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BY EMAIL ONLY

9 February 2022

Dear Sir/Madam,

Re: Thanet Local Plan Update – Engagement (Discussion Papers and Evidence Base Documents)

Thank you for providing Kent County Council (KCC) with the opportunity to comment on the published Discussion Papers and Evidence Base Documents.

The County Council has reviewed the consultation documents and would like to raise the following comments for consideration, as you progress the review of the Thanet Local Plan.

Discussion Paper - Development Strategy

The County Council recognises the importance of the Local Plan in establishing the framework for sustainable development within Thanet and has been supportive of the strategic approach to growth that Thanet District Council has taken within the adopted Local Plan. KCC notes that the Housing Needs Update indicates a total housing need of 21,000 dwellings up to 2040 (1,085 dwellings a year), which means that an update of the Local Plan will need to identify a sufficient number of sites to accommodate an additional 4,000 – 4,500 dwellings.

The County Council notes the opportunities being progressed through the delivery of key infrastructure such as Thanet Parkway and will look to work closely with the District Council as it considers its future development strategy, to ensure that necessary infrastructure is planned for, funded and delivered in a timely manner, ahead of housing growth, where necessary. The County Council is a keen advocate of an “Infrastructure First” approach to growth – this approach requires close collaboration between key partners from the outset.

Highways and Transportation: The proposed methodology of maximising development within built up areas, towns and villages does also need to be considered within the context of other key planning issues and constraints (including highway and transport matters). The sustainability of all sites (that would include transport, access and viability considerations)

should be a key consideration of the Local Plan. Some previously developed (brownfield) sites can prove to be unviable to deliver new housing, which in turn can impact on the ability of such sites to provide necessary funding toward key infrastructure that is essential if sites are to be adequately mitigated. This includes mitigation of traffic impacts on the local/wider transport network, as outlined within an Infrastructure Delivery Plan (IDP). Therefore, consideration should be given to the ability of such sites being able to appropriately mitigate their impacts, whilst remaining financially viable.

Focusing on built up areas, towns and villages is a sensible approach for the strategy to take, as typically these locations can provide access to existing local amenities, services and transport links. However, not all villages in Thanet have the full range of services and associated transport links (including active travel opportunities and public transport connectivity) and this will affect the sustainability of some sites. Sites should therefore continue to be assessed on a case-by-case basis. The existing road and footway links in some villages are geometrically constrained by historic geography and should be given appropriate weight when balancing the merits of a given development site or option.

The County Council as the Local Highway Authority is aware that the “Call for Sites” process has been reopened and would welcome the opportunity to discuss future development options and feed into associated assessment processes in due course, once site availability is fully understood.

Public Rights of Way (PRoW): As a general statement, the County Council is keen to ensure that its interests are represented within the local policy frameworks of the districts and boroughs in Kent. 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). The County Council’s ROWIP should be evidenced within the Local Plan, as it is a strategic and statutory policy document for PRoW protection and enhancement.

KCC is keen to promote the protection and enhancement of the network and local planning policy support is very helpful in protecting the network and negotiating enhancements to it, through new development.

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.

Provision and Delivery of County Council Community Services and Facilities: For all new residential development as specified in the National Planning Policy Framework (NPPF)¹, mitigation will be required for primary, secondary and Special Educational Needs (SEND) education, community services (library, adult education and youth service), social care and waste.

¹ “(i) the number of dwelling houses to be provided is 10 or more; or
(ii) the development is to be carried out on a site having an area of 0.5 hectares or more”

Appendix A provides an initial view of the required county infrastructure mitigation for the additional 4,000 – 4,500 dwellings proposed. Continued engagement between the District Council and County Council would be welcomed in respect of planning and delivery of growth and infrastructure in the district.

It is recognised that the primary focus for development within the adopted Local Plan is the delivery of strategic sites (policies SP15-21), as well as within villages within Thanet, primarily in Minster, with limited development at Cliffsend, Monkton and St Nicholas. It should be noted that new primary schools will be required for proposed and approved development at strategic sites, including:

- Westwood Cross (SP19)
- Westwood Village (SP20)
- Manston Green (SP15)
- Birchington (SP16)
- Westgate (SP17)
- Humbers Mill – Land at Manston Court Road/Haine Road) (SP18)

Primary school expansion is limited at Minster and Monkton and will be supported by contributions to the new Manston Green Primary School with a contingency project. Highway access/parking can often be an issue and will require liaison between KCC as Education Planning Authority and as Local Highway Authority to establish whether expansion of existing schools and/or new schools can be accommodated.

KCC would welcome engagement as any future development strategy is progressed, especially if alternative locations for development are proposed, so that KCC can assess the impact of growth and whether existing services can be enlarged to accommodate growth, or whether new infrastructure will be required.

If a new settlement is proposed as an option for housing growth, it will require a detailed assessment of the impact on all County services and facilities, as well as a detailed assessment of primary and secondary need, and will likely require at least one new 2FE primary school at 2.05 ha, as well as potentially, a secondary school site of 12 ha.

Waste Management: The County Council, as Waste Disposal Authority, considers that the adopted Local Plan development strategy is appropriate to meet the needs of residents in terms of waste. The Margate Household Waste and Recycling Centre (HWRC) is well located to serve residents of Thanet, with plans for expansion to meet future demands.

Culture and Creative Economy: The role of culture in placemaking should be considered as the growth strategy develops and consideration of the [Town and County Planning Association - That Word Art! Putting Art Back into Planning; A Practical Guide for Councils](#) is recommended.

It will be important to consider how residents living in new and existing developments access cultural infrastructure and activity in cultural-hub facilities – such as regional theatres, cinemas, music venues, galleries and art centres. Daytime activities and the night-time

economy can bring people together and create vibrant places to live. Incorporating policies to create multifunctional community and cultural spaces can be beneficial, as can a Cultural Strategy.

The Local Plan Review should include consideration of the provision for ongoing growth in homeworking and the freelance economy. While this is not unique to the creative industries, it is a significant feature with the majority of workers employed as freelance. Future developments should offer flexible / co-working spaces and facilities to support homeworking, including digital connectivity.

Discussion Paper - Employment Need

Highways and Transportation: The figures stated within this paper are noted by KCC as the Local Highway Authority. However, consideration is needed as to whether the additional employment spaces are seeking to simply address the district's own employment requirements or meet the needs of adjacent districts. The latter could have an impact on the level of traffic/trip growth/migration that would not be accounted for within trips associated with Thanet housing allocations. If significant inward migration of jobs is forecast from people who live outside the district, then subsequent allowances will need to be made within any Transport Impact Appraisal for the Local Plan to account for inbound trips. Consideration will also be required for new Thanet residents who travel to neighbouring districts for work. Any new significant employment allocations could have a bearing on the distribution of existing trips within the local highway network.

Culture and Creative Economy: The South East Local Enterprise Partnership (SELEP) Creative Workspace Masterplan is currently being developed, which will guide future creative industry workspace development cross the SELEP region. The deadline for delivery of the report is 31 March 2022 and KCC will ensure it is shared with the District Council.

The Employment Density Guide (3rd edition) 2015 referred to in the Discussion Paper was amended to take into consideration freelancers and portfolio workers, but could not have anticipated the impact of the pandemic and the move to homeworking. The need for more local, flexible space will require further investigation. In Margate, where there is a commitment to encourage creative industries growth, the workspace requirements for the sector should be considered within the Local Plan Review. The research for the Margate Land Trust identifies the exact amount of floorspace required for creative industries – this research is available upon request.

The Employment Table (published by KCC) referenced in the Discussion Paper does not explicitly consider growth sectors such as creative industries – instead, they sit between "Information & Communications" and "Arts, Entertainment & Recreation" sectors. Paragraph 7 recognises that growth sectors like the creative industries have not been adequately captured, neither has home working. Further research using the Digital, Culture, Media and Sport (DCMS) sic codes for creative industries would update this in respect of explicit consideration of the creative industries.

The County Council welcomes the priority given to the creative industry within the [Economic Development in Thanet \(Employment Land Update and Economic Needs Assessment\) July](#)

[2018](#), and the commitment to cultivating the creative industries across Thanet. The County Council would recommend consideration of the potential for further primary research to ensure that the Local Plan Review captures the growth needs of the creative industry sector – who do not always access traditional business networks, such as Locate in Kent and the Chambers of Commerce. Updates should include recent developments like the Margate Town Deal, the setting up of a land trust to support creative workspace and the loss of critical creative industry employment space (e.g. Resort Studios).

Consideration should also be had for creative practice and businesses who have a diverse workspace need – it is noted that some subsectors needs are being met by the repurposing of former industrial space. Redundant retail spaces also offer the opportunity for creative industry growth whilst increasing footfall and vibrancy. Research by SELEP² is due to be released by the end of February 2022, which should be taken account of.

Evidence Base Document - Local Housing Need Update

Highways and Transportation: The identified increase in the housing requirement is noted and represents a material increase on previously identified housing needs, although it is appreciated that this does reflect the extended period of the Local Plan from 2031 to 2040. A significant number of dwellings within the current Local Plan are forecast to be supplied through windfalls. Given that windfall sites are relatively difficult to quantify and plan for in terms of forecasting future highway needs and can impact on strategic infrastructure funding, it is recommended that additional Local Plan needs do not lead to a significant increase in windfall allocation within the review period.

The need for affordable housing provision has been a topic of extended discussion through more recent planning applications within the district and there is a considerable need identified within this document. This adds weight to ensuring that whole Local Plan viability is robustly tested at the plan making stage, so that any infrastructure pressures can be planned for, and that the Infrastructure Delivery Plan (IDP) remains deliverable across the plan period. It is recommended that affordable housing policy continues to provide sufficient flexibility to enable a balanced approach be adopted on a case-by-case basis, as site viability is better understood.

In terms of housing mix, it is also important to consider the location of the development when taking into account housing needs for older people, vulnerable people and people with disabilities. Sites that are closer to local amenities are generally more suitable for this category of housing. The needs of future residents in terms of accessibility of local centres needs careful consideration as part of the associated IDP (scooter parking, new disabled parking bays within village centres and new and improved footway access are just a few examples). It is encouraging to see that the Sustainability Appraisal Scoping Report includes reference to development being appropriately located, however a site can still be within close proximity, but ultimately inaccessible to the necessary highway infrastructure, if links are not secured or deliverable.

² <https://www.southeastlep.com/new-role-for-the-creative-and-cultural-sector-as-driver-for-future-of-our-high-streets/>

The County Council as Local Highway Authority would like to take this opportunity to reiterate that, given the level of additional housing that has been identified, it will be necessary for the Local Planning Authority to fund and carry out its own review of the Transport Impact Assessment, in consultation with KCC as the Local Highway Authority, which may include the provision of a new/improved transport model.

Affordable Housing Need - paragraph 1.27

Provision and Delivery of County Council Community Services and Facilities: The analysis identifies a notable need for affordable housing and it is clear that provision of new affordable housing is an important and pressing issue in the district. This report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise. KCC is of the view that affordable housing requirements should be considered alongside other key infrastructure requirements needed to mitigate the impact of development. The County Council supports the assertion that setting an unachievable affordable housing requirement in Thanet is likely to strain development viability.

Family housing and appropriate mix of housing – paragraph 1.36

Provision and Delivery of County Council Community Services and Facilities: The County Council is supportive of new developments that provide a mix of dwelling types and homes to suit a range of needs in the community. Any housing needs assessment should include specialist housing for the elderly and vulnerable adults with learning and physical requirements.

The County Council would also request a universal requirement that new homes are built as Wheelchair Accessible and Adaptable Dwellings, in accordance with Building Regulations Part M 4 (2).

The Department for Levelling Up, Housing and Communities identified in June 2019 guidance - Housing for older and disabled people³ - the need to provide housing for older and disabled people as critical. Accessible and adaptable housing enables people to live more independently and safely, providing safe and convenient homes with suitable circulation space, bathrooms and kitchens. KCC requests that these dwellings are built to Building Regulation Part M4(2) standard (as a minimum) to ensure that they remain accessible throughout the lifetime of the occupants, meeting any changes in the occupants' requirements.

Recommendations for older persons and those with disabilities – paragraph 1.44

Provision and Delivery of County Council Community Services and Facilities: The County Council's initial calculations have identified a need to plan for the following over the 2020-2040 period:

³ <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

- 2,100 housing units with support (sheltered/retirement housing), in both the market and affordable sectors;
- 1,000 additional housing units with care (e.g. extra-care), again in both the market and affordable sectors;
- 1,286 additional care bedspaces; and
- 860 dwellings to be for wheelchair users (meeting technical standard M4(3)).

The County Council supports the principle of enabling the elderly to remain in their own homes and/or live independently in accommodation with assistance on-site. Indeed, since the onset of COVID-19, there has been a significant decrease in the number of social care clients choosing to go into traditional care home settings. This shift towards specialist housing for the elderly has significant implications for the way in which this part of the community needs to be supported by county social care services – and is requiring continuous adaptations in how assistance and care is provided.

As such, with regard to developer contributions for any proposed development in Thanet, it is important that resources are directed towards five key areas to increase capacity in Adult Social Care. These are:

- Assistive Technology and Home Adaptation Equipment – to enable people to continue to live independently;
- Specialist Housing – Adult Social Care will purchase nomination rights from registered housing providers;
- Adaptations and improvements to existing community facilities to enable all to be able to access these;
- Provision of sensory facilities;
- Provision of Changing Place facilities to enable those with profound physical and mental health issues (and their carers) to remain active and as independent as possible.

Older persons and those with disabilities - paragraph 1.47

Provision and Delivery of County Council Community Services and Facilities: The County Council supports the recommendation that the District Council could consider (as a starting point) requiring all dwellings (in all tenures) to meet the M4(2) standards (which are similar to the Lifetime Homes Standards) and at least 5% of homes meeting M4(3) – wheelchair user dwellings. KCC currently requests that all homes are built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2).

Evidence Base Document - Sustainability Appraisal Scoping Report

Chapter 2 Population Growth, Health and Wellbeing

PRoW: There is a large body of evidence about the benefits of physical activity and access to green space and coast, of which the PRoW network and access land are key components. The network provides important social, recreational and sustainable travel options which support Kent's economy. Health and wellbeing outcomes will need to be

integrated with spatial planning, creating places that support people to improve their health through regular activity such as walking or cycling. The County Council would therefore welcome consideration of the KCC ROWIP. The Sustainability Appraisal (SA) Objective 3 should also include an assessment of opportunities provided by an improved PROW network.

Chapter 3 – Economy

PRoW: The PRoW network is an asset that can help contribute towards a robust infrastructure that enables development and encourage economic growth leading to regeneration and attraction of new businesses. The ROWIP has a significant role in supporting sustainable economic growth, directly contributing to transport, green infrastructure and open spaces. The ROWIP as a statutory document can inform, support and add weight to policies within the Local Plan and should be referenced accordingly. Sustainable rural leisure and tourism is a key way of supporting the socio-economic well-being of rural areas, providing jobs and supporting community services. The PRoW network and the ROWIP has a critical role in this. SA Objective 4 should include assessment of opportunities provided by an improved PROW network.

The Local Plan should ensure that new developments incorporate good sustainable transport connections, with a high-quality walking and cycling infrastructure available, which can link local amenities. As such, SA Objective 4 should include assessment of opportunities provided by an improved PRoW network.

Chapter 4 - Transport Connections and Travel Habits

PRoW: The County Council would like to see specific reference and consideration made to the KCC PRoW network and the KCC ROWIP. Assessment of the impact on the network from development plays a significant role in increasing active travel participation and implementing NPPF paragraph 98, which seeks to ensure planning policies protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trail.

Through the improvement of the existing PRoW network to facilitate active travel for shorter journeys and improving links to transport hubs, the County Council and District Council can work towards more sustainable travel patterns in Thanet. For longer distances, walking and cycling may not be feasible and other methods of travel including bus, car and train will need to be used. The PRoW network still plays an important role in providing links to these modes of transport, such as bus and railway stations. Encouraging people to leave their cars at home and use active travel methods for shorter journeys will not only provide health and wellbeing benefits to the participant but will also have a positive impact on the local environment, contributing to reduced road congestion and better air quality. The provision of links that provide access to work, school and facilities is an essential element of a well-planned green infrastructure to facilitate sustainable and active travel.

Sub-national (Paragraph 4.7)

Highways and Transportation Paragraph 4.7 refers to LTP 4: Delivering Growth without Gridlock 2016-2031. Whilst this remains current for now, the County Council is in process of and preparing a new LTP 5, which seeks to align with recent changes to highway, transport, planning and sustainability policy/guidance at both a national and local level. Any planned growth (including infrastructure provision) identified as part of the Local Plan Review will also need to consider (and inform) LTP 5, which is due to be developed over the next twelve to eighteen months.

Pages 72-73

Highways and Transportation: There is no reference to the fact that travel demand in Thanet is largely seasonal and that demand and peaks can fluctuate throughout the spring and summer season which consequently has an impact on levels of service on the A28 corridor.

Road Network and Congestion Hotspots (Paragraph 4.12)

Highways and Transportation: Thanet is connected to the UK motorway network by the A299 (not the A229 as stated). It is also relevant to point out that the A299, A28 and A256 all form part of the recently established Major Road Network (MRN) and as such, infrastructure funding through the MRN and Large Local Majors Investment Programme is possible, subject to necessary endorsements at sub regional level. A bid for MRN funding is currently in process by KCC as the Local Highway Authority relating to the A28 (located within the district).

Bus Network (Page 74)

Highways and Transportation: It is also relevant that consideration is had to the fact there are regular bus services between Thanet and Canterbury along the A28 corridor, which helps to cater for the demand in Figure 4.1.

Sustainability Issues and Likely Evolution of the Issues Without the Local Plan Review (Page 79)

Highways and Transportation: Road congestion remains a challenge within Thanet, however it is not accurate to attribute this solely to Brexit and the uncertainty that exists over the customs and immigration checks at the Port of Dover. This may have had greater relevance during the Brexit transition period (when Manston Airport was used as a temporary lorry holding facility by DFT), however that temporary arrangement has since come to an end and the impact has subsequently diminished. Consequently, border facility checks are now more relevant to adjacent authorities such as Dover that are more closely located to the Port of Dover, where a larger proportion of the freight within the county is currently handled. It is possible that such issues could become relevant to Thanet, should freight operations at Ramsgate Port recommence or expand in the future.

Commuting Patterns and Travel Behaviour

PRoW: The County Council would recommend specific mention of the PRoW network and Active Travel role in encouraging change in patterns and behaviour. KCC would welcome a role in the earliest stages of planning for growth to clarify opportunities and provide up to date knowledge of routes proposed and advise regarding essential legal processes required. It is also essential that the Local Plan reflects that PRoW opportunities are not merely for leisure, but through improvements and enhancements to routes can provide significant Active Travel connectivity, as shown in recent Emergency Active Travel funding and projects in partnership with KCC Highways.

Transport Connections and Travel Habits SA Objectives and Appraisal Questions (Page 80)

Highways and Transportation: In respect of SA Objective 6, the proposed questions are reasonable and are in line with national planning policy. It would however be helpful to define what “key facilities” means in practice, to enable options to be assessed on a consistent basis. It is noted that Appendix A (SA Objectives) provide a level a quantitative approach to this by distance parameters to certain destinations to meet objective themes.

In line with the Thanet Transport Strategy, reducing the need to travel by locating development in the right place with the necessary infrastructure to encourage sustainable travel is also a key component of any Plan/option assessment. This can be further reinforced by considering specific policy that seeks to support the more recent prevalence of home working practices which has been accelerated by the recent pandemic.

PRoW: The County Council, in respect of PRoW, is supportive of Objective 6 and requests that Appraisal questions include promotion of investment through development opportunities to improve walking and cycling (including PRoW network) to encourage modal shift away from short car journeys.

Chapter 5 – Air, Land and Water Quality

Waste Management: KCC, as Waste Disposal Authority, welcomes the reference made to waste, as well as specific mention of the National Planning Policy for Waste (NPPW).

Chapter 6 – Climate Change Adaptation and Mitigation

Sustainable Urban Drainage Systems (SuDS): It is assumed that SA Objective 10 on page 117 should be SA Objective 11. Section 3.6 of County Council’s Drainage and Planning Policy contains guidance for Local Authorities in respect of preparing Local Plans. It is recommended that the District Council references KCC’s Drainage and Planning Policy Document in the “Sub-national” section. New developments are required to demonstrate compliance with the policies within this KCC policy document, however these are largely based on existing national guidance, such as the NPPF and the Non- Statutory Technical Standards for Sustainable Drainage as published by Defra. Therefore, by addressing the ‘national requirements’ new developments could also be fulfilling County Council policy requirements.

Sustainable Business and Communities

The County Council welcomes reference to the Kent Environment Strategy, and would also recommend consideration of the [Energy and Low Emissions Strategy](#).

The County Council will continue to work closely with the District Council to help ensure the delivery of new housing and infrastructure in response to local needs – delivering sustainable growth for the Thanet District. The County Council will welcome engagement with the District Council in addressing the matters raised in this response and through the progression of the Local Plan Review.

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

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Yours faithfully,



Stephanie Holt-Castle

Director – Growth and Communities

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Appendix A: Indicative assessment of required county infrastructure mitigation