military and civil defence sites (such as the pillboxes in the countryside and the air-raid tunnels in Ramsgate) that can play a role in engaging visitors and residents alike. There are also numerous examples of historic industrial or civic buildings that help provide an attractive character to the district.
- Thanet has some of the richest archaeological heritage in the UK and contains a number of internationally famous archaeological sites. This has great potential to contribute to the visitor economy but only if it can be presented to the public.
- Crime need to be reduced to attract tourism. More visible policing needed in these areas
- The information provided in relation to the visitor economy shows that Thanet is already a tourist attraction with significant visitor numbers. Within any policy for increases in visitor numbers the impacts on the coastal habitats and the species that use them will need to be assessed. This is particularly important if the season is to be increased with promotion of visitors within the winter months as this is when large numbers of migratory birds will be present.
- Improve transport networks to Thanet
- Remove all on road parking charges in towns
- Regarding beach concessions and chalets, there is a great risk here that this could result in lack of control over the coastline. Broadstairs should identify zones and control building on or near beaches and bays.
Tourist accommodation

- Hotels should be near to the airport
- Small boutique hotels are more important than caravan parks, the spend per person is higher
- Year round static caravan parks free up some dwellings so reduce housing shortage.
- Developers should consider hotels that are designed to be easily converted to housing/apartments if the tourism market fell
- We already have plenty of hotels/guest houses
- Hotel developments need to be encouraged but reviewed on a case by case basis in or out of town centres.
- For static and mobile parks caravan parks the intended use needs to be understood; whether for transient holiday makers or longer term stays. Either way the impact has to be assessed as there has to be a ceiling set on the total market allowed for such use.
- No benefit in restricting the redevelopment of self-catered accommodation if it is not viable and would better serve the local economy in another form.
- You must take account of travelling and Romany families, especially with possible Bulgarian and Romanian communities in Thanet by 2031.
- Free market forces should determine what is delivered.
- Consideration should also be given to allowing touring caravans (and potentially static caravans, where appropriate) near the coast as it is essential to increase the stock of self-catering accommodation. Thanet has a very small supply of this type of accommodation compared to other leading seaside locations, and it is often more financially viable to develop new caravan sites than hotels.
- Allowing caravans near the coast in certain areas, encouraging more low-budget visitors does not gel with Broadstairs' vision as a boutique hotel / rental flat / second home holiday resort.
- We need to improve the quality of accommodation available. Encourage the conversion of sub-standard B&Bs and HMOs
- Encouraging tourism is a fundamental tenet of the District's employment policy. Accordingly, it is essential that appropriate sites for new tourist facilities e.g. hotels be identified. This would allow the Council to identify the most sustainable and suitable sites as part of a clear strategy rather than responding, ad hoc, to speculative applications.
- There are already sufficient sites and people should be encouraged to use what we have.
- There is real lack of accommodation for tourists (particularly upmarket) and business visitors. Day trippers do not spend in the area. It is important to create and promote higher standard accommodation.
- Encourage hotel accommodation as the stock has reduced over the years
- More hotels in town centres with swimming pools and a conference centre
- Self-catering in refurbished farm buildings attractive to some

Protection and promotion of facilities:

- There was a concern that unviable facilities may only be down to bad management
- All existing facilities that are visitor destinations (as well as the natural assets) should be protected and upgraded or replaced where necessary. The document should therefore be clear about what facilities constitute attractions for visitors in appropriate locations, and an explanation be added to the accompanying text to a policy and in the Glossary. Theatres are not easy to
define as they could be a tourist attraction, a leisure facility, a heritage asset or a community facility among others.

**Tourism development should not be promoted on the following:**

- Slipways
- Hoverport. This site provides access onto the mudflats within Pegwell Bay for walkers and dog walkers. The council would need to ascertain the nature of the tourism facilities planned for this site, predicted visitor numbers and how access onto the most sensitive areas of the SPA would be managed before any policy is formulated to ensure that the proposed tourism does not lead to significant impacts on the bird populations due to recreational pressure.
- Amusement centres are not likely to be suitable for Broadstairs.

**There were a number of suggestions of additional facilities, tourist projects and specific sites to be used for tourism purposes including:**

- Promotion of ecotourism, for example Thanet Coast Project and more needs to be made of the area between Ramsgate and Sandwich
- Northdown Park with good supervision and little financial outlay would make a suitable Caravan Club Certificated location, with a limited number of caravans at any one time.
- A Margate Town Trail an extended Museum/Tudor House site (including a micro brewery in the Maltings?), Shell Grotto/Caves + a fully operational Time Ball the better. Same goes for Ramsgate Tunnel Project of course.
- Center parcs at the airport
- Adventure playground/holiday centre at Manston or Gasworks, Boundary Road, Ramsgate,
- State of the art water parks on the beaches
- The Royal Harbour is not marketed enough as an attraction in its own right as well as the support for operation Dynamo and the area marked for operation sea lion (Hitlers UK invasion)
- The Wyevale Garden Centre site in Ramsgate was suggested for tourism uses
- East Northdown Farm is suggested as a location for visitor accommodation
- Revive the derelict waterfront at Ramsgate
- Dreamland and the Lido, Margate as key priorities.
- Royal pavilion, Ramsgate should be given to the community to bring it back into use, not given to outside interests such as Wetherspoons
- Royal pavilion, Ramsgate should be urgently brought back into use, funded by Wetherspoons or another suitable nationally based company
- There is a need to continue to protect the Dreamland site.
- The need to protect Dreamland should be clarified to state that Dreamland is protected for its amusement park use and its heritage, to support the town's tourism/visitor economy.
- At present Thanet has very limited museum provision for archaeology in its urban centres and certainly nowhere capable of housing the many artefacts excavated in the district each year. This would also help to give Thanet's tourism product a stronger cultural flavour to complement its existing seaside economy.
- You have a secret Port (Richborough) that no one can get to, you have the only area that was a Holocaust refuge center for the many Jews who escaped from Europe and made their home for the duration of the War yet no evidence remains.
Economy Issue 7 – How can we support communications infrastructure and home working?

Q 7.1

There was consensus in agreement that we should support home working subject to local impacts.

There was also consensus in support of expecting all new development to be provided with the infrastructure to support high speed broadband and other communications.

Many comments said that efficient broadband is essential and is increasingly an expectation for business. Also effective communications infrastructure can mitigate against Thanet’s relative distance from business markets and make a valuable contribution to the economy.

Representations included the following points:

- RTC seeks to encourage a fibre-optic network in Ramsgate
- Home workers are SME’s
- We need to get more money from the government for this
- The document implies that home working brings money into the District. This may be in the form of larger premises becoming more attractive to professionals as able to work from home and commute when necessary, but may not be a straightforward relationship.
- Contact should be made with the internet providers to ensure that quality and speed of the services is further improved.
- We should help and support home working by promoting the sharing of knowledge and experience in a network style set up in all our towns. A third space in the town, not linked to a café or even a user friendly break out space or meeting point badge within cafes. We should encourage individuals to come together to feel part of something tangible and more substantial as if home-working is a collective lifestyle choice.
- More support for home-working should be available and not just in IT. Many cottage industries could prosper if given the appropriate help.
- Planning permission should be easy to obtain/not required. Council departments need to co ordinate to enable home working to thrive.
- Find out the barriers to bringing cable to Margate. What are the barriers to a quality fibre optic network in the area?
ISSUE: How many homes do we need to provide?

Q 8.1

Consultation asked how important 10 factors listed below in italics were in deciding how many homes were needed.

Providing more choice for Thanet’s residents. There was no clear consensus on the importance of this factor but “important” was the most commonly held view.

Providing homes for people who want to move to Thanet. There was no clear consensus but the most common view was “not that important”

Providing homes to support economic growth. There was some consensus that this factor was important or very important.

Providing homes for people who live in Thanet but may work outside the district. There was some consensus that this factor was important or very important.

The need for more affordable housing. There was some consensus that this factor was important or very important.

Impact on traffic and travel. There was strong consensus that this factor was important or very important.

Impact on the amenity /character of existing neighbourhoods. There was strong consensus that this factor was important or very important.

Impact on the environment. There was strong consensus that this factor was important or very important.

Capacity of the market to deliver. There was some consensus that this factor was important or very important.

Capacity of infrastructure and services. There was complete consensus that this factor was important/very important.

Analysis of these responses infers that many respondents believe housing provisions should be influenced by the needs of Thanet’s existing residents, promoting economic growth, including the needs of economically independent incomers and meeting need for affordable housing. Individual views cited different combinations of these. Responses also revealed notable concern about providing homes at levels (and of types) that would attract additional benefit dependent incomers, about the need to protect the environment and amenity of existing neighbourhoods and a mix of homes for settled communities. There was complete consensus that capacity of infrastructure and services was an important or very important factor.

Responses also show considerable concern about impact of housing numbers on traffic and travel and about capacity of the market to deliver. Comments include making better use of existing stock.

Q 8.2

There was no clear consensus about which of the four projections represented the best starting point in deciding housing numbers, with a spread of responses across
all four options. The highest dwelling requirement forecasts, (Economic Higher Growth and Migration Trend) when considered together, gained the most support, however this was only slightly more than the support shown for the Economic Baseline projection, and the Economic Lower Growth projection.

Comments advocating the Economic Higher Growth projection scenario cited consistency with economic messages in the Plan, the need to be aspirational and according with government’s growth agenda. Comments associated with support for the Past Migration Trends projection included that it was objectively based, takes account of migration which cannot be discounted and, in light of major growth points and sectors in Thanet, would be a realistic and reasonable basis.

Several responses specifically described the Economic Baseline projection as “realistic” citing reasons such as no evidence of an economic upturn, a stagnant UK economy, and being not overambitious. Those supporting the Economic Lower Growth projection included reference to the need to assume modest growth based on uncertainty about economic and employment growth and the merits of applying a wait and see approach.

Q 8.3

Question 8.3 asks for further comments in relation to how many homes are needed. Responses include the following key points.

Economic expectations (perhaps optimistic) may not match housing provisions based on them. In consequence "overbuild" will attract more economically dependent people to the area.

It is important to fully meet social housing need (although evidence of actual need was questioned in light of an “oversupply” of cheap housing).

Priority should be given to maximising the potential of derelict and empty property to provide new homes rather than building new or inflating total numbers, including reverting converted flats/HMO accommodation to family homes. This could serve to reduce the overall level of new homes required.

The need to consider/ protect the environment including areas designated for habitat importance and top grade agricultural land. Specific concern was raised regarding the potential impact of increased recreational pressure on the Natura 2000 and Ramsar network associated with the three higher level housing options, (including impact upon SPA bird populations and increased traffic and visitor pressures on habitats and species for which the SAC’s are designated). The concern regarding habitats is fuelled by uncertainty about the combined effects of development in Thanet and neighbouring areas and about robustness of mitigation measures. Partnership working with relevant organisations to formulate appropriate strategies is urged.

Representations also included the following points:

(8.1)

- Need more affordable homes (including for 1st time buyers, low wagers/ people downsizing and people who cant afford to buy. Focus these in less deprived wards
- Capacity of market is important as it can impact on deliverability and viability.
• Support for additional homes (some support conditional on not attracting incomers on benefits, some support conditional on homes for working households coming back to Thanet as birthplace).
• Need more homes (including variety and quality) to help retain existing, and attract new residents.
• Consider and avoid significant impact (of development) on amenity, character and environment of existing neighbourhoods, road network and environment; especially at edge of settlements.
• Facilitate more family homes through downsizing by elderly. No more estates/ghettos for single parents/unemployed. Avoid proliferation of bedsits/1 bed flats in Ramsgate.
• Be realistic about infrastructure. Improve it (including water and transport) before new housing. Increased population will place extra burdens on hospitals, GP’s and dentists and there is a shortage of primary school places. Westwood in danger of bigger snarl-ups.
• Overbuilding when economic growth is uncertain could lead to in migration of economically dependent households contrary to regeneration plans.
• Primary aim should be maintain services and infrastructure for present residents. New jobs should as priority be for current inhabitants.
• Economic growth is priority. Needs sufficient supply of quality homes to attract higher earners.
• Homes to support economic growth should only provide for people coming to work, people born in Thanet or commuters who don’t travel far out.

(8.2)
• Scale of Airport growth is uncertain and could significantly impact any scenario.
• Past Migration scenario is realistic and objective. The other scenarios lack ambition.
• No evidence of growth prospects so no need for more housing.
• Sensible to assume modest growth/wait and see approach
• Baseline is realistic/sustainable.
• Baseline supported as lower would suggest decrease in workforce contrary to prospective economic projects.
• Be realistic but ambitious – Perhaps somewhere between baseline and higher growth.
• Higher economic growth supported - consistent with economic messages in Local Plan and accords with governments pro growth and sustainable growth agenda.
• Range of housing targets featured in consultation is insufficient as they fall below figure suggested by projections by Office for national Statistics.
• Sufficient housing (type and number) is needed to underpin economic growth. Number should be set at 11,791, 11,648 or higher.
• To be sound, targets should be based on scenarios that are deliverable, robust internal migration projections and not be unduly aspirational.

(8.3)
**Economic factors**
• Potential additional job growth, whilst desirable, is not certain.
• Avoid overbuild /gear housing starts with job growth to avoid attracting economically dependent migrants.
- Homes can breathe life into areas and attract people who invest in them. Need to understand and tune the property offering accordingly. (Be it commuters or retirees).

**Housing Need & Demand**
- Important to meet shortfall in housing need as identified in evidence and by ensuring sites are deliverable and existing allocations carried forward.
- See no evidence of need for affordable homes (Thanet is already over supplied with cheap housing).
- Rebalance flats: houses ratio. Resist bedsits, 1 bed new homes/conversions.

**Magnitude and Type of Provision**
- Shrink figures by measures like better use of empty property and surplus business parks and net off approved residential applications.

**Environmental & Infrastructure Concerns**
- Concerned at potential impact of recreational pressure on Natura and Ramsar network (including on birds, habitats and species). Partnership working needed.
- Protect top grade agricultural land for food production, and green wedges by attaching development to present urban establishments.
- Building extra homes is not an option unless there is a strategy for water supply to the island and sewage disposal.
- Need adequate water supply and access roads for new development projects.
ISSUE: Where should our new homes be provided?

Q 9.1

In terms of a broad approach to guide future location of homes, there was strong consensus in support of either maximising or focusing development within the existing built up areas of the towns and villages, with a relatively even split between focusing development at these locations but with restrictive criteria (for example safeguarding gardens, family homes, and sites not previously developed) and maximising development in these areas in order to minimise use of greenfield land.

Very few supported a focus on greenfield sites and aiming to restrict housing sites in the existing built up areas to those important for regeneration.

Comments advocating maximising or focusing on the existing built up areas of the towns and villages included safeguarding the function of the Green Wedges, land for food production, the landscape and finite open countryside.

Frequently mentioned was the need to prioritise use of previously developed sites, in particular derelict land and property, to improve the appearance of the area.

Comments highlighted the desirability of capitalising on presence of existing infrastructure and services in the urban areas but avoiding over development and cramming people into these areas in order not to over stress infrastructure and to safeguard family homes. Concerns also included the need for a green and friendly environment and retention of green and open space for community development.

Some comments emphasised the need for an approach that is sustainable, viable and one which may involve a mix of previously developed and greenfield land including urban regeneration, urban extensions, and extension to villages, informed by site characteristics and location and a settlement hierarchy. (Comments included examples of sites on which residential allocation is sought). Some specifically advocated providing housing in and around villages which could include the benefit of helping prevent their stagnation/degeneration.

Q 9.2

In relation to the location of any greenfield land required there was no clear consensus with varied views but the majority (just over half) supported dispersed sites, slightly less at a small number of locations and very few supported a single location.

A number of comments supported a dispersed sites approach on the basis that this would spread provision around in an area dominated by urban areas, have less impact of existing communities, and infrastructure and potentially be more able to deliver quality homes.

Comments regarding a small number of locations suggested that this option would have low environmental/visual impact, would help to spread provision around without representing a piecemeal (dispersed) approach and is easier to accommodate/plan for in terms of infrastructure. Comments also included that provision needs to support community cohesion, be close to urban areas (some advocating growth at rural settlements - e.g. Minster) be linked to settlements, have good public transport/cycle routes and/or be clustered reflecting community facilities.
Comments relating to a single site allocation option were largely focused upon alternative uses or development of specific sites including the port, airport, Jackey Bakers and the "Manston Green" proposal. Comments also included that a single site could place the deliverable land supply in jeopardy.

**Q 9.3**

Regarding the right location for any greenfield homes, there was significant support for locations adjoining the urban area and some support for locations adjoining the villages. A small number supported freestanding countryside sites or a new settlement. Some responses supported a combination of options.

Options relating to locations adjoining the urban areas and adjoining the rural settlements attracted the most comment. Frequent references were made to the ability of these options to benefit from and support accessible services and infrastructure. These options were also supported as having lower environmental impact (some citing need to protect the Green Wedge and remaining space between villages and countryside) and a more natural form of growth. The question of limiting the scale and deliverability of development and integrating it with existing communities including meeting the housing needs of villages was also mentioned.

Comments supporting a new settlement included suggesting the ferry port and airport as appropriate locations.

**Q 9.4**

In response to the request for any further comments in relation to where our new homes should be provided comments were wide ranging. Many amplified or repeated comments made in respect of question 8.3. Prominently, comments related to:

- The need to prioritise use of Thanet’s substantial stock of empty/derelict property and brownfield sites as priority/before building new homes/greenfield homes.
- The need to protect/enhance green space and biodiversity, address potential loss of significant farmland bird habitat and SPA and SSSI foraging and roosting habitat and take account of potential NOx emissions on the urban population and on wildlife habitat.
- Any new homes in or as extensions to villages should be of limited scale, and to augment services at a sustainable scale and not overstretch them. Comments include the need to acknowledge the sustainability merits of housing adjoining villages in association with requests to allocate specific sites.

Representations also included the following points:

1. Use brownfield sites before thinking about use of Greenfield
2. Infrastructure is already in the built up areas.
3. Focus on reusing empty and run down properties in blighted areas.
4. Protect green wedges, green fields, green spaces, green corridors and finite agricultural land/countryside
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- Green Wedges have important function in preventing one stretched conurbation.
- Agree some new homes are needed but open countryside between the 3 main towns must be protected.
- Advocate steady controlled organic growth of existing urban areas.
- Recognise potential/role of larger scale well located greenfield sites/ greenfield sites adjacent to existing urban area /sustainably located small deliverable sites
- Need mix of urban regeneration, urban extensions and extensions to villages depending on site characteristics and location.
- Some development in and around villages would help them to thrive and provide people with locational choice
- Retain family homes and land not previously used.  Cramming of people leads to stress and over use of resources like schools.
- Avoid further high density development.
- Keep it green and environmentally friendly.
- Start with a settlement hierarchy to provide basis for sustainable assessment and attribution of development levels to each settlement

(9.2)
- Single locations can better meet local needs, support social and economic regeneration, link to existing infrastructure and provide a large proportion of affordable housing and contributions to secure major infrastructure improvements.

- Small number of locations supported as easier to support with infrastructure and plan for infrastructure, least environmental and visual impact, can increase close communities, reduces need for widespread use of greenfield sites, single location would be like a new town and could put land supply in jeopardy, dispersed sites would be too piecemeal and unsustainable, providing homes in clusters will help retain Green Wedge, would help spread provision around in a district dominated by existing urban areas, should be close to urban areas and with public transport and cycle routes, and should include appropriate level of growth in the rural villages to allow growth and choice

- Dispersed sites supported as less environmental impact, spread provision around in very small developments, alternative approaches risk creating ghettos, less impact on existing communities and infrastructure, only minimal development is possible otherwise we will join up, small deliverable sites subject to CIL contributions can provide better quality homes, housing attached to existing community boundaries can promote inclusive society, don’t want another new town/big single site like the 1200 homes at Westwood, greenfield land should be last resort, less impact if build a few houses in each rural village/hamlet.

- Should focus first on strategic spatial options referring to a settlement hierarchy rather than constraints based approach.
- Do not support new housing at Westwood (road network is not adequate).
- Support consolidation of Westwood including a range of housing.

(9.3)

Regarding (greenfield) locations adjoining urban area/villages
• Can use/enhance existing facilities/infrastructure, more sustainable (access to and support for services) least environmental impact, more natural form of growth.
• Maintain green wedge, prevent urban sprawl and retain remaining green space between villages and countryside.
• Development should be considered in relation to transport and in relation to integration as part of existing communities.
• Need to focus on sites close to Westwood / small estates/ sites which are small, deliverable and sustainable. Westwood should be the only new town otherwise Thanet could become a gigantic coastal conurbation.
• Meet local need in village environment for appropriate growth adjoining villages to provide choice and quality homes. Don’t let villages get too large and become undesirable.

**Regarding Freestanding countryside sites**

• Lessens impact on existing communities and infrastructure

**Regarding a New settlement**

• Give the towns and villages a break.
• Ferry port and airport meets a housing need. As new settlements.
• Land values and property prices in large schemes may not be sufficient to enable infrastructure provision and scheme delivery. Organic growth as opposed to large estates can integrate better with the built environment.
• Deliverable and accessible, quality homes suited to community aspirations will be well served by more small sites well related to good public transport connections.

(9.4)

• Use the many brownfield sites including empty property before releasing greenfield land.
• Promote re-use of HMO’s and disused properties back into quality family housing
• Development should protect, enhance and augment recreational and natural green space and where possible links between them, for longer walks to aid dispersal of biodiversity.
• Rural/village extensions should be relatively small but enable village services to be supported/encouraged and not overstretched.
• Location of housing anywhere within or adjacent to the urban area is likely to impact on the Natura 2000 and Ramsar network (increased visitor numbers and car use). Balance needs to be struck between quality of life and protecting designated sites and farmland populations.
• A strategic bird survey is recommended to assess potential development sites for impact on bird habitats and where appropriate inform how impacts can be minimised/compensated for.
• Maintain and retain the Green Wedges. Oppose any greenfield development.
• Recognise need to conserve and enhance the natural, built and historic environment including reference to Thanet’s scheduled ancient monuments and registered park and garden.
• Need more jobs before more homes
• No more homes near Westwood Cross
• Consider development and locations in relation to sewerage and water capacity and accessibility including walking and cycling routes.
• Respect the natural beauty of the Wantsum Channel and Lower Stour Wetland. Mitigation strategies are needed to minimise impacts on local habitats and natural sites such as Sandwich Bay.

• Concerned at high housing numbers and impact of associated recreational pressure on SPA species which would require mitigation.

• Allocations and policies should take account of the need to promote preservation, restoration and re-creation of priority habitats, ecological networks and protection and recovery of priority species populations.

Some responses to question 9.4 identify particular sites which representors consider should be allocated for development. These are:

Land east and west of the A256 (“Manston Green”), land at Nash Court Farm, (adjoining housing under construction at Westwood), land at Gore End Farm, Birchington, Royal Mail delivery offices at The Broadway Broadstairs, Addington Road Margate and Wilfred Road Ramsgate, land at East Northdown, Gas holder site King Street Margate, Ramsgate Garden centre, Jentex site at Cliffsend, Eurokent site, New Haine Road, Land at Red House Farm, land at Hopeville Avenue Broadstairs, Jackey Bakers, the Airport and the ferry port
ISSUE: What type of new homes do we need to provide?

Q 10.1

This question asks for views on the importance of 6 specific factors in deciding what type of homes should be provided.

The needs and aspirations of the existing community. There was strong consensus that this is important/very important.

Achieving balanced and mixed community neighbourhoods. Quite strong consensus that this is important/very important.

Need and demand from people moving into Thanet to work. Some consensus but some diversity of opinion, with the majority of responses considering this was important/very important, but also a reasonable number considering it not that important/not important at all.

Need and demand from all people moving into Thanet. There was a diversity of views with no clear consensus, with the most popular answer being not that important, followed by important.

The need for more affordable homes. There was some consensus that this was important/very important.

Impact of particular types of homes upon the character of existing neighbourhoods. There was almost complete consensus that this factor is important/very important.

These responses reveal that factors considered most important were the aspirations of the existing community and the impact of particular type of homes on the character of existing neighbourhoods. Just less than half considered need and demand from people moving into Thanet was important/very important. However in relation to working incomers the percentage increased to 68%.

Comments included the importance of protecting the character of the area, neighbourhoods and communities, the need to build attractive homes and the need to attract professional people but not economically dependent incomers. The need to focus on using empty homes featured prominently. In addition comments referred to the need to provide affordable homes to meet needs (some advocating that this be targeted for local people, and some querying the need for more affordable homes which might attract in migration by benefit dependent people and when there is already a large supply of cheap housing). Also included were the need to provide specialised housing for older people and to facilitate movement including downsizing to get the market moving and the need to balance needs of elderly people with a balanced community structure.

Q 10.2

There was a diversity of opinion with no clear consensus regarding the appropriateness of the guideline proportions for types of market homes recommended in the 2009 Strategic Housing Market Assessment. However, the most common response was that of a neutral opinion, followed by agree, with the least common answer being strongly disagree.
Responses revealed recognition of the complexity of the issue, but included the need for strong emphasis on providing or freeing up more family homes avoiding or reducing 1 bed flats/bedsits and the importance of securing social cohesion.

However, views also included the need for a mix of larger and smaller homes and that people should live in flats as these take up less land.

**Q 10.3**
As with question 10.2 there was a diversity of opinion regarding the guideline proportions for types of affordable homes recommended in the 2009 Strategic Housing Market Assessment. The highest proportion of responses was split between neutral and disagree, with slightly less than those responses agreeing with the proposed guideline proportions.

Frequently raised was the need for a lower proportion of 1 bed/smaller flats (sometimes supported on the basis of a corresponding increase in 2 bed flats/2/3 bed houses). Some queried the need for market or affordable homes greater than 3 bedrooms. Some commented that a mix of types is important for balance and social cohesion. Individual views included that more flats are needed to reduce land take.

**Q 10.4**
The degree of support for options relating to achieving affordable housing is summarised in relation to each option below.

*Future housing development should include 30% as affordable housing.* There was no general consensus, with just over half agreeing/strongly agreeing, but a reasonable number also disagreeing/strongly disagreeing.

*All new housing developments should be expected to provide affordable housing irrespective of the total number of dwellings proposed.* There was no general consensus, with just over half agreeing/strongly agreeing, but a reasonable number also disagreeing/strongly disagreeing.

*In some cases affordable housing could be provided off site or through a financial contribution.* Views were mixed but those agreeing/strongly agreeing were nearly double those agreeing/strongly disagreeing. 20% were neutral.

*The provision of affordable housing should be on the basis of 70% social rent and 30% intermediate.* There was no clear consensus, with the most commonly held response being neutral and slightly more agreeing/strongly agreeing than those disagreeing/strongly disagreeing.

*Continue to exceptionally allow release of land adjoining the built up parts of our rural villages where this would deliver affordable housing to meet the needs of the village.* There was no clear consensus, however twice as many respondents agreed/strongly agreed than those disagreeing/strongly disagreeing.

Responses show diversity of opinion regarding the issue of affordable homes. Prominent within responses was the need to ensure that affordable housing policy requirements are flexible/applied case by case and do not jeopardise viability of development including when infrastructure costs are factored in. Views included that 30% is about right or too high and that each case might best be dealt with flexibly and on merit. There was also support for financial contributions where justified as an alternative to on site provision. There was some concern regarding potential loss of
greenfield land associated with exceptional release of land to meet local need in villages particularly in light of potential scale.

**Q 10.5**

The level of agreement relating to options for addressing Houses in Multiple Occupation is illustrated below.

*Continue to allow HMO’s subject to consideration of their effects on the local character and living environment of an area.* Opinion was divided on the merits of this issue. The majority (just over half) agreed or strongly agreed, with a reasonable number also disagreeing/strongly disagreeing.

*Restrict HMO’s in certain areas.* There was no clear consensus with a diversity of views. The most commonly held response supported/strongly supported this option, however nearly half of responses were neutral and a small number disagreed/strongly disagreed.

*The number of HMO’s in a particular area should be restricted beyond a specific level.* There was a diversity of views, however half of responses agreed/strongly agreed, with only a small number of responses disagreeing/strongly disagreeing.

The majority of responses stem from concerns that HMO’s (particularly where clustered) can be a driver of social problems, disturbance for local communities, can change the character of neighbourhoods and affect perception of the district. In relation to possible specific levels, responses imply low percentages are supported. Suggestions include zero, low, 5%, 10%, 15% and 25%. Specific areas mentioned where HMO’s might be restricted include Cliftonville (including Cliftonville East), the estate adjoining the university campus and other estates characterised by family homes. Some responses recognised that HMO’s (including those occupied by students) properly managed can meet housing need, but this was generally subject to the need to prevent proliferation. Others suggested that the issue was too wide to be resolved through planning policy and included the view that HMO’s create few problems.

**Question 10.6**

The following summarises the level of agreement regarding factors that might be taken into account in considering sites or proposals for gypsy and traveller accommodation.

*Impact on surrounding uses.* There was clear consensus in agreement that this factor should be taken into account.

*Access to facilities (such as schools, jobs and healthcare).* There was some consensus in agreement that this factor should be taken into account; however a small number disagreed/strongly disagreed.

Comments associated with these views indicate significant concern regarding impact on surrounding uses and amenity. Comments also included that planning considerations applied to locations for gypsy/traveller accommodation should be similar to those for other developments.
A number of responses expressed concern that providing such accommodation may serve to add to problems associated with existing social needs and already stretched social infrastructure. The need for any provision was also queried but some responses acknowledged the needs of gypsies and travellers as part of the wider community including the importance of access to normal life, schools and medical care.

**Q 10.7**
This asks whether respondents are aware of any other housing requirements relating to particular groups. Frequently mentioned was the need for homes for older people including specific types of accommodation (such as sheltered accommodation), and the potential for such provision to facilitate downsizing. Also mentioned was the need to accommodate students in bespoke and affordable accommodation.

**Q 10.8**
This question asks for any further comments on the type of homes we need to provide. Responses were wide ranging and included reference to the need for well designed homes in keeping with their local area, the needs of people who are elderly (including for example extra care housing and sheltered accommodation), disabled or in need of care, and the need to safeguard/provide more family homes.

Representations also included the following points:

**(10.1)**
- Character of the area and needs of locals are most important. New homes should not affect homes in existing neighbourhoods.
- Existing community interests do not necessarily represent absolute barriers to meeting need.
- A proper mix is needed for a dynamic market, balanced communities, economic sustainability and improved quality of life/social life.
- Support provision of high quality homes associated with the needs of, and providing choice for, the growing population including in-migrants. Need an appropriate amount mix and range of high quality homes in the villages.
- Need to make provision of sufficient "professional" homes in order to attract highly skilled workers from outside the area to Discovery park.
- Need to avoid importing social problems (e.g. displaced housing benefit households).
- Needs of incomers are not important and add pressure on infrastructure.
- Need emphasis on family sized, larger homes.
- Not too many flats and protect high townscape value areas.
- Affordable homes essential/not important. (Already have plenty of cheap homes).
- Need good quality 1st time buyer and affordable homes in areas like Ramsgate and Broadstairs.
- Need to limit retired people or encourage provision of specialist housing for older people across all tenures.
- Use up empty homes then brownfield sites. Use derelict sites to safeguard farmland.
- Need to extend selective landlord licensing and regimentation of HMO’s.

**(10.2)**
- Represents balanced mix, although there could be more emphasis on 3 bed houses and less on 1 bed flats.
Need strong emphasis on new family homes but recognise need for mix for social cohesion.

Need to avoid over concentration of bedsits

Pleased to see houses given more consideration.

Can allocation take account of present/ near future number of children?

Difficult to be prescriptive. Demand is there for large properties for couples & singles.

Proportion appears well balanced.

People should live in flats to take up less land.

Already overdone flats which will provide future problems.

Suggests swap percentages for 1 & 2 bed flats and a larger proportion of 3 bed homes (convertible to flats if needed)

Proportion of 1 bed flats appears high. No more 1 bed flats.

We have too many flats. More 2 & 3 bed properties would be beneficial.

Singles should be 10%

(10.3)

Agree emphasis of provision of new family houses and smaller single bed starter units

Swap % of 1 and 2 bed flats.

Disagree. People should live in flats to take up less land.

3 bed should be affordable maximum.

There are sufficient flats. If development is essential 3 and 4 bed houses.

Should be same as percentage for market homes.

Lower percentage of 1 bed flats and higher on 2 bed houses / more 2-3 bed properties

No new 1 bed flats. Use existing stock (and upgrade) for this. Only exception should be for homes aimed at older residents (i.e. serviced retirement sheltered housing).

(10.4)

Each case on merits/case by case basis (including subject to target of up to 30% and viability and reflecting localised need).

Flexible approach required reflecting number and type of homes proposed and need for social and infrastructure contributions. Affordable element should reduced/commuted sum applied where needed to avoid undermining viability.

Accept need for criteria but don’t believe in one size fits all scenarios. (30% might work in some scenarios). Option of financial contribution and releasing land near villages gives flexibility.

Seek 15% affordable housing. Developments smaller than 10 units may not have room. In respect of villages infill can help reduce sprawl and thus maintain attractiveness.

Need to apply affordable housing contributions more strictly than in past.

Important to maximise provision (if needs be through off site/contribution)

At least some contribution to social housing should be made in all new housing development.

High proportion of affordable homes will hinder property sales.

Should be 50/50 and only on brownfield sites.

No more affordable housing in the towns.

No land release for affordable housing. Much countryside already sacrificed.

Agree exceptional release adjoining villages if it suits the village or meets its need.
Exceptional release adjoining villages risks small or excessive loss of green sites.
Agree with social rent/intermediate split for local people born and raised in Thanet.
Allow for affordable housing commuted sums where it is unrealistic to provide on site.

(10.5)
Presence, concentration, density of HMO’s often negatively affects communities (associated with crime, deprivation and a.s.b., no go areas at night).
HMO’s suit some requirements. Build more homes for people who need this type of accommodation and convert existing homes for self contained use.
Restrict/control proliferation or deal with case by case on basis of impact on local community.
Specific levels referred to include Zero, low, 5%, 10%, 25%
No more than 5% HMO in any one street/group of streets. No more HMO’s in areas already with many 1 bed flats or HMO’s.
Be careful in villages – maybe 15% per ward.
Allow no more in Cliftonville until balance restored. Restrict numbers in east Cliftonville and in any particular area allow no more than 5-10%
HMO’s for students/special homes are necessary, but avoid ghettos (e.g. estate near University campus 1%)
Only allow HMO’s if targeted at students. If any built make them halls or residence style only.
Ensure all landlords licensed.
HMO’s more suited to high street locations not family residential areas.

(10.6)
Apply same considerations for these groups as for any other form of development.
Take account of older people. Suitable internal adjustments for less abled.
Consider impact on environment, amenity and local services before providing sites.
Needs of existing residents is most important factor.
Gypsy sites often do not have an adverse effect on the surrounding population.
One large location
Relevant factors include access to and impact on facilities like schools and medical care, and impact on surrounding areas.
Facilities like doctors and schools are already over capacity. Travelling communities could cause “blips” with major effect on existing communities.

(10.7)
A range of homes for older, retired and elderly people (including sheltered accommodation) which can also facilitate downsizing.
Families, young people old people with long term illness and disabilities and in particular old people, smart housing where people can live, work and be cared for in one place.
More housing for disabled people.

Halls of residence for the University (as opposed to housing students in HMO’s)
Service families (requiring differing design and facilities).
Children leaving care.
People wishing to build their own homes and students currently being exploited by private sector rents
Ex forces

(10.8)
Design and sustainability
- A good mix to suit all people and needs, in keeping with the area, well designed, contemporary high quality architecture to lift the area, environmentally sustainable.
- Mitigate the stock of empty, neglected property
- Property built in town centres should provide car parking

Need/demand
- Family and executive homes suiting work-orientated residents
- More family homes. More sheltered accommodation (bungalows)
- More start up homes and accommodation for people on lower incomes.
- Promote re-conversion of basement and ground floors of 5 storey Georgian housing stock into family units.

Needs of particular Groups
- Special consideration for elderly people and disabled people (including granny annexes).
- Need better quality homes not more 1-2 bed flats/bed sits. Resist more 1 bed flats.
- Prospective mandatory Lifetime Standards
- Recommendations of Wheelchair Accessible Housing Design Guide.
- (Kent County Council) would like to see reduction in some types of residential care provision for all social client groups and greater focus on housing options to support better outcomes for individuals. Would welcome provision of Extra Care Housing
Issue 11 – Maintaining physical separation between Thanet’s towns and villages

Qs 11.1, 11.2, 11.3

There was consensus in support of maintaining a physical separation between Thanet’s towns and villages. Strong support was given to the green wedges because they provide clear, separate identities between Margate, Broadstairs and Ramsgate, provide wildlife habitats and contribute towards the health and wellbeing of Thanet’s residents. Opportunities to maintain, enhance or create biodiversity and wildlife habitats were supported. Concern was raised regarding multifunctional uses on the wedges as this could have a detrimental impact on birds, and could end up urbanising the areas by attracting a lot of people to them. Some comments suggested that there should be no development at all in the green wedges and countryside, whilst others suggested that this may be appropriate and necessary in some instances.

Representations also included the following points:

- There should be a strategic level policy protecting these areas
- The green wedges can never be reclaimed once they are built on. They contribute towards our health and wellbeing, as closely linked towns with little green space or wildlife are considered more depressive by nature and would not attract either businesses or residents to Thanet.
- The green wedges, whilst important, must be balanced against growth as some land may need to be released for development. Boundaries should not be drawn tightly around settlement boundaries to avoid sterilising land that could be genuinely sustainable for development. To achieve this balance, it was suggested that consideration should be given to the needs of the settlement, sustainability and adequate and sensitive landscaping that would shelter development from public view.
- It was suggested that land at the edge of settlements described as countryside could have a distinct appearance and character from open fields, and could therefore offer development opportunities directly adjoining the built environment without harming the wider open character of the countryside.
- Merging development sites including natural and amenity space could form a larger block of amenity space (could be a country park). One comment suggested development near the hospital along Westwood Road as the Margate-Broadstairs Green Wedge is fairly large.
- There is a demand for allotments
- Land use should be based on character and history of the landscape
- Flora and fauna lost through development should be reinstated
- Need evidence to establish whether green wedges provide biodiversity and important foraging, roosting and breeding habitats
Issue 12 – How can we respect Thanet's important views and landscapes?

Qs 12.1, 12.2

There was consensus in support of the continued protection of Thanet’s landscapes. They were strongly supported in terms of their heritage value, biodiversity value, their contribution to the uniqueness of the district and making the district an attractive place for residents, businesses and tourists.

Representations also included the following points:

- Thanet's landscapes should be promoted more as a tourist feature to attract people to the area.
- Developments at Westwood and the new East Kent Access road have proved previous landscape designations to be of little value, and a suggestion was that future development be located in close proximity to the urban areas to minimise the effect on open areas of undisturbed open landscapes.
- Concerns were expressed regarding the protection of the urban coast against in-fill development, the impact of wind farms and solar farms on our landscapes.
- Development should be focussed towards brownfield sites and the re-use of vacant buildings to reduce the need to develop on land with landscape significance.
- Essential utility development should be allowed if the benefit outweighs the harm and no alternative sites are available.
- Independent Design Panel should advise on the design quality and appropriate location of all major development proposals.
- Views across Pegwell Bay, the Wantsum Channel and Lower stour wetlands should be protected and demand great sensitivity in planning for future development.
Issue 13 – How can we protect, maintain and enhance Thanet’s green infrastructure?

Qs 13.1, 13.2, 13.3, 13.4, 13.5, 13.6

There was consensus in support of protecting and enhancing existing areas of open space. There was strong agreement that open spaces are considered essential to the well being of Thanet’s residents, and a good clean atmosphere. Comments were made that some open spaces could be better utilised (eg play areas, facilities) and that they should not be allowed to fall into neglect.

The options for providing new green infrastructure in new developments were strongly supported – enhancement to the green wedges gained the most support, mitigation against farmland bird habitats gained the least support. Some support was given to the options for achieving a net gain in biodiversity. Planting of hedgerows gained the most support, provision of green roofs gained the least support.

There was strong support for the options to reduce the disturbance to birds at the nature conservation sites around the coast, although there was no clear consensus as to which would be the most or least effective.

Representations also included the following points:

- Other areas that could be identified as green space:
  - Cliff tops
  - Old putting green at Westgate
  - Newington infants school, Melbourne Avenue
  - Open area between Shottendane Lane and Hartsdown Road should be made into a wooded area
  - Dane Park extension – land on which transport depot is located
  - Plot of land at the top of Effingham Street
  - Culmer’s land allotments and amenity, Taddys allotments in Reading Street, Kittys Green
  - Ex hoverport site
  - Land to the rear of the former power station at Richborough
  - Weatherles Hill – area in between garage and stream looking back towards wind turbine – former railway line
  - Wildlife corridor next to Pfizer’s social club

- Green roofs need watering, they cause problems with the water table, encourage mosquitos and the costs may make them uneconomic

- Bat and bird boxes are only effective if their food sources are also preserved/enhanced. Also reliant on the individual/community to install and maintain

- The integration of SUDs should be included as a method of introducing new GI in new developments

- People need to be educated and informed, information sharing and greater general awareness about the relationship between dogs/dog walkers and birds and wildlife habitats

- Introduce a (HRA) mitigation strategy

- Need to consider protected/notable species

- Protect sports facilities and playing fields and ensure adequate future supply

- More rubbish bins needed

- Marine Conservation Zone is not mentioned
- TDC should work with partners (eg other EK planning authorities, Natural England, Kent Wildlife Trust, RSPB etc) to set up landscape scale projects to increase quantum of natural habitat throughout Kent. It is important to develop a cross boundary access and management strategy, based upon up-to-date evidence of potential recreational disturbance effects and visitor pressures (current and predicted).
- Voluntary garden groups should be encouraged (like Spencer Square Gardens)
- Warre Rec, Nethercourt and Ellington parks should be protected and retained for community use
- The local plan should:
  - Increase the number of sites for priority habitats and protected species that are given some form of protection
  - Specify actions to promote the preservation, restoration and recreation of priority habitats, and the protection and recovery of priority species populations
  - Contain specific policies that will contribute to the conservation and enhancement of species populations in the wider environment (ie outside natura 2000 sites), in order to help deliver the overall objectives of the Birds and Habitats Directive
  - Outline the legislative background to species protection and highlight developer requirements to conform to species protection provision or use planning conditions to secure protection
  - Have policies that would enable local planning authorities to secure long term maintenance of sites that were created following the granting of planning permission, either as mitigation/enhancement, or as additional new sites. Further details on the best way to do this may be appropriately located in a SPD
  - Refer to management plans for all publicly owned sites supporting priority habitats and species, working with natural England
  - Include strategic policies to deliver conservation and enhancement of the natural environment
  - Include planning policies to minimise impacts on biodiversity and geodiversity
  - Aim to minimise pollution and other adverse effects on the local and natural environment
  - Identify land where development would be inappropriate because of its environmental significance
  - Contain policies that require biodiversity to be designed into the built environment. Further details could then be included in a SPD on design that would refer back to the policy. See Appendix 2 of Exeter city Councils Residential Design SPD
  - Use planning conditions to require both extensions to existing properties and all new developments to provide sites for species that nest or roost in the built environment
  - Use the Kent Habitats Survey 2012 and the 2006 open space audit to inform a Green Infrastructure strategy that should be reflected in the local plan
  - Include ANGST standards
  - Site allocations should enhance biodiversity networks
  - Require habitat management plans through planning conditions for particular types of developments, eg renewable energy
- There should be a clear reference to the key role of the natural beauty of the area between Sandwich and Thanet
• Any means by which natural conservation and enhancement may be combined with promotion as a tourism asset should be explored
• The HRA should consider:
  o Loss of foraging habitat for golden plover
  o Disturbance to SPA species due to recreational pressure
  o Increases in nitrogen disposition as a result of expansion of Manston airport, Ramsgate port and Richborough power station
  o Changes in coastal processes from the expansion of Ramsgate port
  o Impacts of development and increased tourism in Dover and Canterbury
• A strategic farmland bird survey should be carried out on all proposed development sites and within the green wedges
• Where possible provide stepping stones of natural habitat within the urban area
• Consider an extensive country park as an alternative natural open space
Issue 14 – Adapting to, and mitigating against, the effects of climate change

Qs 14.1, 14.2, 14.3

Adapting to Climate Change

There was consensus in support of requiring new development to include water efficiency measures. Individual comments gave strong support for water re-use and water conservation.

There was no clear consensus in requiring conversions of buildings to include retrofitting measures. Whilst there was some support for this option, there was also some disagreement. Where this option was answered with disagree or neutral, there were concerns about the viability of development. A comment was made that it is much easier to build to new more efficient standards, than to convert some older properties due to the nature of their construction. Concern was expressed about retrofitting to historic buildings as it may negatively impact the buildings historic structure or setting.

There was a consensus of some support for restricting development along the coast where it may be affected by coastal erosion, with answers ranging from neutral to strong support.

There was no clear consensus for applying a local policy in relation to flood risk to expand on the requirements of the NPPF with no strong opinions either way. A suggestion was made that additional flood risk policies may disadvantage existing homeowners in Thanet and restrict further development in comparison to other coastal communities. Another comment was that development within flood risk areas would be in the wrong place anyway.

There was consensus in support of encouraging the use of SUDS in new development to manage surface water, with answers of strongly agree and agree. There was one answer of neutral and one of disagree, however reason for these choices were not provided. A concern was raised about blank looking porous surfaces because of their often unattractive appearance, and appropriate planting would be a better option. Some SUDs may impact on archaeological remains where, for example, improving areas drainage can change the moisture level in the local environment.

Representations also included the following points:

- Should consider desalination plants and solar or tidal power
- Encourage active travel
- Landscaping also provides stepping stone, wildlife corridors and new habitats and will contribute to Thanets GI
- Thanet’s water quality is poor and needs to be improved

Mitigating against climate change

There was consensus in support for requiring new development to meet a Code for Sustainable Homes level ranging from neutral to strongly agree – the majority of responses being strongly agree or agree. One supporting comment suggested that the highest code level for water should be used as Thanet is a water stressed area.
There was consensus in support of requiring new development to incorporate design principles including landscaping, layout and use of materials.

There was consensus in support of requiring new development to obtain an element of its energy from renewable or low carbon sources.

There was no clear consensus for encouraging district heating systems, with a diversity of opinion. One comment expressed concern that district heating systems have to run all the time, whereas local sources only run when they need to.

There was no clear consensus for requiring new developments to incorporate measures to reduce the use of the private car, with a diversity of opinion. A suggestion was made that cycling and walking facilities should be planned for in the initial stages of new developments to encourage them as normal methods of transport rather than recreational pastimes.

There was no clear consensus for encouraging the development of solar farms, with a diversity of opinion. A suggestion was made for solar panels to be situated on factory roofs or over car parks as this would also provide shade for cars and reduce the need to build them on farmland. Other suggestions included their development within the green wedges, and not on grade 1 agricultural land.

There was no clear consensus for encouraging other forms of renewable energy developments, with a diversity of opinion – mostly strong support but with some disagreement. Reasons for disagreement included energy developments causing loss of agricultural land, detriment to wildlife and negative impacts on our landscapes.

There was no clear consensus for allocating sites/identifying areas which would be suitable for large scale renewable energy developments, with a diversity of opinion – some support and some disagreement. Support was given for green industries in the Richborough Corridor although another comment considered that there was not enough discussion regarding the opportunities the sites present being a brownfield site, and existing connection to the National Grid. Allocating sites was considered difficult in other areas due to the uncertainty of grid point connections. It was suggested that the council should be promoting Richborough as a focus for green and renewable technologies, as a location for energy generation, working with Dover DC to ensure consistency in policies for the site and identifying it as a location for waste to energy in line with the Kent Waste local plan. Appropriate technologies were suggested as solar, biomass, waste to energy, anaerobic digestion, methane capture, reworking of the landfill and supporting infrastructure.

Representations also included the following points:

- Viability is still an issue as Thanet’s economy is fragile and may not be able to support these measures
- Tidal power should be explored
- Anaerobic digesters and combined heat and power systems could be appropriate in some locations
- Can the tunnel networks be developed for ground source heating?
- Solar panels on new housing should be standard
- Large scale schemes should be mitigated where reasonably possible
- Old hoverport site could lend itself well to a renewable project – perhaps a solar farm
- Should be an overall Green Thanet initiative
Use regional energy capacity studies to develop strategies for renewable energy deployment

Use bird sensitivity maps in defining areas suitable for renewable energy and in planning control
Issue 15 – To what extent do you agree or disagree that we should have policies in place to address the following issues?

Qs 15.1, 15.2

There was consensus in support of having policies to address the issues of pollution, contaminated land, unstable and derelict land, air quality, noise, light pollution and groundwater quality. Several comments supported the options as they are essential to the quality of life and well being of residents and visitors. A number of concerns were raised about environmental effects of Manston airport including:

- Huge, noisy low flying planes causing air and noise pollution in Ramsgate
- Planes ejecting fuel before they land causing air pollution
- Need to balance benefits with economic considerations

Representations also included the following points:

- More control needed on air pollution, e.g. Manston often has fumes emerging from Southern Waters release valve
- Stricter control of chemicals used in farming is important for ground water quality
- Ground water aquifer being polluted by airport
- Parts of Thanet contain old chalk quarries and ancient pits/wells which may cause unstable land – developers should be required to log any such discoveries and a public record should be available
- Building on unstable land above the caves at Margate and Ramsgate could cause irreparable damage to the sea caves which are designated as part of the SAC
- Ramsgate Gas Works is an example of a site suitable for a major development of quality housing, but the site is contaminated
- Development land is often unkempt and produces noxious weeds like ragwort and thistles which creates a bad impression
- Restrict the use of upward facing lights to reduce light pollution
- Light pollution has a major impact on wildlife, particularly bats
- A policy on the conservation of water resources would be appropriate as Thanet is a water stressed area
- Hoverport site could still have contamination issues
- Landscape and Visual Impact Assessments should be submitted with planning applications considering issues like light pollution, visual and landscape impacts
- Environmental issues identified in this section have an impact on biodiversity
- Local Plan should require polluters to pay for land to be cleaned up before development can take place
- Development adjacent to wastewater treatment works should only be permitted if the distance to the works is sufficient to allow adequate odour dispersion
- Rubbish is a problem as it breeds rats, pigeons and seagulls
Issue 16 – How can we provide high quality homes, development and neighbourhoods?

Q 16.1

In providing high quality homes, development and neighbourhoods:

There was consensus that the living conditions of existing and new residents is important.

There was consensus that the character and appearance of the area is important.

There was consensus that the compatibility with, and impact on, neighbouring buildings is important.

There was no clear consensus with a diversity of opinion regarding the importance of pedestrian/cyclist/vehicle movement with answers ranging from not important at all to very important.

There was consensus that the provision for disabled access is important.

There was consensus that open spaces and gaps in development are important.

There was consensus that landscaping and planting is important, although there was some disagreement.

There was no clear consensus regarding the importance of the provision of wildlife habitats and corridors with a diversity of opinions ranging from not important at all to very important. Reasons for supporting the provision of green infrastructure will create new habitat as well as providing benefits for new residents.

There was consensus regarding the importance of measures to prevent crime and disorder, although there was some disagreement. This option was supported because activities to improve communal areas would be undermined if there are insufficient measures to prevent crime and disorder.

There was no clear consensus regarding the importance of the integration of public art with polarised views. This option was supported because public art can be important in contributing to the character and identity of a place or development, although can be achieved through other forms of design and landscape referencing which would allow more flexibility. Reasons for not supporting this option included that modern art may not be respected and therefore have a negative rather than positive effect, and could have financial implications. Another view was that public art is a lower priority than factors such as good design and green spaces.

There was no clear consensus regarding the importance of the provision of clothes drying facilities and refuse disposal/dustbin storage, with a diversity of opinion.

There was consensus that it is important to incorporate sustainable drainage systems.

There was no clear consensus for the appropriate design and location of advertisements with opinions ranging from not important at all to very important. A comment was made that some advertisements do not need planning permission so
any policy should avoid excessive prescription and only address issues of amenity and public safety.

There was consensus that the size and layout of new residential accommodation is important. This was considered important because of the tension caused by cramped houses, and the negative impacts of splitting up gardens or subdividing houses. A comment was made that the UK generally builds smaller units than other European countries.

Representations also included the following points:
- Compatibility with existing buildings should not mean creating replicas – not everything from the past was lovely
- Small play areas look less oppressive if surrounded by only 2 or 3 storey town houses
- It seems better to have several small play areas on housing estates than few large ones – to avoid having lots of children congregating and ‘falling out’
- No dogs allowed on playgrounds
- One comment supported refuse storage considering it to be critical given our seagull population.

Q 16.2, 16.3

There was consensus in support of protecting areas that are of high townscape value, with responses ranging from neutral to strongly agree. Reasons for support included to attract inward migration of higher income households as well as visitors – particularly those interested in architectural heritage. One view was expressed that whilst in agreement with this option, we do already have listed buildings and conservation areas so further designations would make more hurdles to jump. One comment was made that areas could be designated as low townscape value and therefore suitable for redevelopment and regeneration.

Q 16.4

There was no clear consensus as to how the density of new housing development should be set, although the option to not set a specific density but ensure that new developments reflect the density of the surrounding area was the most strongly supported. There were concerns that high density housing in some areas is too dense, whilst it was also considered that higher density in urban areas could reduce the need to develop in the countryside. Density should be incorporated into any policy to allow higher density development where it can be demonstrated that it would not cause harm to the amenities of adjacent neighbours. Density should not be a ceiling applied to development but a guideline.

Q16.5

There was a general consensus that residential development on garden land is not appropriate because it would have a detrimental impact on the character and appearance of the area, would result in a feeling of loss of space and privacy and would involve the loss of trees or wildlife habitats. However some comments suggested that each case should be considered on its own merits as there may be instances where residential development in a large garden may be acceptable, and preferable to developing virgin Greenfield land.

Representations also included the following points:
- Greater community involvement at the outset, with developers consulting the council and local residents before outline plans are drawn up
- Adequacy of housing supply should not prohibit the delivery of otherwise genuinely sustainable development
- Utilise empty properties
- Control inappropriate disfigurement of prominent boundary walls
- Paving over front gardens lowers the environmental quality of the neighbourhood, and encourages cars to drive at higher speeds as the roads are clearer when cars are parked on paved over front gardens
- Independent Design Panel should advise on the design quality and location of all major proposals
- Suggest wording on design parameters for schools as there are financial restrictions for new buildings
- Monitor property conversions so they are not subdivided beyond 2 bed dwellings
- Build homes around small areas of green communal land
- Use good space standards to ensure there are no unpleasantly small homes
- Section should refer to Sport England’s Active Design
- The Design for Crime Prevention document should be used to ensure that all development proposals incorporate the principles for designing out crime
- The Local Plan should have regard to the Commissioners Police and Crime Plan
Issue 17 – How can we protect and enhance Thanet’s heritage assets?

Questions 17.1, 17.2, 17.3, 17.4

There was consensus in support of most of the options for protecting Thanet’s heritage assets and their settings.

There was no clear consensus for the designation of new conservation areas with polarised views ranging from not that important to very important. One comment considered conservation areas to be pointless as cheap plastic windows have been allowed. It was also considered that there is insufficient enforcement of inappropriate development in conservation areas.

There was no clear consensus on the use of Article 4 Direction in Conservation areas to restrict permitted development, with polarised views ranging from not that important to very important.

There was consensus in support of the protection and enhancement of listed buildings. However there was concern that current policies may make listed buildings unattractive to purchasers and also that the high number in Thanet is preventing economic development.

There was some support for taking a proactive approach to heritage at risk, with some disagreement.

There was no clear consensus with polarised views as to whether the NPPF provides sufficient policy and guidance for determining applications in relation to heritage assets.

There was consensus in support of a local list, although there was one disagreement expressing concern that too much policy protection is pointless unless the resources are there to enable proactive improvement. A suggestion was made that the local list should include all categories of heritage assets such as buildings, archaeological sites, parks and gardens and elements in the historic or urban landscape.

There was consensus in strong support of a policy relating to renewable energy and the historic environment, and also for site specific policies for significant heritage assets with development potential.

Representations also included the following points:

- Historic environment can hold meanings and memories for a community that go beyond the architectural, archaeological or historic importance of designated assets. Refers to English Heritage checklist for heritage-led regeneration.
- All of Thanet’s heritage assets must be protected for their contribution towards tourism
- Cliftonville baths/lido should be carefully monitored
- Preservation is not appropriate. We should conserve and enhance and be creative rather than reactive
- There are conflicts between what is of historical importance and adapting buildings for people with mobility problems
• Should ensure higher priority allocation of resources – there are a number of heritage groups who can be called on for support but need a professional co-ordinator
• Essential utility development should be permitted if the benefit of the development outweighs the harm
• Include a 5 point plan: Protect-Preserve-Restore-Enhance-Develop
• Better lighting and proper in date signage
• Avoid pastiche – a copy is never as good as the original
• Should consider heritage assets in close proximity to Thanet's borders – Sandwich is 'The most complete Medieval Town in England' and has a heritage offer which could compliment the 18th, 19th and 20th century development of the Thanet coastal towns 'Kents coast through the ages'.
• St Lawrence should be protected and established as a Heritage Area
• Support the recognition that viable uses must be found for heritage assets
Thanet Local Plan Issues and Options Consultation
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Issue 18 – How should we plan for community facilities?

Questions 18.1, 18.2, 18.3

There was no clear consensus for the options in this question, although there was some support for all three options. Whilst there was some support for community facilities and the benefits they can bring to a community, there was concern that unused, inadequate or poor standard facilities should not be retained.

Responses to whether there is a need for any particular community facilities not currently or adequately provided for included:

- Better facilities for the elderly/infirm
- Lacking facilities at Northdown Park Estate
- Lacking facilities at Newington
- Youth clubs in Ramsgate
- Thanet CAB needs to operate from more locations
- Fenced dog areas
- Lacking community centre in Broadstairs and St Peters

Representations also included the following points:

- S106 agreements could be used to provide community facilities for large scale developments
- Design and scale of community facilities should attract use by not only the local community but appeal to the wider visitor economy
- It is the service that should be assessed – not the land and buildings they are provided on – service may be provided in other accommodation if a building closes
- Public Rights of Way should be protected or enhanced
- Plan should provide sufficient protection to ensure continued theatre use
- Need to ensure planned approach to the provision of facilities and opportunities for sport and recreation
- Warre Rec, Nethercourt and Ellington parks should be retained for community use
- Ensure Thanet's community has access to good quality social and health services
- Broaden and improve the range of active leisure facilities to encourage greater participation within the local community
- Redevelopment of the Jentex site would provide a care home and additional local facilities including potentially a doctor’s surgery/pharmacy and small convenience store, which are currently lacking in Cliffsend.
ISSUE: How can we enable an efficient and effective transport system?

Q 19.1

This question asks for views about the importance of seven specific factors in enabling an efficient and effective transport system. Responses showed considerable consensus that all factors were important as illustrated below. While some respondents disagreed none of the respondents were “neutral” about the options.

a) Reducing the need to travel (especially by car) to access the facilities we need day to day. 86% agreed/strongly agreed.

b) Encourage more people to walk, cycle or use public transport. 94% agreed/strongly agreed.

c) Making better use of High Speed 1 rail link. 71% agreed/strongly agreed.

d) Dealing with any pinch points in the transport network. 96% agreed/strongly agreed.

e) Improving through-traffic flows at Westwood and facilitating convenient and safe movement within the area. 94% agreed/strongly agreed.

f) The level and location of public car parking needed in the town centres. 88% agreed/strongly agreed.

 g) Addressing the deficiencies in the transport system to deal with existing problems or accommodate future growth. 90% agreed/strongly agreed.

Comments included support for the need to improve public transport, increase cycling, and walking, pedestrian priority and to reduce dependency on car use. Reasons featured reducing pollution/emissions, noise and pressure on infrastructure, improving health and road safety, and protecting habitat and Thanet’s green image. Concern was raised that cycling is dangerous in some roads where cycle paths have not been provided. Views included the merits of locating development where well linked to services but also the need to accept people, including older people and people living in rural areas will always still need to use cars for some trips.

In respect of buses, comments included the need to provide more frequent services to certain destinations, a more flexible ticketing system the need to widen the area covered by the Loop service and to update/provide services in rural areas including Cliffsend.

Westwood generated comment including the need to improve/manage/overhaul traffic and concerns about access by emergency vehicles. Views included support for widening Poorhole Lane and concern that an increasing number of pedestrian crossings are negating the benefit of the relief road. However one response noted that traffic flows at Westwood are no worse than in most other town centres in the SE and considered the main priority is for better signage.

Comments regarding rail services included that Parkway should be supported, that it would be a “disaster”, that the expense of a new station such as the Parkway project is unnecessary, and that HS1 rail link should be improved at Ramsgate station.
Car parking also featured in comments including that town centre ones should be free for Thanet’s residents and workers/everyone to encourage visitors and give a level playing field alongside Westwood and that they should be better signposted. Concern was raised about adequacy of parking and potential impact of this on Dreamland/Tesco. Comments also proposed that improved parking is unnecessary in favour of other forms of travel and that unattractive car parks be redeveloped for leisure/residential.

**Q 19.2**

Comments suggesting measures to help deal with issues in question 19.1 were wide ranging. They included:

- Sorting out traffic problems at Westwood, including considering underpasses to improve traffic flow, providing signage to divert traffic to Broadstairs via Ramsgate instead of via Westwood and providing a park and ride to Westwood.

- Promoting cycling and walking as safe and normal activities by designing them in at an early stage in all developments, training & education, integrated timetables, pay as you go ticketing, penalising motorists more heavily to fund walking, cycling and better public transport and introducing discount schemes for public transport travel.

- Facilitating pedestrian movement including footpaths where missing (e.g. rural areas), and considering pedestrianising Marine Parade and Margate High Street.

- Facilitating cycling through providing more dedicated cycle paths, negotiating/securing improvements to dangerous parts of Viking trail, widening other hazardous pinch points and providing secure cycle storage in towns.

- Improving bus services through bigger buses, increased services to villages, a limited stop direct service Margate/Westwood/Ramsgate and increasing the frequency of the Loop service in the evenings.

- Addressing parking issues including considering providing car and cycle parking at leisure/tourism facilities, addressing disparity in parking charges in town centres and free space at Westwood, reducing town centre parking fees and introducing modestly charged permits for residents to park on street or in town centre car parks.

- Addressing train issues including balanced consideration of a station linking easily to high speed services and operators consulting users.

- Addressing traffic issues including a new road by-pass for St Peter's, widening of Nash lane to allow traffic from Westwood to avoid Margate town centre, extending a 20mph limit to all residential roads and considering 40mph limit on many rural lanes.

**Q 19.3**

This question asks for any further comments in relation to how we can deliver an efficient and effective transport system. Comments were wide ranging and embrace a range of travel modes. Responses mostly reflect the need to move towards more sustainable means of travel, and include a wide range of suggestions about measures that will assist this including improvements to public transport services. Some of these relate to activities of service providers and charging policies. Representations also include emphasising the important need to take account of the effect of future development on the capacity of the strategic road network and
references to the Thanet Parkway Project, including that the project should be supported and alternatively that it is unsustainable/not needed and that it’s funding could be better deployed to improve local transport.

Representations also included the following points:

- Support emphasis on walking, cycling and public transport. Promotion and awareness of these reduces pressure on infrastructure, improves health, reduces carbon emissions and enhances the area's Green image.
- Plan transport (including walking (pedestrian priority) and cycling alongside vehicles and road links) into initial stages before development.
- Focus development at sites with best possible links to services (reduces need to travel).
- Need to thoroughly assess potential impact of Local Plan options (in combination with those of adjoining districts) on the Strategic Road network. Of primary concern to the Highways Agency is impact on the M2/A2 (principally between M2, Jn 7, Brenley Corner and A2/A256 corridor).
- The scale of growth aspired to by the airport is likely to impact significantly and the Strategic Road Network. Evidence will be needed to assess the resultant level of impact and appropriate mitigation.
- Impact on the strategic road network needs to be monitored against evidence about the level, form, location and timing and acceptable transport impacts. This should include delivery and funding of necessary transport infrastructure.
- Need emphasis on making personal transport more efficient rather than improving bottlenecks.
- Reduce dependency on cars (reasons of pollution, safer roads, less noise and impact on wildlife). Any road improvements should not result in loss of trees or hedgerows unless replaced.
- Doubt people across any age group will give up their cars.
- Need to accommodate needs of people who use car when necessary e.g. people in rural areas and Thanet's many elderly residents who can't walk or cycle.
- An efficient and effective transport system must include Birchington and the villages and evening/week end transport to avoid isolation for older residents.
- Reduce traffic speeds to reduce accidents, traffic at pinch points and pollution.

Westwood

- As priority sort out traffic issues at Westwood Cross. Developer’s (not ratepayer) should pay.
- Whole road network round Westwood needs overhauling and less roundabouts. Proposed widening of Poorhole Lane is good idea but will not alleviate the other side of Westwood Roundabout.
- Westwood traffic flows are no worse than in most town centres in the south east. Main priority is for better signage so visitors to Broadstairs are not directed through it.
- Other suggestions include Park & Ride to Westwood Cross, possible underpasses at Westwood, Westwood as possible location for a railway station linking to HS1, turn Westwood Cross roundabout into light controlled box junction, widen Nash Lane to allow traffic from Westwood to avoid Margate Town centre, consider redesign for Pearce Signs roundabout, remodelling the Sainsbury's area, improve walking routes for and centralized parking for Westwood.
Cycle
- Cycling is deterred by roads being too dangerous. Cycle paths do not cover the dangerous routes. Priority should be to complete and make safe cycle routes between secondary schools, settlements and from settlement to settlement (possibly as a dual use of walking routes).
- Need safe cycle lanes especially around Westwood Cross and secure cycle storage including safe lock bars.

Bus
- Buses are alright. Some routes/services/frequencies including rural are inadequate. Expand Loop route to areas not currently covered and extend its frequency in evenings and extend.
- Need bigger buses, better signage of stops and some re routing.
- Need more bus services to villages
- Limited stop direct bus services Margate/Westwood/Ramsgate
- Consider a “Sprinter shuttle” service for the coastal towns including Herne Bay & Whitstable.
- Increase frequency of bus service between Ramsgate and Canterbury
- Need a joined up bus transport service (e.g. going to Cliftonville)
- Need cheaper bus fares with tickets covering all routes.

Parkway & Rail
- (KCC) Welcome mention of Thanet parkway as an intervention to promote Economic Infrastructure Assets and enable efficient and effective transport system. It should be made clear that TDC are fully supportive of the Parkway project and provide some commitment to it.
- A parkway station would not be sustainable as it will perpetuate car usage and create new car parks in green fields. Improved efficiency of the seven existing stations could provide better connections to HS1 and provide rapid communication across Thanet. Cost of Parkway could, if spent on Thanet’s existing infrastructure, result in considerable improvements.
- Oppose Parkway station.
- Build a rail station at Manston in next 3 years.
- High Speed 1 will help regeneration of Thanet more than anything else.
- HS1 rail link should be improved at Ramsgate station. There is no need for the expense of another station such as Parkway. Parkway station would be a disaster under all options.
- Time spent between trains in Ramsgate is a disincentive for visitors.
- Reduce price of train travel to help increase visitors and reduce car use.
- Improve rail speed (HS1 and in general), reduce the cost and clean up the train stations.

Walking
- Consider people first before vehicles and sharing of road space.
- Pavement and bus stop parking results in large vehicles hampering pedestrian passage.
- Protect & enhance public rights of way and access as valuable green infrastructure.

Cars and Parking
- Parking is a major problem. Turner Contemporary and shoppers both need parking. Tesco/Dreamland won’t help.
• Street parking levy could help fund more facilities / stop charging for on street parking / make town centre roads modestly charged residents parking including fee use of car parks for residents.
• Town centre car parks should be free to all/Thanet residents and workers to compete with Westwood/encourage visitors.
• Consider residents only parking on one (periodically rotating) side of selected streets.
• Consider annual permits for on street and free access to all Thanet's car parks.
• Not necessary to improve parking as people should walk, cycle or use public transport.
• Need to signpost car parks and have more regard to traffic management at Westwood.
• Reduce car dependency for day to day shopping. Car parks are not attractive and could be used for leisure/residential development to take pressure off greenfield land.
• Need to address disparity in charge free parking in town centres; Westwood
• Rationalise glut of parking at Ramsgate harbour.
• Rigorous enforcement of parking restrictions to deter use of cars to supermarkets.
• Consider providing drop off/pick up points at supermarkets for taxis.
• Address parking for schools.

Various other suggestions supplied including:
- Higher penalisation of motorists to fund promoting cycling, walking facilities and public transport.
- Make non car travel free (subsidised through council tax)
- Integrated public transport timetables and pay as you go travel card / residents discount schemes for round the Isle public transport.
- Consider car and cycle parking facilities to leisure and tourism facilities.
- Extend 20mph schemes to all residential areas and consider 40mph for rural lanes.
- Ideally pedestrianise Margate’s Marine Parade and High St.
- Provide footpaths to improve pedestrian safety (e.g. at rural areas like Haine Rd).
- Several crossings should be replaced with underpasses or footbridges.
- Rural public transport needs improvement - but difficult to see how. / Need for improved transport services to Cliffsend
- Road network does not seem large enough or scalable to extend future development.
- Make town centre parking free and accessible.
- Widen the roads especially at Westwood and remove lights from Marine Drive.
- Improvements to the road network will attract more motorists.
- Improved regional and international transport links to and from Thanet and East Kent are important for development of Discovery Park and the visitor economy of this area.
- Infrastructure must not be pursued at the cost of the rich natural heritage assets which are a key attractor for tourism and inward investment. Urge further improvements to road network through and around Westwood Cross before any further development in that area.

Some responses to this question identify particular projects/schemes:
“Manston Green” proposals incorporating strategic highway improvements to A256 corridor and multi modal interchange comprising Parkway Station and Park & Ride facility. Merits described include infrastructure supporting Airport’s growth aspirations, relieving traffic along Haine Road, allowing use of its southern section for bus service, local traffic and a pedestrian link, delivering improvements to the A256 between Lord of the Manor and Stirling Way, to Lord of Manor roundabout, to Manston Rd roundabout, providing new access to Manston Airport and relieving Manston village of heavy traffic.

Detailed suggestion of the concept of a new clearway from north St Peters and Cliftonville through to the A28 on Margate side of St Nicholas Roundabout and potentially passing thorough new road system now under construction at Westwood ) to be identified, built into the plan and protected to enable implementation over a feasible period .

By-pass round St Peters,
Closure to traffic on Broadstairs High Street
Q 20

This question asked for any further comments. The main issues and comments are summarised below by subject area.

Housing

- Replace unsuitable housing (e.g., old guest houses) and replace with modern buildings
- Compulsory purchase derelict properties to bring back into housing use
- Housing estates and countryside do not mix well. Initiatives to shrink demand for housing could include:
  - Financial incentives for single occupiers of large homes to move to smaller ones
  - Extra council tax for owners of second homes
  - CPO houses left empty after 6 months
  - Encourage residential above shops
- East SHMA provided a sound basis for illustrating general local requirements (supplemented by key demographic/economic modelling, options testing and interpretation). It is recognised that as this document ages and national practice is clarified that the primary reliance must be on bespoke economic end (especially) demographic information. This would seem to be appreciated, and we look forward to seeing further information and analysis exploring the way forward in further detail. It should be noted that robust new information will become available through additional analysis of Census data that is underway for the national demographic resources available to strategic planners
- Note the relative lack of national and international environmental designations (e.g., AONB, SSSI, flood zones etc) applicable to inland Thanet, compared to other east Kent districts. Also, whilst a range of options are presented in Table 6 (dwelling scenarios) the central three are all 'economic' based linked with how many thousand jobs will be created. Historically this has been a standard approach however in future job-based development targets may not be considered sound if found to be unduly aspirational and insufficiently deliverable (also aggregate job numbers may not relate well to service led economic growth e.g., lower wage part time work in the retail and tourism industries). Does Thanet have local demographic-led evidence available to further calibrate its options? Internal migration assumptions are pivotal to projections in Kent, how does the 10 year trend compare with 5 (PAS recognise the issue of trend timescales)? What are the specific labour supply implications i.e., working age population changes with different options? We can confirm that due to the characteristics of Shepway (majority of land in flood zone 3, extensive AONB, extent of demographic change) the sound Core Strategy housing policy does not meet a level whereby it fully maintains the working age population to 2026; thus arguably rendering any employment expansion targets largely academic. The need for increased housing growth in east Kent is recognised in the Shepway Core Strategy and if the emerging Thanet Plan continues to tackle this head on, the important contribution Thanet can make to sustainable development in the sub-region is supported.
- Land at Red House Farm should be re-allocated for residential development
- Hopeville Farm – development could provide a range of housing, additional open space and a softer wooded edge to the urban area which would enhance the Green Wedge
- Must be adequate land for access roads for new development projects
• Unfenced area at Palm Bay Avenue could potentially lead to unwelcome roaming travellers

Economy
• Too many blighted areas – projects like Dreamland and Ramsgate Sands need to be seen through to a successful conclusion, and Ramsgate tunnels and motor museum supported
• Art and culture must be encouraged and supported
• Local Plan should seek to manage specific population and economic issues such as cared for children, asylum seekers and other vulnerable groups, and how to support skills and training
• Development of the airport is crucial but need improved train and bus services
• A conference centre could bring a lot of revenue both in hotel and leisure facilities
• Ferry port should be taken over as a marina development site with high quality build community dwellings to support marina
• Airport is a total failure – we have lost jobs due to it proximity and location and it prevents any high class quality development in the towns
• Welcome the positive approach in supporting CCCUs presence in Broadstairs
• Thanet needs to be more effective in promoting its tourism opportunities
• In terms of the level of housing and employment development you will be aware that as part of Dover District Council's Land Allocations Local Plan (which is due to be submitted to the Planning Inspectorate for Examination in early August) we have revised our economic forecasting. We would, therefore, like to be assured and demonstrated by evidence that the level of growth that has been proposed will not undermine Dover District's Adopted Core Strategy. Until this has been demonstrated it is difficult at this stage to provide any further comments.

Retail/Town Centres
• It is recognised Thanet has properly commissioned specific research in this respect; this need careful application. In the absence of any regional plan, it behoves LPAs to adopt a reasonable approach to retail and commercial development. It would not be considered consistent with national policy and the spirit of cooperation for undue retail growth (wherever it is located) to risk 'cannibalising' town centres in the sub-region at a time of intense retail competition. As accepted nationally, the sensitivity of retail need projections to turnover, efficiency and expenditure assumptions (with the latter itself fluctuating substantially with macroeconomic conditions) means it is unlikely to be robust to rely on long-term floorspace growth predictions in this sector; especially with the on-line revolution. It is noted that over a more realistic time period, Thanet's need is low. An up-to-date evidence base is central to how much retail growth is justifiable and should be maintained, both with respect to economic changes and the decisions taken by Thanet on residential growth.
• In terms of retail, in particular the additional floorspace at Westwood, Dover District Council does not raise any objections but, again, would need to be assured that the expansion would not undermine the centres in Dover.

Countryside/GI etc
• Restrict development on agricultural land
• Sport England has web based toolkit to assist in delivering tailor made approaches to strategic planning for sport
Loss of public golf courses at Hartsdown Park and Palm bay Avenue has left both areas with little leisure activity

**Design/Heritage**
- ‘Heritage’ should be promoted to ‘Economy’
- Keep lovely old buildings and maintain the uniqueness of Thanet’s history
- Buildings should be quality, not cheap dwelling sheds

**Renewable Energy**
- Planning policy and decision making have an important role in the wider deployment of renewable energy and therefore contributing to the following benefits which should be recognised in the plan:
  - Reaching the UK’s renewable energy generation targets
  - Ensuring the security of energy supply
  - Stabilising energy process to the customer and reducing fossil fuel dependence and
  - Job creation and other local benefits
- Plan should refer to DCLG Planning Practice Guidance for Renewable and Low Carbon Energy as the latest and current guidance
- Should be a policy on wind energy – there is an urgent need for a significant expansion of onshore wind
- There is a drive for renewable energy – everyone wants to use it but nobody wants it in their back yard

**Community Facilities**
- No mention of effect of increase in population eg extra burdens on hospitals, gp surgeries, dentists etc
- Shortage of primary schools – this will mean children being transported across the island to their schools which will create additional traffic, emissions and pollution

**Other**
- Consideration should be given to including some content devoted to the cross LPA border context in order to fully reflect the Duty to Cooperate
- As with other areas of sub-regional interest, Shepway looks forward to further joint working, local cooperation, shared communication and the chance to discuss these issues and to input to the Local Plan as it takes forward all the matters explained and identified in the Issues & Options paper, and as a sound draft plan is prepared. These includes close cooperation on matters such the introduction of CIL Charging Schedules in Kent, and other topics such as transport, community/social infrastructure, coastal planning /Habitats Regulations (including best practice for assessing and dealing with recreational impacts and site management)
- Appears well prepared, comprehensive and particularly well written in introducing salient topics and associated information
- Appears to be far more realistic and less overly ambitious than some others and has a chance of meeting or exceeding its objectives over its lifetime. It should encourage investors and provide a certain amount of reassurance that development will be properly controlled, appropriate and sustainable.
- The plan must be fully integrated with all of the other plans policies and procedures issued by the council
A. The Vision

There was no clear consensus regarding the vision as a whole. Whilst a number of responses supported the vision as positive and achievable, there were also comments that it is insufficiently optimistic and also contrasting views that it is over optimistic and unrealistic.

There was strong support for the focus on tourism, culture and heritage and the coastal town centres, but also a need to provide a range of employment opportunities and further emphasis on the green economy.

There was no clear consensus in relation to the role of the airport or the port with some support for them as successful economic assets, but some disagreement.

In relation to Westwood there was no clear consensus, with some supporting the vision’s statement and some disagreeing with it. Those that disagreed with it raised concern regarding traffic and the impact on the coastal towns.

There was some support for the need for new housing. Some commented that the vision needs to further emphasise providing the level of housing needed to accommodate predicted levels of in-migration and population growth, whilst others raised concern with large amounts of housing. There was some concern regarding the capacity of local services and infrastructure, including roads, schools, water and health. There was some concern that the need to provide affordable housing is not referred to in the vision.

There was strong support for the protection of the countryside between the three towns and some concern about loss of countryside generally. Some comments suggested the vision needs more emphasis in relation to protecting our green spaces and enhancing biodiversity.

B. Strategic Priorities

There was some support for strategic priority 1 (economy). Some considered it to be the most important priority, but there was no clear consensus. No comments specifically disagreed with the priority.

There was no clear consensus in relation to priority 2 (town centres). The main area of disagreement was in relation to Westwood with some suggestion that it should not be included as a priority and concern that the consolidation of Westwood would be harmful to the coastal towns. However there was some specific support for the proposals for Westwood. There was general consensus in support regarding the need to regenerate the coastal town centres.

There was no clear consensus in relation to priority 3 (housing). No comments specifically disagreed with the priority. Comments included the need to provide sufficient affordable homes, to create communities, locate development in sustainable locations and to concentrate on larger family houses rather than flats.

There was clear consensus in support of priority 4 (environment). Some concern was raised about how this could be achieved in balance with meeting the other priorities.

There was clear consensus in support of priority 5 (transport). Comments included the need to provide for all sustainable modes of transport and not just road
infrastructure. There was clear consensus that infrastructure must be in place before development.

The following specific issues were identified as being missing from the strategic priorities:

- Culture
- Nationally and internationally protected wildlife sites around the coast, biodiversity opportunity areas, farmland birds
- Discovery Park and Manston Business Park
- Climate change and renewable energy
- Other infrastructure
- Farming

C. Objectives

There was some consensus in support of the objectives as a whole. However, concerns were raised that there are too many objectives, and about how they will be monitored and delivered. There was also some concern raised that some of the objectives conflict with each other.

*Strengthen and diversify the local economy*

A number of comments support the need to reduce rail journey times to London, however there were wide range in views regarding how this could be achieved. There was no clear consensus in relation to the airport, with some concern that growth will not happen and that it would be harmful for Thanet and others supporting growth at the airport.

A few commented that the economic strategy should not just concentrate on tourism; however there was no clear consensus here.

*Regeneration of the coastal town centres and consolidation of Westwood*

There was no clear consensus regarding the development of Westwood, with a diversity of views from those fully supporting the objective to enable Westwood to consolidate and evolve as a sustainable residential and business community, and others that disagreed with any further development. There was some consensus in support of the objectives relating to the coastal towns.

*Housing*

There was no clear consensus regarding the need to provide housing. There was some support for fully meeting all needs for housing, with others raising concern regarding infrastructure capacity and loss of agricultural land/open space.

There were wide ranging views in terms of affordable housing, with some considering there already sufficient affordable housing and other stating more in needed and the need should be fully met.

*Environment and Quality of Life*

Wide ranging individual comments were received in relation to these objectives, including the need to strengthen the biodiversity objective, supporting the need to maintain a physical separation between the towns and protection of green and open
space, as well as the need to refer to archaeological sites, which are significant in Thanet.

Transport and Infrastructure

Wide ranging individual comments were received in relation to these objectives, with no clear consensus on a particular view, although no comments specifically disagreed with any of the objectives.