
**From: David Brazier, Cabinet Member – Transport & Environment
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To: Environment, Highways & Waste Cabinet Committee

Date: 3 October 2013

Subject: Report on KCC’s representations on recent District Local Plan consultations including

- **Canterbury City Council Local Plan Preferred Options consultation,**
- **Thanet District Council Local Plan Issues and Options consultation**
- **Swale Borough Council Local Plan Preferred Options consultation**

Classification: **Unrestricted**

Summary:

This report summarises KCC representations on the following Local Plan consultation documents;

Canterbury City Council Local Plan Preferred Options (June – Aug 2013)

The City Council proposes that a minimum of 15,600 dwellings will be built over the plan period 2011-2031. The Local Plan also includes 118,000 sq m of business space on eight strategic sites and proposes that the Wincheap Retail Area will be developed as a satellite centre of Canterbury City, focused on retail and leisure provision.

Thanet District Council Local Plan Issues and Options consultation (July – Aug 2013)

TDC are at an earlier stage of the Local Plan process and consider three job growth options ranging from a Lower Growth option of 1,200 jobs, an economic baseline based on historic trends of 3,100 jobs and a Higher Growth scenario of 5,100 jobs. TDC have taken a similar approach to housing and matching this to job growth to produce a series of scenarios including zero migration of 3,714 homes and trend migration up to 11,648 homes. Manston Airport is considered separately, and could provide an additional 2,420 jobs. The Plan aims to strengthen and diversify the local economy and focus investment at the coastal towns and at Westwood.

Swale Borough Councils Local Plan Preferred Options consultation (August - September 2013).

SBC plan to keep its housing target at 540 dwellings per annum leading to a housing target of 10,800 dwellings for the years 2010/11-2031. Sittingbourne continues to be the main focus for development and concentration of public services and facilities. The Plan provides employment land targets of 545,614m² floorspace and 7053 jobs (353 per annum) between 2011 and 2031. Kent Science Park, Sheerness Port and the Sittingbourne Southern Relief Road are identified as 'Areas of Future Change' which could trigger a partial review of the Local Plan.

Recommendation(s):

That the Cabinet Committee notes the representations submitted from KCC by the Cabinet Member for Environment and Transport as set out in Part 2, 3 and 4 of this report and summarised in the conclusions at Part 5.

Financial Implications

The decisions to be taken by Canterbury City Council may have long term financial implications for KCC as the provider of infrastructure and services to support development. Thanet District and Swale Borough are both at an earlier stage in their processes and as such there will be no direct financial implications for the County Council from decisions taken at this part of their process.

Bold Steps for Kent and Policy Frameworks

The submitted responses by KCC to the consultations support the County Council's ambition to grow the economy, and the following priorities of *Bold Steps for Kent*.

- Priority 5: Deliver the Kent Environment Strategy
- Priority 8: Respond to key regeneration challenges, working with partners
- Priority 9: Support new housing growth that is affordable, sustainable and with the appropriate infrastructure
- Priority 10: Deliver 'Growth without Gridlock'

1, Introduction

1.1 The District and Borough Councils consult KCC as a statutory consultee at the formal consultation stages in pursuance of Regulation 18 (Issue and Options and Preferred Options) and Regulation 19 (Pre submission) of The Town and Country Planning (Local Planning) (England) Regulations 2012.

1.2 The Planning Policy Team co-ordinates the KCC response by consulting internally with officers, members of the EHW Committee and KCC Local Members, who represent wards in the relevant Borough or District to ensure their views are provided to the Cabinet Member for consideration when making KCC's response to each Local Authority. An overview of KCC's response for all three of these Local Plans consultations is presented in this report.

2. Canterbury Local Plan (CLP) Preferred Options Draft Consultation 2013

Introduction

2.2 Canterbury City Council (CCC) consulted on their Local Plan Preferred Option Draft Consultation between 20th June 2013 and 30th August 2013. The KCC Planning Policy Team circulated the Local Plan Consultation Document to all relevant officers, Local Members and EHW Cabinet Committee members and requested comments by 22nd July. A single Plan will be produced which will set out policies and proposals that will be used to guide decisions and investment on development and regeneration over the period up to 2031.

2.3 Following this consultation CCC will consider the comments made by individuals and organisations, and will prepare a final draft Plan. It is anticipated that this will be consulted on in Winter 2013/Spring 2014 and considered by an independent Inspector, appointed by the Government at a public inquiry expected to take place summer 2014. Further comments can be made at the Submission stage and KCC may also be invited by the Inspector to attend the public hearings.

The Local Plan Draft Consultation

2.4 The emerging plan has four Objectives, they are:

- To provide sufficient housing to meet local housing need and support economic growth.
- To strengthen and broaden the local economy.
- To protect the built and natural environment.
- To develop sustainable communities, and seek to ensure that adequate community facilities are provided.

Housing

2.5 The South East Plan target for housing for Canterbury City Council's area was 10,200 dwellings over 20 years. This was deemed (by NLP¹ consultants) to lead to virtually no net increase in local workforce to support the broadening and strengthening of the local economy. Therefore to

¹ Nathaniel Litchfield and Partners

implement the Council's vision for the area it was considered that there would need to be a significant increase above the historic levels of the rate of development both for housing and employment space.

2.6 Accordingly Policy SP2 states that land is allocated to meet the identified development requirements for the period 2011-2031 and in total these are as follows:

- Dwellings 15,600 (53% increase on SEP although increase now relates to the period to 2031 rather than 2026 as for the South East Plan)
- Business 138,000 sq m
- Retail 50,000 sq m for comparison goods at Canterbury and 3,250 sq m at Whitstable

2.7 In order to strengthen and broaden the local economy, development will be permitted at 8 strategic sites listed in Policy SP3, the main provisions of the policy are:

Site	Dwellings	Employment Floorspace sq m	Other	Infrastructure
South Canterbury	4,000	70,000 sq m	Local Community "Hub", primary school; doctors surgery, extended park & ride	New junction on to the A2 and modifications to the existing junction arrangement; new fast bus link from the site to Canterbury City centre;
Sturry, Broadoak	1,000	local	Community facilities to be determined with parish council	New Sturry Crossing bridge, closure/partial closure of existing crossings at Broadoak and Sturry, closure of existing rail foot crossings, provision of new car park at Sturry Station
Hillborough, Herne Bay	1,000	33,000 sq m	Doctor's surgery, community facilities	New link to Thanet Way via Altira Park and limited access to Sweechbridge road, provision of new west-facing on slip to Thanet Way at the Heart-in-Hand road; proportionate contribution towards the provision of Herne Relief route and new Sturry Crossing.
Herne Bay golf club	400	1 ha	8ha of sports and leisure facilities, 1.25	Proportionate contribution towards the provision of Herne Relief route and new Sturry

Site	Dwellings	Employment Floorspace sq m	Other	Infrastructure
			ha set aside for Herne Bay High School, doctors surgery, care home	Crossing.
Strode Farm, Herne Bay	800	15,000	Community facilities, including new parish hall and local needs housing	Provision of new relief route for Herne, proportionate contribution towards the provision of Herne Relief route and new Sturry Crossing.
Greenhill, Herne Bay	600	-	Community facilities to be determined; recreation and leisure facilities, new allotment provision	Proportionate contribution towards the provision of Herne Relief route and new Sturry Crossing.
Thanet Way, Whitstable	400	-	Extension to Duncan Down Country park	-
North of Hersden	800	1 ha	New community building, play areas and allotments, multi-use games area	Proportionate contribution towards the provision of Herne Relief route and new Sturry Crossing.

2.8 In addition to the strategic sites listed above as identified in Policy SP3, the Council also believes that land to the south of the A28 at Hersden could be considered further, in the light of ongoing investigations as to its suitability as a development site under the Habitat Regulations requirements. Also the Ministry of Defence has recently announced that Howe Barracks is regarded as surplus to requirements and that many elements of the site will be closing in the near future. The Council considers that the main area potentially suitable for housing development is that which is currently within the 2006 Local Plan urban boundary. The MoD land also offers the opportunity to provide enhanced transport links.

Economic Growth

2.9 Policy SP3 includes 118,000 sq m of business space on three of the strategic sites. In addition to this quantum, sites identified in Policy EMP1

are to be allocated in conjunction with housing and other uses to ensure that employment land is appropriately located so as to be delivered as part of mixed-use development schemes. These allocations provide 21.55 ha at 9 locations.

- 2.10 The City Council has cooperated with Kent County Council in respect of the impact of proposed new development in the Plan on the need for new or improved school provision and Policy EMP9 commits CCC to work with KCC *‘to ensure that provision is made for educational needs arising from new development and that appropriate mechanisms are secured through legal agreements to deliver this provision’*.

Town Centre Retail Development

- 2.11 Consultants for CCC (DTZ) conclude that demand for new capacity for both central and non-central retail space might rise to as much as 31,000 sq m by 2021. The local plan suggests that given the constraints of the historic city, the need for significant comparison retail capacity and the lack of suitable City centre sites to accommodate this need, CCC needs to make a significant retail allocation in a suitable location.

- 2.12 Higher quality and specialist retail and leisure operators should be within the City centre and a satellite centre in an edge or out of centre location should be identified. Policy TCL7 proposes that The Wincheap Retail Area will be developed as a satellite retail centre of Canterbury City, focused on retail and leisure provision. It will *“substantially accommodate the large format retail and leisure floorspace”* and *“contribute towards a package of transport improvements”*.

- 2.13 This should have a complementary retail function, catering for more mass-market and large format retailers. There is already substantial retail floorspace on the estate and the local plan proposes a target retail floorspace of 50,000sqm.

- 2.14 Large format stores now include clothing and other comparison goods that will compete directly with retail function within the historic core. The local plan will have to demonstrate that there are no smaller sites available within the historic core that should be developed first (such as the former County hotel site). It should also specify the leisure, convenience and replacement retail space that would be provided, and thus clarify the additional comparison goods space to be provided at the satellite location for full consideration of its potential impact.

Transport Strategy

- 2.15 KCC are working closely with the City Council on the Canterbury Transport Strategy and are playing a key role in its development. This must be recognised in the CLP and our support for the CLP is conditional upon a workable and deliverable Transport Strategy being agreed.

2.16 Para 5.57 refers to a study into a full eastern bypass linking the A28, A257 and A2. KCC consider that this is not a scheme that would remove a pinch point, in the way that would be the case for a Sturry bypass, but would provide a considerable length of new road which would be likely to alter all of the traffic patterns in the city. This scheme will require detailed traffic modelling and will need to be funded by development.

Tourism

2.17 Policy TV2 states planning permission will be granted in or on the edge of town centres for proposals to provide new tourism development including hotels, guesthouses, bed and breakfast, self catering accommodation and new visitor attractions. The lack of identified sites in the plan is questionable.

The Historic Environment

2.18 Canterbury City centre is perhaps the most critical place in terms of its character and the impact of new developments on views and vistas. An Area of High Landscape Value has been identified to protect the historic setting of the City and World Heritage Site. Within this area, any development that causes unacceptable harm to the local landscape character or the setting of the City and / or WHS should not be permitted.

Infrastructure Planning and Delivery to Support Planned Growth

2.19 The Council is developing an Infrastructure Plan for the key investments required to support the development being proposed in the Plan. It is seen as "...critical that the necessary infrastructure (whether physical or social) is delivered in a timely way, to ensure that the development programme is not delayed significantly". Key elements of infrastructure include:

- Provision of fast bus links into Canterbury
- Road improvements at Sturry and Herne
- Additional Park & Ride provision to serve Canterbury
- Completion of bus lanes in key areas
- New/improved A2 junction at Bridge
- New utilities infrastructure
- New schools/extensions to existing schools
- New medical facilities
- New employment floorspace
- New green infrastructure

2.20 CCC is proposing to use Section106 Agreements, bonds and other mechanisms to deliver key infrastructure on strategic development sites. Accordingly Policy SP7 states that an Implementation Plan will be prepared which will set out its proposals for the use of S106 Agreements and similar mechanisms, and community infrastructure levy. It will identify the scope and phasing of infrastructure.

Other Comments

2.21 KCC noted that there was no mention of the Richborough Connection and CCC's approach to assessing its impact and ensuring the delivery of their local plan proposals.

3. Thanet District Council Local Plan Issues and Options Consultation Document.

Introduction

3.1 Thanet District Council (TDC) published their Local Plan Issues and Options consultation document on 4th June 2013 and the consultation closed on 14th August 2013. This is the first of three consultations that are proposed to take place. A further consultation on the Preferred Strategy is expected to take place early 2014 with a Submission to the Secretary of State due late 2014 with the Plan being adopted in 2015.

Economy

3.2 The Local Plan aims to create additional employment and training opportunities, to strengthen and diversify the local economy and improve local earning power and employability. Also to facilitate the continued regeneration of the coastal town centres, developing their individual and niche roles, whilst also consolidating the role and function of Westwood as Thanet's primary retail centre, ensuring retail expenditure is retained within the district.

In order to achieve this, the following objectives are proposed:-

- Support the diversification and expansion of existing businesses in Thanet,
- Retain and attract skilled people.
- Support the sustainable growth of Manston Airport and Ramsgate Port.
- Support additional improvements to the high speed rail links
- Provide a supply of land to accommodate expansion and inward investment by existing and new business.
- Facilitate the provision of accessible, modern and good quality schools, as well as higher and further education and training facilities
- Facilitate the tourism economy taking advantage of the area's unique coast, countryside, its townscape and cultural heritage
- Support a sustainable rural economy,
- Reshape Margate town centre and seafront to achieve a sustainable economic heart celebrating its traditions as a place of relaxation, leisure and seaside fun and growing reputation as a cultural destination.
- Assist Ramsgate to achieve its full potential capitalising on its historic and nautical heritage and visitor economy.
- Enhance Broadstairs as a popular location for visitors and residents.

- Enable Westwood to consolidate and evolve as an accessible, successful and sustainable residential and business community.

3.3 TDC consider the options for the level of employment growth, these are set out below.

OPTIONS	NUMBER OF JOBS	FACTORS TO CONSIDER
Based on past patterns of growth 'Economic Baseline'	3,100	Jobs would be provided for local people. There would be growth in the visitor economy. There would be growth in sectors that will attract a younger working age population. Skills of local people will need to be developed to take advantage of these jobs. There is competition for labour supply within East Kent, due to our ageing population. There would need to be additional housing to accommodate in-migration of workers.
Additional growth in visitor and green economy 'Economic higher growth'	5,100	Further job opportunities would be provided for local people. Strong growth in the tourism and green sectors would have a knock-on effect for the rest of the economy. Significant intervention and support likely to be required from the Council and its partners making this level of growth more challenging to deliver. There would be a need to plan for a higher level of housing. However there is a risk that, if the jobs are not delivered, more housing will attract economically dependent migrants.
Based on economy returning to recession 'economic lower growth'	1,200	Limited opportunities for local people. Socio-economic deprivation in Thanet would be unlikely to improve significantly. Pessimistic approach not supported by national policy.

3.4 These job growth scenarios do not take into account any potential growth at Manston Airport. A separate assessment considers two scenarios a) that the airport will grow in line with the current owners Masterplan creating an additional 2,421 jobs by 2031 b) lower growth scenario related to other similar sized airports of 240 jobs by 2031. The targets in the Masterplan have not currently been met and there is uncertainty regarding Government's future policy for aviation. Although a new domestic flight service commenced in April 2013 to Amsterdam.

3.5 Much of Thanet's allocated employment land is located around Manston (46ha) and Westwood (26ha) and the majority of growth is likely to be in offices (B1) and storage and distribution (B8), with a net loss in industrial floorspace (B2).

The consultation considers the employment land needed

Method	Approx Area Needed to 2031 (ha)
Based upon the employment growth scenarios determined by Experian	Range between 3 and 15 (ha)
Based upon past take up rates	26 (ha)
Maintain the existing supply of employment land as identified in Thanet Local Plan 2006	74 (ha)

3.6 TDC will be reviewing the existing allocations and deciding where to locate employment land and whether the existing allocations are in the appropriate location. TDC are preparing a Strategic Plan for the Port which will guide future development and investment.

3.7 A Parkway station located to the west of Ramsgate on the existing railway line serving HS1 is being explored by KCC and is a proposal in the Local Transport Plan and Growth without Gridlock. The Plan also suggests that funding is also in place to improve both Margate and Ramsgate railway stations.

Town Centres

Vacant floorspace compared to floorspace need (constant market share) by 2031 in the Town Centres (2012)

Town	Current Vacant Floorspace sq.m	Total Floorspace Need to 2031 sq.m
Westwood	480	36,280
Margate	2,970	3,119
Broadstairs	600	6,104
Ramsgate	3,230	1,200

3.8 Margate and Ramsgate have a high level of vacant commercial premises in their town centres, there is nearly enough vacant floorspace to meet the retail need identified for these towns until 2031. This is not the case at Westwood and Broadstairs where vacancy rates are much lower so consideration will need to be given to the allocation of sites to accommodate the need.

Housing

3.9 The aim of the Plan is to provide homes that are accessible to, and suited to the needs and aspirations of, a settled and balanced community.

3.10 The South East Plan, required TDC to plan for at least 7,500 extra homes in Thanet over the 20 year period to 2026. Since the South East Plan was abolished, TDC now need to decide how many additional homes will need to be provided for over the Local Plan period to the year 2031.

3.11 Five scenarios have been developed as a starting point for considering the number of homes that should be provided. These are based upon potential changes in future population and households taking into account changes to the existing population, assumptions about economic growth and the number of people coming in to Thanet.

Dwelling Forecast Scenarios

Scenario	Explanation	Extra homes needed 2011-2031 (annual average required)
1. Zero Migration	Theoretical illustration of how Thanet's population would change if in and out migration were assumed to be equal. This is useful in order to understand how the existing population is expected to change.	3,714 (186)
2. Economic Lower Growth	Based on predicted employment growth of, 1229, 3082 and 5071 jobs respectively. The economic scenarios assume that any shortfall in the resident workforce will be met by people coming to live in Thanet. However, such incomers will include some non-economically active migrants which may include elderly people but also for example children of economically active migrants.	7,600 (380)
3. Economic Baseline		9,639 (482)
4. Economic Higher Growth		11,791 (590)
5. Trend Migration	Assumes past migration levels continue at the same rate as over the past five years.	11,648 (582)

3.12 The Zero Migration scenario would result in the loss of young and working age people. The Migration Trend and Economic Higher Growth scenarios would result in the highest level of increase in young people and working age people.

3.13 The need for affordable housing in Thanet and its neighbouring areas is very high. A study of market viability suggests that delivery of housing schemes may be compromised if TDC were to require an element of more than 30% affordable housing. TDC are currently reviewing their evidence for affordable housing.

3.14 TDC are working with the bodies responsible for delivering and regulating infrastructure such as transport, utilities and community facilities. This work will help identify the infrastructure that would need to be provided alongside different levels of future housing. An infrastructure delivery plan will be prepared which will provide information on the infrastructure available and required to accommodate future housing site options.

3.15 TDC are aiming to prioritise a mix of affordable and market homes and re-balance the stock to incentivise provision of family homes, support retention of young families to supply the future labour force as well as meeting the needs of an ageing population.

3.16 TDC are obtaining an updated assessment on Gypsy and Travellers, it may be appropriate however to solely set out a criteria by which to judge any planning application that might come forward.

Environment and Quality of Life

3.17 The Local Plan aims to safeguard local distinctiveness and promote awareness, responsible enjoyment, protection and enhancement of Thanet's environment, including the coast, countryside, rich seaside heritage, historic environment, diverse townscapes and landscape, biodiversity and water environment.

3.18 TDC consider that the planning policies protecting the green wedges are still relevant and applicable and they form an important part of Thanet's green infrastructure network which could be enhanced and made more accessible. A number of valued landscape character areas are identified in Thanet, and it is considered that these should be protected and enhanced through policy.

3.19 It is recognised that Richborough Power Station site is included in KCC's Waste Local Plan for waste to energy development.

3.20 The Local Plan will ensure that all new development respects and understands the heritage of the District balancing the need for growth against the need to protect and enhance the historic environment. A Heritage Strategy is being prepared for the District, assisted by KCC. The Local Plan will ensure preservation and enhancement of existing and new Conservation Areas, listed buildings, historic parks and gardens and scheduled monuments and identification and where appropriate protection of the Districts archaeological heritage.

Community Facilities

3.21 The need for new community facilities, and more detail about how they can be provided, will be addressed once the number and location of homes that will be built in the district has been decided.

3.22 A Planning Obligations and Developer Contributions SPD, was adopted in 2010, this will be re-written in conjunction with the Community Infrastructure Levy.

3.23 Sufficient community facilities can be provided through new developments, existing facilities being protected and allowing new facilities to be developed.

3.24 The Plan needs to ensure that any policy is specific and strong enough to protect existing community facilities, and can ensure the delivery of replacement alternative community facilities where there is a local need.

Transport

3.25 The Local Plan aims to provide an efficient and effective transport system, delivering the transport infrastructure required to support existing communities and new development.

3.26 The Plan identifies projects in KCC's Growth without Gridlock which include rail line speed improvements between Ramsgate and Ashford and a Thanet parkway station in the vicinity of Manston Airport.

3.27 TDC are preparing a Transport Strategy which will involve detailed assessment of transport issues, including dealing with significant congestion and delays in the transport network. It will consider a strategy for the Westwood area to avoid future traffic congestion and enable safe and convenient travel to and within the area and it will identify the major infrastructure required and guide delivery of future transport improvements.

3.28 Ramsgate Port and Manston Airport are identified as significant pieces of transport infrastructure supporting an international gateway function for Thanet.

4 Swale Borough Council Local Plan Preferred Options

4.1 The Swale Borough Local Plan, sets out the strategic planning framework to guide development and investment in the Borough over the period 2011 to 2031.

4.2 Following this consultation a Submission Draft Local Plan (Reg 19) will be prepared by Swale Borough Council, and the document will then be

submitted to the Secretary of State for public Examination, and if found by the Inspector to be 'sound', it will be adopted by the Borough Council.

The Number of New Dwellings

4.3 Swale Borough Council (SBC) previously set a housing target of 13,500 homes (540 dwellings per annum) for the period 2006 to 2031 (25 years) which KCC supported. This number was expected to meet the future needs of the existing population and to ensure adequate local labour. The Council has decided to keep its housing target at 540 dwellings per annum which means a housing target for a plan period between the years 2010/11-2031 of 10,800 dwellings. The Council has anticipated that this is likely to present tensions with the development industry and have therefore indicated that should economic conditions improve an urgent review of the Local Plan will take place that will re-examine their ability to meet higher housing targets in the longer term.

4.4 KCC's submission supported SBC's target of 10,800 as a minimum with a view that this will be reviewed if economic conditions improve.

Economy Development Targets

4.5 The draft Local Plan provides employment land that will give flexibility to the market, and targets of 545,614m² floorspace (previously 343,269m²) and 7053 jobs (353 per annum) (previously 8,500) between 2011 and 2031. SBC consider that this should more realistically meet the likely needs and demands for economic growth in the Borough. Although the job target has fallen, the range of employment sites has remained very similar. SBC is planning for a flexible choice of sites and a range that will meet the needs of specific sectors or local strengths.

4.6 Additional material has been added from the Council's review of its employment evidence and now specifically addresses economic needs and more fully includes tourism and retail. More clarity has also been added to the policy to make clearer the locations where economic development may be permitted outside allocations and what comprises existing strategic employment locations.

4.7 KCC's submission supported the approach to employment for Swale, and its floorspace and job targets.

The Location of New Development

4.8 Sittingbourne continues to be the main focus for development and concentration of public services and facilities. Development proposed on the Isle of Sheppey is to enable the economic regeneration of Sheerness Port and sites along the A249. There is also a strategic opportunity for regeneration at Queenborough and Rushenden primarily for housing and employment with associated social and community provision although SBC has had to be more realistic about the numbers that these areas are likely to

achieve. See the Key Diagram Appendix A. KCC's submission supported the location of new development mainly at the urban areas, notably Sittingbourne and Sheerness and Queenborough & Rushenden.

4.9 Policy ST4 below summarises the targets for new dwellings, employment and retail/leisure provision.

Policy ST4 Meeting the Local Plan development targets

Source of Supply for development	Number of new dwellings to meet target of 10,800	B Class Employment (m ²) ⁽¹⁾	Retail/Leisure (m ²)
Completions 1 st April 2011 to 31 st March 2012	397	Minus 22,048	Minus 239
Sites with planning permission as 1 st April 2012 yet to commence	2192	318069	0
Windfall sites	1,449	N/A	N/A
Allocations (inc allocations from the 'saved' Swale Borough Local Plan 2008) at			
Sittingbourne	3519	82,733	750
Sheerness	0	0	0
Faversham	538	41,000	0
Minster/Halfway	1521	0	0
Queenborough Rushenden	909 ⁽²⁾	151,011	0
Boughton	39	0	0
Eastchurch	15	0	0
Iwade	42	0	0
Leysdown	10	0	0
Newington	14	0	0
Teynham	338	26,840	0
Sites for Gypsies and Travellers to be identified within Part of the Local Plan	82 ⁽³⁾	N/A	N/A
Total	11,065	597,605	511

1. Excludes 55,442sqm of future floorspace losses at Queenborough and Sittingbourne Industrial Park

2. Plus 45 dwellings beyond the plan period

3. As at 1 April 2013. Future provision to include an element of pitches to be provided on qualifying housing allocations

4.9 Three 'Areas of Future Change' have been identified which could trigger a full or partial review of the Local Plan and an increase in dwelling numbers. These are:

- Land reclamation proposals for 2,000 houses at the Port of Sheerness including the former steel mill site and Blue Town (Policy AFC1).
- Major expansion of the Kent Science Park beyond the current highways capacity of the area; (Policy AFC2)
- Sittingbourne Southern Relief Road (SSRR) connecting the A2 and M2 east of Sittingbourne; (Policy AFC3)

The Port of Sheerness

4.10 SBC supports proposals for major regeneration at the Port of Sheerness. A major opportunity is provided by the planning application for the manufacture and assembly of wind turbines, although the previously planned operator can no longer proceed with its plans, the Port, Borough and County Councils are working hard to secure a new site operator. KCC's submission supported this policy approach to the Port of Sheerness although consider that a partial review could delay schemes and the potential for economic growth and would like to see this site taken forward as soon as possible.

Kent Science Park

4.11 SBC supports the principle of major expansion, but the means of delivering the infrastructure necessary to support this growth are felt to be too uncertain for this proposal to progress as a strategic land allocation at this time. KCC's submission supported continuing support for the approach to further expansion of Kent Science Park, and works with SBC and the park operators to bring forward a partial Review of the Local Plan, considering in parallel the Sittingbourne Southern Relief Road and linked development (Policy AFC2 and Policy ACF3).

Faversham

4.12 The Core Strategy proposes an emphasis on the conservation and enhancement of the historic and natural environment of Faversham with new development and services focused in the town. In response to the previous consultation the Council has brought forward the Oare gravel workings site as a mixed use allocation (150 homes, 20,000sqm of B use class). KCC's submission supported the policy emphasis for Faversham, and the allocation of a new employment site at Oare gravel workings.

Gypsy and Travellers

4.13 A Gypsy and Traveller Accommodation Assessment has now been undertaken which KCC supported and there is a now a target of 85 pitches to 2031 included in the Plan these sites will be allocated in by a separate Part 2 Local Plan which is due to start soon. SBC also need to maintain a 5 year supply of such sites. SBC are bringing forward a requirement for larger housing developments (50 dwellings or more) to include provision within their schemes for pitches for Gypsies and Travellers or to provide a commuted sum. KCC supports the SBC approach to Gypsy and Traveller sites and

offered continuing support in meeting needs for well-managed, socially-rented sites.

KCC Infrastructure and Service Provision

4.14 A draft Implementation and Delivery Plan and Schedule will be included as part of the Plan, including a list of infrastructure that will be funded by Section 106 agreements and the proposed Community Infrastructure Levy. This will be finalised when the Local Plan reaches submission stage when the spatial strategy and allocations have been confirmed. KCC acknowledges that given the current viability assessment SDC has, there is a likelihood that CIL revenue will be significantly less than the cost of the infrastructure that is identified as necessary to support growth in the district. KCC is willing to assist the Borough Council in its preparation of its CIL and final Infrastructure Delivery Plan and consideration of how infrastructure can be funded. The KCC submission to SBC therefore requested that the Borough Council include in policy, and make clear in the CIL charging schedule that:

- KCC services to support new development must be funded by developer contributions, and that it will be necessary for the Borough Council to pass CIL revenue to KCC for schools, highways and other services.
- site(s) for schools and other services will be allocated in the appropriate Development Plan Document, and where they are located on development sites the developer should provide land, fit for development, at no cost to KCC.

Education

4.16 KCC has made an interim assessment of the need for new school capacity, but this needs to be refined to take into account the location of dwellings now proposed. This includes expansion of existing primary schools at Sittingbourne Faversham, Minster, Rushenden Eastchurch. The Local Plan has allocated land for a new secondary school in north west Sittingbourne.

When SBC provide a revised housing trajectory KCC will be able to list and cost new school capacity more confidently.

4.17 The KCC submission to SBC requested a continuation of the dialogue on the implications for KCC services of development in the Borough, and to reflect the outcome in the Infrastructure Delivery Plan and CIL charging schedule.

Transport

4.18 A Local Transport Strategy is being prepared in partnership with Kent County Council with measures to reduce car use and manage transport demand more sustainably. Transport modelling has not yet been undertaken to see the cumulative effect of the development sites in this Local Plan strategy, although a considerable amount of modelling was undertaken for the

previous Local Development Framework and demonstrated the parts of the network that would become stressed by the proposed development. This is likely to be similar for the sites in the current Local Plan as the main premise of the quantum and location of development have not changed significantly.

4.19 The Local Plan recognises that longer term measures to relieve Junction 5 of the M2 and to improve the distribution of traffic into Sittingbourne could be achieved by a Sittingbourne Southern Relief Road (SSRR), but there are no clear means of delivering this at the current time. If the context for the delivery of the road becomes favourable an immediate partial review of the Local Plan would be triggered.

4.20 An 'area of search' has now been identified for the Bapchild sections of the Sittingbourne Northern Relief Road (SNRR) (Policy AS1), joining the A249 with the A2 east of Sittingbourne. Unlike the SSRR the SNRR is likely to be deliverable within the plan period, and the route of the road will be sought and allocated either by Part 3 of the Local Plan or via its own SPD. Funding will be sought both from any suitable sources of public funding and from developer funding.

4.21 The Plan suggest that the interim access arrangement of a partial J5a and spur to Kent Science Park (KSP) is agreed and deliverable within the next 5 years. KCC do not agreed with this statement. The Plan states that the Local Enterprise Partnership (LEP) have "formally endorsed this as a strategic priority" however neither scheme (partial or full J5a) was put forward as part of the "long list" of schemes for funding via Local Transport Body and LEP.

4.22 KCC's response to the SBC consultation advocated that KCC as Highway Authority continues to work closely with the Borough Council in preparing the Transport Strategy which will be incorporated into the SBC Implementation Delivery Schedule and that transport modelling is undertaken to fully understand the cumulative impacts of the proposed development sites.

Environment

4.23 A number of changes have been made to the environment section since the previous consultation, KCC welcomed the amended sections of the Local Plan and supports the approach taken by the Borough Council to energy, water, ecology landscape, heritage and green infrastructure.

Property

4.24 Two potential housing sites owned by KCC do not appear in the Draft Local Plan, although one of them appears to be in the SHLAA. These include Halfway Houses Primary School and Old Danley Middle School. One of these sites will house a replacement school for Halfway Houses but a decision has not been made on which site yet, that is in the hands of the Education Funding Agency. KCC requested that these sites are included in the allocations section of the Local Plan.

4.25 There are five additional sites that have been identified by KCC currently in the use of Families and Social Care Directorate for service delivery or office use which will potentially be released from these uses within the next five years. These are Kiln Court, Osborne Court and Faversham SEC offices at Avenue of Remembrance, Sittingbourne. KCC would like to highlight that if released, we would want these sites considered for potential residential development. Finally, KCC are proposing to relocate Tunstall Church of England Primary School onto greenspace within the village.

5. Recommendations

5.1 That the Cabinet Committee notes the representations submitted from KCC by the Cabinet Member for Environment and Transport as set out in Part 2, 3 and 4 of this report and summarised in the conclusions at Part 5 below.

Canterbury

- (a) support the level of development proposed in Policy SP2 for housing, employment and retail
- (b) support the target of 15,600 dwellings to 2031, which will assist the City in broadening and strengthening the local economy
- (c) welcome the specification of the highway schemes necessary to support each of the strategic sites identified in Policy SP3
- (d) request that the required provision for schools is specified for each site in Policy SP3, and regarded as essential infrastructure
- (e) request that the Local Plan should state the number of jobs that could reasonably be accommodated on each of the allocated sites
- (f) question the proposed allocation of a large scale satellite retail space near to the City Centre, as the primary objective of the Local Plan should be to sustain the economic functions of the historic core. Canterbury City Coun
- (g) support the allocation of new sites for hotels within the Local Plan
- (h) welcome and support the commitment in Policy SP7 to produce an Infrastructure Plan, and the proposed use of S106 Agreements to delivery key infrastructure on strategic development sites
- (i) welcome and support the commitment in Policy QL5 to agree funding prior to planning permission being granted but should suggest that this principle is established early in the plan as part of Infrastructure Planning & Delivery
- (j) support Policy SP6 and the intention to prepare a green infrastructure strategy

Thanet

- a) support the approach for strengthening and diversifying the local economy and focusing investment at the coastal towns and Westwood.
- b) support the 'Economic baseline' option as a minimum which would result in an additional 3,100 jobs and 9,639 extra homes by 2031.

- c) support further growth at Manston Airport and the Port of Ramsgate
- d) request that TDC clarify what funding has been secured for Margate and Ramsgate railway stations.
- e) support the green wedge policy to retain separation between Thanet's towns and villages.
- f) generally support the approach set out in the Environment and Quality of life section.
- g) request that KCC Property and Education team work with TDC to explore the potential for new school or expansion of existing sites.
- h) submit six sites in response to the call for sites to be included in the site allocation document.
- i) broadly support the approach taken in relation to transport.

Swale

- a) support the target of 10,800 new dwellings and the distribution as a minimum with a view that this will be reviewed if economic conditions improve.
- b) support the approach to employment for Swale, and its floorspace and job targets.
- c) continue to support the policy approach to further expansion of Kent Science Park, Port of Sheerness and the approach to development of the main urban areas of Sittingbourne, the Isle of Sheppey and Queenborough & Rushenden. Ensuring that any partial review of a Local Plan does not delay schemes and future economic growth.
- d) support the policy emphasis for Faversham, and the allocation of a new employment site at Oare gravel workings.
- e) support approach to Gypsy and Traveller sites and offer continuing support in meeting needs for well-managed, socially-rented sites.
- f) requests the Borough Council include in policy, and make clear in the CIL charging schedule that:
 - KCC services to support new development must be funded by developer contributions, and that it will be necessary for the Borough Council to pass CIL revenue to KCC for schools, highways and other services.
 - site(s) for schools and other services will be allocated in the appropriate Development Plan Document, and where they are located on development sites the developer should provide land, fit for development, at no cost to KCC.
- g) continue the dialogue on the implications for KCC services of development in the Borough, and to reflect the outcome in the Infrastructure Delivery Plan and CIL charging schedule.
- h) as Highway Authority continues to work closely with the Borough Council in preparing the Transport Strategy to be incorporated into the Implementation Delivery Schedule
- i) welcome the amended sections of the Local Plan and supports the approach to energy, water, ecology, heritage, landscape and green infrastructure.

- j) requests that Halfway Houses Primary School and Old Danley Middle School site are included in the allocations section of the Local Plan.

6 Background Documents

- 1) Canterbury City Council Local Plan Preferred Options Consultation Document (June 2013) -
http://canterbury-consult.limehouse.co.uk/portal/preferred-options-2013/cdlp_preferred_option_2013?pointId=2360239
- 2) Thanet District Council Local Plan Issues and Options Consultation Document (June 2013) -
<https://consult.thanet.gov.uk/gf2.ti/f/1346/3461.1/PDF/-/Annex%201%20Local%20Plan%20Issues%20and%20Options%20Consultation%20Document%20FINAL%20for%20Consultationx.pdf>
- 3) Swale Borough Council Local Plan Preferred Options Consultation Document (August 2013) –
<http://www.swale.gov.uk/bearing-fruits-2031-the-draft-local-plan/>

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Appendix A

Key Diagram: Consultation Draft Swale Borough Council Local Plan Part 1

August 2013

Key

- Principal Natural Asset (DM24,27)
- Areas of High Landscape Value (DM24)
- Protection of wider countryside (ST3)
- Main Borough Urban Centre (ST3 Primary Growth Focus)
- Other Borough Centres (ST3 Secondary, constrained growth focus)
- Other Urban Local Centres (ST3 Supporting growth focus)
- The West Sheppey Triangle (ST3 Main Sheppey growth focus)
- Rural Local Service Centres (ST3 Main focus in rural areas)
- Other Villages (ST3 Minor focus for development)
- Coastal Change Management Area
- Strategy area boundary (ST5-7)
- Housing locations greater than 100 dwellings (A1-A11)
- Main proposed employment locations (A1-4, A7-8, A10)
- Town Centre Regeneration
- Existing Strategic Employment Site (CPI)
- Reserve housing and employment site (A8)
- Proposed transport improvement
- Proposed secondary school
- Main areas for landscape enhancement (DM24, 29)

