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**BY EMAIL ONLY**

**Growth, Environment & Transport**

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30 August 2016

Dear Iain

**Re: Stone Hill Park – Former Manston Airport Site, Manston Road, Ramsgate (OL/TH/16/0550)**

Thank you for inviting Kent County Council (KCC) to comment on the hybrid planning application received for the comprehensive redevelopment of the former Manston Airport site comprising the following:

- Full planning permission - sought for the change of use of retained existing buildings and the development of Phase 1 including four industrial units with ancillary car parking and associated infrastructure; and
- Outline planning permission - sought for the provision of up to 2,500 residential units, 85,000 sq. m of employment floorspace, a new local centre, two primary schools and other non-residential institutions, open space, car parking and associated infrastructure.

The County Council **strongly supports** the proposed redevelopment of the Manston Airport site led by Stone Hill Park Ltd. The proposals represent a unique opportunity to transform the vacant site at Manston and make a significant contribution to the delivery of homes and jobs in the Thanet District and the wider prosperity of the East Kent sub region. KCC notes that the objectively assessed housing need for the Thanet District has increased from 12,000 to 15,600 homes (to 2031) and therefore additional deliverable housing sites will need to be allocated to meet the shortfall.

KCC has historically provided unequivocal support to the owners of the site following their acquisition of Discovery Park, Sandwich from Pfizer in 2012 and the economic and social success of this venture is well documented. The mixed use development proposed at Manston will complement the commercial offer provided at Sandwich. As a provider of key strategic infrastructure in Kent, the County Council will continue to proactively engage with the applicants and their consultants to ensure the overall

viability and deliverability of an outstanding scheme which will leave a legacy for East Kent<sup>1</sup>.

KCC Officers have actively and constructively engaged with the applicant and the consultant team as part of a series of ongoing pre-application discussions. Following the submission of the planning application and statutory consultation period, Officers of the County Council have taken the opportunity to provide an update on a number of technical matters as set out below. As the preparation of the scheme evolves and various supporting assessments and studies are completed, there will be a need for the County Council to update its position in autumn 2016.

## **Highways and Transportation**

In accordance with KCC's response to the associated EIA scope, the creation of a strategic level transport model to assess the key routes within the surrounding highway network is necessary to support an application of this scale. Therefore, the level of assessment provided to date (using manual spreadsheet assignment model) is insufficient to comprehensively appraise the impact of this development. In view of this issue, at this stage the outputs and mitigation identified within the current Transport Assessment (TA) document cannot be assessed with an appropriate level of confidence.

As outlined within the TA, work is currently underway by the applicant on the above transport modelling and the highway authority are engaged in the associated scoping, assessment and validation process in relation to this. It is necessary for the highway authority to reserve its position in relation to any potential mitigation package (including public transport strategy and other transport related matters) until this process has been completed.

The TA makes reference to the emerging local plan and its accompanying Transport Strategy (TS). The TS is currently in draft form. Any future external mitigation strategy for this development site should reflect the longer term requirements of the TS. Whilst the internal parameter plans for the development are well thought out and have the potential to align with the TS, but the outputs of the pending strategic model will be key in making informed decisions in relation to these development proposals going forward and how they feed into this process.

The site is located in close proximity to the primary road network to the south, which provides good quality road links to the wider highway network in that vicinity. However the highway network to the north consists of lower quality local rural routes, without dedicated pedestrian or cycle infrastructure. Page 27 of the TA illustrates the distribution of local amenities and services, it is evident that the existing site is relatively remote and is not currently well linked to Westwood by both vehicular and pedestrian/cycle means.

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<sup>1</sup> In March 2015, Kent County Council published a position statement on Manston Airport documenting the consistent strong support which the Authority has given to various investors in a commercial aviation operation. However, the economic reality is that during 16 years of private ownership, the airport incurred significant losses by a series of operators. The statement sets out KCC's view on alternative options for the site with the ultimate aspiration of supporting the economy of East Kent through inward investment and the creation of a significant number of new jobs.

The Highway Authority has some initial queries in relation to the way in which traffic has been assigned to the local highway network within the spreadsheet model. Some of the baseline trip and distribution methodology will need to be agreed prior to the completion of the strategic model, for which technical discussions will need to take place in due course.

The proposed development is of significant scale and will generate additional job-related and residential-related trips. Therefore, it is considered that a proportionate financial contribution towards the provision of required highways and transportation infrastructure may be appropriate.

In summary, KCC considers that the current level of transport assessment does not provide sufficient detail with which to make an informed decision in relation to highway and transportation matters and would welcome further discussions in relation to the above.

### Thanet Parkway Railway Station

The site is located some distance from the existing principal railway station in Ramsgate and the other stations at Birchington-on-Sea and Minster which are served by very limited rail services. Whilst these stations could be accessed with an enhancement to existing or new bus services, they are outside of reasonable reach by either walking or cycling. Car parking provision at these stations is extremely limited, and journey times to and from them using local routes are typically unreliable in peak times; as such, the scope for modal shift is clearly reduced.

The strategy for enabling sustainable transport in this part of Thanet since the publication of KCC's strategic transport planning documents<sup>2</sup>, is for the creation of a new Parkway Station in Cliffsend which would significantly enhance accessibility to sustainable means of transport. Such access to sustainable transport is a key component in realising sustainable development as a whole in line with national planning policy. The principle of a new railway station is supported by TDC, and the emerging Thanet Local Plan to 2031 safeguards land at the preferred location west of Cliffsend (Policy SP39).

The Thanet Parkway Railway Station is also a key feature of the South East Local Enterprise Partnership (SELEP) Strategic Economic Plan and has been previously allocated a contribution of £10 million from the Local Growth Fund subject to approval of a Full Business Case by the SELEP Accountability Board. KCC has committed its own capital funds for the design work and will be submitting a planning application for the new station in due course.

The proposed development is of significant scale and will generate additional job-related and residential-related trips. This demand will in part be met by the Thanet Parkway Railway Station.

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<sup>2</sup> KCC's Transport Delivery Plan 'Growth without Gridlock' in 2010, 'Local Transport Plan for Kent (2011-2016)' and the current 'Consultation Draft Local Transport Plan 4: Delivering Growth without Gridlock (2016-2031).

As the proposed development progresses and particular demand placed on the project is identified, it can be considered that a proportionate financial contribution towards the construction of the Thanet Parkway Railway Station will be appropriate.

### Public Rights of Way

KCC considers that the proposed development will directly impact Public Bridleways TR8, TR9 and TR10.

The local area has a very limited Public Rights of Way network available to residents. With regard to connectivity associated with the wider Rights of Way network and the existence of historic route alignments, the County Council welcomes the proposed reconnection of the historic network, as set out in the current Masterplan and draft s106 document. The proposed development will provide greater provision of walking and cycling routes and opportunities for active recreation.

In establishing sustainable access choice, it is recommended that improved facilities for walking and cycling are provided from the site to the destinations of Ramsgate Railway Station, the Marlowe Academy and the proposed Thanet Parkway Railway Station. Such improvements include those to footways on Canterbury Road West and surfacing of Public Bridleway TR10.

The County Council has actively engaged with the applicant in reviewing requests in relation to the requirements to provide for walking and cycling, as well as other active recreation, and such requests are detailed in the draft s106 document submitted as part of this application.

### **Provision and Delivery of County Council Community Services**

KCC has assessed the implications of this proposal in terms of the delivery of its Education and Community Services (i.e. Libraries, Youth, Community Learning and Social Care) and is of the opinion that the proposed development will have an additional impact on the delivery of its services, which will require mitigation either through the direct provision of infrastructure or the payment of an appropriate financial contribution.

### Primary Education

The proposed development is forecast to give rise to 700 additional primary pupils which cannot be accommodated within existing or currently proposed capacity in local schools. To mitigate the increased demand from the proposed development, the provision of two new primary schools, each providing two forms of entry (420 places) is required.

KCC requests **£6 million** towards the construction of each new primary school, as well as the provision of land for each school, at nil cost to the County Council. **A total financial contribution of £12 million will be required for primary education provision** and should be recovered through the associated planning obligation. This

is costed at current prices and will need an appropriate uplift to reflect sector inflation between now and the point of commissioning the schools.

A copy of the County Council's General Site Transfer Requirements and education assessment is appended to this letter.

### Secondary Education

The proposed development is forecast to generate 500 additional secondary pupils, these cannot be accommodated within existing capacity in the area. To mitigate the additional impact, the County Council proposes the provision of additional places in a new secondary school in the Thanet District. It is requested that the cost of this additional capacity, at **£25,458 per pupil** is incorporated within a planning obligation.

The number of pupils generated and resulting total contribution required will be dependent on the final housing mix; based on the current 500 pupil forecast a total contribution of **£12.7 million** is requested. This is costed at current prices and will need an appropriate uplift to reflect sector inflation between now and the point of commissioning the schools.

### Community Services

The County Council notes that a community facility is included within the wider development proposal. In order for KCC to fulfil its statutory obligations and provide the new community with access to County services, the County Council requests that provision within the proposed community building is made for the on-site delivery of community learning, adult social care, youth services and library services.

To meet demand and deliver the range of services required, it is recommended that the proposed community facility includes at least the following: a 50m<sup>2</sup> classroom, small hall, kitchen, storage space for class equipment, sufficient toilet facilities for classes of 30, a changing place facility, automatic doors and full Disability Discrimination Act 1995 compliance for access by service users in wheelchairs. In addition, KCC also requests 35 hours use of part of the facility per week with no rent charged.

Additionally, the delivery of a range of services from the community facility will require necessary capital equipment (including IT equipment). **The associated cost of this is £177,000** which KCC requests should form part of any resulting planning obligation.

### Adult Social Care

It is noted that the application proposes up to 250 age-restricted dwellings. The County Council welcomes the principle of the proposed development incorporating an element of age-restricted housing and confirms that there is need for such provision in the local area. The tenure type and level of support provided to residents will be an important factor in ensuring that the broad proposals for age-restricted dwellings meet the specific needs of the local area. Therefore, KCC recommends the provision of an older persons' care home of a minimum 60 beds in the area, as well

as supported accommodation for people with learning disabilities or mental health needs in 16 self-contained flats.

It is also requested that 50 wheelchair accessible homes are provided as part of the affordable housing element within the proposed development with nomination rights given in consultation with KCC Social Care.

### **Heritage Conservation**

Investigations including those undertaken in 2010 on the adjacent East Kent Access Road indicate the rich archaeological resource present in Thanet District with remains of prehistoric, Roman, Anglo-Saxon and medieval date likely to be present at the proposed development site.

The County Council notes comments provided by Historic England dated 29 June 2016 and supports its view that the cultural heritage assessments undertaken are incomplete and do not adequately set out the significance of the heritage assets and buried archaeology that will be affected by the development proposal. Therefore, it is recommended that further work is undertaken to robustly analyse the background and data model for the proposed development site in order to understand its archaeological potential.

KCC also concurs with Historic England's view that more consideration should be given to the historic layout of the former airfield and preservation of the historic character within the design as the preparation of the Masterplan advances. Additionally, further explanation is needed to justify the scoping out of the assessment of designated and key undesignated heritage within and surrounding the airfield.

Following engagement between KCC and the applicant, it has been agreed that further evaluation works regarding geophysical surveys and trial trenching will be undertaken and the outcomes of such works, combined with a revised desk based assessment, will be submitted as an Addendum to the EIA.

### **Arts and Culture**

The Thanet District has an international reputation for outstanding cultural provision and it is advised that the applicant clarifies how the proposed development relates to the unique local culture and heritage of the District's three main towns: Margate, Broadstairs and Ramsgate.

As it stands, the application does not set out how residents will gain access to cultural activity. Consideration should be given to access to such cultural activity in the District's main towns.

The County Council recognises the applicant's vision for an array of different parks and open spaces that could provide opportunities for creative interventions and public art.

## **Sustainable Urban Drainage**

In its response to the District Council dated 21 June 2016 the County Council – as Lead Local Flood Authority – raised concerns regarding the submitted outline Drainage Strategy and recommended the following: the undertaking of further ground investigation works; the preparation of a detailed Surface Water Management Strategy; and the provision of Conditions should the District Council be minded to grant planning permission.

A full copy of KCC's Sustainable Drainage response is appended to this letter.

## **Biodiversity**

In its letter of response dated 23 June 2016, KCC Ecological Advice Service set out its comments regarding the following requirements: the submission and consideration of information concerning the potential ecological impacts and the completion of ecological surveys with outcomes, conclusions and any necessary mitigation proposals submitted to the District Council prior to determination. In addition, the County Council requested the submission of further information regarding the following: Great Crested Newts; Barn Owls; habitat extents; and the parameters associated with the proposed ecological green infrastructure.

A full copy of KCC's Ecological Advice Service response is appended to this letter.

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If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely



**Barbara Cooper**

Corporate Director – Growth, Environment and Transport

Encs:

1. General Site Transfer Requirements
2. Education Assessment