

APPENDIX 1: KCC response: schedule of technical comments –Thanet District Council Local Plan Main Modifications

Main Modification Reference	Policy / Paragraph	Respondent	Commentary
MM/006	Paragraph 1.12	Heritage Conservation	The County Council is supportive of the proposed modification. It is important to recognise the contribution of the Heritage Action Zone work currently being carried out and to make sure that the historic environment is used as a catalyst for sustainable growth.
MM/007	Policy SP02 - Economic Growth	Public Rights of Way and Access Service	<p>KCC is committed to working in partnership with Thanet District Council to achieve the aims contained within the County Council's Rights of Way Improvement Plan (ROWIP).</p> <p>KCC is committed to securing enhancements to the whole network of routes and paths available to the public, of which the PRow network is an important but not exhaustive part. KCC looks forward to working with Thanet District Council to build upon the countryside access assets already identified.</p> <p>KCC would therefore request that the final paragraph that starts “<i>Development is supported that enhances the rural economy...</i>” includes a reference to KCC ROWIP, which can help contribute towards infrastructure that enables development and encourages economic growth leading to regeneration and attraction of new businesses.</p>
MM/009	Policy SP03 - Land Allocated for Economic Development	Highways and Transportation	It is recommended that this policy refers to charging points being active and providing a minimum of 7kw capacity per charging point. This would put the policy in line with recent central government guidance in relation to electric charging infrastructure ( <a href="#">Paragraph 8 - Electric Vehicle Charging in Residential and Non-Residential Buildings July 2019</a> )
MM/018	Paragraphs 2.20 & 2.21	Highways and Transportation	The County Council raises a significant concern over the removal of the reference to the Millennium Way road link, as this is particularly important in the context of future highway access to Westwood Cross from Broadstairs. The implementation of this link will be one of the aims and objectives of the future Westwood Supplementary Planning Document (SPD) The County Council as Local Highway Authority is continuing to develop more detailed microsimulation highway modelling, with initial outputs demonstrating that this link will provide journey time benefits and resilience to key retail and leisure destinations within Westwood Cross. It is strongly recommended that reference to this route is retained within the Local Plan.
MM/019 –	Policy SP07 - Westwood	Public Rights of Way and Access Service	KCC welcomes the inclusion of text that promotes multi-modal access and would request that the Transport Assessment has specific consideration of the PRow network including an assessment of the impact on the network.
		Heritage Conservation	The County Council is supportive of the retention of the archaeological clauses within this policy.
		Waste Management	<p>The County Council notes the paragraph within Policy SP07, which states:</p> <p><i>“Masterplanning will be informed by and address the following: The capacity of any utility services and infrastructure and any need (and provision of) improved or additional infrastructure (as may be advised or reasonably required by service providers);”</i></p> <p>The County Council recommends that “utility services and infrastructure” must include the consideration of waste management infrastructure and whether there is sufficient capacity to support growth for all strategic housing sites, including at Westwood.</p>
MM/020	New paragraph following paragraph 2.33	Heritage Conservation	The County Council welcomes the recognition that the potential impact on heritage assets will be a key issue considered for the development of new lifeboat facilities in Margate. The County Council recommends that this is also reflected in the wording of MM/021 (part 7).
MM/022	Paragraphs 2.42 and 2.43	Minerals and Waste	The County Council recognises that reference is specifically made to the relevant safeguarding policies of the Kent Minerals and Waste Local Plan 2013-30 (KMWLP). This includes Policy CSM 6: Safeguarded Wharves and Rail Depots and Policy CSM 7: Safeguarding Other Mineral Plant Infrastructure and the inclusion within the Thanet Local Plan of the safeguarding of the wharf for its mineral importation activity. The Main Modification is therefore supported by the County Council as Minerals and Waste Planning Authority.

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MM/023	Policy SP09 - Ramsgate	Heritage Conservation	The County Council is supportive of the retention of the archaeological clauses within this policy.
MM/032	Policy SP12 - General Housing Policy	Public Rights of Way and Access Service	The County Council recommends that reference should be made to the PRow network, including the provision of safe and convenient pedestrian and cycle access connecting community facilities safely. The County Council also requests that reference is made to the incorporation, and provision for, connections and improvements to the existing PRow network to provide good access to footpaths, bridleways and cycle networks to facilitate access to the surrounding countryside and provide opportunities for exercise and recreational activities for walkers, cyclists and equestrians.
		Waste Management	As the Waste Disposal Authority, the County Council would like to see the inclusion of waste in this policy, as highlighted below:  “In addition to the timely delivery of education, health, <b>waste</b> and transport infrastructure, proposals for the development of strategic sites under Policies SP13 - SP18a must include an assessment of the need for community facilities as part of the masterplanning process.”
MM/033	SP13 - Strategic Housing Site - Manston Green	Heritage Conservation	The County Council supports the requirement that any masterplan for Manston Green must take into account “a pre-design archaeological assessment taking into account the presence of any significant and sensitive remains”, as well as “the preservation of listed buildings at Ozengell”.
MM/033	SP13 - Strategic Housing Site - Manston Green	Public Rights of Way and Access Service	The Transport Assessment should encourage a modal transport shift towards walking and cycling. High quality, traffic-free walking and cycling routes integrate effectively with the wider transport network. These links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access. Increasing active travel participation would help to reduce vehicle congestion on roads, address issues of air quality and improve public health and well-being. The PRow Network can support public transport and the wider highway network, by providing opportunities for recreation and commuting, especially short distance journeys.
MM/034	SP14 - Strategic Housing Site – Birchington (1600 new dwellings)	Heritage Conservation	The County Council strongly recommends the wording for requirement 3 “Masterplanning will be informed by and address the following: ...3) pre-design archaeological evaluation” is modified to: <b><u>pre-design archaeological assessment and evaluation and provision, if necessary, for the preservation of significant archaeological remains.</u></b>  In addition, the inclusion of a requirement such as that set out at 2) in MM0/35 should be included in the MM/034 to help preserve and enhance the setting of Scheduled Monuments.
MM/035	SP15 - Strategic Housing Site – Westgate-on-Sea (2,000 new dwellings)	Heritage Conservation	The County Council strongly recommends the wording for the proposed requirement 1) “an archaeological evaluation” is amended to <b><u>a pre-design archaeological assessment and evaluation and provision, if necessary, for the preservation of significant archaeological remains.</u></b>  The County Council welcomes requirement 2 concerning the Scheduled Monuments and Dent de Lion gateway.
MM/036	SP16 Strategic Housing Site – Westwood (1,450 new dwellings)	Minerals and Waste	The County Council notes that this strategic site is within 250m of a safeguarded waste facility. Therefore, an Infrastructure Assessment will be required to determine whether the proposed strategic sites are in accordance with the safeguarding policies of the KMLWP.  Therefore, an Infrastructure Assessment must be carried out to inform the masterplanning of a strategic housing site.
		Heritage Conservation	The County Council strongly recommends the wording for requirement 1 “Masterplanning will be informed by and address: 1) pre-design archaeological assessment” is modified to: <b><u>pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.</u></b>
MM/038	SP17- Strategic Housing Site – Land fronting Nash and Haine	Minerals and Waste	This strategic site is within 250m of a safeguarded waste facility. Therefore, an Infrastructure Assessment will be required to determine whether the proposed strategic sites are in accordance with the safeguarding policies of the KMLWP.  Therefore, an Infrastructure Assessment must be carried out to inform the masterplanning of a strategic housing site.

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	Roads (1,020 new dwellings)		
		Heritage Conservation	<p>The County Council is concerned that the proposed modifications do not include any requirement for archaeological assessment to be included in the masterplan requirements. The County Council therefore recommends the inclusion of the following:</p> <p><b><u>4) pre-design archaeological assessment and evaluation and provision, if necessary, for the preservation of significant archaeological remains</u></b></p>
MM/039	SP18 - Strategic Housing Site – Lane at Manston Court Road/Haine Road (1400 new dwellings)	Highways and Transportation	<p>Bullet 5 should be altered as follows:</p> <p><i>“junction improvement at A256 <del>Old</del> Haine Road/<u>New</u> Haine Road and Star Lane/Haine Road (including a dual lane link between them)”.</i></p> <p>This change is required to ensure that the correct reference to the junction is made within the policy.</p>
		Heritage Conservation	<p>The County Council strongly recommends the wording for requirement 1) “Masterplanning will be informed by and address: 1) pre-design archaeological evaluation” is modified to: <b><u>pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.</u></b></p>
MM/040	SP18A - Strategic Housing Site – Land north and south of Shottendane Road (550 new dwellings)	Highways and Transportation	<p>Paragraph 3, Point 3</p> <p>The revised text now refers to new roundabout junctions on Shottendane Road, Manston Road and Hartsdown Road. However, this should be altered to enable flexibility over the form of the junction on Hartsdown Road. The County Council therefore recommends that this policy is altered to require new roundabout junctions on Shottendane Road, Manston Road and an ‘appropriate form of junction at Hartsdown Road’.</p>
		Public Rights of Way and Access Service	<p>The Transport Assessment should encourage a modal transport shift towards walking and cycling. High quality, traffic-free walking and cycling routes integrate effectively with the wider transport network. These links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access. Increasing active travel participation would help to reduce vehicle congestion on roads, address issues of air quality and improve public health and well-being. The PRoW Network can support public transport and the wider highway network, by providing opportunities for recreation and commuting, especially short distance journeys.</p>
		Heritage Conservation	<p>The County Council strongly recommends that this policy includes a requirement for archaeological assessment to be included in the masterplan requirements. The County Council recommends the inclusion of the following:</p> <p><b><u>6) pre-design archaeological assessment and evaluation and provision, if necessary, for the preservation of significant archaeological remains</u></b></p>
MM/048	Paragraph 4.33	Public Rights of Way and Access Service	<p>An improved and enhanced PRoW network will offer good public transport and active travel links with green infrastructure and open spaces so that the public are not dependent on private vehicle use for visiting these sites. Opportunities should be taken to work with KCC PRoW to improved connectivity across Thanet’s green infrastructure.</p>
MM/050	Paragraph 4.37 New paragraph 4.37a	Biodiversity	<p>The County Council notes that these paragraphs provide a list of green infrastructure suggestions; however, it is also recommended that the policy make reference to the mitigation hierarchy, detailed below. The need to retain biodiversity is particularly important given the provisions within the Environmental Bill introducing mandatory net gain.</p> <p>The ‘mitigation hierarchy’ described in British Standard BS 42020:2013, involves the following step-wise process:</p> <ul style="list-style-type: none"> <li>• Avoidance – avoiding adverse effects through good design;</li> <li>• Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;</li> <li>• Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm;</li> </ul>

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			<ul style="list-style-type: none"> <li>Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.</li> </ul>
MM/051	Policy SP24 - Green Infrastructure	Public Rights of Way and Access Service	An improved and enhanced PROW network will offer good public transport and active travel links with green infrastructure and open spaces so that members of the public are not dependent on private vehicle use for visiting these sites.
MM/053	Paragraph 4.45	Biodiversity	The County Council recommends that the District Council ensures the Local Plan does not unduly restrict the application of the Strategic Access Management and Monitoring Strategy (SAMMS) tariff as the Local Plan currently states that residents from all new housing must contribute to the SAMMS and this must include places such as static caravan parks which are open in winter.
MM/055	New paragraph 4.50a	Biodiversity	The County Council recommends that the District Council has consideration of the provisions of the Environment Bill, particularly regarding net gain.
MM/063	Policy SP31 - Provision of Accessible Natural and Semi Natural Green Space, Parks, Gardens and Recreation Grounds	Public Rights of Way and Access Service	An improved and enhanced PROW network will offer good public transport and active travel links with green infrastructure and open spaces so that members of the public are not dependent on private vehicle use when visiting these sites. The District Council is encouraged to explore opportunities to work with KCC PROW to improved connectivity across the District's green infrastructure.
MM/067	Policy SP35 - Climate Change	Public Rights of Way and Access Service	Policy should ensure that new developments incorporate good sustainable transport connections, with high quality walking and cycling infrastructure available, which can link local amenities. Replacing private vehicle journeys with active travel should help to address low carbon targets, reducing emissions and improve air quality and public health.
MM/071	Policy SP43 - Transport Infrastructure	Public Rights of Way and Access Service	The County Council recommends specific mention of the PROW network - emphasising the benefits to development of providing high quality walking and cycling routes, which, together with accessible land, should be appropriately protected and improved through development proposals.
MM/072			
MM/074	Policy SP45 - New Railway Station	Transport Policy	The County Council is supportive of the proposed changes to this policy.
		Public Rights of Way and Access Service	Point 3 – “ <i>Integration with wider public transport services</i> ” should include mention of PROW network. KCC is looking to provide active travel links to proposed developments from the new railway station.
MM/086	Policy E07 - Serviced Tourist Accommodation (Hotels, Guest Houses and B&Bs)	Public Rights of Way and Access Service	Sustainable tourism is a way of supporting rural areas, providing jobs and supporting community services. The PROW network and the ROWIP has a critical role in this, and as such, there should be specific mention of the need to support improvements to walking and cycling routes where they can assist the Council's tourism objectives.
MM/087	Policy E08 - Self Catering Tourist Accommodation		
MM/092	Policy E10 - Thanet's Beaches	Public Rights of Way and Access Service	An improved and enhanced PROW network will offer good public transport and active travel links with the undeveloped beaches identified so that the public are not dependent on private vehicle use for visiting these sites. Development proposals should therefore explore these opportunities.

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MM/094	Policy E14 - Quex Park	Heritage Conservation	The County Council is supportive of the retention of the archaeological clauses within this policy.
MM/097	Policy E15 – Development for new business in the countryside	Public Rights of Way and Access Service	The County Council requests specific mention of the impact on the PRow network to reflect the extent to which an enhanced PRow network meets the likely future public need to contribute towards more sustainable rural development.
MM/097	E16 - Conversion of rural buildings for economic development purposes	Heritage Conservation	The County Council is not supportive of the removal of the former clause 4, which stipulated that any alterations should be sympathetic to the existing character of the building or its historic fabric or features. Many of Thanet's rural buildings have a heritage interest either individually or as part of complexes. Where this is so, interest should be safeguarded through careful and sympathetic alteration and the requirement for this is entirely appropriate to this policy. KCC recommends that the former clause 4) is reinstated.
MM/105	HO3 – Land on west side of Old Haine Road, Ramsgate	Heritage Conservation	The County Council strongly recommends the wording for requirement 1) "Proposals will be judged and permitted only in accordance with a masterplan for the whole site which should include: 1) pre-design archaeological evaluation" is modified to: <b><u>pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.</u></b>
MM/106	HO4 – Land fronting Nash Road and Manston Road	Public Rights of Way and Access Service	The Transport Assessments should aim to encourage a modal transport shift towards walking and cycling. High quality, traffic-free walking and cycling routes integrate effectively with the wider transport network. These links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access. Increasing active travel participation would help to reduce vehicle congestion on roads, address issues of air quality and improve public health and well-being.
		Heritage Conservation	The County Council strongly recommends the wording for requirement 2), "Masterplanning will be informed by and address: ... 2) pre-design archaeological assessment" is modified to: <b><u>pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.</u></b>
MM/107	HO6 – Land south of Brooke Avenue, Garlinge	Public Rights of Way and Access Service	The Transport Assessments for all the policies above should encourage a modal transport shift towards walking and cycling. High quality, traffic-free walking and cycling routes integrate effectively with the wider transport network. These links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access. Increasing active travel participation would help to reduce vehicle congestion on roads, address issues of air quality and improve public health and well-being.
		Heritage Conservation	The County Council strongly recommends the wording for requirement 1) "Proposals for the development of the site will be informed by and address: 1) an archaeological evaluation" is modified to: <b><u>pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains</u></b>
MM/108	HO7 – Land at Haine Road and Spratling Street, Ramsgate	Heritage Conservation	The County Council recommends that the policy includes a requirement for archaeological assessment to be included in the masterplan requirements.  KCC therefore recommends the following addition:  <b><u>5) pre-design archaeological assessment and evaluation and provision, if necessary, for the preservation of significant archaeological remains</u></b>
MM/109	Policy HO8 - Land south of Canterbury Road East, Ramsgate	Heritage Conservation	The County Council strongly recommends the wording for requirement 1) "Proposals for the development of the site will be informed by and address: 1) an archaeological evaluation" is modified to: <b><u>pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.</u></b>
MM/114	HO12 – Land at Tothill Street, Minster	Public Rights of Way and Access Service	The Transport Assessment should encourage a modal transport shift towards walking and cycling. High quality, traffic-free walking and cycling routes integrate effectively with the wider transport network. These links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access. Increasing active travel participation would help to reduce vehicle congestion on roads, address issues of air quality and improve public health and well-being.

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		Heritage Conservation	The County Council recommends that the policy includes a requirement for the masterplan to be informed by archaeological constraints that have been identified through assessments and evaluation.
MM/115	HO13 – Land at Manor Road, St Nicholas at Wade	Heritage Conservation	<p>The County Council recommends that the policy includes a requirement for an archaeological assessment to be included in the masterplan requirements.</p> <p>KCC therefore recommends the following addition:</p> <p><b><u>1) pre-design archaeological assessment and evaluation and provision, if necessary, for the preservation of significant archaeological remains</u></b></p>
MM/116	HO14 – Land at Walter’s Hall Farm, Monkton	Heritage Conservation	The County Council strongly recommends the wording for requirement 1) “Proposals for the development of the site will be informed by and address: 1) an archaeological evaluation” is modified to: <b><u>pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.</u></b>
MM/117	HO15 – Land south of A253 Cliffsend	Heritage Conservation	The County Council strongly recommends the wording for requirement 1) “Proposals for the development of the site will be informed by and address: 1) an archaeological evaluation” is modified to: <b><u>pre-design archaeological evaluation assessment and provision, if necessary, for the preservation of significant archaeological remains.</u></b>
MM/118	Policy HO16 - Land north of Cottington Rd, Cliffsend	Public Rights of Way and Access Service	Point 3 – the proposed Transport Statement should include reference to PRoW. The KCC PRoW and Access Service is engaging with partners including Thanet District Council regarding the enhancements and improvements to provide connectivity to the proposed Parkway station.
MM/119	HO17 – Land South Side of Cottington Road	Public Rights of Way and Access Service	The proposed Transport Statement should include specific reference to PRoW, rather than just footpaths and cycleways.
		Heritage Conservation	<p>For requirement 1, KCC recommends the following addition:</p> <p><b><u>Development should avoid impact on the prehistoric monument identified in the pre-allocation evaluation.</u></b></p>
MM/129	HO24 - Retention of existing housing stock	Heritage Conservation	The County Council is supportive of the inclusion of the new clause 4) that stipulates proposals will only be permitted subject to the heritage policies of the local plan
MM/137	Policy GI06 - Landscaping and Green Infrastructure	Public Rights of Way and Access Service	The County Council recommends that reference is made to the ROWIP and the Kent Design Guide.
MM/139	Policy QD01 - Sustainable Design	Public Rights of Way and Access Service	Point 3 – KCC requests specific mention of the PRoW network and ROWIP to encourage early engagement which would enable provision of safe and attractive cycling and walking opportunities to reduce the need to travel by car.
MM/140	QD02 - General Design Principles	Public Rights of Way and Access Service	The County Council recommends that reference is made to the ROWIP and the Kent Design Guide to provide safe and convenient pedestrian and cycle access, connecting communities safely and designed to create a sense of place and ownership.
MM/143	HE03 - Heritage Assets	Heritage Conservation	The County Council is supportive of the revised text in this policy as it now includes all heritage assets whether statutorily protected, locally listed or non-designated. However, KCC would recommend that the opening paragraph “The Council supports the retention of local heritage assets, including listed buildings, structures, features and gardens of local interest. Local heritage assets will be identified in a local list as part of the Heritage Strategy” be expanded to include <b><u>archaeological sites.</u></b>

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MM/144	HE04 Historic Parks and Gardens	Heritage Conservation	<p>The text should be corrected to:</p> <p><i>Proposals that affect historic parks and gardens will be assessed by reference to the scale of harm, both direct and indirect, or <b>loss to the significance</b> of the park or garden.</i></p>
MM/146	Policy CC02 - Surface Water Management	SUDS	The County Council as Lead Local Flood Authority welcomes the revisions of the text to bring it in line with the National Planning Policy Framework (NPPF), whilst providing greater clarity on requirements.
MM/148	Policy CC03 - Coastal Development	Public Rights of Way and Access Service	<p>KCC requests inclusion of details regarding the England Coast Path and the existence of Coastal Access rights in the District. Following the introduction of the Marine and Coastal Access Act 2009, the County Council has been working in partnership with Natural England to establish the Kent stretches of the England Coast Path. This is a new National Trail walking route that will eventually circumnavigate the entire English coastline, securing access rights for the public to explore the coast. In addition to the creation of a continuous walking route around the whole of the English Coast, the project secures public rights to explore adjacent beaches and headlines – known as the coastal margin.</p> <p>When the trail is complete, the path will be approximately 2,800 miles long, making it one of the longest promoted coastal walking routes in the world. Due to the scale of the project, the coast path is being developed in ‘Stretches’ around the country. With regards to Thanet, the Ramsgate to Folkestone stretch of the coast path was opened to the public on the 19 July 2016. The Ramsgate to Whitstable stretch of the coast path has been approved by the Secretary of State and is currently being established on the ground. This stretch is expected to be open late 2020.</p> <p>Efforts to improve public access and enjoyment of the coast should be encouraged where possible, and KCC would welcome future engagement with Thanet District Council to ensure that development plans and proposals consider coastal access.</p> <p>The District Council should be aware that coastal access rights do not prevent land from being developed or redeveloped in the future, though consideration should be given to the potential impacts on the Coast Path. If necessary, Natural England may need to submit a variation report to the Secretary of State recommending a change to the trail alignment, to ensure the route is not obstructed by development. When development proposals are being considered, the planning authority should look to include provision for the England Coast Path on the seaward side of development where possible.</p>
MM/160	Policy CM01 - Provision of New Community Facilities	Public Rights of Way and Access Service	The County Council recommends specific mention of the Public Rights of Way Network to access local community facilities encouraging active travel.
MM/165	Policy TP01 - Transport Assessments and Travel Plans	Public Rights of Way and Access Service	Transport Assessments and Statements should consider multimodal transport options and be produced with consideration of the ROWIP as statutory KCC policy.