From:	[redacted]
To:	Manston Airport
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Subject:	SMAa representation to the Secretary of State for Transport - Matter 1
Date:	27 June 2021 10:09:22
Attachments:	SMAa representation to the Secretary of State for Transport - Matter 1.pdf

For the attention of the Manston Airport Case Team

TR020002 – SMAa representation to the Secretary of State for Transport – Matter 1 Re-determination of the Application by RiverOak Strategic Partners Limited ("the Applicant") for an Order granting Development Consent for the reopening and development of Manston Airport in Kent.

SMAa has over 3,700 members who are in full support of the Development Consent Order to reopen Manston Airport, many wanting jobs for themselves, their family or other Kentish people. Thus, we wish to make further representations to assist in the re-determination of the DCO.

In the Department for Transport's Statement of Matters letter dated 11th June 2021 it invited Interested Parties to make further representations on 4 matters. This representation will look at:

- **the extent to which current national or local policies (including any changes since 9 July 2020 such as, but not limited to, the re-instatement of the ANPS) inform the level of need for the services that the Development would provide and the benefits that would be achieved from the Development.**

Please see attached :

SMAa representation to the Secretary of State for Transport - Matter 1.pdf

From the SMAa Committee on behalf of the 3,700 members

[redacted]

TR020002 – SMAa representation to the Secretary of State for Transport – Matter 1

Re-determination of the Application by RiverOak Strategic Partners Limited ("the Applicant") for an Order granting Development Consent for the reopening and development of Manston Airport in Kent.

SMAa has over 3,700 members who are in full support of the Development Consent Order to reopen Manston Airport, many wanting jobs for themselves, their family or other Kentish people. Thus, we wish to make further representations to assist in the re-determination of the DCO.

Statement of Matters

In the Department for Transport's Statement of Matters letter dated 11th June 2021 it invited Interested Parties to make further representations on 4 matters. This representation will look at:

- **the extent to which current national or local policies (including any changes since 9 July 2020 such as, but not limited to, the re-instatement of the ANPS) inform the level of need for the services that the Development would provide and the benefits that would be achieved from the Development.**

1.0 Policies

1.1 Local Policies

Manston Airport is situated within the Thanet District Council (TDC) Local Authority. In July 2020 TDC adopted its Local Plan[1] which contained the following Policy SP07 on Manston Airport:

"Manston Airport as identified on the Policies Map is safeguarded for airport related uses. Whether or not the DCO is confirmed, the future use and development of Manston Airport and/or other policies affected by the outcome of the DCO process will be determined through the early review of the Plan".

Manston Airport continues to be safeguarded for Airport use under this Policy which replaced the previous Policy EC4 from the 2006 Local Plan[2]:

"LAND AT THE AIRPORT, AS IDENTIFIED ON THE PROPOSALS MAP, IS RESERVED FOR AIRSIDE DEVELOPMENT. DEVELOPMENT PROPOSALS WILL REQUIRE SPECIFIC JUSTIFICATION TO DEMONSTRATE THAT AN AIRSIDE LOCATION IS ESSENTIAL TO THE DEVELOPMENT PROPOSED. DEVELOPMENT WILL BE REQUIRED TO RETAIN SUFFICIENT LAND TO PERMIT ACCESS BY AIRCRAFT OF UP TO 65M (217FT) WINGSPAN TO ALL PARTS OF THE SITE".

Although the Policy wording has changed the effect is the same, so it has not altered the need for or benefits from the development which remain strong.

[1] Thanet District Council Local Plan 2020 - page 30

[2] Thanet District Council Local Plan 2006 - page 34

1.2 <u>National Policies</u>

In December 2020 the Supreme Court overruled the Court of Appeal and reinstated the Airports National Policy Statement (ANPS). The ANPS is predominately concerned with the case for a third runway at Heathrow but it does refer to "Making Best Use" (MBU) of existing runways.

"Having analysed the responses, the Government has confirmed that it is supportive of airports beyond Heathrow making best use of their existing runways"[3].

N.B. The ANPS was published at the same time (June 2018) as it published "Beyond the horizon, the future of UK Aviation, Making best use of existing runways".

The ANPS goes on to say:

"*However, in light of the findings of the Airports Commission on the need for more intensive use of existing infrastructure as described at paragraph 1.6 above, the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow*".

The ANPS indicates the importance of Air Freight to the economy and states that "*over £178 billion of air freight was sent between UK and non-European Union countries in 2016, representing over 45% of the UK's extra-European Union trade by value"*[4]. A reopened Manston will be able to increase this value still further.

Finally, the ANPS highlights the need for increased capacity in the South East which Manston can help satisfy:

"*Aviation demand is likely to increase significantly between now and 2050.*[38] *All major airports in the South East of England*[39] *are expected to be full by the mid-2030s, with four out of five full by the mid-2020s. By 2050 demand at these airports is expected to outstrip capacity by at least 34%, even on the department's low demand forecast.*[40] *There is relatively little scope to redistribute demand away from the region to less heavily utilised capacity elsewhere in the country*"[5].

However, the ANPS has only been reinstated by the Supreme Court and, as such, is not a new Policy. It was referred to in the Examination by the applicant and Interested Parties and so its reinstatement does not alter the already strong need and benefit case.

Although there have been many statements and comments by Government, there have been no new national Policies since 9th July 2020.

It should be noted that the Supreme Court, in its judgement in December 2020, stated that ministerial statements could not constitute government policy.[6]

[3] ANPS – page 11 section 1.39
[4] ANPS – page 14 section 2.7
[5] ANPS – page 15 section 2.12
[6] Supreme Court Judgement December 2020 – page 35 section 105

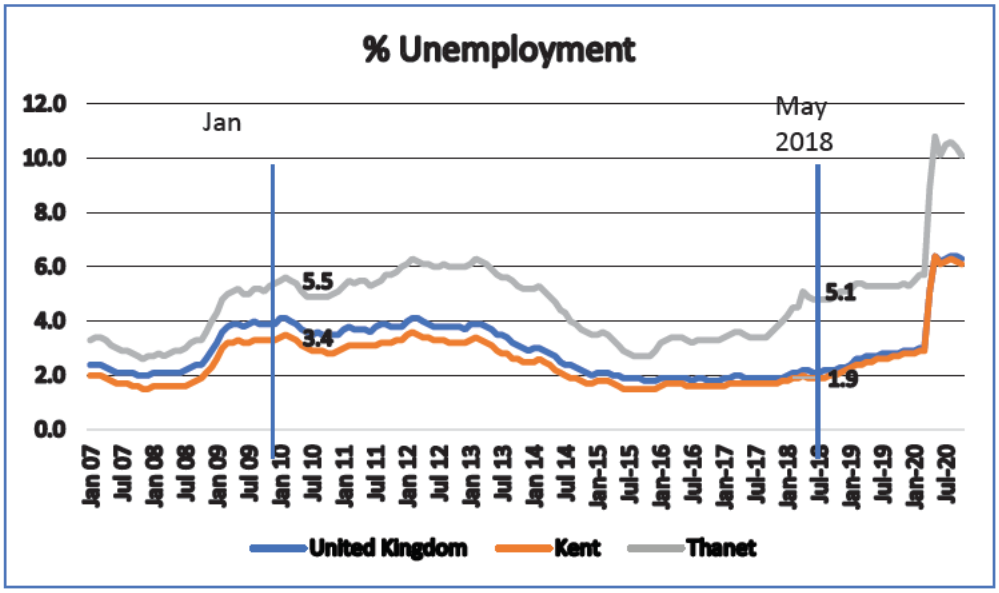
2.0 Benefits

During the examination phase of the DCO process it was necessary to identify the Principal issues and Need and Socio-economic factors were treated as discrete units.

However, there is a correlation between the two and there is a strong case to argue that areas of high unemployment and deprivation, such as Thanet, "Need" the development proposed to bring about the Socio-economic benefits generated from increased employment and the associated reduction in overall deprivation in the area.

Thanet, despite being in the South East, is an area with high unemployment and deprivation.

2.1 - Unemployment – rates in Thanet nearly double those of Kent



The Chart shows that Thanet has consistently had a significantly higher % unemployment rate than Kent[7]. In contrast Kent has had a lower % unemployment rate than the UK average.

For the period shown from January 2007 until July 2020 Thanet has had:

An average of **1.9 times the % unemployment rate of Kent** (Thanet 4.7% / Kent 2.5% = 1.9)

The lowest was 1.6 times the % unemployment rate of Kent (Jan 2010 Thanet 5.5% / Kent 3.4% = 1.6)

The highest was 2.6 times % unemployment rate of Kent (May 2018 Thanet 4.9% / Kent 1.9% = 2.6).

2.2 – 18-24 unemployment - Thanet rates highest in the South East

The situation for the young is even worse. "Thanet has the highest 18–24-year-old unemployment rate in the South East at 17.2%.". That is more than double the UK figure of 9.2%.[8]

[7] District-unemployment-level-Kent 2020
[8] District-unemployment-bulletin 2020

The 18–24-year-old unemployment rate in Dover 12.9%, Swale 12.2% and Kent 9.9%.

It is clear from the information above that Thanet and neighbouring authorities desperately need jobs that are accessible to local people. (see section 2.5 below).

Public Health England have indicated the link between unemployment and poor health:

"*The evidence is clear that unemployment, particularly long-term unemployment, and poor working conditions, are bad for health and contribute to health inequalities*"[9].

It goes on to suggest interventions such as:

"*working with local employers to encourage, incentivise and enforce good quality work; interventions to increase employment opportunities and retention for people with a long-term illness or disability; and interventions to increase employment opportunities and retention for older people*"[9].

A reopened Manston would go a long way to meeting those needs. (see section 2.5)

2.3 – <u>Deprivation – "the most deprived Local Authority in Kent"</u>

According to figures produced by the Office for National Statistics (ONS) and published by Kent County Council (KCC) in 2020[10] looking into the index of multiple deprivation (IMD 2019):

"Thanet continues to rank as the most deprived Local Authority in Kent"·

It has been the most deprived Local Authority in Kent since at least 2010.

Out of 317 Local Authorities, Thanet is now ranked 30th, so there are only 29 more deprived Local Authorities in England.

England is divided into 32,844 Lower Super Output Areas (LSOA) each with a population of 1,500. Margate Central 003A (in Thanet) is 67th out of 32,844 LSOAs.

Thanet has 18 LSOAs within the top 10% most deprived LSOAs in England.

"*In England, there is a systematic relationship between deprivation and life expectancy, known as the social gradient in health. Males living in the least deprived areas can, at birth, expect to live 9.4 years longer than males in the most deprived areas. For females, this gap is 7.4 years*"[11].

However, it is not just life expectancy that is influenced by deprivation.

"*The gap in healthy life expectancy at birth is stark. In 2015–17, people in the least deprived areas could expect to live roughly 19 more years in good health than those in the most deprived areas. People in the most deprived areas spend around a third of their lives in poor health, twice the proportion spent by those in the least deprived areas*"[12].

[9] Public Health England – page 78
[10] Indices-of-Deprivation-headline-findings 2020
[11] The Kings Fund – Inequalities in Life Expectancy
[12] The Kings Fund – Inequalities in Healthy Life Expectancy

2.4 - Major employers – currently only 0.1% of Thanet enterprises employ more than 250 people

Referring to information from the Office for National Statistics published by KCC in 2020[13] it is shows there are very few enterprises that employ more than 250 people:

In Thanet District only 0.1% of enterprises (5 out of 4,050) employ more than 250 people.

It is not much better in neighbouring districts; Canterbury District 0.5% (25 out of 5,400) Dover District 0.1% (5 out of 3,570) and Swale District 0.3% (15 out of 5,020).

In contrast most enterprises employ 0-4 people, Thanet 77.5% (3,140 enterprises) and in neighbouring districts; Canterbury 76.3% (4,120 enterprises), Dover 76.8% (2,740 enterprises) and in Swale 77.2% (3,875 enterprises).

2.5 - The future – Manston Airport will be a major employer of local people

By any standard, a reopened airport will be a very significant enterprise with the number of jobs projected.

By year two, direct jobs projected by the applicant (856)[14] will exceed the 250-job threshold making it one of the major employers in the area. Note the total does not include up to 800 initial construction jobs.

Table 4 *Forecast job creation*

	Freight tonnage	Passenger numbers	Direct jobs	Indirect/ induced jobs	Catalytic jobs	Total job creation
Y1	0	0	116	0	0	**116**
Y2	96,553	0	856	1,542	0	**2,398**
Y3	108,553	662,768	1,551	2,791	6,203	**10,545**
Y4	167,092	679,868	2,085	3,753	8,341	**14,179**
Y5	173,741	686,672	2,150	3,870	8,601	**14,621**
Y6	181,436	965,295	2,466	4,438	9,862	**16,766**
Y7	192,908	975,591	2,576	4,638	10,306	**17,520**
Y8	200,673	975,591	2,645	4,762	10,581	**17,988**
Y9	203,245	975,591	2,668	4,803	10,673	**18,143**
Y10	212,351	975,591	2,749	4,948	10,996	**18,693**
Y11	222,377	1,011,587	2,812	5,062	11,249	**19,124**
Y12	234,508	1,049,022	2,890	5,202	11,561	**19,653**
Y13	244,690	1,087,954	2,947	5,305	11,789	**20,042**
Y14	256,989	1,128,444	3,018	5,432	12,072	**20,522**
Y15	270,579	1,170,553	3,094	5,570	12,378	**21,042**
Y16	283,904	1,214,347	3,164	5,695	12,656	**21,515**
Y17	296,594	1,259,892	3,224	5,802	12,894	**21,920**
Y18	312,344	1,307,259	3,301	5,942	13,205	**22,448**
Y19	324,838	1,356,521	3,349	6,029	13,397	**22,775**
Y20	340,758	1,407,753	3,417	6,151	13,668	**23,235**

[13] UK-business-counts-statistics 2020

[14] [APP-085] – Volume IV page 28

It is the stated aim of the applicant to employ as many local people as possible. They intend to:

"Work with local councils and 3rd sector organisations to help promote job opportunities to local people, particularly to the long-term unemployed."[15]

Schedule 2 Requirement 20 of the DCO states that:

"No part of the authorised development is to commence until an Education, Employment and Skills Plan has been submitted to, and approved in writing by, the relevant planning authority ….".

It makes clear that this plan must include a Local Hiring Policy.

This has been incorporated into the Third Schedule of the section 106 agreement[16].

THIRD SCHEDULE

EDUCATION / TRAINING / RECRUITMENT / PROCUREMENT

DEFINITIONS AND INTERPRETATION

1. Where in this Schedule the following defined terms and expressions are used they shall have the following respective meanings unless otherwise stated:-

Word or Phrase	Meaning
"Education & Training Contribution"	means: • an initial payment of £250,000.00 Index Linked (Two hundred and fifty thousand pounds) ("**Initial Payment**"); and • an annual payment of Fifty thousand pounds (£50,000.00) to be paid for a period of twenty years commencing on the 1st anniversary of the Initial Payment ("**Annual Payment**"). such sums to be used for towards those requirements set out in the Education, Employment and Skills Plan; and
"Education, Employment & Skills Plan"	means the Education, Employment and Skills Plan required to be submitted under Requirement 20 of the Development Consent Order which, for the avoidance of doubt, must contain the following: • chapters addressing: o legal compliance; o reporting procedures; and o obligations to be placed upon third parties including local educational establishments and bodies; • plans and policy documents including: o a local hiring policy; o an education and skills policy; o a workplace training policy; • provision for the establishment of a local employment partnership board to include the relevant planning authority and the relevant local education authority and other relevant

3.0 Conclusions

Manston Airport, with its large, existing runway, lies in the district of Thanet in East Kent, which currently has the highest unemployment figures in Kent and the highest unemployment in the South East for 18–24-year-olds. As indicated earlier it has severe deprivation together with unemployment which has severe health implications both in life expectancy and quality of health. Thanet desperately needs jobs.

[15] [APP-085] – Volume IV page 38

[16] [REP11-010] – page 16

Noise will have no significant effect during the Construction Phase[17] but could have a minor to moderate effect to some receptors during the Operational Phase[18]. However:

"*A noise insulation scheme (as detailed in the Noise Mitigation Plan (NMP)) for residential properties will be offered by the airport operator to help avoid significant adverse effects on health and quality of life"*[19].

It should also be noted that the *effects upon human health and ecological resources of aircraft ground support equipment emissions and airport operation emissions are considered not significant after the appropriate mitigation*[20].

With the appropriate mitigations put in place by the applicant, it is our firm belief that the positive effects on health of reducing unemployment and deprivation in Thanet and beyond far outweigh any negative aspects.

The DCO for a dedicated cargo hub will provide a considerable number of jobs and will ensure that Thanet's prosperity and future employment will increase. The knock-on effect of the reopening of Manston Airport, with the huge investment provided by RSP, is paramount for the economy, both locally and nationally and for the health of its residents.

Finally, as indicated earlier there have been no new national policies since July 2020, so it remains government policy to make best use (MBU) of existing runways. The Stansted Airport Appeal Decision letter makes clear:

"There is no requirement flowing from national aviation policy for individual planning applications for development at MBU airports, such as Stansted, to demonstrate need for their proposed development or for associated additional flights and passenger movements".

From the SMAa Committee on behalf of the 3,700 members

Dr Beau Webber (Chairman)
Liam Coyle (Vice-Chairman & Chief Moderator)
David Stevens (Vice-Chairman)
Margaret Sole (Treasurer)
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[17] [APP-034] – page 12.38
[18] [APP-034] – page 12.38
[19] [REP11-008] - P75
[20] [REP11-008] - P49

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1 Thanet District Council Local Plan 2020	9 – 271
2 Thanet District Council Local Plan 2006	272 – 644
3 ANPS	645 – 736
4 Supreme Court Judgement December 2020	737 – 795
5 District unemployment level Kent 2020	796 – 803
6 District unemployment bulletin 2020	804 – 840
7 Public Health England	841 – 927
8 Indices of deprivation headline findings 2020	928 – 945
9 The Kings Fund	946 – 948
10 UK business count statistics 2020	949 - 962

Thanet District Council

Local Plan

Adopted July 2020



Foreword

This Local Plan has taken a long time to produce under quite difficult circumstances, but I am pleased that we have now been able to adopt a new Local Plan for the district. I would like to thank all those council officers, elected councillors, members of the public and stakeholders who have contributed along the way.

Our new Local Plan seeks to meet our housing needs, including affordable housing, but also to support the Thanet economy, including tourism and cultural industries, and ensure the provision of supporting services and infrastructure, such as schools, roads, health facilities and open space.

The Plan also aims to protect the best of our natural environment, and enhance biodiversity across the district - including the international wildlife sites at the coast - and our historic environment. Thanet has approximately 2,000 Listed Buildings and 27 Conservation Areas, as well as other local heritage assets. The council has declared a Climate Emergency, and the Plan recognises the impact of climate change on all of us.

Having an adopted Plan means that the council now has more control over the location, type and quality of development that happens in the District. Just as importantly, it will support the council's wider vision for the area over the next few years.

Of course, this is not the end of the story, and the council will soon need to embark on a review of the Plan. The year 2020 is now likely to be remembered as one of significant change, which we will need to take into account in that review. However, the aim remains the same - to meet the housing and other needs of local people, to protect the environment for the long term, and to address the impact of climate change. The adoption of this Plan marks a significant step forward in that endeavour.

Cllr Rick Everitt, Leader

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Strategy

What is the Local Plan?

1 The Local Plan is a key Council document that is required to guide and deliver the Council's plans and aspirations for growth. It is essential to shaping change in a form which is desired by the Council and Thanet's communities, and for the delivery of development projects and infrastructure.

2 The Plan must be prepared with the objective of contributing to the achievement of sustainable development, and be in accordance with national planning policy.

3 The Plan should be aspirational but also realistic and should provide sufficient flexibility to adapt to rapid change. The Plan must be based upon up-to-date, sound evidence. We have to be able to demonstrate that the Plan will be deliverable and therefore the proposals included within it must be viable and realistic. The Plan will be delivered by a number of partners, including the private sector.

4 The Plan sets out policies and proposals that will be used to guide decisions and investment on development and regeneration over the period to 2031. It sets out how and where the homes, jobs, community facilities, shops and infrastructure will be delivered and the types of places and environments we want to create. It also identifies land to be protected from development, such as open space. Once adopted, the Plan will form the statutory planning framework for determining planning applications and will replace the "saved" policies from the Thanet Local Plan 2006. The Cliftonville Development Plan Document (2010) still remains in force.

Why is the Council producing a Local Plan?

- The Council is required by Government to produce a Local Plan.
- The Council also wants to set out in advance how it wishes to see the district develop. This provides certainty to developers, businesses, the local community and others.
- The Plan provides a framework to help deliver the Council's Economic Growth Strategy
- The Plan will ensure that decisions on planning applications are made in accordance with local policy. Without a Plan the Council has less control over development in the area.

How has the Council decided what the Plan should contain?

- The National Planning Policy Framework and the National Planning Practice Guidance set out what the government expects local plans to cover.
- We have considered the specific issues and opportunities that are relevant to Thanet.
- We have considered key elements of the evidence base, and carried out key work in relation to Local Plan viability, Sustainability Appraisal and infrastructure delivery
- We carried out consultation on the Preferred Options for the Plan, and further Proposed Revisions to that Plan, and have considered the comments received.
- We have assessed the merits of the options in achieving sustainable development, including through the Sustainability Appraisal.
- We have and will continue to co-operate with our neighbouring authorities on cross-boundary strategic issues.

5 The options and assessment of their merits are documented in the Issues and Options Consultation Document, the Sustainability Appraisal and in Examination statements, which can be accessed on the Planning Policy pages of the Council's website.

How is the Plan structured?

6 The Plan is set out in three main sections.

Section 1 provides the introduction and sets the context for the Plan. It sets out the vision for Thanet that the Plan is seeking to achieve, and introduces the overall strategy behind the Plan, as well as setting out the strategic priorities and objectives which need to be achieved in order to deliver the vision and strategy of the Plan.

7 Section 2 sets out the strategic issues and policies of the Plan. These are the overarching policies which underpin the Plan's strategy. These include the strategies for delivering sustainable development and the overall levels of development and growth which are needed in Thanet, and the strategies for the economy, town centres, housing, environment, communities and transport, including strategic housing and employment site proposals.

8 Section 3 sets out district wide development management policies. These are detailed and wide ranging policies which may be relevant to all new development proposals in Thanet. The section is set out in topic areas, and covers issues including climate change, design and heritage.

Thanet's Profile and Key Issues

9 In order to inform the Plan for the future, we must have a good understanding of the characteristics of Thanet today, and the opportunities and issues that it presents. These are set out in the evidence and background papers supporting this document.

10 The Local Plan seeks to maximize the opportunities available and deliver policy support to respond to the issues facing the area.

11 Thanet is located in East Kent, in close proximity to continental Europe. It has three main coastal towns of Margate, Ramsgate and Broadstairs. The built up area is densely populated and forms an almost continuous urban belt around the north east coast. This is separated by areas of countryside between the towns and providing relief in the built area. There are also attractive coastal and rural villages.

Map 1 - Map of Thanet



12 The district has an area of about 40 square miles (103,300ha) and a resident population of about 140,000. About 30% of the district is urban with 95% of the population living in the main urban area around the coast. Thanet is the fourth most populated district in Kent, and has the second highest population density. Thanet is a popular area for retired people to live, and has the highest number of over 65 year olds in the county whilst having a lower proportion of 16-64 year olds than the county average.

13 Thanet is a unique and vibrant coastal area, with an attractive environment and a number of unique features. There are 20 miles of coastline with attractive chalk cliffs and beautiful sandy beaches and bays, many of which have been awarded European Blue Flag status. Much of the coast is also recognised for its internationally important habitats, including coastal chalk and significant populations of coastal birds. This is reflected in the coast's designation under international and national legislation, including Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation, and a Marine Conservation Zone. These areas are protected by legislation to prevent harm to them from development change and other human activity. There are also areas of Thanet which have a functional relationship with the Special Protection Areas, and the Council recognises the importance of protecting that relationship in the longer term.

14 Thanet is also rich in history. This is recognised today in the identification of around 2,000 listed buildings and 27 Conservation Areas. Its historic landscape contains many archaeological sites dating back to pre-historic times.

15 Outside of the urban area, much of the land is high quality and intensively farmed agricultural land.

16 Thanet has some areas which are at risk from flooding. These are confined to the low lying areas of the countryside to the south west of the district, and along the very edges of the coast, affecting small areas of Margate and Ramsgate. It accounts for approximately 11% of the district area.

17 In 2005, a new town centre was established at Westwood. This brought many retailers not previously represented in Thanet, and in turn has significantly reduced the leakage of retail spend from the district. The centre continues to attract investment, with further development planned over the next few years. The area does however suffer from traffic congestion and accessibility around the centre, particularly on foot, is not convenient.

18 The district benefits from excellent road access to and from the M25 and London via the M2 and the A299 Thanet Way. Access to Dover and beyond is via the A256, with the East Kent Access Road providing dual carriageway for the majority of the route. Access to the nearby cathedral city of Canterbury and to Ashford is via the single carriageway A28. Thanet has regular rail links to London, Canterbury, Dover and Ashford. Since 2009 High Speed domestic rail services operate from Thanet to London St Pancras using HS1.

19 Ramsgate is a cross channel port with capacity for passenger and freight services to mainland Europe. It has also recently established itself as a base for servicing offshore wind farms.

20 The tourism sector has grown substantially over the last few years, compared to other parts of the South East and England, and there has also been significant growth in the creative sector. However, Thanet also has some economic challenges to deal with, and the Council's Economic Growth Strategy is one step in responding to those challenges. For example, Thanet's business parks have taken time to develop, and there remains a significant amount of undeveloped employment land. The Council is part of a partnership with KCC (East Kent Opportunities), seeking to accelerate the delivery of key sites. More recently, that area has seen growth in the number of start-ups, particularly in the cultural sector.

21 Nationally, "High Streets" face a range of challenges, particularly with vacancy rates. However, following a completed Townscape Heritage Initiative and alongside the opening of the Turner Contemporary Gallery in April 2011, Margate's Old Town and lower High Street have seen a significant number of new businesses opening.

22 The district has some significant difficulties. Average skills levels in the district are lower than the rest of Kent and England, with unemployment levels higher than the Kent average (KCC Business Intelligence publications). Wage levels are also lower than the national and regional average. However, the Council and a range of other organisations have a clear strategy to encourage both local business growth and inward investment and are working with industry partners to achieve this.

23 The overall quality of life of Thanet's residents is varied. Some residents enjoy a very high quality of life, including living in high quality residential environments. However, Thanet also has a number of highly deprived wards with many people with support needs. These areas are also characterised by pockets of urban decline and poor housing stock. A key challenge is to ensure that everyone has the same opportunities by reducing inequalities in the area and improving

quality of life for all. The Council and relevant other organisations are working to deal with these issues through different initiatives.

The Vision: the Council's aspirations for 2031

- Thanet has realised its growth potential as a location for business investment. Making the most of its close proximity to Europe and easy access to London, Thanet plays an important role in East Kent.
- It has benefited from sustained investment in skills, employment and infrastructure. Thanet successfully retains and attracts skilled people to live and work in the area.
- Health and educational attainment in Thanet are comparable with the county average, driven by good quality education and training.
- Thanet has a sustainable, balanced economy with a strong focus on advanced manufacturing, emerging technologies, tourism, culture and leisure, supported by the three thriving coastal towns.
- It has a well-established year round visitor economy, a destination of choice, having high quality accommodation and inviting public spaces. Thanet capitalises on its natural assets, the coastline and beaches, the heritage and culture, and these assets are protected and positively managed for the longer term.
- The coastal town centres have re-defined their roles, maximising their unique characteristics, with diverse commercial offers and independent places to shop, eat and stay. New and restored housing has been regenerated next to boutique hotels and art studios.
- Margate is a contemporary seaside resort based on its unique assets of a sandy beach, harbour and rich townscape. The creative industry, niche retail and educational sectors have diversified the economic heart of the town.
- Ramsgate's maritime heritage, the commercial function of the port, supporting renewable technology, its Royal Harbour, marina, beach and attractive waterfront, provide a vibrant mix of town centre uses, with a strong visitor economy and café culture.
- Broadstairs is a charming and attractive town and a popular location for visitors and residents, who enjoy the flavour of its historic associations, range of small shops and restaurants, beach and picturesque waterfront.
- Westwood has strengthened its position as a retail destination, as well as being firmly established as a town centre, and has developed as an integrated community, with housing, business, leisure, sport and recreation, and education. This has been supported by investment in transport infrastructure creating a safe and attractive pedestrian environment at its centre.
- High quality new homes, as well as the regeneration of Thanet’s high quality historic housing, provide a choice of homes for Thanet’s residents and for those who have invested in, or newly arrived in the area.
- Cliftonville has an economically independent, settled and mixed community structure, with the pride and confidence to invest in quality development and care for its local environment.
- The villages retain their separate physical identity, historic character and have vibrant communities with local facilities and services.
- The open countryside between the towns and villages remains essentially undeveloped, with a varied landscape, tranquility and distinctive views. Opportunity has been taken to increase public access and there is a diverse agricultural economic base, including green tourism.

The Local Plan Strategy

24 The following sections set out the key drivers for this Local Plan strategy, explains the overarching principles of the strategy and context of national planning policy, and the need to deliver sustainable development.

Sustainable Development

25 The Local Plan is prepared by Thanet District Council under the national planning policy system, whose central principle is to achieve “sustainable development". This may be defined as “development that meets the need of the present without compromising the ability of future generations to meet their own needs".

26 The National Planning Policy Framework (NPPF) sets out the Government’s view of what sustainable development in England means in practice for the planning system. The NPPF identifies the three dimensions of sustainable development; economic, social and environmental; giving rise to the need for the planning system to perform a number of roles:

an economic role – *contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*

a social role – *supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and*

an environmental role – *contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.’*

27 In pursuing sustainable development, this Plan positively seeks opportunities to meet the needs of the area, and economic, social and environmental gains are sought jointly and simultaneously. The Plan as a whole sets out what sustainable development means for Thanet.

28 A bold and positive strategy is needed in order to achieve the Council’s vision for Thanet. Realising the economic aspirations for the district and improving the quality of life for all Thanet’s residents will require investment in new job creation, new quality homes, open space and infrastructure, as well as maintaining and enhancing Thanet's existing high quality built and natural environment.

29 Although Thanet has historically experienced social and economic problems, the Council has high aspirations for growth as set out in the Council's Corporate Plan and Economic Growth Strategy. The Local Plan looks to support this by identifying, facilitating and helping to deliver the development required. The NPPF requires the Council to plan positively for economic growth and boost housing supply, which is what this Plan seeks to achieve.

30 Preparing this draft Local Plan has involved some complex decisions including the selection of key sites to accommodate new development.

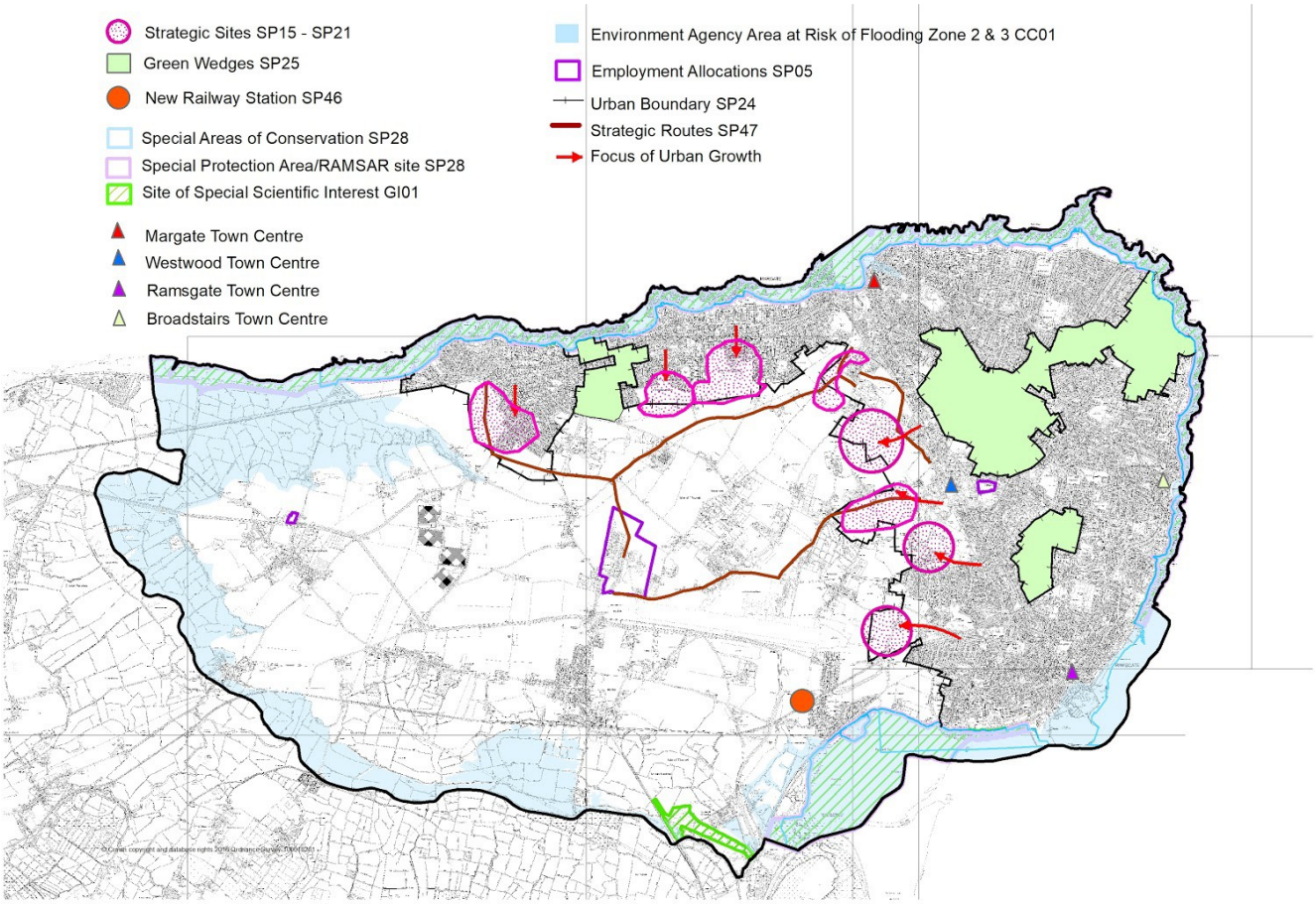
31 The levels of development proposed within the draft Plan are based upon robust and up to date evidence of the needs of the district. Thanet's population is expected to grow significantly over the next 20 years, and new homes and jobs are required to support this. The overall strategy aims for an optimistic and aspirational level of economic growth necessary to bring about the step change that is required in the district. It also aims to deliver the right number and mix of housing required alongside such growth, as well as delivering new open space, and protecting and improving the quality of Thanet's existing built and natural environment.

32 It is recognised that any growth in Thanet must be supported by the necessary infrastructure, such as roads, schools and health facilities. The Plan aims to take a co-ordinated approach to delivering such facilities alongside new development, and the Council has and will continue to work with other agencies, organisations and service providers to ensure that this is achieved. This is addressed in Policy SP02 and through the draft Infrastructure Delivery Plan.

33 The location of growth set out in this Plan is based upon a district settlement hierarchy and the key principle of focusing new development in locations that are highly accessible, and that can take advantage of and support Thanet's existing infrastructure and services. Thanet's established settlement pattern and transport links have evolved over a long period of time, and have been strongly influenced by its coastal location and peninsular geography. The hierarchy aims to inform and underpin policies in this Local Plan to facilitate growth in a manner sustainable in the local context.

34 A number of sites and proposals are of fundamental importance to delivering the objectives of the Local Plan. The locations of sites of strategic importance for the Plan are indicated on the Key Diagram, and the text of the Local Plan sets out the relevant specific policies.

Key Diagram



Strategic Priorities and Objectives

35 The following strategic priorities and objectives set out what this Plan is seeking to do in order to achieve the Council's vision and deliver sustainable development for the district. (No order of priority is implied)

Strategic Priority 1 - Create additional employment and training opportunities, to strengthen and diversify the local economy and improve local earning power and employability.

Objectives:

- Support the diversification and expansion of existing businesses in Thanet, with a focus on advanced manufacturing, emerging technologies, tourism, culture and leisure, and provide the right environment to attract inward investment.
- Retain and attract skilled people.
- Support the sustainable growth of Ramsgate Port.
- Support additional improvements to high speed rail links that will achieve further reduction of journey times.
- Provide a sufficient and versatile supply of land to accommodate expansion and inward investment by existing and new businesses.
- Facilitate the provision of accessible, modern and good quality schools, as well as higher and further education and training facilities to meet the expectations of employers and of a confident, inclusive and skilled community.
- Take advantage of the area's unique coast, countryside, its townscape and cultural heritage and potential of the coastal towns, while safeguarding the natural environment.
- Support a sustainable rural economy, recognising the importance of best and most versatile agricultural land.

Strategic Priority 2 - Facilitate the continued regeneration of the coastal town centres, developing their individual niche roles, while also consolidating the role and function of Westwood as Thanet's primary retail centre, ensuring retail expenditure is retained in the district.

Objectives:

- Guide investment in the coastal towns to support the tourism economy and provide for the needs of local communities.
- 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 historical and nautical heritage and visitor economy.
- Enhance Broadstairs' role as a popular location for visitors and the local community.
- Enable Westwood to consolidate and evolve as an accessible, successful and sustainable residential and business community with an excellent range of homes, schools, leisure, sports, shops and other facilities in an attractive environment.

Strategic Priority 3 - Provide homes that are accessible to, and suited to the needs and aspirations of, a settled and balanced community.

Objectives:

- Plan for sufficient new homes to meet local community need so that, irrespective of income or tenure, people have access to good quality and secure accommodation.
- Meet the housing needs and demands of a balanced and mixed community and to support economic growth.
- Safeguard family homes and the character and amenity of residential areas.
- Increase the supply of good quality affordable homes.
- Improve the environment and the quality and mix of housing in areas needing revitalisation to restore mixed and confident communities.

Strategic Priority 4 - 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.

Objectives:

- Accommodate the development needed to optimise access to jobs, key services and facilities required to promote the physical and mental well-being, independence and quality of life of all sections of the community, and retain young people.
- Preserve and enhance Thanet’s exceptional built historic environment and ancient monuments and their settings, and historic and designed landscapes.
- Safeguard and enhance the geological and scenic value of the coast and countryside, and facilitate its responsible enjoyment as a recreational and educational resource.
- Conserve and enhance the character of Thanet’s landscapes, while meeting the area’s social and economic needs
- Retain the separation between Thanet’s towns and villages as well as their physical identity and character.
- Protect, maintain and enhance the district’s biodiversity and natural environment, including open and recreational space to create a coherent network of Green Infrastructure that can better support wildlife and human health.
- Mitigate and adapt to the forecast impacts of climate change (including the water environment, air quality, biodiversity and flooding).
- Use natural resources more efficiently, increase energy efficiency, the use of renewable and low carbon energy sources, to reduce the district's carbon footprint.
- Facilitate improvements within areas characterised by poor quality housing, empty property and poor physical environment.
- Ensure that all new development is built to the highest attainable quality and sustainability standards and enhances its local environment.
- Reduce opportunities for crime and the fear of crime
- Ensure Thanet's community has access to good quality social and health services
- Broaden and improve the range of active leisure facilities to encourage greater participation within the local community.
- Support the social, economic and physical revitalisation of Margate and Cliftonville West in line with community aspirations and through partnership working.

Strategic Priority 5 - Deliver the infrastructure required to support existing communities and new development, including an efficient and effective transport system.

Objectives:

- Promote development patterns and behaviour that will minimise the need to travel or use private cars to access services and amenities.
- Facilitate the enhanced integration of the High Speed 1 network with the wider public transport and highway network by supporting infrastructure that would maximise its benefits
- Promote an efficient public transport system alongside expansion of larger scale transport infrastructure.
- Facilitate provision of direct walking and cycling routes to reduce potential congestion, noise and pollution.
- Deliver required improvements to the road network in order to reduce congestion and pollution, and to accommodate new development.
- Facilitate the provision of infrastructure required to support new development and communities.
- Ensure development safeguards public and commercial water supplies in the principal chalk aquifer

Development Strategy for Thanet

36 The development strategy for Thanet has been determined by a number of factors, namely;

- The size and geography of the District – Thanet is one of the smallest districts in Kent and is bounded by the sea on three sides. The largest settlements, including the main towns of Margate, Broadstairs and Ramsgate follow the coastline and form an almost continuous urban area, separated only by Green Wedges.
- Significant policy constraints – the Thanet Coast is the subject of multiple national and international wildlife designations, including Ramsar Sites, Special Protection Areas and Special Areas of Conservation. Extensive areas to the south and west of the District are also subject to high levels of flood risk associated with former marshland and the Wantsum Channel.
- Best and Most Versatile Agricultural Land - The rural hinterland beyond the urban area is predominantly Grade I agricultural land, with lower grade land only existing in small, isolated pockets, often subject to a high risk of flooding

37 Westwood is part of the wider urban area of Thanet, and is a major source of employment and retail facilities. In the previous Local Plan, a significant level of housing was proposed to encourage a more sustainable pattern of development and activity. That approach is continued in this Plan.

38 For these reasons the Plan does not set out a settlement hierarchy. Instead, it supports the principle of new development throughout the urban area as defined by the boundary on the Policies Map. Additional development is also supported on the edge of the urban area across a range of allocated sites consistent with the findings of the Sustainability Appraisal.

39 Beyond the urban area are seven rural villages of varying size, form and character. Minster is the largest of Thanet's rural villages and has a good range of services, and is therefore capable of accommodating a higher level of development, as set out in this Plan.

40 There are six smaller villages – Acol, Cliffsend, Manston, Monkton, Sarre and St.Nicholas – which possess a smaller range of local services and public transport connections.

41 Housing allocations have been made on a proportionate basis in the villages of Cliffsend, Monkton and St. Nicholas. However, Acol, Sarre and Manston only have very limited services and facilities required to meet the day-to-day needs of their residents. New development is therefore limited to proposals which fall within the confines of the village, and is expected to be small in scale, consistent with their form and character.

42 Development will be permitted within the identified confines of the rural villages, as defined on the Policies Map.

Policy SP01 – Spatial Strategy - Housing

The primary focus for new housing development in Thanet is the urban area as identified on the Policies Map.

Within the Thanet villages, housing development is allocated primarily in Minster, with limited development at Cliffsend, Monkton and St Nicholas. No housing development is specifically allocated in Sarre, Acol or Manston, but housing development of a size and scale commensurate with the size of the relevant settlement will be permitted within village confines, subject to other policy requirements of the Plan.

Plan Implementation and Infrastructure

43 The provision of infrastructure to support development is vitally important. The Council is working with the relevant agencies to ensure that it is fully informed about future infrastructure requirements and the timing of those requirements, and to make sure that this important social and physical infrastructure is provided in a timely manner alongside new development.

44 The Council has also prepared a draft Infrastructure Delivery Plan (IDP) in conjunction with those agencies, setting out the infrastructure requirements and the known costs; the phasing of the requirements and the body responsible for ensuring delivery. Some infrastructure would need to be provided directly by a developer on a given site; some would be off-site infrastructure funded by a developer and some would be funded by other mechanisms. The Council will also seek other forms of funding, as appropriate, to support the provision of key infrastructure identified in the working draft Infrastructure Delivery Plan.

45 The IDP addresses the full range of infrastructure required to support development and is the subject of ongoing independent viability assessment.

46 The Council is keen to ensure that the Local Plan is fully implemented, not just the housing and employment sites, but the full range of policies, so that the Plan is successful in supporting long- term economic growth and regeneration for the area, and meeting the strategic objectives of the Plan.

47 To this end, the Council has:

- Prepared a draft Infrastructure Delivery Plan, engaging with the relevant service providers

and others to ensure that new housing development in particular, is supported by the requisite social and physical infrastructure;

- Carried out viability assessments to ensure that key infrastructure can be delivered at the appropriate time;
- Undertaken various discussions with neighbouring authorities, to ensure that wider infrastructure is considered as part of the Plan process;
- Sought to develop initiatives, outside the planning process, to encourage and attract inward investment, and in particular development investment, to the area; such as maintaining and developing partnerships with various agencies (such as Homes England) and private developers groups (such as the Kent Developers Group); and
- Committed to the preparation of a robust monitoring framework.

47 The Council does not consider that the use of CPO powers will normally be required to implement the Plan, but it will give consideration to their use (subject to securing the appropriate indemnity arrangements with developers) if critical sites or infrastructure are delayed, to the detriment of implementing the provisions of the Plan.

48 The Council intends to monitor key elements of the Local Plan strategy, using the Annual Monitoring Report framework, to ensure that the overall strategy is delivered.

49 If monitoring through the AMR demonstrates that the implementation of the Plan is not proceeding as expected, the Council will review the implementation process and consider what measures need to be taken to progress implementation.

50 The Council will give due consideration to the viability of individual developments, in circumstances where independent viability appraisals indicate that a particular development cannot fully meet the infrastructure requirements set out in this Plan.

Policy SP02 - Implementation

All new development will be expected to fully meet its infrastructure requirements, whether directly on site and/or by way of a contribution to necessary off-site infrastructure, having regard to the provisions of the Infrastructure Delivery Plan. Provision should be made in accordance with a phasing and implementation plan where necessary. All such requirements will be secured by means of conditions, legal agreements, Community Infrastructure Levy or other appropriate mechanisms.

The Council will also, with partner organisations as appropriate, seek to obtain additional funding from other sources to support infrastructure provision including, the strategic provision of services and facilities

If necessary, the Council will give consideration to the use of other available mechanisms (such as compulsory purchase*, Article 4 Directions and so on) to ensure the effective delivery of the overall planning strategy for the district.

[*Footnote: subject to appropriate indemnity arrangements being in place]

51 The Council will undertake an early review of the Local Plan as set out in Policy SP03. There are several matters that need consideration, as a result of changing circumstances:

- To consider the implications of climate change;
- To review the provisions of the Plan in relation to Manston Airport in the light of a decision on the Development Consent Order;
- To assess the implications of the Local Housing Need Methodology on housing requirements for the district;
- To consider the provision of Gypsy & Traveller sites to meet the requirements set out in Policy HO22; and
- To ensure compatibility with the most recent National Planning Policy Framework.

52 There may be other issues that arise that need to be addressed through the review of the Plan.

Policy SP03 - Local Plan Review

Within six months of the adoption of the Local Plan, the Council shall undertake and complete a review of the Plan with information published as part of an updated Local Development Scheme setting out a timetable for the completion of the review and any update as may be required.

Monitoring and Review

53 The Council is committed to monitoring the implementation of the Local Plan and to undertaking what actions it can to support delivery of the strategic objectives of the Plan, and the individual development proposals.

54 Development monitoring takes place on a rolling annual basis through the housing and commercial information audits, and the preparation of the Annual Monitoring Report.

55 It is the Council's intention to monitor a focussed set of key indicators, which will give a clear indication of how successful the Local Plan Strategy is. These indicators will relate to key work areas; for example:

- Delivery of key housing and employment sites
- Delivery of key elements of the Infrastructure Delivery Plan
- Key environmental indicators, such as national and international wildlife sites; quality of development in conservation areas; maintenance of variety of beaches/seafronts
- Effectiveness of the mitigation scheme (Strategic Access Management and Monitoring strategy) for the Special Protection Area.

1 - Job Growth Strategy

1.1 The Local Plan's job growth strategy sets out how the Thanet's economy should grow, develop and create new jobs and prosperity over the Plan period. The strategy is based upon a positive and optimistic level of growth. The strategy explains where the growth is expected to take place, and what the Local Plan is doing to support this, alongside the Economic Growth Strategy for Thanet November 2016.

1.2 One of the core principles of the National Planning Policy Framework (NPPF) is to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. It states that planning authorities should set out a clear economic vision and strategy for their areas which positively and proactively encourage sustainable growth, identify strategic sites to meet anticipated needs over the plan period, support existing business sectors and plan for new and emerging sectors. Policies should be flexible to accommodate needs not anticipated and to allow rapid responses to changes in the economy. It also states that clusters or networks of knowledge-driven, creative high-technology industries should be planned for, priority areas for economic regeneration and infrastructure provision, and environmental enhancement should be identified, and flexible working practices such as the integration of residential and commercial uses within the same unit should be facilitated.

1.3 It further states that plans should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose. The Council has reviewed all allocated employment sites and has retained only those which are in accordance with the NPPF.

1.4 The NPPF states that plans should recognise town centres as the heart of their communities and support their vitality and viability, promote competitive town centres that provide customer choice and a diverse retail offer, retain and enhance existing markets and introduce new ones, and allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed.

1.5 The NPPF also states that Local Plans should support the sustainable growth and expansion of all types of business and enterprise in the rural areas, promote the development and diversification of agricultural and other land based rural businesses, support sustainable rural tourism and leisure developments that benefits businesses in the rural area and promote the retention and development of local services and community facilities. The Plan's evidence base should assess the needs of the food production industry and any barriers to investment that planning can resolve.

1.6 Thanet has a diverse economy which is currently strong in the education and health sectors and traditionally has seen above average representation of retail and public administration. Evidence shows that the tourism is doing very well and is gaining momentum year on year. Green technology is currently doing well and advanced manufacturing technologies are expected to increase in the district.

1.7 Thanet's business parks have been slow to develop leaving a significant amount of land available which in itself is an opportunity. This land is beginning to be delivered which is positive but as evidence suggests that only 30% of future jobs will be in traditional office, industrial and warehouse (Class B) type uses that are often located on business parks and a more flexible approach to Thanet's employment land is required. A range of employment sites is needed to

cater for all types of employment generating development.

1.8 Thanet also benefits from an international port which offers significant potential to deliver job growth and connections to Europe. Ramsgate Port is a major infrastructure asset and potential catalyst for growth. It is important for the manufacturing and green sectors and as a wharf for the movement of minerals. The Council supports the growth of port related uses and would wish ultimately to see the reintroduction of a roll-on/roll-off passenger ferry service.

1.9 Tourism has historically been at the heart of Thanet's economy and continues to be a vitally important component of Thanet's economy along with retail and leisure which have been particularly strong. Thanet's strength in the visitor economy stems from the attractive sandy beaches in close proximity to London, the established successful tourist destination of Broadstairs, the development of the Turner Contemporary Gallery and the strong character of Thanet as a traditional tourist destination. Thanet also contains a wealth of heritage assets which are attractive to visitors with around 2,000 listed buildings.

1.10 The most recent tourism research commissioned by Visit Kent shows the total economic impact of tourism in Thanet was £293 million in 2015. A good visitor economy can also provide benefits for Thanet residents in terms of leisure facilities, attractive public realm and quality of life which in turn attract business to the area. It is therefore of primary importance to support the tourism economy.

1.11 In delivering growth in tourism, the main challenge is to increase visitor spend in Thanet, which can be achieved by encouraging the overnight visitor and developing more of a year-round offer. The Council is committed to addressing this and has adopted a Destination Management Plan (DMP) which focuses on individual projects bringing together a variety of stakeholders to improve beach management, facilitate coastal regeneration and develop a shared story to improve marketing for visitors.

1.12 In Thanet's town centres there is opportunity to capitalise on heritage assets and cultural and creative industries, creating vibrant hubs of innovation and entrepreneurship. This is increasingly the trend in Margate, particularly the Old Town which has a number of cultural and creative industries. The Heritage Action Zone in Ramsgate also looks to achieve economic growth by using the historic environment as a catalyst. Research from 2016 has found that creative businesses in Thanet have grown by 84% in four years. It is recognised that Thanet’s developing cultural and creative industry is an important component of the district’s economic and social profile. It is, therefore, also important that it is both supported and encouraged to grow.

1.13 Thanet's manufacturing base has traditionally been characterised by small scale business which are fundamentally important to Thanet's economy and it is imperative that existing and new micro businesses are supported. These smaller manufacturing firms require smaller industrial units and it is, therefore, important within the strategy to protect our existing fit for purpose sites. There also has to be consideration of grow on space as local businesses grow and require larger premises. This will keep successful businesses local to the area and provide economic sustainability.

1.14 30% of overall job growth is still likely to be from the development in B use classes found on business parks. Many existing businesses in Thanet need space for growth and the availability of suitable premises is a challenge to be overcome, particularly the availability of spec units which individual companies do not have the capacity to build.

1.15 There has been growth in low carbon goods and services, renewable energy, advanced manufacturing and service businesses. These sectors are likely to deliver some job growth over the Plan period. Thanet has already seen above average development of offshore wind farms, solar farms, anaerobic digesters and other renewable sources of energy production particularly located around the former Richborough Power Station site. Thanet Earth is a prime example of cutting edge "agritech" technology. It is important that sufficient employment land is available to facilitate any future growth.

1.16 Improving education and skills in Thanet in partnership with the private sector is an important part of growing the economy. The Plan seeks to support the provision of these facilities particularly the expansion and diversification of further and higher education.

1.17 Canterbury Christ Church University is pioneering the STEM agenda by operating as Kent & Medway STEM (Science, Technology, Engineering and Maths) providing information and links to STEM Enhancement & Enrichment (E&E) activities. This enables young people to make informed decisions about future career paths in and from STEM, provides teachers with impartial information and support to enable them to deliver STEM curriculum, support industry in reducing the STEM skills gap and raises the profile of science and engineering in the region. This is a significant opportunity for the area.

1.18 Thanet's current employment offer and relatively peripheral location combined with improving transport and communications infrastructure means that a certain level of commuting is expected. Currently the majority of working age people that live in Thanet work in Thanet but a significant number commute to the neighbouring districts of Dover and Canterbury, as well as further afield. Improved rail linkages in the future could expand this. This is not necessarily a harmful trend as it brings wealth to the area and better access to jobs which increases local consumer spend, further strengthening the retail and leisure professions. It is envisaged particularly that the Discovery Park Enterprise Zone established in Sandwich following the closure of the Pfizer pharmaceutical plant, will impact upon out commuting levels, but its close proximity to Thanet is beneficial in terms of retention of wealth in the area as well as potential relocation of firms to Thanet's nearby employment sites. The proximity of the Enterprise Zone to Thanet is positive for employment and Thanet's economic strategy takes account of this in order to complement Discovery Park and benefit from it.

1.19 Thanet has 7 rural settlements with a population of around 6,000 residents which make up just 4% of the population. The employment land review concludes that Thanet has quite a low representation of rural employment enterprises when compared to the rest of the south east with less than 10% of VAT registered premises being located in the rural areas. Nonetheless the Council wishes to support rural economic development of an appropriate scale.

1.20 Thanet currently has a high proportion of people who work from home. With anticipated growth in housing it is considered that with appropriate digital infrastructure and business support those sustainable enterprising communities can be created.

1.21 Given that Thanet has a diverse economy a flexible economic strategy is needed in order to accommodate all employment generating uses. Future job growth in Thanet is expected to remain strong in town centre uses, as well as in public administration and education. Thanet is a popular retirement area and this brings with it benefits to the economy particularly in terms of the health and caring professions which are expected to grow.

1.22 The Economic Growth Strategy for Thanet identified transformational initiatives to focus on

to deliver employment growth. These are:

- Developing the Port at Ramsgate
- Investing in high value manufacturing and engineering across Thanet and east Kent
- Position Thanet as a global agritech hub
- Promoting Thanet's broader cultural/leisure offer
- Cultivating the creative industries across Thanet
- Designing enterprise into new communities
- Long term feasibility modelling for Margate and Ramsgate

1.23 The overall target is to deliver a minimum of 5,000 jobs across the district during the Plan period to 2031 concentrating on the transformational initiatives coupled with improved transport and communications infrastructure.

1.24 Job growth in the district will be supported, promoted and delivered by;

- supporting the growth of port related uses at Ramsgate Port.
- allocation and retention of employment land and premises that are fit for purpose across the district;
- flexibility of uses on some employment land;
- allocation of vibrant town centres able to accommodate a wide range of compatible uses reflecting their individual characters and economies;
- recognising the important role of cultural and creative industries in the regeneration and reinvigoration of Thanet's towns;
- being flexible with regard to holiday accommodation reflected and supported by the Council's Destination Management Plan;
- providing for cultural and creative industries within the town centres
- providing suitable and sufficient employment land to support growth in advanced manufacturing; and
- nurturing workforce skills by supporting education and skills facilities.

1.25 It is not possible to predict or plan specifically for the needs of all significant job creating development proposals that may arise over the lifetime of the Plan and only 30% or employment growth is expected to be in the B use classes that are traditionally located on business parks. The Council wishes to plan positively for all kinds of employment generating development taking account of relevant environmental and countryside policies and the aspirations of the strategic priorities. Account will also be taken of prospective benefits arising from additional and better paid local employment.

The following policy sets out the Job Growth Strategy for this Plan.

Policy SP04 - Economic Growth

A minimum of 5,000 additional jobs are planned for in Thanet to 2031.

The aim is to accommodate inward investment in job creating development, the establishment of new businesses and expansion and diversification of existing firms. Sufficient sites and premises suited to the needs of business are identified and safeguarded for such uses. Manston Business Park is the key location for advanced manufacturing and large scale job creating development.

Land is identified and allocated to accommodate up to 53.5ha of employment space over the period to 2031. Land and premises considered suitable for continued and future employment use will be identified and protected for such purpose. Within the urban area, and the confines of villages as defined on the Policies Map, proposals for employment generating development on non-allocated sites will be supported in principle, subject to meeting the requirements of other policies in the Plan.

Thanet's town centres are priority areas for regeneration and employment generating development, including tourism and the cultural and creative industries which will be supported.

The growth of the Port of Ramsgate is supported as a source of employment and as an attractor of inward investment.

New tourism development, which would extend or upgrade the range of tourist facilities particularly those that attract the staying visitor, increase the attraction of tourists to the area and extend the season, will be supported.

Development is supported that enhances the rural economy subject to protecting the character, quality and function of Thanet's rural settlements and natural environments.

Employment Land

1.26 The employment land strategy sets out how the Council proposes to support job growth through the allocation of employment land for development, the safeguarding of existing premises and flexibility regarding the types of development considered appropriate. The supply of employment land is supported by the town centre strategy which also provides land for economic development and job growth.

1.27 The National Planning Policy Framework (NPPF) requires that local planning authorities set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable growth, identify strategic sites to meet anticipated needs over the plan period, support existing business sectors and plan for new and emerging sectors. It also requires flexibility and states that the long term protection of sites with little chance of being used for employment purposes should be avoided.

1.28 In accordance with the NPPF an assessment of current and future growth sectors has been carried out along with an assessment of Thanet's employment sites and land available.

1.29 Forecasts show that Thanet will need in the region of 15 ha of employment land (B1, B2 and B8 uses) over the plan period. Methodology and discussion of this is contained in the employment growth topic paper and the Economic and Employment Assessment 2012.

1.30 There is a need to provide land for potential inward investment and for growing existing businesses to relocate to. There is also a need for affordable premises for the indigenous market and start up space also fulfills an important role.

1.31 Thanet needs to cater mainly for small to medium sized businesses and tourism related trade. Some land needs to be made available for larger businesses but some of these types of

businesses may be drawn towards Discovery Park Enterprise Zone and Thanet's employment allocations will complement this trend. Some larger established sites such as Pysons Road, Haine Road and Westwood Industrial Estate are in need of some investment to secure their renewal and/or upgrade. Good quality, popular sites that are within the urban and rural confines are retained and protected. Of particular importance are quality sites that support Thanet's small and medium enterprises such as Manston Green. As far as possible there is a balanced distribution of sites across the district.

1.32 There is a need to keep a range of sites for cheap premises and business start ups. Thanet also needs to retain some sites that can accommodate uses such as paint spraying and tyre recycling. The range of sites includes some in the rural area to support the rural economy. A "flagship" site for inward investment that can also accommodate growing indigenous businesses is provided for at Manston Business Park. There is also a need for "flexible" sites where alternative non Class B uses will be allowed. This reflects the current trend and ensures land is provided to meet all types of economic development. For the purposes of applying Policy SP05, flexible uses include leisure, tourism and other town centre uses which, due to scale and format cannot be accommodated within town centres. They also include uses known as sui generis which do not fall into a category in the Use Classes Order. These include uses such as car showrooms and crèches.

1.33 Thanet's portfolio of employment sites caters for all of these uses both in terms of new sites and existing sites protected for future employment purposes. The following policy identifies Thanet's employment allocations, where new employment generating development will be promoted and supported. These sites are shown on the Policies Map.

Policy SP05 - Land Allocated for Economic Development

The following sites are allocated for business and employment generating purposes:

	Total Site Area (ha)	Remaining employment allocation (ha)
Manston Business Park, Manston	**75.2**	**42.53**
Eurokent (part)*, Ramsgate	**38.6**	**5.45**
Thanet Reach Business Park, Broadstairs	**9.74**	**3.7**
Hedgend Industrial Estate, St Nicholas	**2.46**	**1.61**
TOTAL	**126**	**53.29**

At Manston Business Park and Hedgend Industrial Estate development will be restricted to use classes B1 (business), B2 (general industry) and B8 (storage and distribution). Eurokent is allocated for flexible business use in accordance with Policy SP09 (2)* Thanet Reach Business Park is also suitable for education related uses as well as B1 and B8 uses.

*** Eurokent is a flexible employment site, where a wider range of employment generating uses will be allowed in addition to B1, B2 and B8 uses. Development must be compatible with neighbouring uses. Proposals for main town centre uses over and above 2000sqm for which planning permission has already been granted should comply with Policy E05 - the sequential test. Flexible employment uses will be expected to contribute towards the Local Employment and Training Fund.**

Development proposals must provide for at least one electric vehicle charging point for every 10 spaces provided.

Manston Business Park

1.34 Manston Business Park is a prime business investment location, being strategically located at the centre of Thanet and adjacent to the former Manston Airport. It also has easy accessibility from the centres of population, the port at Ramsgate and excellent road links to the rest of Kent and the UK via the A299 and M2.

1.35 Approximately half of the site is owned by East Kent Opportunities which is a joint venture between Kent County Council and Thanet District Council. The aim for the joint venture is to bring forward economic growth and regeneration in Thanet. Manston Business Park is approximately half developed, and there is some infrastructure in place ready for the rest of the site to be developed. Whilst development on the site has been slow to come forward in the past, more recent developments have included speculative business units, and purpose built accommodation. The site provides a good opportunity for the relocation of existing growing business.

1.36 The focus for development of the site should be office, industrial and warehousing, whilst some mixed use including additional business support services and training facilities which demand a location outside of Westwood and of the coastal urban belt will be considered appropriate, where this would serve to attract new or support existing job creating development.

1.37 Development on this site will be expected to contribute to the delivery of the transport strategy particularly the extension of Columbus Avenue and improvements to Spitfire junction.

Policy SP06 - Manston Business Park

Manston Business Park is allocated and safeguarded for business purposes within classes B1 (business), B2 (general industry) and B8 (storage and distribution).

Development proposals will need to comply with all of the following criteria:

1) **Provide Green Infrastructure to ensure that proposals take into account the location of the site and the rural character and appearance of the immediate surrounding area.**
2) **Provide necessary on-site transport infrastructure and proportionate contributions to the improvement of the 'Spitfire Junction' and the Columbus Avenue extension.**

Manston Airport

1.38 The Council recognises that proposals are being put forward by River Oak Strategic Partners for an airport operation at the site, through a proposed development consent order (DCO), pursuant to the Planning Act 2008. The application is before the Secretary of State for consideration and the proposals are subject to thorough scrutiny as part of this process. A DCO, if granted, would give consent for the project in recognition of its national importance and may also include authorisation for the compulsory acquisition of land to assist in the achievement of its objectives.

1.39 If a DCO for Airport use is granted, the early review of the Plan will need to take this into account as well as its implications for other policies in the Plan and consequential land use considerations. In the event that the DCO is not granted or does not proceed, the Council will similarly need to consider the most appropriate use for the site as part of the early review.

Policy SP07 – Manston Airport

Manston Airport as identified on the Policies Map is safeguarded for airport related uses. Whether or not the DCO is confirmed, the future use and development of Manston Airport and/or other policies affected by the outcome of the DCO process will be determined through the early review of the Plan.

2- Town Centre Strategy

2.1 The town centre strategy sets out how Thanet's town centres will develop, the inter-relationship between them, and how the towns' commercial functions will support and contribute to the overall economic strategy for the district.

2.2 The National Planning Policy Framework states that planning policies should be positive and promote competitive town centre environments and set out policies for their management and growth over the plan period. Plans should recognise town centres as the heart of the community and pursue their vitality and viability. A network of centres should be defined that reflects the relationship between them in order to guide future development.

2.3 The strategy for Thanet's town centres seeks to reinforce the different but complementary roles of the primary centre at Westwood and of the coastal town centres of Margate, Ramsgate and Broadstairs. The objectives of the hierarchy are to:

- Safeguard and sustain Westwood's role in preventing retail expenditure leaking outside the district.
- Enable the coastal towns to achieve and maintain a viable, diverse and sustainable commercial base.
- Ensure the scale of development at the District and Local Centres is sufficient to serve local catchments but not harmful to the function of the town centres.
- Allow residential development in locations that support the function of the town centres.

2.4 The Council is required to set out a network and hierarchy of centres. Identifying the existing hierarchy provides an understanding of the role and function of the town centres and their inter-relationship. A major factor in determining the role of the centres is the catchment which they serve. Canterbury is the pre-dominant centre in the wider sub region of East Kent. Thanet's hierarchy of centres is set out in Policy SP08 below:

2.5 The retail hierarchy demonstrates an understanding of how town centres interact with one another at district and sub-regional levels. It is not designed to favour one centre over another and does not in itself direct investment decisions.

2.6 Thanet currently retains 84% of retail expenditure within the district and given this healthy retention rate there is no need to increase Thanet's market share within the sub region. However, in order to maintain the current market share the following growth will be required over the plan period:

- 24,567 square metres of floorspace selling comparison (high street style) goods. The majority of this is needed at Westwood which requires 16,787 square metres.
- 1,255 square metres of floorspace selling convenience goods and 4,338 square metres of A2-A5 floorspace is needed across Thanet.

2.7 Convenience retailing is currently skewed towards the large supermarkets clustered around the Westwood area and this trend is likely to continue. However, the Council would like to encourage more convenience provision within the coastal town centres.

2.8 In addition to this, an assessment has been made of other uses that are traditionally found in high street locations and support the retail function of centres - these include uses such as

banks, building societies, restaurants, take aways, and drinking establishments and are known in planning terms as the A2-A5 use classes. The assessment concluded that a total of 3,499 square metres of such floorspace is needed in the district to support the retail function of town centres. Much of this is shown to be needed at Westwood although uses such as restaurants would support the tourism appeal of the coastal town centres.

2.9 Town centres are hubs of the community and as such are not just retail areas. They contain a number of uses including leisure and tourism. Although no need for major commercial leisure facilities such as cinemas has been identified, there is a need to be flexible within the town centres in order to support the tourism economy.

Table 1 below sets out the retail need for Thanet's town centres (gross floorspace)

Table 1* - Indicative retail need for Thanet's town centres to 2031 (gross)

	Convenience sqm	Comparison (high street goods) sqm	A2-A5 uses sqm	Total Need sqm
Westwood	-	16,787	910	17,697
Margate	700	1,853	496	3,049
Broadstairs	1,650	2,143	1,161	4,954
Ramsgate	783	2,822	932	4,537

***This gives an indication of the quantitative level of retail need and shouldn't be applied rigidly. It should be regarded as a guide rather than a target.**

Policy SP08 - Thanet's Town Centres

Provision is made for main town centre uses reflecting the individual role, character and heritage of the town centres (as identified on the Policies Map), including provision for retail development as referred in Table 1 above (see policies SP09 to SP12 respectively).

Thanet's retail centre hierarchy is as follows:

Westwood - this centre sits at the top of the hierarchy as it caters for high order need, attracts the major national retailers and has a catchment that covers the whole of Thanet as well extending to areas outside of the district.

Coastal Town Centres - Margate, Broadstairs and Ramsgate. The catchments of these town centres are their individual town populations and tourist trade with a wide range of shops to cater for everyday need, special interest and tourism. These towns have traditionally attracted national retailers and services as well as local businesses.

District Centres - Cliftonville, Westgate, Birchington and Minster. These centres cater for local needs and services. They serve large residential and semi-rural locations but catchments are limited and these locations are not appropriate for large scale retail development.

Local Centres - Several across the district such as Westbrook and St Peter's (defined in Policy E06). These cater for a more restricted local need and tend to have a small

catchment. These centres provide services such as takeaways, hairdressers and small convenience stores.
Business is often local rather than the national multiples. These centres are not appropriate for large scale retail development.

Westwood

2.10 The key issues for Westwood are:

- developing it into a sustainable residential community;
- ensuring safe movement by pedestrians and cyclists within the commercial area;
- reducing current levels of traffic congestion.

2.11 Westwood Cross opened in June 2005 consolidating what had become piecemeal retail development in the Westwood area. Since its opening there have been a number of further developments such as the development of the leisure complex and numerous developments at and improvements to the surrounding retail parks. Westwood has proved highly successful in its aims of clawing back retail expenditure formerly lost to locations outside the district boundary. It has secured its place as the preferred location for the large format style of retailing favoured by the national chains. This style and scale of retail was never before available in Thanet.

2.12 Figures show that in the region of 17,000 square metres of retail floorspace is needed at Westwood to maintain the status quo. Some of this floorspace is already taken up by recent permissions, leaving no reason to significantly expand the boundaries of the town centre. The remaining floorspace need at Westwood to the end of the plan period can be accommodated amongst the existing town centre development by way of redevelopment and reconfiguration.

2.13 The adjacent housing allocation and flexible employment allocation at Eurokent supports tourism and leisure uses as well as B1 uses and will serve to add footfall to the town centre and increase its vitality, viability, accessibility and sustainability.

2.14 In addition to the 976 new homes under construction, Westwood is identified as a wider strategic housing allocation to enable its development as a sustainable mixed use business and residential community.

2.15 The area currently suffers from poor connectivity between sites, both vehicular and pedestrian. This is a challenge that needs to be addressed in the future development of Westwood.

2.16 A relief strategy is in development to address this issue, which the Council is implementing. This requires developer-led solutions. A fundamental objective of this strategy is to realign traffic routes to enable free movement by pedestrians between town centre facilities. The final element of the relief strategy that still needs to be delivered is a link between Margate Road and Westwood Road. The Council will continue to explore options which are available to delivering this link.

2.17 The piecemeal nature of the way Westwood has grown over the years means that it does not form a cohesive town centre as many of the individual component sites face inwards on each other leading to problematic pedestrian connectivity between sites. The Council now

seeks to ensure that any new development at Westwood addresses this problem and seeks to encourage active frontages on the intersections between the different retail parks and better pedestrian flows between sites. Ultimately the vision is for the whole area to look and feel more like a single town centre. A supplementary planning document will be drafted to seek to establish this aim following the adoption of the Local Plan. The SPD will consider short, medium and long term solutions and will be presented in three phases as follows:

- Phase 1 – Completion of Westwood Relief Strategy/Improved signage
- Phase 2 – General Pedestrian Improvements/ Pedestrianisation/Stopping up traffic
- Phase 3 – Remodelling the various component sites following redevelopment

In the interim period any new development will be expected to be consistent with these aims.

Policy SP09 - Westwood

The Council will seek to support the evolution and development of Westwood as a mixed use business and residential community in line with the following area based policies, indicated on the Policies Map.

Development proposals in the Westwood Area should have regard to the aims and objectives of the Westwood Area SPD and also the Westwood Relief Strategy once adopted.

1) Westwood Town Centre

Main town centre uses will be directed to the town centre area at Westwood in accordance with policies E04 and E05. Any development proposals should ensure there is no net loss in overall commercial floorspace unless permitted by other Local Plan policies.

2) Eurokent Mixed Use Area

Development of Eurokent will be for a mix of residential and business purposes, in accordance with a comprehensive masterplan linking and integrating the development into the wider Westwood community.

Land at Eurokent is allocated for:

- **up to 550 new dwellings, and**
- **the development of up to 5.45ha of land for flexible business uses as identified in Policy SP05.**

Proposals will be judged and permitted only in accordance with a masterplan as required below:

- **A minimum of 3.4 ha of publicly accessible natural/semi natural open space in accordance with the requirements of Policy SP34.**
- **A range of community facilities in accordance with Policy SP14, including small scale convenience retail provision to serve the day to day needs of the community**

- **Development will be expected to provide proportionate contribution to necessary offsite highway improvements in the form of the Westwood Relief Strategy, improvements to the A256 from Lord of the Manor and any other improvements identified in the Transport Assessment.**

All development proposals must include a phasing and implementation plan to include the phasing of development, infrastructure and landscaping.

Masterplanning will be informed by and address:

- **Liaison with service providers to investigate the need to upgrade the capacity of any utility services and infrastructure.**
- **Archaeological assessment and the need to preserve and enhance the setting of heritage assets adjoining the site.**

Proposals will be accompanied by a Transport Assessment which shall:

- **Assess the impact of the development on the local road network**
- **Identify measures to promote multi modal access including footway and cycleway connections, and an extended bus service accessible to the development, and rail linkages.**

3) Thanet Reach

In accordance with Policy SP05, part of Thanet Reach is allocated for employment and education uses. The southern part of the site is allocated for residential development (80 dwellings) in accordance with Policy HO1.

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Margate

2.18 The vision for Margate is to build on its success as a fashionable seaside resort based on its unique assets of a sandy beach, harbour, rich townscape, and on the success of the Turner Contemporary Gallery and a revived Dreamland Heritage Amusement Park. Margate's economic heart will be diversified through creative and cultural development and the town will no longer suffer disproportionately high levels of deprivation, transience and poor quality accommodation.

2.19 Positive signs of this step change are beginning to emerge, with a 14% increase recorded in contacts to the Visitor Information Centre in May 2017 compared to May 2013. Margate has a rich heritage which is important to the vibrancy of the town and as an attraction for visitors.

2.20 Margate has a number of commercial areas such as the Old Town, College Square and the upper and lower High Street areas that perform different functions around the town. The upper and lower High Street along with the seafront have suffered from high vacancy rates although this is now beginning to improve.

2.21 The Old Town area is a vibrant part of the town which contains many restaurants, cafes, gift shops and galleries. This area is popular with tourists and local people alike. This area of the town lends itself to tourism and leisure uses.

2.22 Dreamland Amusement Park is synonymous with Margate as a seaside resort. The park closed after the 2006 season. Since its closure the Council has worked, alongside partners to re- open Dreamland as an amusement park. The Council has compulsory purchased the site and a comprehensive phased development scheme is in place, maximising its potential to contribute to the economic well-being and attractiveness of Margate as a visitor destination.

2.23 The run down Lido complex is situated close to the Margate Winter Gardens and Turner Contemporary and, given its coastal location, provides an ideal opportunity for a leisure/tourism related development with uninterrupted sea views. The site is also an important heritage asset but is in need of significant restoration and repair, which the Council considers should be the main focus for any redevelopment proposals.

2.24 Strategic Local Plan designations that are expected to help deliver the continued regeneration of Margate include Margate's Town Centre and Old Town area, Margate's seafront area, and Dreamland.

2.25 Margate has a number of sites which present the opportunity for mixed use redevelopment that potentially include residential. These will also contribute to the overall vibrancy and energy of the town. These sites include Arlington House, the Rendezvous site, the Centre, the Cottage car park and Bilton Square.

2.26 The Arlington House site is a highly prominent site in Margate and has permission for a supermarket. Should this development not commence, the Council considers that this site is suitable for mixed use redevelopment.

2.27 The strategy for Margate's core area is to support retail uses including banks, restaurants and drinking establishments in the primary shopping frontage centred around the upper and lower High Street. The Old Town area will provide a range of town centre uses including cultural and creative industries. There will also be a designated Margate Seafront and Harbour Arm area that supports and encourages seafront leisure uses that are sympathetic to the surrounding seafront architecture. Evidence shows that in Margate there is a need for an additional 3,049 square metres of retail floorspace to the end of the plan period. Current vacancy levels and the wider town centre designations can adequately accommodate this need.

2.28 Seafront areas are important to the vitality and viability of the coastal town centres as they attract tourists and provide a natural leisure focus for the towns in close proximity to the High Streets and main shopping areas. As such, it is important that leisure and tourism uses are encouraged here that are complementary to the town centres and encourage economic growth.

2.29 The District Council recognises the need for a new Lifeboat station in the Margate area, capable of accommodating the latest class of lifeboat. It is recognised that there are limited opportunities for such a facility, and the Council will work with the RNLI to identify a suitable location to meet their operational requirements. Key issues that need to be considered as part of that process would be the potential impact on heritage assets (Policies SP36 and HE01 – HE03 apply) and national and international wildlife sites (Policies SP28 and GI01 apply).

Policy SP10 - Margate

The Council will seek to support the continued regeneration and development of Margate as a contemporary seaside resort in line with the following area based proposals, indicated on the Policies Map.

1) Margate Town Centre

Main town centre uses will be directed to the town centre area at Margate in accordance with policies E04 and E05.

2) Margate Old Town

Margate's Old Town area will continue in its complementary role, contributing to the vitality and viability of Margate's town centre, increasing footfall and enhancing quality and choice of facilities in the town centre. It will be a focal location for creative and cultural industries.

Residential development will be permitted above ground floor level and the Council will resist the loss of existing commercial premises in the area unless it can be demonstrated that there has been a consistent and genuine but unsuccessful attempt to market the premises for a period of 12 months prior to an application being made at an open market value that reflects its existing commercial use and condition.

3) Margate Seafront and Harbour Arm

Within the seafront area of Margate and the Harbour Arm as indicated on the Policies Map, leisure and tourism uses will be permitted, including retail, where they enhance the visual appeal of these areas and protect the seafront character and heritage. Residential development above ground floor will be permitted.

4) Dreamland

Dreamland will be developed as an amusement and/or theme park and will be a significant attraction supporting the regeneration of the town.

Proposals that seek to extend, upgrade or improve the attractiveness of Dreamland as an amusement and/or theme park will be permitted. Development on site that would lead to the reduction in its attractiveness as a leisure or tourist destination, will be resisted, including the loss of the scenic railway.

Proposals would be required to be compatible with the context and proposals of the strategic urban design framework, and integration with appropriate proposals for redevelopment/refurbishment of neighbouring sites.

5) Opportunity Areas

There are Opportunity Areas identified on the Policies Map at Arlington, the Rendezvous site, The Centre, the Cottage car park and Bilton Square, which are considered suitable for mixed use town centre development. The ultimate goal of redevelopment of these sites is regeneration. Residential development will be considered acceptable where this does not conflict with the area based criteria above.

6) The Lido

Proposals for leisure and tourism related uses will be supported at the Lido. Any development must respect and restore the site's status as a significant heritage asset.

7) Lifeboat Station

The development of a new lifeboat station in the Margate area will be supported, subject to relevant Local Plan policies.

Development will only be permitted under this policy where it can be demonstrated that it will not adversely affect any designated nature conservation sites through any pathway of impact, including increased visitor pressure. Development proposals must comply with the requirements of SP28, SP29 and GI01.

Ramsgate

2.30 The vision for Ramsgate is to maximise its maritime heritage, Royal Harbour, marina, beach and attractive waterfront, and provide an economic base for its vibrant mix of town centre uses, visitor economy and café culture. The former surplus of small shops beyond the town's commercial core has been refurbished to provide quality residential accommodation and there is a viable balance and mix of residential and commercial use including specialist shopping.

2.31 Ramsgate has been adversely affected by the decline of the traditional resort holiday. However, with its rich heritage adding vibrancy to the town, Ramsgate has been quick to recover. A café culture has developed around the harbour area and this needs to be further encouraged.

2.32 The key issue for Ramsgate town will be to maintain and improve the vitality, diversity and economic vibrancy of the town centre, secure enhancement of historic buildings, support development of the visitor economy including cultural creativity, attract more economically active residents and strengthen the range of local services.

2.33 Ramsgate contains many separate commercial areas. As well as at the traditional focal point of the High Street, commercial development has stretched to the upper High Street and the length of King Street. Over recent years as with all high streets, Ramsgate has seen an increase in vacancies and commercial development has become somewhat sporadic and in some cases run down. The strategy of the Council has been and continues to be to draw commercial development back to the commercial heart of Ramsgate and allow the more peripheral areas of the town centre to revert to residential use. This strategy has been showing results and Ramsgate is benefitting from an improved public realm and so it is appropriate for this policy approach to be continued.

2.34 Ramsgate has a need for an additional 4,537 square metres of retail floorspace. The current vacancies and scale of the town centre boundary can adequately accommodate this in the plan period.

2.35 Retail development will be focused in Ramsgate's core area with complementary town centre uses accommodated within the wider town centre boundary. Leisure and tourism uses will

be particularly encouraged around the marina area.

2.36 Land at and adjacent to Ramsgate harbour is identified for a mix of uses including leisure, tourism, retail and residential purposes. Any proposals should have regard to the Ramsgate Maritime Plan or any future plan for the port and Royal Harbour.

2.37 The Royal Harbour and historic waterfront are important for both leisure and commercial users which is important for the vibrancy of the town. The seafront area already has a thriving café culture. The Royal Harbour is a Grade II* listed structure and is at the heart of Ramsgate Conservation Area. The regeneration of Ramsgate depends on the continued attractiveness of the Royal Harbour and new development in this area will need to preserve and enhance its character and appearance. It is a tourism and leisure attraction with significant potential and already offers much to smaller pleasure craft. Commercial fishing and ship repair are also carried out in the Royal Harbour.

2.38 The growth of the Port of Ramsgate is supported as a source of employment and as an attractor of inward investment. The Kent Minerals and Waste Local Plan 2013-2030 safeguards the port for the importation of minerals into Kent (Policies CSM6 and CSM7 apply). In addition to the potential growth of port trade including passenger ferry operations, there is additional employment associated with marine engineering, including the use of the port as a base to assemble and maintain offshore wind turbines, and other businesses benefiting from a port location.

2.39 Further development will be permitted at Ramsgate Port that supports the aims of the Ramsgate Maritime Plan or any future plan which the Council as Port Authority adopts. The Maritime Plan is a non-statutory operational plan that seeks to set out the strategy for the Port and is updated from time to time. Any business plans and supplementary guidance will have regard to the need to make optimum use of the existing port land to protect and support diversification of its function.

2.40 Recognising the proximity of the port to the Sandwich Bay and Thanet Coast SSSIs, SPAs, Ramsar Site, Marine SAC and Thanet Marine Conservation Zone (MCZ), development proposals for growth would be subject to the Habitat Regulations and will need sensitive consideration in relation to nature conservation and landscape. Proposals would need an acceptable environmental assessment of their impact on the Harbour, its setting and surrounding property, and the impact of any proposed land reclamation upon nature conservation, conservation of the built environment, the coast and archaeological heritage, together with any proposals to mitigate the impact.

Policy SP11 - Ramsgate

The Council will seek to support the continued regeneration and development of Ramsgate focusing on its maritime heritage and developing leisure role, in line with the following area based proposals, indicated on the Policies Map.

1) Ramsgate Town Centre

Main town centre uses will be directed to the town centre area at Ramsgate in accordance with policies E04 and E05.

2) Ramsgate Waterfront and Royal Harbour

Land at and adjacent to Ramsgate Royal Harbour, as indicated on the Policies Map, is identified for development for a mixture of leisure, tourism, retail and residential purposes.

Any such proposals should have regard to the Ramsgate Maritime Plan or any subsequent plan adopted by the Council. The following activities and development will be supported:

- **Eastern Undercliff - mixed leisure, tourism and residential uses; and**
- **Ramsgate Royal Harbour - continued development of mixed leisure and marina facilities, in particular at the Military Road arches.**

All proposals must:

- **Take particular care in the design, location, use of materials and relationship of land- based facilities with open water, such as to protect important views and preserve or enhance the historical character of the Royal Harbour and seafront.**
- **Ensure that the integrity of nature conservation interests within the adjacent SSSI, SPA, SAC, Ramsar, Thanet MCZ site is maintained.**

3) Opportunity Areas

There are Opportunity Areas identified on the Policies Map at Staffordshire Street car park and Eastern Undercliff, which are considered suitable for mixed use town centre development. The ultimate goal of redevelopment is regeneration.
Residential development will be considered acceptable where this does not conflict with the area based criteria above.

4) Ramsgate Port

The Council supports further development at Ramsgate Port which would facilitate its improvement as a port for shipping, increase traffic through the port, and introduce new routes and complementary land based facilities including marine engineering, subject to:-

- **a demonstrable port-related need for any proposed land based facilities to be located in the area of the port, and a demonstrable lack of suitable alternative inland locations; and**
- **compatibility with the character and function of Ramsgate waterfront and the Royal Harbour as a commercial leisure facility; and**
- **an acceptable environmental assessment of the impact of the proposed development upon the harbour, its setting and surrounding property, and**
- **the impact of any proposed land reclamation upon nature conservation, conservation of the built environment, the coast and archaeological heritage, together with any proposals to mitigate the impact.**

Land reclamation will not be permitted beyond the western extremity of the existing limit of reclaimed land.

Development will only be permitted under this policy where it can be demonstrated that it will not adversely affect any designated nature conservation sites through any pathway of impact, including increased visitor pressure. Development proposals must comply with the requirements of SP28, SP29 and GI01.

Broadstairs

2.41 Broadstairs is an attractive town with a thriving town centre and is a popular location for visitors and residents who enjoy its heritage, Dickensian past, beaches, local events and picturesque waterfront. Broadstairs has a strong commercial and visitor economy and has been resilient during the economic downturn. It is important to maintain and enhance the town's attractive character and economic base.

2.42 Broadstairs is a popular shopping destination characterised by small independently owned shops. The town has many independent shops interspersed with cafes, restaurants and drinking establishments that have enabled the town to buck the trend of high vacancy rates. The town has a particular demand for retail premises selling high street style goods (comparison goods).

2.43 There is a need for 4,954 square metres of additional retail floorspace to the end of the plan period. The prime focus for retail is centered around the High Street but with supporting town centre uses along Albion Street and the upper end of High Street towards the railway station. The town centre is largely linear in character and there is little scope for physical expansion and development. In order to accommodate retail need in the future it will be necessary to be flexible and allow some development on the edge of the town centre as close as possible to the High Street.

2.44 Broadstairs promenade and beach front is an important part of the town and is an attraction in itself, drawing families to the area. It contains a mix of cafes, restaurants and drinking establishments as well as residential uses and areas of open space. It is important that existing commercial premises are retained in order to maintain the commercial function of this area as a link between the beach and the High Street. Development in this area should contribute to and support the vibrancy of the town centre but also respect its peaceful and unique character.

2.45 The town is linear in style with separate beachfront and town centre areas and the town would benefit from improved pedestrian connectivity between these two areas.

Policy SP12 - Broadstairs

The Council will seek to support proposals that maintain and enhance the role and character of Broadstairs as a popular attractive small seaside town in line with the following area based proposals, indicated on the Policies Map.

1) Broadstairs Town Centre

Main town centre uses will be directed to the town centre area at Broadstairs in accordance with policies E04 and E05.

New retail development will be acceptable on the edge of Broadstairs town centre, subject to Policy E05. Proposals will be required to provide direct pedestrian links to the High Street, be well related to the retail core, centres of population and be accessible by a range of means of transport.

2) Broadstairs Promenade and Beach Front

Opportunities to enhance the use and attractiveness of the promenade, seafront and beach are welcomed, particularly where they achieve improved connectivity between the town centre and beach front. Within this area, small scale leisure and tourism uses will be permitted, including retail, where they do not harm the character and heritage interest of the surrounding area. Within Victoria Gardens, open space policies will prevail. The Council will resist the loss of existing commercial premises in the area unless it can be demonstrated that there has been a consistent and genuine but unsuccessful attempt to market the premises for a period of 12 months prior to an application being made at an open market value that reflects its existing commercial use and condition.

Development will only be permitted under this policy where it can be demonstrated that it will not adversely affect any designated nature conservation sites through any pathway of impact, including increased visitor pressure. Development proposals must comply with the requirements of SP28, SP29 and GI01.

3 - Housing Strategy

3.1 The Plan's housing strategy sets out how the Local Plan seeks to meet the housing needs of Thanet alongside other partners, including the Council's housing regeneration, empty property and strategy functions. The Local Plan proposes to do this by

- identifying sufficient and suitable land for expected population growth
- requiring the right types of homes, including affordable homes and self-build and custom-build housing, to be provided to support economic growth and to meet the needs of the local community
- supporting the re-use of empty properties and restricting the loss of existing residential property; and
- supporting area specific regeneration objectives.

3.2 The Local Plan must allocate enough land to accommodate the amount of housing needed by 2031. This amount of housing is known as the Objectively Assessed Need (OAN) and is calculated based on a number of factors including population growth, population change market signals and in-migration (including from London) and out migration. This Local Plan allocates sufficient land to meet the housing target over the plan period.

3.3 The National Planning Policy Framework (NPPF) aims to boost the housing supply and expects Local Plans to meet the full objectively assessed needs for market and affordable homes.

3.4 The assessment of development needs is presented in the Thanet Strategic Housing Market Assessment (SHMA) January 2016 and update January 2017. Neighbouring Councils and other key stakeholders were invited to participate in workshops on the methodology and findings of the SHMA and subsequent review. In identifying this need it is important to consider key functional linkages between places where people live and work - this is known as a Housing Market Area and comprises the districts of Thanet, Canterbury and Dover. (There is also some overlap with parts of other adjoining authorities - Faversham in Swale, Chilham in Ashford and Folkestone in Shepway). The Council has worked closely with neighbouring authorities in addressing strategic housing needs and other cross-boundary issues. The Council intends to meet its housing need within the Thanet district.

3.5 The key driver of housing growth in Thanet has been the number of in-comers choosing to live in the district. Further in-migration will be needed to provide an adequate labour supply to deliver the economic strategy.

3.6 The Council's Housing Strategy seeks to create sustainable communities, recognising the need for Thanet's residents to have access to high quality housing which they can afford.

3.7 In particular it recognises the need for a greater emphasis on provision of family homes, that need for affordable housing outweighs supply, the importance of bringing empty property back into use to provide new homes, and the need to work with the private sector to drive up standards in the private rented sector. Its main objectives are to: -

- Deliver a range of homes to meet the local housing need which residents can afford;
- Make better use of the existing housing stock across all tenures and improve housing conditions;

- Enable vulnerable people to access good quality housing and to live independently;
- Provide an accessible housing options service for Thanet residents;
- Deliver housing in support of our regeneration and economic development objectives

3.8 Reflecting this, an imperative of the housing strategy of the Local Plan will be to facilitate delivery of the type and quality of homes that will meet the needs of settled and mixed communities including in particular those aspiring to take advantage of and generate new employment opportunities.

Amount of Housing

3.9 Housing provision is made for 17,140 additional homes over the 20 year period to 2031. This reflects forecasts based on an updated assessment of migration trend based population projections (2014) and the labour requirements supporting the Council's aspirations for economic and employment growth. The NPPF requires local authorities to be able to demonstrate that the sites in its housing land supply are deliverable. The Council is taking a "stepped" approach to delivering the housing target ie. a lower target is set for the first five years, with higher targets for the following 10 years to make good the total housing requirement for the Plan period. This is for two main reasons:

- There are significant infrastructure requirements that need to be delivered to support new development. If the Council were required to allocate more sites to cover average requirement for the first five-year period, this might undermine the delivery of that infrastructure, and therefore the wider Local Plan strategy; and
- Thanet has an emergent development market, but there is a real possibility that driving high levels of requirement in the early years might undermine the viability of some sites, or result in lowered viability, which again could affect the delivery of services and infrastructure, as well as affordable housing

3.10 Taking a "stepped approach" to meeting the housing target means that the Council can ensure that developments are supported by the necessary services and infrastructure, and reflects the expected trajectory of housing delivery from the strategic sites.

3.11 The Council is also seeking to work with the market to encourage higher rates of house-building and recently achieved accreditation to the Housing Business Ready Programme, run by the Housing & Finance Institute (HFI). This involvement of the Homes & Communities Agency (HCA) in development in the district, and their purchase of sites for development, is an indicator of commitment to delivery in the area. The Council has been demonstrating its commitment to the delivery of housing, both to meet local housing need and to support economic regeneration, by granting planning permission for residential development on sites proposed for housing allocations, and non-allocated sites.

Policy SP13 - Housing Provision

Provision is made for at least 17,140 additional homes in the period to 2031, with notional delivery across the period as indicated below. The Council will review the provisions of this policy as part of the wider Local Plan review set out in Policy SP03

Period	2011-16	2016-21	2021-26	2026-31
Additional Homes	1555 311pa	3000 600pa	6000 1200pa	6585 1317pa

Location of Housing

3.12 Thanet is a relatively small district surrounded on three sides by the coast. The three main coastal towns of Margate, Ramsgate and Broadstairs, and the central island development of Westwood form the main urban areas. Outside of the urban areas is open countryside including high quality farm land and seven rural settlements. Thanet's Green Wedges serve an important function by maintaining the physical separation between, and identity of, the Thanet towns and have been consistently protected from development by local plan policies. Thanet currently has an under provision of all 5 typologies of open space identified in the Open Space Strategy (2017). These limitations restrict the availability of sites that are appropriate for housing allocations. In considering appropriate site options to accommodate the housing target as required in the NPPF, the Council has also had to take into account a number of environmental issues including internationally and nationally important nature conservation designations, local wildlife designations, areas at risk of flooding and archaeology/designated heritage assets.

3.13 Identification and allocation of housing land has been informed by assessment of the sustainability of individual sites through the Strategic Housing Land Availability Assessment alongside the strategy for the planned location of homes whose key principles are to:-

- optimise use of capacity from sites in the built up areas of the coastal towns;
- focus provision at sites abutting those areas; and
- make modest provision at rural settlements to meet identified need for affordable homes and to provide locational choice at a scale compatible with their character and access to services and facilities.

3.14 A number of allocated sites are of strategic importance for delivering the quantity and type and variety of homes required to deliver the strategy. These are identified as Strategic sites. The distribution of allocated housing land is illustrated in Table 2.

3.15 Within the total housing provision shown below the Strategic Housing Land Availability Assessment suggests capacity to deliver some 3017 dwellings exists by way of sites which have already received planning permission. In addition some 1555 dwellings have already been delivered since the start of the Plan period.

Table 2 - Total Housing Distribution

Period	**2011-2031**
Strategic Sites (sites of 500+ dwellings)	
Westwood	1,450
Birchington on Sea	1,600
Westgate on Sea	2,000
Manston Green	(planning permission granted so not counted in allocations)
Land at Manston Court/Haine Road	1400
Land north and south of Shottendane Road	550
Other Housing Sites/Areas	1,691

Table 3 - Total Housing Supply

Local Plan requirement	**17,140**
Completions from 01/04/11 to 31/03/19	2704
Residual requirement	14,436
Total allocations supply	8691
Planning permissions supply	4713
Empty Homes 27 pa (27x12)	324
Windfall allowance 225x9*	2025

*Windfall allowance discounted for the first 3 years to avoid any potential double counting.

Area Specific Objectives

3.16 Reflecting the make-up of the housing stock and specific issues in different parts of Thanet, the Council has identified, and will seek to achieve, the following area based objectives. It will expect applications for residential development to demonstrate that full account has been taken of these.

Table 4 - Area Specific Objectives

Area	Area specific housing objectives
District wide	Increase the proportion of houses (non flatted homes) within the overall dwelling stock. Safeguard and increase the stock of family homes. Increase the stock of affordable homes Safeguard and enhance the character and amenity of existing residential neighbourhoods.
Westwood	Transform the neighbourhood into a mixed business and residential community benefiting from mutual proximity, accessibility and supporting amenity infrastructure. Contribute a significant addition to the district's stock of non-flatted accommodation including family sized houses and of affordable homes.
Coastal town centres	Contribute to area regeneration objectives expressed in policy or supplementary guidance, and, where appropriate, in line with specific site development briefs.
Cliftonville West & Margate	Establish a mixed, inclusive and settled community through improvements to the quality and configuration of residential accommodation and its environment and diversity of tenure. Apply public sector intervention and finance to pump-prime private sector investment.
King Street, Ramsgate	Improve the visual appearance of the area and provide good quality housing that is affordable and well managed.
Newington & Millmead	Establish a mixed, inclusive and settled community through improvements to the quality and configuration of residential accommodation and to the local environment and diversity of tenure.
Rural settlements	Accommodate additional homes to provide locational choice at a scale compatible with the size and character of the settlement and in light of accessibility of services and community facilities. Increase the stock of affordable housing at a scale commensurate with any outstanding local need.

Strategic Housing Site Allocations

3.17 The existing built up areas of the district will continue to deliver additional housing. However, a significant amount of greenfield housing land is required to meet the housing target. Assessment has revealed that some of the suitable and sustainably located greenfield sites identified are large and some are adjoining or in mutual proximity. These sites provide the opportunity to deliver development at a scale that will serve both to facilitate a step change in

delivering the type of homes required to meet need and secure the infrastructure required to support them. Such large and clustered sites have been identified as strategic housing allocations that will be of particular importance in delivering the Plan's housing objectives.

3.18 The geographical extent indicated for individual strategic site allocations represents the anticipated maximum land requirement. Proposals will be expected to consider, and where possible accommodate, notional maximum dwelling capacities indicated together with all other relevant policy requirements within a lower level of greenfield land take. This section identifies, and sets out policies for, housing sites of strategic significance to the Local Plan strategy.

3.19 The sites listed below are identified as Strategic Housing Sites. Applications to develop such sites shall be accompanied by a detailed development brief including an illustrative site masterplan featuring all elements of the proposal and indicating phasing of development and supporting infrastructure. Applications will be determined in light of the following site specific policies:

SP15 Manston Green
SP16 Birchington on Sea
SP17 Westgate on Sea
SP18 Westwood
SP19 Land fronting Nash and Haine Roads
SP20 Land at Manston Court/Haine Road
SP21 Land north and south of Shottendane Road

General Housing Policy Requirements

3.20 There are a number of policy requirements relating to residential development that will apply to all of the site specific policies and land allocated for housing. The following policy applies to all sites allocated in this Local Plan for residential development. NB There are other policies in the Local Plan that would also apply to new residential developments - the plan must be read as a whole.

3.21 One of the “transformational initiatives” identified in the Council’s Economic Growth Strategy (EGS)(November 2016) is “designing enterprise into communities”. This is particularly important in Thanet, where a significant proportion of jobs growth is expected in the SME and micro-business sector. As well as supporting working at home with good-quality broadband as provided in policies E02 and E03, the provision of active working space and networking opportunities for the self-employed and sub-contractors is seen as a means of enhancing this aspect of Thanet’s employment profile. This is the basis for seeking “community business space” within the strategic housing allocations. The intention is for community buildings to be provided which make provision in whole or in part for small, fully serviced and flexible spaces suitable for use by small businesses and sole traders to support business activity. This approach is also supported by Policy CM01, which makes provision for broadband in community facilities.

Policy SP14 - General Housing Policy

Proposals for residential development on sites allocated in this plan must:

1) Provide one electric car charging point for every 10 parking spaces provided in

communal areas, or one charging point to be provided for every new dwelling with parking provision within its curtilage;

2) Retain existing boundary features where possible;

3) Provide a connection to the sewerage system at the nearest point of adequate capacity, in collaboration with the service provider;

4) Allow future access to the existing water supply infrastructure for maintenance and upsizing purposes;

5) Provide for the installation of digital infrastructure;

6) Provide for the installation of Fibre to the Home (FTTH);

7) Contribute towards the Strategic Access Management and Monitoring Plan to meet the requirements of SP29.

Additionally, all proposals for 10 or more units must:

1) **Provide an appropriate mix of dwellings (including care and supported housing) to meet the requirements of Policy SP22;**
2) **Include an element of self-build properties where there is a demonstrable demand from persons included in the Council's self-build register;**
3) **Provide affordable housing to meet the requirements of Policy SP23;**
4) **Provide accessible homes to meet the requirements of Policy QD05; and**
5) **Include an assessment of the development's effect on 'functional land' that may be used as a roosting or feeding habitat by wintering and breeding birds identified by the Thanet Coast and Sandwich Bay Special Protection Area citation, and provide mitigation where necessary. All development must comply with policies relating to the Protection of International and European Designated Sites and associated Mitigation Strategy.**

In addition to the timely delivery of education, health and transport infrastructure, proposals for the development of strategic sites under Policies SP15 – SP21 must include an assessment of the need for community facilities as part of the masterplanning process. Where required to create sustainable, mixed-use communities the Council will expect such facilities to include community business space having regard to the Economic Growth Strategy.

A Heritage Impact Assessment will be required at the masterplanning stage for the strategic sites to assess any cumulative impacts of the site allocations and highways infrastructure on heritage assets and archaeological resources.

Strategic Site Policies

Policy SP15 - Strategic Housing Sites - Manston Green

Land is allocated for up to 785 new dwellings with an approximate average density of 35 dwellings per hectare (net) at land known as Manston Green. Proposals will be judged and permitted only in accordance with a masterplan for the whole site which should include:

1) **a minimum of 6.3 ha of open space;**
2) **a fully serviced area of 2.05 ha (to be provided at the cost of the developer) to accommodate a new two-form entry primary school and its construction in a location**

and in a form agreed with the County Council;
3) **a range of community facilities in accordance with Policy SP14, including small scale convenience retail provision to accessibly serve the day-to-day needs of the residents;**
4) **linkages to new and existing public transport infrastructure, including bus and rail services;**
5) **improvements to the roundabout at the junction with A256 Haine Road/B2050 Manston Road and approach roads; and**
6) **a proportionate contribution to necessary off-site highway improvements in accordance with Policy SP47.**

Masterplanning will be informed by and address the following:

1) **built development will be focused at the northern part of the site;**
2) **a pre-design archaeological assessment taking account the presence of any significant and sensitive remains;**
3) **the preservation of the setting of listed buildings at Ozengell;**
4) **the integration of development and landscaping to enable a soft edge between the site and open countryside and minimise impact on long views southwards toward Pegwell Bay;**
5) **the provision of sustainable urban drainage taking account of the site's location in the Groundwater Source Protection Zone;**
6) **the capacity of any utility services and infrastructure, and any need and provision for improved or additional infrastructure (as may be advised or reasonably required by service providers).**

All development proposals must be planned and implemented in a coordinated manner and accompanied by an infrastructure delivery and phasing plan.

Proposals will be accompanied by a Transport Assessment which shall:

1) **assess the impact of development on the local road network;**
2) **identify measures to promote multi-modal access, including footway and cycleway connections and an extended bus service accessible to the residential development and rail linkages.**

3.22 Westgate-on-Sea and Birchington, along with Garlinge and Westbrook form part of the continuous urban coastal belt of Thanet, located to the west of Margate.

3.23 Westgate comprises, in the main, high quality residential environments and was originally developed as a seaside resort for the upper and middle classes. It has a small commercial centre which serves the surrounding residential community, and a train station with routes to Margate and the rest of Thanet, as well as Faversham and London. Between Westgate and Margate are the smaller suburbs of Westbrook and Garlinge, both of which also have small commercial centres that serve the local community.

3.24 Birchington is a large village with an existing population of approximately 10,100. It has a good sized and well-functioning commercial centre which serves the surrounding residential community. The village has a train station with routes to Margate, and the rest of Thanet as well as Faversham and London, with regular bus services running to Canterbury. Birchington Square lies on the main route to Margate for those travelling into the district from the west, and as such at peak times suffer from traffic congestion. This has also resulted in the area suffering from

higher levels of air pollution.

3.25 These settlements are considered to be sustainable locations for new development, with good access to local services, including schools and other community facilities, as well as convenient transport options to the rest of Thanet and locations outside of the district. Developers will need to work with relevant health care providers to ensure adequate provision is made in these locations.

Policy SP16 - Strategic Housing Site - Birchington

Land is allocated for up to 1,600 new dwellings with an approximate average density of 35 dwellings per hectare net at Birchington. Proposals will be judged and permitted only in accordance with a masterplan for the whole site which should include:

1) **a minimum of 12.8 ha of open space;**
2) **a fully serviced area of 2.05 ha (to be provided at the cost of the developer) to accommodate a new two-form entry primary school and its construction in a location and in a form agreed with the County Council;**
3) **a range of community facilities in accordance with Policy SP14, including small scale convenience retail provision to serve the day-to-day needs of the residents;**
4) **provision for the expansion of medical services at the Birchington Medical Centre to cater for the additional needs created by the development;**
5) **linkages to new and existing public transport infrastructure, including bus and rail services;**
6) **a new link road to serve the development and extending from Minnis Road and the A28, and A28 to Manston Road including new junctions on A28/Minnis Road and Acol Hill/ Manston Road;**
7) **access on to Park Lane and a footway connection to the entire frontage to connect to the existing footway in Park Lane near to the access with Brunswick Road; and**
8) **a proportionate contribution to necessary off-site highway improvements in accordance with Policy SP47.**

Masterplanning will be informed by and address the following:

1) **measures to preserve the listed buildings Gore End Barn and Upper Gore End Farmhouse and their setting, including the setting of Quex Park;**
2) **measures to integrate the development within the landscape to enable a soft edge between the site and the open countryside;**
3) **pre-design archaeological evaluation;**
4) **noise mitigation for any development near the northern edge of the site which is adjacent to the railway line;**
5) **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).**

All development proposals must be planned and implemented in a coordinated manner and accompanied by an infrastructure delivery and phasing plan.

Proposals will be accompanied by a Transport Assessment which shall:

1) **assess the impact of development on the local road network;**
2) **identify measures to promote multi-modal access, including footway and cycleway connections and an extended bus service accessible to the residential development and rail linkages.**

Policy SP17 - Strategic Housing Site – Westgate-on-Sea

Land is allocated for up to 2,000 new dwellings with an approximate average density of 35 dwellings per hectare (net) at land to the east and west of Minster Road, Westgate-on-Sea.

Proposals will be judged and permitted only in accordance with masterplan for the whole site which should include:

1) **a minimum of 16 ha of open space to include functional green space(s) between existing urban edge and new development;**
2) **a fully serviced area of 2.05 ha (to be provided at the cost of the developer) to accommodate a new two-form entry primary school, and its construction in a location and in a form agreed with the County Council;**
3) **a range of community facilities in accordance with Policy SP14, including small scale convenience retail provision to serve the day-to-day needs of the residents;**
4) **provision of serviced 1 ha of land suitable for a new medical centre to cater for the additional needs created by the development;**
5) **linkages to new and existing public transport infrastructure, including bus and rail services;**
6) **vehicular access from Minster Road and Dent-de-Lion Road;**
7) **the provision of a link road between Dent de Lion Road and Minster Road (including necessary junctions) and the provision of a new signal controlled junction at High Street Garlinge/A28;**
8) **improvements at Dent-de-Lion Road/High Street, Garlinge junction;**
9) **an assessment to identify necessary measures to manage on-street car parking in Dent-de-Lion Road and Garlinge High Street, between the site and the A28, and potential methods of delivery;**
10) **the upgrade of Shottendane Road to Local Distributor standard; and**
11) **a proportionate contribution to necessary off-site highway improvements in accordance with Policy SP47.**

Masterplanning will be informed by and address

1) **an archaeological evaluation;**
2) **the preservation and/or enhancement of the setting of scheduled ancient monuments and the listed Dent de Lion Gateway, and the measures to be undertaken;**
3) **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);**
4) **appropriate arrangements for surface water management/sustainable drainage schemes in line with Margate Surface Water Management Plan,**
5) **Landscape and Visual Impact Assessment to address any visual impact on views to and**

from the adjacent Green Wedge and protecting wide open landscapes and strategic views; and

6) **the integration of development and landscaping to take account of public rights of way and the provision of a soft edge between the site and open countryside.**

All development proposals must be planned and implemented in a coordinated manner and accompanied by an infrastructure delivery and phasing plan.

Proposals will be accompanied by a Transport Assessment which shall:

1) **assess the impact of development on the local road network and address any implications for on-street car parking arrangements in Dent-de-Lion Road and Garlinge High Street, between the site and the A28; and**
2) **identify measures to promote multi-modal access, including footway and cycleway connections, and an extended bus service accessible to the residential development and rail linkages.**

3.26 Westwood was originally allocated as a new town centre in the 2006 Thanet Local Plan and is a significant area for retail and commercial developments. The land fronting Nash and Haine Roads as identified on the Policies Map (Policy SP19 refers) already has the benefit of various planning permissions. Outline planning permission was granted in 2008 for a mixed use urban extension comprising residential use (total of 1020 units), community facilities, commercial and employment uses and associated infrastructure including a new link road and associated alterations to existing junctions and new access arrangements. Development is well advanced with most phases of the development having been completed. The delivery of the proposed school and medical centre have been negotiated through various stages of the planning application process, and remaining phases 3c, 4 and 5 (providing a total of 770 residential units) of the development are expected to be completed within this local plan period.

Applications for strategic sites at Westwood identified in this plan should have regard to previous planning permissions to ensure a cohesive and comprehensive delivery of infrastructure and community facilities is provided to serve the existing and wider allocations.

Policy SP18 – Strategic Housing Site - Westwood

Land is allocated for up to 1,450 new dwellings with an approximate average density of 40 dwellings per hectare (net) at Westwood.

Proposals will be judged and permitted only in accordance with a masterplan for the whole site which should include:

1) **a minimum of 11 ha of open space;**
2) **a fully serviced area of 2.05ha (to be provided at the cost of the developer) to accommodate a new two-form entry primary school and its construction in a location and in a form agreed with the County Council;**
3) **a range of community facilities in accordance with Policy SP14, including small scale convenience retail provision to serve the day-to-day needs of the residents;**
4) **linkages to new and existing public transport; infrastructure, including bus and rail services;**
5) **highway improvements including widening of Nash Road and links to Nash Road and Manston Road, to local distributor standard between the southern extent of the site**

and Star Lane; and

6) **a proportionate contribution to necessary off-site highway improvements in accordance with Policy SP47.**

Masterplanning will be informed by and address:

1) **pre-design archaeological assessment;**
2) **the preservation of the setting of listed buildings at Nash Court Farm;**
3) **the capacity of any utility services and infrastructure and the provision for any necessary improvements or additional infrastructure (as may be advised or reasonably required by service providers);**
4) **arrangements for surface water management in line with the Margate Surface Water Management Plan;**
5) **a layout that responds to the existence of overhead power lines;**
6) **measures to integrate the development within the landscape to enable a soft edge between the site and the open countryside.**

All development proposals must be planned and implemented in a coordinated manner and accompanied by an infrastructure delivery and phasing plan.

Proposals will be accompanied by a Transport Assessment which shall:

1) **assess the impact of development on the local road network;**
2) **identify measures to promote multi-modal access, including footway and cycleway connections, an extended bus service accessible to the residential development and rail linkages.**

Policy SP19 - Strategic Housing Site - Land fronting Nash and Haine Roads

Land is allocated for up to 1020 new dwellings at land fronting Nash and Haine Roads.

Proposals will be judged and permitted only in accordance with a masterplan for the whole site which shall include:

1) **a minimum of 1.75 ha as local open space (including an equipped play area and casual/informal play space) together with an area of usable amenity space as an integral part of the design of the development. Where feasible, the area of local open space should be larger than the minimum indicated above;**
2) **a fully serviced area of 2.05 ha (to be provided at the cost of the developer) for a new two form entry school as an integral part of the development;**
3) **a minimum of 2 ha to enable provision of a medical centre and provide a community assembly facility.**

Masterplanning will be informed by and address the following:

1) **landscaped buffer zones adjacent to any new road infrastructure and along the boundaries to adjacent to open farmland;**
2) **provision and maintenance of appropriate equipment for continuous monitoring of local air quality to inform the Council's ongoing air quality review and assessment programme.**

All development proposals must be planned and implemented in a coordinated manner and accompanied by an infrastructure delivery and phasing plan.

Applications for successive phases of development will have regard to the need to integrate as far as feasible with any approved masterplans relating to neighbouring areas addressed in this policy and with the Thanet Transport Strategy.

Proposals will be accompanied by a Transport Assessment which shall:

1) **Provide for any highway improvements identified as necessary in a traffic assessment and the development masterplan. Individual phases of development will be required to make provision pro-rata towards such improvements;**
2) **incorporate and provide for connections and improvements to footpath and cycle networks facilitating walking, cycling and public transport to, from and within the site, including provision of or contribution to improvements to public transport services.**

Policy SP20 -Strategic Housing Site - Land at Manston Court Road/Haine Road

Land is allocated for a mixed use development, comprising up to 1400 new dwellings with an approximate average density of 35 dwellings per hectare (net), and leisure uses at land at Manston Court Road/Haine Road

Proposals will be judged and permitted only in accordance with a masterplan for the whole site which should include:

1) **A minimum of 11.24ha of open space;**
2) **Provision on site of a serviced site of no less than 8ha for a 6-form entry secondary school and its construction in a location and in a form agreed with the County Council;**
3) **linkages to new and existing public transport infrastructure, including bus and rail services;**
4) **the provision of an internal spine road laid out in accordance with the requirements of the draft Transport Strategy**
5) **junction improvement at A256 Haine Road/New Haine Road and Star Lane/Haine Road (including a dual lane link between them) and;**
6) **a proportionate contribution to necessary off-site highway improvements in accordance with Policy SP47**

Masterplaning will be informed by and address:

1) **pre-design archaeological evaluation;**
2) **the capacity of any utility services and infrastructure and any need and provision for improved or additional infrastructure (as may be advised or reasonably required by service providers).**

All development proposals must be planned and implemented in a coordinated manner and accompanied by an infrastructure delivery and phasing plan.

Proposals will be accompanied by a Transport Assessment which shall:

1) **assess the impact of development on the local road network**
2) **identify measures to promote multi-modal access, including footway and cycleway connections, an extended bus service accessible to the residential development and rail linkages.**

Policy SP21 – Strategic Housing Site – Land north and south of Shottendane Road

Land is allocated for up to 300 dwellings at land north of Shottendane Road, and up to 250 dwellings at land south of Shottendane Road, with an approximate average density of 35 dwellings per hectare net.

Proposals will be judged and permitted only in accordance with a Masterplan for the whole site which should include:

1) **a minimum of 4.4 ha of open space – this may be spread over both sites but must be readily accessible to both sites;**
2) **linkages to new and existing public transport infrastructure, including bus and rail services;**
3) **a local distributor link road between Shottendane Road and Manston Road, including new roundabouts on Shottendane Road and Manston Road and a new junction with Hartsdown Road;**
4) **the reconfiguration of the Coffin House Corner signal controlled junction and the Manston Road and Shottendane Road junction;**
5) **Provision for the retention and/or upgrading of designated footpath TM14;**
6) **a proportionate contribution to necessary off-site highway improvements in accordance with Policy SP47.**

Masterplanning will be informed by and address:

1) **pedestrian and cycle access between the two sites;**
2) **appropriate landscape treatment in order to provide an appropriate transition between the development and the adjacent open countryside;**
3) **A Heritage Impact Assessment to assess effects on St Johns Cemetery and sites/memorials within it and consideration of the setting of Shottendane Farm House;**
4) **an assessment of potential implications of policies CSW16 and DM8 of the Kent Minerals and Waste Local Plan (or subsequent revision) and the need (if any) to mitigate any potential impacts on waste management capacity;**
5) **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).**

All development proposals must be planned and implemented in a coordinated manner and accompanied by an infrastructure delivery and phasing plan.

Proposals will be accompanied by a Transport Assessment which shall:

1) **assess the impact of development on the local road network;**

2) identify measures to promote multi-modal access, including footway and cycleway connections, an extended bus service accessible to the residential development and rail linkages;

Type and size of dwellings

3.27 The Strategic Housing Market Assessment 2016 (SHMA) identified as a critical challenge tackling the impact of an ageing population, and forecast loss of younger age groups with the resultant potential loss of working age population.

3.28 Subsequent economic and population forecasts based on the economic aspirations and housing provisions in this Local Plan also predict for Thanet an increase in the ageing population (especially those above retirement age). However, they do also predict that there will be an increase in younger age groups.

3.29 Both the SHMA and the subsequent forecasts referred to above show that single person households are expected to increase in number. The SHMA notes however that there is a greater supply of smaller units than of family homes and houses, and that this demographic trend should not dictate policy. Indeed it notes that in aiming to deliver substantive regeneration and economic strategies the housing role in turning round economic performance is both to provide appropriate and attractive housing for higher earners and facilitate retention of local young families.

3.30 The SHMA notes that the housing stock is characterised by a combination of dense provision, overprovision of smaller flats and flatted buildings, and a shortage of larger homes of three bedrooms and more. It states that it is important that future development policy prioritises a rebalancing of stock to incentivise the provision of family homes and control the expansion of "flatting" of larger homes, while at the same time recognising solid demand for smaller homes including from young single people and increasing numbers of older single people.

3.31 Cliftonville West and (part of) Margate Central wards have had particular issues relating to the availability of cheap properties that have been converted into small residential units and resultant transient community. Due to the severity of the issues in these areas, evidence is available to support planning policies to resist the conversion of buildings to 1-bedroom flats, and provide more family housing. These policies are included in the Cliftonville Development Plan Document (adopted 2010)

3.32 In assessing housing needs the SHMA considers information about aspirations, economic development plans for the sub-region, opportunities to attract mature working households that new rail links will bring and priority need for affordable housing. It recommends broad proportions of the sizes and types of market and affordable homes that should be provided. This is shown in tables 5 and 6.

3.33 In applying Policy SP22, the Council will have regard to the relevant conclusions of the Strategic Housing Market Assessment (2016) or any relevant evidence serving to refresh or update it. On sites of 10 units or less the Council will take a flexible approach to the application of the SHMA recommendations, taking into account the nature and location of the site.

Table 5 - Mix of market housing by dwelling type (built form)

	Detached	Semi-detached	Terraced	Flat
Thanet	25-30%	25-30%	20-25%	20-25%

The SHMA recommends the following sizes of dwellings needed for market housing (including a higher requirement for 2 bedroom homes, reflecting the result of a growing older population and younger households living in smaller households).

- 1-bed properties: 10-15%
- 2-bed properties: 40-45%
- 3-bed properties: 30-35%
- 4-bed properties: 10-15%

Table 6 - Mix of affordable housing by dwelling type (built form)

	Detached	Semi-detached	Terraced	Flat
Thanet	0-5%	25-30%	20-25%	45-50%

The SHMA recommends the following sizes of dwellings needed for affordable housing

- 1-bed properties: 35-40%
- 2-bed properties: 30-35%
- 3-bed properties: 20-25%
- 4-bed properties: 5-10%

3.34 Previous dwelling completions in Thanet have included a large share of flatted accommodation. Consequently, in line with the SHMA recommendations it is important to increase the proportion of houses in the overall stock. The SHMA recommends a mix of 20-25% flats and 75-80% houses for market housing, and 45-50% flats and 50-55% houses for affordable housing. Accordingly proposals will be expected to deliver at least the proportion of houses (as opposed to flats) in line with Policy SP22. It is recognised that in some instances there may be reasons such as configuration of buildings contributing to townscape quality why only flatted accommodation will be feasible. Schemes proposing a higher proportion of flats will need to be accompanied by a supporting justification.

Policy SP22 - Type and Size of Dwellings

Proposals for housing development will be expected to provide an appropriate mix of market and affordable housing types and sizes having regard to the SHMA recommendations as may be reviewed or superseded.

The Council will encourage proposals for residential development to incorporate a higher

ratio of houses to flats (as recommended in the SHMA as may be reviewed or superseded). Proposals for developments incorporating a higher proportion of flats will need specific justification.

Proposals to convert properties currently used as flats to use as single family or single household accommodation will be permitted where a satisfactory standard of accommodation can be provided.

Development proposals involving the net loss of single family dwelling houses will only be permitted where the subdivision or redevelopment of the site continues to provide accommodation suitable for occupation by families.

Providing affordable homes

3.35 Affordable housing is defined as social rented, affordable rented, intermediate housing, provided to eligible households whose needs are not met by the market. The Strategic Housing Market Assessment's (SHMA) analysis is that tackling the backlog of need is an enormous task. The SHMA also sets out the requirement for a proportion of starter homes (homes for first time buyers under the age of 40 at a discount of at least 20% below the open market value) to be delivered on all suitable reasonably-sized housing developments.

3.36 Through its functions as housing and planning authority the Council will aim to maximise the number of decent affordable homes that can viably be delivered alongside market homes in order to meet need. Negotiating elements of affordable housing in new schemes will contribute valuably to meeting local need.

3.37 Reflecting economic viability considerations in general the Council will negotiate for an element of 30% affordable housing in residential development

3.38 In applying the following policy, site specific considerations will be taken into account in relation to the element of affordable housing that will be expected. The presumption is that the affordable element will be delivered on the application site, unless robust justification exists for provision on an alternative site in the developer's ownership and control, or for a financial contribution in lieu of on-site provision which will help to deliver strategic housing objectives. It is accepted that on sites comprising a total of 10 dwellings or less and which have a maximum combined floorspace of no more than 1,000 square meters, a financial contribution should not be sought.

3.39 Developers will be required to demonstrate how any affordable housing will be made available to households unable to obtain adequate housing through the private market and will be expected to engage with registered providers. (The Council can provide a list of provider partners). This may be secured by entering into a planning agreement. The developer will be required to demonstrate that enjoyment of the affordable housing as such can be guaranteed for successive as well as initial occupiers for the foreseeable future. However, eligibility of owners to acquire/ progress to full ownership is acknowledged as an exception.

Policy SP23 - Affordable Housing

Residential development schemes for more than 10 dwelling units, including mixed use developments incorporating residential and developments with a combined gross floor

area of more than 1,000 square meters shall be required to provide 30% of the dwellings as affordable housing.

The affordable housing shall be provided in proportions set out in the Strategic Housing Market Assessment or successive documents.

The above requirements will only be reduced if meeting them would demonstrably make the proposed development unviable.

4-Environment Strategy

Protecting the Countryside

4.1 The National Planning Policy Framework (NPPF) states that local plans should take account of the roles and character of different areas, promoting the vitality of our main urban areas and recognising the intrinsic character and beauty of the countryside.

4.2 Thanet's open countryside is particularly vulnerable to development because of its limited extent, the openness and flatness of the rural landscape and the proximity of the towns. Thanet's countryside provides important landscapes that contribute to its sense of place, as well as making Thanet an attractive place that people want to come to. Much of the countryside is classified as 'best and most versatile agricultural land'. The countryside also supports a variety of habitats and species, particularly a number of important species of farmland birds which have declined in numbers over the last few decades.

4.3 There is a presumption against development in the countryside as the sites allocated in this plan meet the development needs of the district. The Council has assessed all of the sites put forward, and some have been allocated in rural settlements where this has been considered appropriate to meet the needs of sustainable development

4.4 The Council considers that it is essential to protect the countryside through planning policy in view of its vulnerability to sporadic forms of development and will locate all but essentially rural development in the Thanet towns. The only exception to this will be proposals for development that meet the criteria set out in paragraph 55 of the NPPF:

- The essential need for a rural worker to live permanently at or near their place of work in the countryside; or
- Where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or
- Where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting; or
- The exceptional quality or innovative nature of the design of the dwelling.

Such a design should:

- Be truly outstanding or innovative, helping to raise standards of design more generally in rural areas
- Reflect the highest standards in architecture
- Significantly enhance its immediate setting; and
- Be sensitive to the defining characteristics of the local area

The following policy seeks to achieve the objective of safeguarding the geological and scenic value of the coast and countryside.

Policy SP24 - Development in the Countryside

Development on non-allocated sites in the countryside will be permitted for either:

1) **the growth and expansion of an existing rural business;**
2) **the development and diversification of agricultural and other land based rural businesses;**
3) **rural tourism and leisure development;**
4) **the retention and/or development of accessible local services and community facilities; or**
5) **the redevelopment of a brownfield site for a use that is compatible with its countryside setting and its surroundings.**

Isolated homes sites in the countryside will not be permitted unless they fall within one of the exceptions identified in the National Planning Policy Framework.

All development proposals to which this policy applies should be of a form, scale and size which is compatible with, and respects the character of, the local area and the surrounding countryside and its defining characteristics. Any environmental impact should be avoided or appropriately mitigated.

Green Wedges

4.5 The coastal towns of Thanet are separated by three particularly important areas of open countryside which are known as the Green Wedges indicated on the policies map.

4.6 The Green Wedges are significant in shaping the character of Thanet which has historically been a 'horseshoe' of built development wrapping around the coast. The Green Wedges provide a clear visual break when passing between the towns, giving a recognised structure and identity to Thanet's settlements. The Green Wedges are distinct from other types of open space as they provide a link between the open countryside and land which penetrates into the urban areas. The Green Wedges also make a valuable contribution to green infrastructure for the District.

4.7 The three Green Wedges differ in size and character. The largest is the one that separates Margate and Broadstairs. Substantial areas of this Green Wedge consist of high quality agricultural land in large open fields without fences or hedgerows. Other parts have isolated belts of woodland. The other two Green Wedges which separate Birchington and Westgate, and Broadstairs and Ramsgate are considerably smaller but perform a very significant function and, due to their limited extent are also potentially more vulnerable to development pressures.

4.8 There is very limited built development within the Green Wedges. The areas have level or gently undulating landform and generally sparse vegetation. The public perception of space, openness and separation is largely gained from roads and footpaths that run through or alongside the Green Wedges in undeveloped frontages. These factors allow many extensive and uninterrupted views across open countryside, enabling people to find the recreational, scenic or amenity resources they require without having to travel long distances. This is important as it adds to the quality of life and well-being perceived by people in the community.

4.9 The aesthetics of the Green Wedges are varied, and they are not always accessible to the public. There is an opportunity to enhance the Green Wedges by creating and enhancing wildlife habitats, for example working with landowners to encourage farmland birds, and to make the areas more accessible, potentially for recreation use. This may require changing farming activities. Funding may be available for environmental land management through Natural England's Stewardship Schemes.

4.10 Local Plan policies have historically been used to prevent urban sprawl, maintain the separation of the Thanet towns and prevent their coalescence, preserving their unique identities. The Green Wedge policy has been consistently and strongly supported at appeals. Inspectors' comments in appeal decisions, and the Inspector's Report to the Thanet Local Plan Inquiry, highlight the significance of the open countryside between the Thanet Towns, in providing visual relief in a highly urbanised area.

4.11 Some areas of the Green Wedges are vulnerable to development pressures, and some sites within them have been suggested as housing allocations. The Council has assessed the sites put forward in the Green Wedges and found that the allocation of some sites proposed in the Green Wedges would cause less harm than others. However, although allowing some small scale development may not significantly diminish the Green Wedge, the cumulative impact of several small scale developments could be of detriment to the Green Wedges and cause new development pressures where there are currently none. It could also set a precedent of releasing Green Wedge sites and result in further development within the Green Wedges which would diminish their functions.

4.12 The Council considers the Green Wedges still perform a highly significant function which overrides the need for development, and should continue to be protected through planning policy and meet the strategic objective of retaining the separation between Thanet's towns and villages with the following policy.

4.13 Policy SP25 sets out the policy approach in the Green Wedges. The Policy recognises that there may be circumstances where it is essential for development to be located in the Green Wedges, where there are no other suitable, available sites. This may include development to support agriculture, where agricultural units are located wholly or largely with the Green Wedges; or schemes to provide essential infrastructure. Applicants will need to demonstrate that it is essential for the proposed development to be within the Green Wedges, and in the case of agricultural development, to demonstrate that the development is required as part of the business plan for the unit.

Policy SP25 - Safeguarding the Identity of Thanet's Settlements

Within the Green Wedges new development (including changes of use) will only be permitted if it can be demonstrated that the development is

1) not detrimental or contrary to the following aims to:

- **Safeguard areas of open countryside in order to maintain physical separation and avoid coalescence of the towns, retaining their individual character and distinctiveness (for example by the expansion of isolated groups of houses or other development).**

- **Conserve, protect and enhance the essentially rural and unspoilt character, and distinctive landscape qualities of the countryside that separates the urban areas, for the enjoyment and amenity of those living in, and visiting, Thanet.**
- **Increase access and usability without compromising the integrity of the Green Wedges.**

Or is

2) essential to be located within the Green Wedges.

Open sports and recreational uses will be permitted subject to there being no overriding conflict with other policies, the wider objectives of this plan and the stated aims of this policy. If granted, any associated built development must be kept to a minimum, essential, small in scale and be necessary to support the open use. It should also be well related to adjacent urban edge and sensitively located to retain openness of the area.

Proposals for policy compliant development that include measures that will create or enhance wildlife habitats and biodiversity within the Green Wedges, or will improve the quality of the Green Wedges by providing high quality public amenity space will be supported.

Views and Landscapes

4.14 The National Planning Policy Framework (NPPF) states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

4.15 Thanet has historically been recognised for its distinctive wide, simple and unrestricted views and dramatic chalk cliffs along parts of its coastline. The Thanet Coast is the longest continuous stretch of coastal chalk in the UK and is one of the reasons for its designation as Special Area of Conservation (SAC). Useful resources and guidance for the interpretation of landscape are the Natural England National Character Areas, the Kent Historic Landscape Characterisation (2001) which has identified the broad historic character of the landscape of Kent, and the Thanet Landscape Character Assessment. In addition KCC commissioned a Seascape Character Assessment for the Dover Strait (2015) which identifies the character areas associated with the Dover Strait from North Foreland to Dungeness.

4.16 Thanet has a distinct landscape area defined by the Wantsum Channel which gave Thanet its "island" identity by separating it from the mainland. The Channel silted up around 1,000 years ago, and is characterised by former shoreline and port settlements and irregular fields bounded by roads, tracks and paths. The Wantsum has a history of reclamation and usage stretching back to at least the 12th and 13th centuries in connection with the considerable ecclesiastical estates in the region.

4.17 The contribution Thanet's landscapes make to Thanet's sense of place and island characteristics is very strong, as well as providing economic benefits in making the district an attractive place to settle and visit. Tourism and recreation uses compatible with Thanet's historic landscapes would be encouraged. Development would be expected to respect the diverse landscape characteristics of the countryside and coast. The character of the landscape within Thanet's countryside is varied, ranging from the distinctive sweep of Pegwell Bay, the flood plains of the River Stour and former Wantsum Channel, the open slopes of the former Wantsum

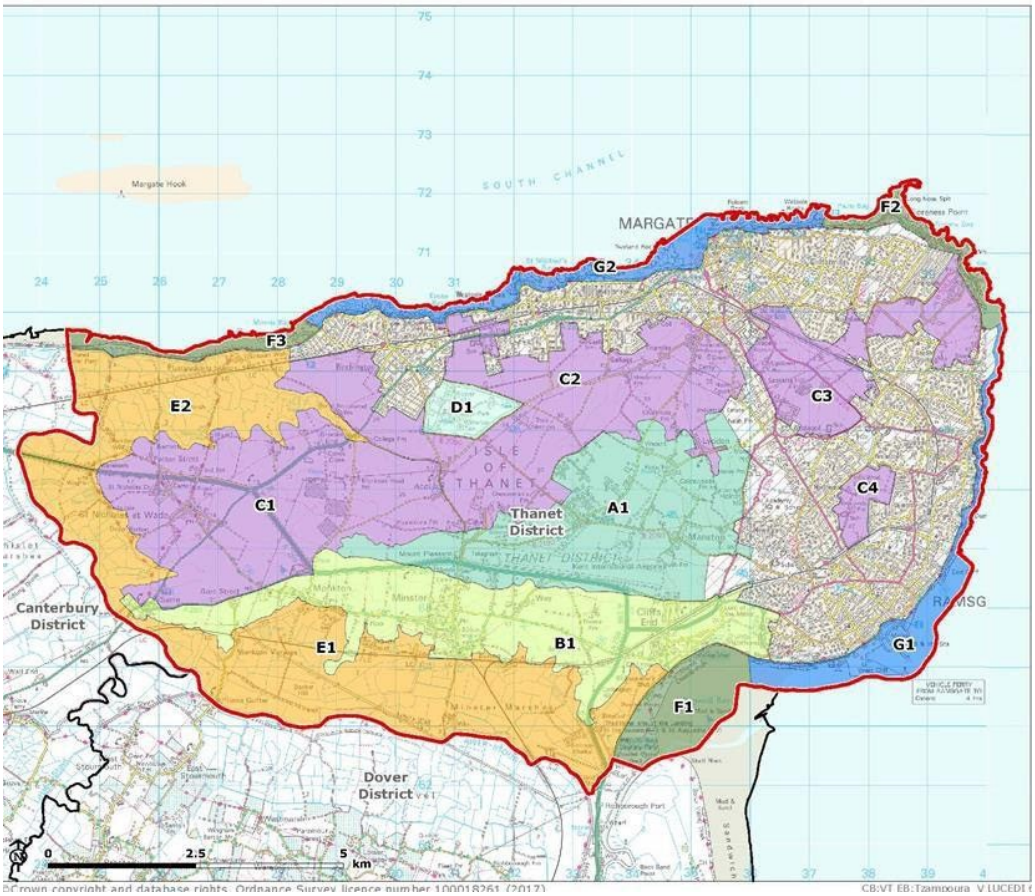
Channel, the level to undulating Central Chalk Plateau, the wooded parkland at Quex and the urban coast. Landscape does not stop at administrative boundaries and two of the broad areas associated with Pegwell Bay and the Wantsum, continue into neighbouring districts of Dover and Canterbury. Developers may be required to submit a Landscape and Visual Impact Assessment (LVIA) with planning applications that are likely to have a significant impact on the landscape. The LVIA should identify the nature, scale and magnitude of landscape and visual effects, and also help to identify ways of avoiding, reducing and mitigating any adverse effects. The Landscape Institute provides guidance on carrying out such an assessment.

4.18 Thanet sits within the Natural England's National Character Area (NCA) number 113 the North Kent Plain, which sits between the outer Thames Estuary and the Kent Downs. This describes Thanet as a 'discrete and distinct area' within this NCA, characterised by its unity of land use. The Thanet Landscape Character Assessment (2017) refines this character area at the local level by identifying 7 broad landscape character types - chalk plateau, chalk slopes, undulating chalk farmland, parkland and estates, marshes, undeveloped coast and developed coast. These are further refined into 13 landscape character areas as set out below in table 7. The assessment sets out the key characteristics which are evaluated through key sensitivities and qualities leading to a landscape strategy setting out guidelines for each character area. These guidelines should be taken into consideration when considering development proposals within these areas. It is the Council's intention to adopt the Landscape Character Assessment as a Supplementary Planning Document which will provide a framework for future development when drawing up masterplans particularly for the strategic sites.

Table 7 - Landscape Character Areas

Landscape Character Type	**Landscape Character Area**
A: Chalk Plateau	A1: Manston Chalk Plateau
B: Chalk Slopes	B1:Wantsum North Slopes
C: Undulating Chalk Farmland	C1: St Nicholas-at-Wade Undulating Farmland
	C2: Central Thanet Undulating Farmland
	C3: St Peter's Undulating Farmland
	C4: Newlands Farm
D: Parkland and Estates	D1: Quex Park
E: Marshes	E1: Stour Marshes
	E2: Wade Marshes
F: Undeveloped Coast	F1: Pegwell Bay
	F2: Foreness Point and North Foreness
G: Developed Coast	G1: Ramsgate and Broadstairs Cliffs
	G2: North Thanet Coast

Map 2 - Landscape Character Areas



The Chalk Plateau

4.19 The central part of the district is characterised by A1: the Manston Chalk Plateau, a generally flat or gently undulating landscape, with extensive, unenclosed fields under intensive arable cultivation. This open landscape is fragmented by the location of large scale developments such as the former airport, Manston Business Park and a sporadic settlement pattern to the north of the airport. The character of this area is also defined by the proximity of the edges of the urban areas. This character area contains the highest point on the island at Telegraph Hill. The elevated plateau results in long distance panoramic views to the south over Minster Marshes and across Pegwell Bay and, in the west, across the Wantsum. The elevated central chalk plateau also forms a skyline in many views back from lower landscapes in Thanet, including the coast and marshlands.

The Chalk Slopes

4.20 This area largely comprises the distinctive and often quite steep hill slopes leading down from the Central Chalk Plateau to the former Wantsum Channel - B1: Wantsum Northern Slopes. The landscape is very open with few features and the former shoreline is more distinct in some places than in others, with the variation in the contour pattern. From the upper slopes it affords extensive views across the whole of the former Wantsum Channel to the slopes on the

opposite banks and in many places to the sea. The former shoreline is more distinct in some places than in others, with the variation in the contour pattern. However, it also provides the unique setting of the former channel side villages of Minster, Monkton, Sarre and St Nicholas, and the smaller, originally farm based, settlements of Shuart, Gore Street and Potten Street. These elements provide important visual evidence of the growth of human settlement, agriculture and commerce in the area.

4.21 The openness of this landscape provides wide and long views of the former Wantsum Channel area and Pegwell Bay. The area also possesses a large number of archaeological sites (including scheduled ancient monuments); numerous listed buildings (including Minster Abbey, the churches at Minster, Monkton and St Nicholas, and Sarre Mill); and the historical landing sites of St Augustine and the Saxons, Hengist and Horsa.

Undulating Chalk Farmland

4.22 The undulating chalk farmland is a particular landscape feature in Thanet and consists of four landscape character areas: C1: St Nicholas-at-Wade Undulating Farmland, C2: Central Thanet Undulating Farmland; C3: St Peter's Undulating Farmland; and C4: Newlands Farm. Some of these character areas are important for their long distant views to the marshes and sea while in others the agricultural land performs a settlement separation function. These areas of high quality agricultural land are of value for farmland and roosting coastal birds. The openness and undeveloped character of the farmland contributes to the essentially rural character and relatively dark skies.

Parks and Estates

4.23 Quex Park (D1) is unique within the Thanet context, comprising a formal and extensive wooded parkland and amenity landscape within an otherwise open intensively farmed landscape. It possesses a formal landscape structure and gardens that act as an effective setting to Quex House Grade II listed. The parkland is intensively cultivated between the tree belts, with limited grazing pasture remaining. Two important historic features of the Park are the Grade II listed Waterloo Tower and a round castellated brick tower to the north of the main House.

Marshes

4.24 The two marshland landscapes of E1: Stour Marshes and E2: Wade Marshes formerly separated the Isle of Thanet from the mainland and formed part of the former Wantsum channel. The former channel stretches from Reculver (in Canterbury District) to Richborough (in Dover district) marked by the remains of Roman forts at these locations. These Roman forts guarded the two entrances of the channel and the area is potentially rich in archaeology. Therefore this is a sub regionally important landscape as it extends into the neighbouring districts of Canterbury and Dover and includes the flood plain of the River Stour. Both areas are characterised by a vast, flat, open landscape defined by the presence of an ancient field system, defined by an extensive ditch and dyke system, the sea walls and isolated groups of trees. These elements provide important visual evidence of the physical evolution of the Wantsum Channel and, like other marsh areas in Kent, produce huge open skies. The former grazing land has been improved and managed as arable farmland, however, it still retains its network of ditches which provide biodiversity interest. In both of these landscapes it is important to conserve the long distance views to the Thames Estuary to the north and Pegwell Bay to the south.

Undeveloped Coast

4.25 There are two stretches of undeveloped coast with the most extensive being Pegwell Bay (F1) which stretches into Dover District at Sandwich. The other is F2: Foreness Point and North Foreness to the north east of Thanet.

4.26 Pegwell Bay is an extensive area of mixed coastal habitats, including mudflats, saltmarsh and coastal scrub stretching from Ramsgate in the north to Sandwich in the south. These habitats form an open and relatively unspoilt landscape, with a distinctive character. The area possesses a sense of remoteness and wildness despite the relative proximity of development. Among its most important features in the area is the unique sweep of chalk cliffs viewed across Pegwell Bay from the south. This landscape creates large open skies. This is also of more than district significance as it stretches into the neighbouring district of Dover. The bay is of significant nature conservation interest which is reflected by its International, European and national designations.

Developed Coast

4.27 The long coastline is one of Thanet's main assets. There are two character areas associated with the developed coast G1: Ramsgate and Broadstairs Cliffs and G2: North Thanet Coast. The distinctive east facing low chalk cliffs of Thanet and the open seascape create a dramatic contrast to the almost continuous urban area of Ramsgate and Broadstairs located on the cliff top. The North Thanet Coast extends from the western edge of Birchington along the northern edge of Margate. The North Thanet Coast is characterised by a series of sandy bays with chalk reefs, mudflats and rock pools backed by a line of low white chalk cliffs.

4.28 With the exception of the Green Wedges, this area is heavily urbanised. The coastal strip is characterised by the presence of traditional seaside architecture, active harbour areas and beaches and some extensive public open clifftop areas. The pattern of bays and chalk headlands provides long sweeping and panoramic views of the coast, which are often complimented by a positive relationship with adjacent built development.

4.29 The Thanet Landscape Character Assessment provides the more detailed guidance for development proposals in each of the local landscape character areas and will be adopted as supplementary planning guidance. The following policy aims to safeguard and enhance the open and historic characteristics of Thanet's countryside and landscapes.

Policy SP26 - Landscape Character Areas

The Council will identify and support opportunities to conserve and enhance Thanet's landscape character and local distinctiveness.

Development proposals should demonstrate how their location, scale, design and materials will conserve and enhance Thanet's local distinctiveness, in particular:

1) **Its island quality surrounded by the silted marshes of the former Wantsum Channel and the sea;**
2) **A sense of openness and 'big skies', particularly in the central part of the District;**
3) **Its long, low chalk cliffs and the sense of 'wildness' experienced at the coast and on the marshes;**

4) **Gaps between Thanet's towns and villages, particularly those areas designated as Green Wedges;**
5) **Long-distance, open views, particularly across the Dover Strait and English Channel, North Sea and across adjacent lowland landscapes; and**
6) **Subtle skylines and ridges which are prominent from lower lying landscape both within and beyond the District.**

Development proposals should demonstrate how they respect and respond to the character, key sensitivities, qualities and guidelines of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA) and summarised below.

All development should seek to avoid skyline intrusion and the loss or interruption of long views of the coast and the sea, and proposals should demonstrate how the development will take advantage of and engage with these views.

Development should generally be directed away from the Stour Marshes (E1), Wade Marshes (E2) and Pegwell Bay (F1) character areas (as detailed in the LCA), as these are largely undeveloped and key to retaining the island character of Thanet. The undeveloped character of Landscape Character Type F: Undeveloped Coast should also be maintained.

Proposals on the coast (within landscape character types F: Undeveloped Coast and G: Developed Coast and the surrounding area) should respect the traditional seafront architecture of the area, maintain existing open spaces and should ensure that recreational and wildlife opportunities are not compromised by development. Proposals should maintain and enhance the setting of sandy bays, low chalk cliffs and associated grassland and long sweeping views of the coastline.

The rural-urban boundary is distinctive in some parts of Thanet, particularly where there is an abrupt urban edge and where the countryside extends into the urban areas as Green Wedges. The distinction between town and countryside should be retained.

Development proposals that conflict with the above principles will only be permitted where it can be demonstrated that they are essential for the economic or social well-being of the area. In such cases, landscape impacts should be minimised and mitigated as far as possible.

Green Infrastructure Network

4.30 The National Planning Policy Framework (NPPF) states that local plans should plan positively for the creation, protection, enhancement and management of networks of biodiversity and Green Infrastructure. It states that local ecological networks should be identified and these should include the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors, stepping stones that connect them, and areas identified by local partnerships for habitat restoration or creation.

4.31 Planning policies should promote the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species.

4.32 The NPPF also states that international, national and locally designated nature conservation sites should be protected, with appropriate weight given to the importance of their

designation.

4.33 The NPPF states that existing open space, sports and recreational buildings and land (including playing fields) should not be built on unless it can be demonstrated that the land is surplus to requirements or if it would be replaced by equivalent or improved provision. Planning policies should also protect and enhance public rights of way and access.

4.34 Thanet boasts a wealth of natural features which contribute to the green infrastructure network, including internationally and nationally designated sites and associated species, a magnificent coastline, chalk cliffs, geological features, river and marshland systems and areas of open countryside with distinctive landscapes and views. It is important that these are maintained and enhanced, and better linked to provide a comprehensive Green Infrastructure network.

4.35 Natural England defines Green Infrastructure (GI) as:

> 'a strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features. It should be designed and managed as a multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. Its design and management should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types.
>
> Green infrastructure includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland. Consequently it needs to be delivered at all spatial scales from sub-regional to local neighbourhood levels, accommodating both accessible natural green spaces within local communities and often much larger sites in the urban fringe and wider countryside.'

4.36 Green infrastructure does not necessarily stop at District boundaries and so the District Council will work the other East Kent Councils to ensure that any Green Infrastructure strategy is compatible with adjacent studies. The various components that make up Thanet's existing Green Infrastructure is shown on policies map.

4.37 There are various Green Infrastructure projects being progressed by the Council and other organisations, and also a number of community projects. These include Dane Valley Woods, Westbrook Undercliffe Nature Park, Friends of Mocketts Wood, Montefiore Woodland and the Windmill Community Allotments. All large development sites will be expected to contribute to Thanet's Green Infrastructure in line with Policy SP27 which should include an appropriate mix, compatible with the surrounding landscape and habitats. The Government has recently published its 25 Year Environment Plan (2018) which seeks to connect people with the environment to improve health and wellbeing through the creation of new green infrastructure. At the local level further guidance on the provision of green infrastructure including provision of new rights of way and cyclepaths can be found in Kent Design.

4.38 The Council seeks to continue increasing and enhancing Thanet's Green Infrastructure network, and will encourage new community Green Infrastructure projects by working with relevant organisations. The Council will produce a Green Infrastructure Strategy in consultation with relevant groups and organisations following adoption of the Plan. The Plan sets out the strategic approach to Green Infrastructure in Policy SP27 which aims to deliver the strategic objectives by protecting, maintaining and enhancing biodiversity and the natural environment

and creating a coherent network of Green Infrastructure. More detail will be added in the forthcoming Green Infrastructure Strategy. Provision of new infrastructure in new developments, particularly for informal recreation and dog walking can help to reduce the impact of visitor pressure on the nature conservation interest at the coast. It can also aid restoration of the landscape, improve biodiversity and improve connectivity between habitats or habitat features such as hedgerows. Good Green Infrastructure can have additional benefits to the wider ecosystem services including healthy water and nutrient cycles, improved air quality, managing flood risk and water pollution and minimising the effects of climate change. There are more direct benefits to local communities including the enjoyment of the natural environment and improved health and wellbeing.

4.39 Development proposals should consider the example list below which is not exhaustive, when considering the inclusion of green infrastructure within their proposals. Not all of these measures may be appropriate in all cases as they need to be applicable to the conditions of the site:

- create new wildlife and biodiversity habitats;
- integrate Sustainable Drainage Systems (SuDs);
- plant hedgerows and trees;
- provide green roofs;
- create ponds;
- create urban green corridors;
- create roadside verges;
- provide and manage new accessible open space including linear routes, for informal recreation/walking and dog walking and provide linkages between areas of open space;
- provide private gardens and play space;
- conserve and enhance the character of historic green spaces;
- provision of off-site enhancements;
- contribute to the enhancement of Thanet's Biodiversity Opportunity Areas or the enhancement of the Green Wedges including the introduction of linear features such as native hedgerows and water bodies where appropriate;
- reinforce and/or restore landscape character in line with the relevant landscape character assessment guidelines;
- Planning new Green Infrastructure assets to maximise their provision of ecosystem services including, but not limited to, improved air quality, natural flood management and climate change adaptation where appropriate;
- Other suitable planting schemes to provide biodiversity opportunities

Policy SP27 - Green Infrastructure

All development proposals should, where possible, safeguard Thanet's Green Infrastructure network and enhance it by integrating new multifunctional Green Infrastructure provision in the design of developments. Opportunities to improve Thanet's Green Infrastructure network by protecting and enhancing existing Green Infrastructure assets and the connections between and providing new Green Infrastructure assets should be identified early in the design process for major developments, together with consideration of how they will be managed and maintained in the long term.

Development should make a positive contribution to Thanet's Green Infrastructure network wherever possible and appropriate, by the incorporation, provision or fulfilment

of those matters and objectives set out in paragraph 4.39 above.

Biodiversity: International and European Sites

4.40 International and national legislation provide statutory protection for the most important nature conservation sites. These are Ramsar sites, Special Protection Areas (SPA) and Special Areas of Conservation (SAC) which form a network of Natura 2000 sites across Europe designated for their important habitat and/or birds. Most of the Thanet coastline is designated and is important for its intertidal chalk, caves, species (such as blue mussel beds and piddocks), dunes and mudflats, and certain migratory and breeding bird species.

4.41 Ramsar sites have been designated as Wetlands of International Importance as a Waterfowl Habitat under the Ramsar Convention. This requires signatory governments to conserve wetlands and designated sites. Special Protection Areas are designated under Article 4 of the Birds Directive (Directive 2009/147/EC on the Conservation of Wild Birds), which requires member states to take "appropriate steps to avoid pollution or the deterioration of habitats or any disturbance affecting the birds". Special Areas of Conservation have also been designated under the EU Habitats Directive (Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora) to provide increased protection to a variety of species, plants and habitats of importance to biodiversity both on a national and international scale.

4.42There are currently six internationally designated sites within or adjacent to the District:

- Thanet Coast and Sandwich Bay Special Protection Area (SPA)
- Thanet Coast and Sandwich Bay Ramsar site
- Thanet Coast Special Area of Conservation (SAC)
- Sandwich Bay Special Area of Conservation (SAC)
- Margate and Long Sands SAC
- Outer Thames Estuary Marine SPA

4.43 Designations do not stop at the District boundary, nor do the nature conservation interest of the sites. For example the Thanet Coast and Sandwich Bay Special Protection Area and Ramsar extend into adjacent Districts. There are a number of other sites within or abutting East Kent which are located in neighbouring districts such as Stodmarsh (SAC, SPA, Ramsar) and the Blean Complex (SAC) and development proposals will need to consider their impact on these in line with Habitat Regulations. Thanet District Council and Canterbury City Council are working co- operatively to deliver a joint approach to mitigation.

Policy SP28 - Protection of the International and European Designated Sites

Sites of International Nature Conservation Importance will receive the highest level of protection.

Proposals likely to have a significant effect on an SPA, SAC or Ramsar site, either alone or in-combination, will be required to undergo appropriate assessment as per the Conservation of Habitats and Species Regulations 2017 (as may be amended). Where possible applicants should incorporate measures to avoid or mitigate any adverse

impacts. Where, despite all possible avoidance and mitigation measures being put in place, a proposal is still shown to have an adverse effect on the integrity of an International site, planning permission will only be granted in exceptional circumstances, where there are no less ecologically damaging alternatives, there are imperative reasons of overriding public interest and damage can be fully compensated.

Where proposals are considered likely to have a significant effect on an International site, early consultation with Natural England, the Council and any other appropriate statutory consultees is recommended.

Strategic Access Management and Monitoring Plan (SAMM) and the Thanet Coast Project

4.44 Recreational pressure at the European sites, particularly the SPA, has given cause for concern from Natural England and the Kent Wildlife Trust regarding the impact of disturbance to over-wintering birds. There is further concern regarding the impact of increased recreational pressure as a result of population increases.

4.45 Evidence suggests that any new housing development in Thanet has the potential to increase the recreational impacts on the SPA resulting from the increase in population. This may have an adverse impact on the species for which the SPA has been designated. The actual level of impact from individual developments may not be significant, however the in-combination effect of all housing developments proposed in the district cannot rule out a significant impact.

4.46 As a result of this impact the Council appointed specialist consultants to produce a Strategic Access Management and Monitoring Plan (SAMM) (2016) to address any potential impact. The Thanet Coast and Sandwich Bay SPA is used by a large number of migratory birds particularly over-wintering Turnstones and European Golden Plover. Much of the coast is accessible for walking and cycling and the large stretch of promenade along the coast bring the Turnstones very close to users and potential disturbance. Recent surveys have revealed a decline in their population eg a 50% drop in Turnstone numbers in 2013, subsequent years also show a decline in numbers. Evidence shows that recreational activity causes disturbance to birds, particularly dog walking. This type of recreational activity is most likely to increase with increased housing and it is this activity that the mitigation strategy seeks to address.

4.47 The zone of influence around a European designated site, is the geographical area within which people will travel to visit it. To keep it to a manageable extent a zone of influence is usually set so as to capture the majority of visits or visitors, rather than every single one. Within this zone, any potential impacts need to be avoided or mitigation provided. The whole of the District falls within a 6km radius of the SPA boundary and evidence has shown the zone of influence for the site to extend further than this. Therefore residents from all new housing in Thanet have the potential to increase recreational pressure on the SPA and the mitigation approach set out in the SAMM strategy applies to the entire District.

4.48 The mitigation package will include measures such as a wardening service to provide on-site presence throughout the SPA for the peak overwintering period - October and April. A co-ordination role will be required to manage the wardening and co-ordinate activities throughout the year such as education and awareness activities such as signage and interpretation. Other measures could include limited access management. Regular monitoring of birds and visitors will also be required. This list is not exhaustive and other appropriate activities may be put in

place. The SAMM will be reviewed no later than 10 years or sooner if monitoring and surveys reveal issues which are not being addressed by the mitigation package. The mitigation package will be delivered by the SAMM Project, in collaboration with the Thanet Coast Project.

4.49 The Thanet Coast Project was established in 2001 and is tasked with much of the delivery of the North East Kent Marine Protected Area (NEKMPA) Action Plan and therefore delivery of the majority of the objectives of the Thanet Cliffs and Shore Biodiversity Opportunity Area (BOA) within Thanet. The main aims of the project are to:-

- Raise awareness of the important marine and bird life, and how to avoid damaging them.
- Work with local people to safeguard coastal wildlife and implement the Management Scheme Action Plan.
- Encourage and run wildlife related events and make links with wildlife, green tourism, coastscape and the arts.
- Be a focal point for enquiries and gathering information on coastal wildlife and environmental issues.
- Keep everyone informed with progress through various means, including newsletters, articles and stakeholder workshops.

4.50 The Thanet Coast Project has been very successful with the following activities and projects set up to deliver these objectives:-

- 10 coastal codes of conduct formulated with stakeholders to alleviate the impacts of human activities on the European sites.
- One scientific research code formulated by The North East Kent Scientific Coastal Advisory Group.
- A twice yearly Thanet Coast newsletter.
- Educational activities and resources for all ages.
- Volunteering opportunities from volunteer wardens to participation in ecological research.

4.51 The SAMM has developed a tariff (revised 2017 in light of the new housing requirement of 17,140 units) that will apply to all new housing according to the number of dwellings built within the district. The tariff is inextricably linked to the housing requirement for the District for the plan period and will be reviewed if this requirement changes. The current tariff is set in table 8.

Table 8 - SAMM Tariff

Development type	Tariff per dwelling - including requirement for in-perpetuity funding
1 bedroom unit	£202
2 bedroom unit	£320
3 bedroom unit	£424
4+ bedroom unit	£530

Policy SP29 - Strategic Access Management and Monitoring Plan (SAMM)

All proposals for new residential development will be required to comply with the Strategic Access Management and Monitoring Plan (SAMM) in order to mitigate against the in- combination effects of new development, through the pathway of recreational pressure on the Thanet Coast SPA and Ramsar site. A financial contribution based on the current tariff in table 8 and any subsequent amendments, is required towards an in-perpetuity access management scheme. This will be collected via a S106 payment.

Developments for other uses that would increase recreational activity causing disturbance to qualifying species will be assessed on a case by case basis under the Habitat Regulations and may be required to make full or partial contributions towards the SAMM Plan if appropriate.

Protection, Conservation and Enhancements of Biodiversity Assets

4.52 Species protected under the Wildlife and Countryside Act, the Protection of Badgers Act, the Habitats Directive or listed in the Natural Environment and Rural Communities Act (Section 41) may be present on sites and would be a material consideration in the assessment of development proposals. Natural England have produced Standing Advice for protected species in relation to planning applications which provide details of the potential existence of protected species, advice on whether survey reports are required, guidance on the survey requirements for protected species and advice on mitigation proposals. Developers should have regard to this advice as appropriate.

4.53 The principle of net gain is set out in national planning policy. For the purposes of Policy SP30 it applies to all developments that result in a loss of, or degradation of habitats including buildings. Net gains in biodiversity can be delivered in a variety of ways ranging from avoiding the loss of high quality habitats, to on or off site habitat creation or enhancement, or a tariff system to invest in strategically important habitats.

4.54 The open countryside within Thanet is known to support a number of important species as is recognised in the international and national designations. In addition, Thanet is also important for farmland birds due to its large areas of farmed countryside. Farmland birds have declined over the last few decades and so it is important to ensure that remaining populations are protected and allowed to increase. The Green Wedges which are a largely arable landscape, provide a dispersal route for migratory bird species which are present on the coast, especially during the winter season. Changing farming practices within the Green Wedges would help to increase populations of farmland and migratory birds by enabling more ecologically diverse habitat to be created.

4.55 The following policy seeks to protect, maintain and enhance biodiversity and wildlife, by recognising that important species should be protected and requires this to be considered in determining planning applications for development.

Policy SP30 - Biodiversity and Geodiversity Assets

Development proposals will, where appropriate, be required to make a positive contribution to the conservation, enhancement and management of biodiversity and geodiversity assets resulting in a net gain for biodiversity assets through the following measures:

1) **the restoration / enhancement of existing habitats,**
2) **the creation of wildlife habitats where appropriate, by including opportunities for increasing biodiversity in the design of new development**
3) **the creation of linkages between sites to create local and regional ecological networks,**
4) **the enhancement of significant features of nature conservation value on development sites,**
5) **protect and enhance valued soils,**
6) **mitigating against the loss of farmland bird habitats.**

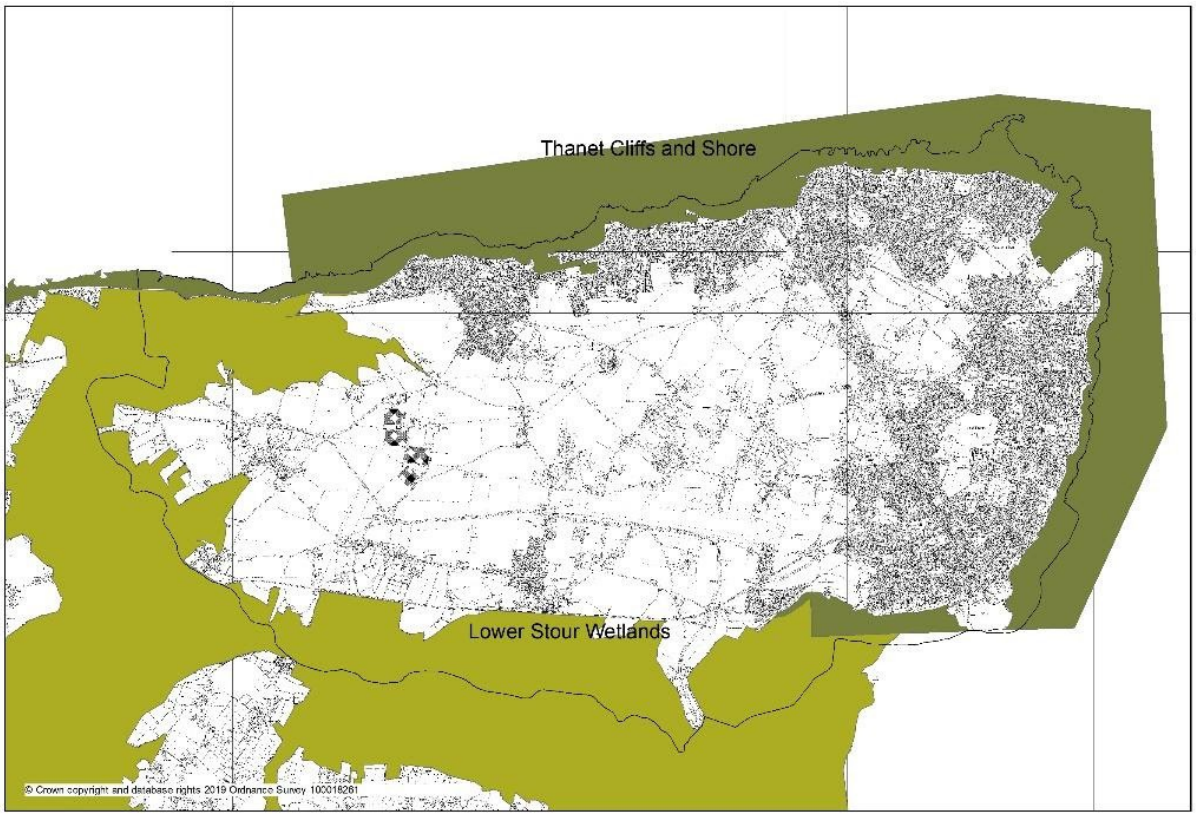
Sites should be assessed for the potential presence of biodiversity assets and protected species. For sites where important biodiversity assets, including protected species and habitats including SPA functional land, or other notable species, may be affected, an ecological assessment will be required to assess the impact of the proposed development on the relevant species or habitats. Planning permission will not be granted for development if it results in significant harm to biodiversity and geodiversity assets, which cannot be adequately mitigated or as a last resort compensated for, to the satisfaction of the appropriate authority.

4.56 The Natural Environment and Rural Communities Act 2006 places a duty on public authorities to conserve biodiversity. The Council has been working with the Kent Nature Partnership to identify Biodiversity Opportunity Areas (BOAs) within the district in response to those priority habitats and species identified through the Kent Biodiversity Action Plan.

4.57 The Biodiversity Opportunity Areas identify where the maximum biodiversity benefits can be achieved and the greatest gains can be made from habitat enhancement, restoration and recreation. These areas offer the best opportunities for establishing large habitat areas and/or networks or wildlife habitats. Thanet has two BOAs:

- Thanet Cliffs and Shore - covers the majority of the internationally and nationally designated coastal habitats, extending through Thanet as far as Whitstable.
- Lower Stour Wetlands - The Lower Stour wetlands extend from the mouth of the old Wantsum channel across reclaimed marshland to the former mouth of the river Stour, and then continue around the coast to the Sandwich mudflats and sand dunes and the Lydden Valley.

Map 3: Biodiversity Opportunity Areas Map



4.58 As well as these identified sites, there is potential for habitat creation and enhancement in the Green Wedges, and sites designated for nature conservation. The Council will work with landowners, developers and other appropriate organisations to improve the opportunity for biodiversity. Developments should take into account their contribution to wildlife and seek to improve habitat connectivity in the wider area where appropriate through suitable landscaping schemes and new provision which can help to address the issues associated with the impact of climate change.

4.59 The following policy aims to meet the strategic objective of protecting, maintaining and enhancing biodiversity.

Policy SP31 - Biodiversity Opportunity Areas

The Council will support proposals that enhance, maintain and protect the identified Biodiversity Opportunities Areas, particularly where proposals increase the biodiversity value of the site.

Protection of Open Space and Allotments

4.60 Thanet's urban areas are interspersed with a variety of areas of open space. These include parks, informal recreation green space, natural and semi-natural green space, amenity

green space, outdoor sports facilities, play areas, cemeteries and allotments. These form part of Thanet's Green Infrastructure network and are shown on the Policies Map.

4.61 The National Planning Policy Framework (NPPF) states that existing open space, sports and recreational buildings and land (including playing fields) should not be built on unless it can be demonstrated that they are surplus to requirements, the loss would be replaced by equivalent or better provision or the development is for alternative sports and recreation provision. The NPPF also states that planning policies should protect and enhance public rights of way (PROW) and access. Kent County Council's Countryside and Coastal Access Improvement Plan identifies the need for planning policies to protect or enhance PROW.

4.62 Open space is a scarce commodity within Thanet's urban areas. Once such areas are lost to development, it is very difficult to provide satisfactory replacements within the immediate vicinity. Open spaces can provide for a wide variety of activities from organised sport to simple relaxation and opportunities for walking. Open space and amenity areas are vital for people's health and quality of life and their visual importance can often contribute to the quality of the local environment. Smaller areas of informal open space on residential estates can provide important local resource, particularly in the more built up areas where there is less opportunity for larger open spaces. Sometimes these areas are too small to be identified on the policies map for protection, therefore any proposed development on open space areas of this nature will need to be justified.

4.63 The Open Space, Indoor and Outdoor Sports Facilities Strategy 2018 (Open Space Strategy) has been carried out and includes recommendations and action plans to be implemented corporately. The draft strategy identifies an under provision in the 5 typologies of open space - amenity greenspace, provision for children and young people, allotments, natural and semi-natural greenspace and public parks and gardens - at 2016 and also by 2031. The figures are set out in table 12 and are based on population figures of 141,00 at 2016 and 161,500 by 2031.

4.64 In line with the draft recommendations, the Council will expect all new developments to make provision for new open space in line with the Fields in Trust Guidelines for provision, accessibility and equipped play space. Table 12 sets out the provision guidelines, table 10 sets out the accessibility criteria and table 11 sets out the Quantity Benchmark Guidelines for equipped/designated play space. This is set out in Chapter 12.

4.65 For the strategic sites the relevant policies set out the general open space requirements, for the specific typologies of open space the Council will expect developers to apply the Fields in Trust guidelines to determine the precise requirements.

4.66 For other developments, where provision cannot be made on site, or where an existing play space lies within the walking distance guideline of a proposed development the Council will seek a financial contribution either towards new provision or improvement of an existing facility. Applicable schemes may include the improvement of facilities at Hartsdown and improved provision at Jackey Baker's sports ground and proposed expansion.

4.67 Allotment sites are a statutory requirement for the Council but are usually managed by town or parish councils. Allotments serve not only local residents by offering them a chance to grow their own fruit and vegetables but also by offering them physical activities, a healthy diet, and general well-being. Allotments can also be important for their contribution to biodiversity. The overall benefits of allotments include:

- Providing a sustainable food supply
- A healthy activity for people of all ages
- Fostering community development and cohesiveness
- Acting as an educational resource
- Providing access to nature and wildlife and acting as a resource for biodiversity
- Providing open spaces for local communities
- Reducing carbon emissions through avoiding the long distance transport of food

4.68 The following policies meet the objectives of promoting physical and mental well-being, safeguarding and enhancing the geological and scenic value of the coast and countryside, retaining the separation between Thanet's towns and villages and enhancing biodiversity and the natural environment.

Policy SP32 - Protection of Open Space and Allotments

Proposals which would result in the loss of protected open space or allotments as shown on the policies map either through built development or a change of use will only be permitted if:

1) **in relation to open space it is for an open recreation or tourism use and is of appropriate scale and design for its setting. Any related built development should be kept to the minimum necessary to support the open use, and be sensitively located; or**
2) **in relation to both open space and allotments there is an overriding a need for development that outweighs the need to protect the open space or allotment which cannot be located elsewhere. In this case provision of alternative open space or allotment of at least an equivalent size and quality must be provided in a suitable nearby location; or**
3) **an assessment has been undertaken which clearly shows that the open space or allotments are no longer required; and**
4) **in all cases, there would be no material harm to the contribution the protected open space makes to the visual or recreational amenity of the area.**

New development that is permitted by virtue of this policy should make a positive contribution to the area in terms of siting, design, scale, use of materials and biodiversity.

Local Green Space

4.69 Local Green Spaces can be designated by communities through the local or neighbourhood planning processes. As set out in the NPPF, once designated, a Local Green Space will be afforded the same protection as Green Belts and new development will not be permitted other than in very special circumstances. The NPPF sets out the circumstances under which Local Green Spaces can only be designated:

- The green space is in reasonably close proximity to the community it serves.
- The green area is demonstrably special to a local community and holds a particular local significance.
- The green area concerned is local in character and is not an extensive tract of land.

4.70 The Local Plan designates 19 Local Green Spaces which are protected under policy SP30. This follows an assessment of 49 proposals submitted by local groups, individuals, town and parish councils during the Revisions to Preferred Option consultation in 2017, and only those listed below were found to satisfy the criteria. Details of the assessment can be found in the report on Local Green Space. The Local Green Spaces designated in the Local Plan are:

- Kitty's Green, Broadstairs
- Culmer's Amenity Land Broadstairs
- Holmes Park, Broadstairs
- Pierremont Park, Broadstairs
- Memorial Recreation Ground, Lawn Road Broadstairs
- St Peter's Recreation Ground, Broadstairs
- Mocketts Wood, Broadstairs
- Westover Gardens, Broadstairs
- Village Green, Foads Lane, Cliffsend
- Meadow, Cliffs End Road Cliffsend
- Playground Foads Lane, Cliffsend
- Earlsmead Crescent, Cliffsend
- Dane Valley Woods, Margate
- Windermere Avenue, Ramsgate
- Adrian Square, Westgate
- Ethelbert Square, Westgate
- Playing Field, Minster Road, Westgate
- Recreation Ground, Lymington Road, Westgate
- Local Park, Victoria Avenue/Quex Road, Westgate

Policy SP33 - Local Green Space

The sites identified on the Policies Map as Local Green Space, and identified in paragraph 4.70, will be protected from development in accordance with the requirements of the National Planning Policy Framework.

Provision of accessible natural and semi-natural green space

4.71 The provision of larger areas of open space will be delivered most appropriately through strategic allocations and should be considered integral to the masterplanning of development proposals.

4.72 The Open Space Strategy (2018) identifies an under provision of natural and semi-natural green space based on the fields in trust guidelines of 1.8ha per 1,000 population, of 190.19ha by 2031. New developments will be required to make provision in line with the Fields in Trust guidelines.

4.73 It can also help to relieve some of the recreational pressure on the coast, although this is in addition to any mitigation that may be required through the SAMM.

4.74 The following policy seeks to ensure the recommended provision of natural and semi natural green space, parks, gardens and recreation grounds is provided for and will contribute to Thanet's Green Infrastructure network.

Policy SP34 - Provision of Accessible Natural and Semi-Natural Green Space, Parks, Gardens and Recreation Grounds

The Council will require suitably and conveniently located areas of usable amenity space, adequate to accommodate the demands for passive recreation generated by residential development. New greenspace provision should, where possible, be linked to existing greenspace, Green Wedges and/or the wider countryside and public rights of way network, away from the coast, to maximise its value. Such provision should seek to enhance the opportunities for biodiversity.

Sites allocated as Strategic Housing Sites will be required to provide natural and semi natural green space and local parks, formal gardens, allotments and recreation grounds to meet the standards set out in Table 12. Natural and Semi-natural green space will be expected to improve the biodiversity potential of the area

The Council will expect appropriate arrangements for maintenance and management to be made. The responsibility for which will be vested in a particular individual, or, subject to commuted payment to meet such costs, in the district, town or parish council. Such arrangements will be secured by entering into a planning agreement.

Any areas of accessible natural and semi natural green space, parks, gardens and recreation grounds created by virtue of this policy will be protected from development by Policy SP32 - Protection of Open Spaces and Allotments.

Quality Development

4.75 The National Planning Policy Framework (NPPF) places high importance on good design, stating that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life. Planning should seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Permission should be refused for development of poor design that fails to take the opportunity to improve the character and quality of an area.

4.76 Thanet's towns, villages, coast and countryside enjoy a diverse and rich built heritage which contributes significantly to Thanet's unique sense of place and identity. There are 21 conservation areas and around 2,000 listed buildings (a large proportion of which are in the historic town centres) - the highest concentration of listed buildings for a local authority in the South East. However there are some areas in the district where the townscape quality needs improvement and the Council is seeking developments of a higher quality. The urban areas have been developed to a high density, with high numbers of flats - largely due to the availability of large properties formerly used as hotels which lend themselves to conversion to flats, and the subdivision of larger family homes. Some of the urban areas boast a rich architectural heritage including attractive Victorian terraces and Regency squares and large and attractive art deco properties along the coasts. Some suburbs and the rural villages are characterised by lower density development, with large, well- spaced properties and a number of tree lined streets.

4.77 Good design can help improve and enhance areas by ensuring high quality developments,

encourage regeneration and can help reduce the opportunities for and the fear of crime. The NPPF re-iterates and reinforces the role of Design Review in ensuring high standards of design. Design Review is an independent and impartial evaluation process in which a panel of experts on the built environment assesses the design of a proposal. The projects that Design Review deals with are usually of public significance, and the process is designed to improve the quality of buildings and places for the benefit of the public.

4.78 Developers proposing projects of public significance (such as urban extensions or town centre mixed use developments) will be required to seek a Design Review by an independent design panel. This should be carried out at an early stage in the process. The South East Regional Design Panel, (Design South East) can be contacted at Kent Architecture Centre www.architecturecentre.org.

4.79 Developers proposing projects that are of national significance or that will have a profound impact on the regional and local environment will be required to seek a National Design Review with the CABE team at the Design Council, www.designcouncil.org.uk. A design review may be required for developments in significant locations such as prominent seafront locations or as part of large strategic allocations.

4.80 This objective of this policy is to ensure that new development is built to the highest attainable quality thereby improving the quality of life for residents and aiding investment and regeneration. More detail on the design considerations for good quality development are set out in Policies QD01 and QD02.

Policy SP35 - Quality Development

New development will be required to be of a high quality and inclusive design as set out in Policies QD01 and QD02. Developers may be required to seek an independent Design Review for all major development proposals, and any proposals regardless of size in prominent locations or which are likely to have a significant visual impact.

Heritage

4.81 The National Planning Policy Statement (NPPF) states that local plans should set out 'a positive strategy for the conservation and enjoyment of the historic environment'. It places emphasis on putting heritage assets to viable uses, the wider benefits that can be achieved by the conservation of the historic environment and the desirability of new development in making a positive contribution to local character and distinctiveness. It also includes criteria which would need to be fulfilled for a proposed development which would lead to substantial harm or loss of a heritage asset.

4.82 Thanet's historic and natural environment defines the character and setting of the district, and contributes significantly to residents' quality of life. It is important to maintain and enhance the historic and natural environment against the background of a successful, growing district encouraging investment and regeneration.

4.83 The district's rich historic environment can trace its origins to pre-historic activity with the remains of all periods from the Palaeolithic to Modern recorded within the area, consisting of

both burial and settlement archaeology. Within the area there are about 2000 listed buildings, 27 conservation areas, 13 scheduled monuments, 1 national registered park and garden of special historic interest, and a wealth of nationally and locally significant archaeological remains. In addition, there are numerous other heritage assets that, whilst not designated, are considered to be nationally, regionally or locally significant.

4.84 It is this rich heritage and the close proximity to the sea that gives the district its special character and distinctiveness; this is emphasised by the large number of highly graded designated heritage assets, often connected to the strong relationship with the sea either in the form of commerce, health or leisure. For example the Winter Gardens, Margate built in 1911 is the only known example of a winter Gardens constructed with a chalk cliff and is Grade II listed. In addition the Lido complex Cliftonville has various elements which are Grade II listed, including the Clifton baths which are one of the earliest surviving seawater bathing establishments in the Country being constructed between 1824-8 and is the only known example of one being dug out of the cliffs. The Lido complex has been vacant for a number of years and its restoration provides an important investment opportunity for this part of Cliftonville, see policy SP10.

4.85 Dreamland has seen significant renovation of and investment in its listed structures - cinema Grade II*, Scenic Railway Grade II - and is an important cultural and historic asset to the Margate seafront. The recent renovation of the Grade II menagerie enclosures and cages that once housed lions, is an important asset to the park. These early animal cage structures are listed for their rarity and exceptionality.

4.86 Ramsgate Royal Harbour, designated in 1821, has a number of Grade II and Grade II* listed buildings and structures ranging from the Customs House and Clock tower, harbour inner basin walls and Jacob's Ladder to rare seaside structures such as the East Cliff lift.

4.87 Thanet can be described as a district with a diverse and vibrant character. The character of the coastal areas owes much to the juxtaposition of grand seafront developments and the smaller scale domestic 'vernacular' buildings associated with working harbours and holiday resorts.

4.88 The character of the rural areas owes much to the strong links with early Christianity with the landing of St Augustine in 597 at Ebbsfleet, and the ensuing development of medieval parishes centred around the church.

4.89 Some of the special qualities of Thanet's historic environment include:

- The richness of 18th, 19th and 20th century development linked to the sea, including grand residential terraces, harbours, leisure and health facilities as well as defence.
- The strong associations with internationally recognised people and their significant legacies within the built environment. These include the renowned architect AW Pugin, the Victorian financier and philanthropist , Sir Moses Montefiore and the Victorian showman George Sanger, Bleak House Broadstairs Grade II listed and its associations with Charles Dickens
- The presence of significant historic technical innovation, including the Scenic Railway Grade II *, Clifton baths Grade II, Albion Place Gardens Grade II and the Waterloo Tower at Quex.
- The wealth of public and private historic open spaces including many planned squares,

parks, cemeteries, chines, cliff top promenades, coastal topography and significant views
- The Victorian/Edwardian suburbs and post-war housing developments (including Westgate on Sea)
- Locally distinctive materials, flint, clinker brick, Kentish red bricks and Kent pegs
- 27 conservation areas which vary considerably in age, size, character and style.
- Around 2,000 statutory listed buildings in Thanet - the highest concentration in the South East.
- A number of highly significant Grade I or II* listed buildings, including St Augustine's and Sir Moses Montefiore Synagogue, Ramsgate; Scenic Railway, Margate.
- 13 Scheduled Ancient Monuments ranging from Anglo-Saxon cemeteries to Minster Abbey.
- A designated Registered Park and Garden; Albion Place Gardens in Ramsgate.
- A richness in archaeological remains. The remains of all periods from Paleolithic to Modern are recorded within the area and consist of both burial and settlement archaeology.

4.90 Thanet's heritage assets including the significant historic building stock and archaeological resource, are irreplaceable and require careful management as the area evolves and undergoes significant growth and regeneration.

4.91 The opportunities to retain, enhance and improve Thanet's historic environment include:

- Using the income generated from the growing local tourism economy to invest in the maintenance and upkeep of historic assets;
- Ensuring development schemes enhance the setting of heritage assets and do not detract from their character and the appearance of the area;
- Supporting proposals for heritage led regeneration, ensuring that heritage assets are conserved, enhanced and their future secured.

4.92 Where development is proposed that may affect a heritage asset (designated or non- designated) or its setting, the Council will require the provision of the following information, proportionate to the asset's significance, in line with policy SP36 (3):

- describe and assess the significance of the asset, including its setting, to determine its architectural, historical or archaeological interest; and
- identify the impact of the proposed works on the significance and special character of the asset; and
- provide clear justification for the works, especially if these would harm the significance of the asset or its setting, so that the harm can be weighed against public benefits.

A change of use of the heritage asset, is likely to be supported provided:

- the proposed use is considered to be the optimum viable use, and is compatible with the fabric, interior, character, appearance and setting of the heritage asset;
- such a change of use will demonstrably assist in the maintenance or enhancement of the heritage asset; and
- features essential to the special interest of the individual heritage asset are not lost or altered to facilitate the change of use.

4.93 A Heritage Strategy is being prepared for Thanet. It is proposed that the strategy will be developed alongside the Local Plan and we have started to develop

an evidence base to support this strategy and the Local Plan. The evidence includes assessing the significance of heritage assets in the area, including their settings, and the contribution they make to their environment. It also involves assessing the potential of finding new sites of archaeological or historic interest.

4.94 The preservation of Thanet's heritage is considered to be an economic asset, and its maintenance and protection plays an important role in the district's economy and aids in regeneration and investment. In recognition of the array of historic assets, Ramsgate has been named as Heritage Action Zone in 2016 by Historic England. This will provide necessary funding and investment to restore a number of heritage assets and regeneration of the area.

4.95 The Council aims to work with property owners and other stakeholders in the historic environment to both protect and enhance the historic environment and ensure its economic viability for future generations. One such scheme is the Townscape Heritage Initiative at Dalby Square, Cliftonville funded by the Heritage Lottery Fund and the Council. This aims to restore the built environment to its former grandeur which would then be seen as an asset and encourage further investment in this area. The following policy sets out how it intends to achieve this.

Policy SP36 - Conservation and Enhancement of Thanet's Historic Environment

The Council will support, value and have regard to the historic or archaeological significance of Heritage Assets by:

1) **protecting the historic environment from inappropriate development;**
2) **encouraging new uses where they bring listed buildings back into use, encouraging their survival and maintenance without compromising the conservation of the building or its historical or archaeological significance;**
3) **requiring the provision of information describing the significance of any heritage asset affected and the impact of the proposed development on this significance;**
4) **facilitating the review of Conservation Areas and the opportunities for new designations;**
5) **recognising other local assets through Local Lists;**
6) **offering help, advice and information about the historic environment by providing guidance to stakeholders, producing new guidance leaflets, reviewing existing guidance leaflets and promoting events which make the historic environment accessible to all;**
7) **issuing Article 4 Directions which will be introduced and reviewed as appropriate;**
8) **supporting development that is of high quality design and supports sustainable development.**

All reviews and designations will be carried out in consultation with the public in order to bring a shared understanding of the reasons for the designation and the importance of the heritage asset.

Climate Change

4.96 The National Planning Policy Framework (NPPF) expects a pro-active approach against climate change and states that adapting to, and mitigating against, the effects of climate change are core planning principles. This can be achieved by planning for new development in locations and in ways which reduce greenhouse gas emissions, actively support energy efficiency improvements to existing buildings, and where appropriate, support standards for sustainable construction. The NPPF lists expectations to improve energy efficiency in new development in terms of decentralised energy and sustainable design, and ways of increasing the use and supply of renewable and low carbon energy. It stresses the importance of addressing longer term factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape.

4.97 Climate change is a change in weather patterns caused by the increased levels of carbon dioxide in the atmosphere produced by the use of fossil fuels. Planning can help increase resilience to climate change impact through the location, mix and design of development.

4.98 The effects of climate change are already being seen in Kent, and include:

- more erratic weather conditions including an increase in the number of 'hot weather' events, storms and also freezing temperature events;
- increase in sea levels and wave crest;
- increase in coastal water temperature;
- length of growing season has extended by one month since 1990; and
- increases in flooding and droughts.

4.99 The Climate Change Act 2008 sets a target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels. There are many opportunities to integrate climate change mitigation and adaptation. Planning can mitigate climate change through reducing emissions by reducing the need to travel and providing sustainable modes of transport; providing opportunities for renewable and low carbon energy technologies; providing opportunities for decentralised energy and heating and promoting low carbon design approaches to reduce energy consumption in buildings such as passive solar design.

4.100 The Council has adopted the Climate Local Kent commitment for Thanet. Climate Local is a Local Government Association initiative to drive, inspire and support council action on a changing climate. The initiative supports councils' efforts both to reduce carbon emissions and also to improve their resilience to the effects of our changing climate and extreme weather. The Climate Local Kent Commitment sets aims which include:

- 34% reduction in emissions by 2020 (2.6% reduction per year).
- Retrofitting to existing homes.
- Reduce water consumption from 160 to 140 litres per person per day by 2016.
- Increase renewable energy deployment in Kent by 10% by 2020.

4.101 The following policy aims to ensure new development minimises the impacts of climate change through mitigation and adaptation measures, and reduce Thanet's carbon footprint.

Policy SP37 - Climate Change

New development must take account of the need to respond to climate change:

1) **by minimising vulnerability and providing resilience to the impacts of climate change through the use of up to date technologies, efficient design and appropriate siting and positioning of buildings;**
2) **mitigating against climate change by reducing emissions and energy demands through the use of up to date technologies;**
3) **realise and make best use of available opportunities to reduce the impact of climate change on biodiversity and the natural environment by providing space for habitats and species to move through the landscape and for the operation of natural processes, particularly at the coast.**

5 - Community Strategy

Healthy and Inclusive Communities

5.1 The National Planning Policy Framework (NPPF) acknowledges the link between planning and healthy communities and states that the planning system should support strategies to improve health and cultural well-being, promote healthy communities and identify policies that will deliver the provision of health facilities. It encourages policies that will facilitate social interaction and healthy inclusive communities.

5.2 Greener neighbourhoods and improved access to nature will improve public health and quality of life and reduce environmental inequalities. Urban green spaces will provide varied ecosystems and will contribute to coherent and resilient ecological networks.

5.3 The NEA & Marmot Review (2010) demonstrate the positive impact that nature has on mental and physical health. High quality natural environments foster healthy neighbourhoods; green spaces encourage social activity and reduce crime. The natural environment can help children's learning. Health issues are addressed in this plan in the following policy areas:

- Housing quality and design
- Transport
- Economic development, employment skills and training
- Access to and provision of local services
- Community safety and crime
- Access to fresh food
- Access to the natural environment

5.4 The following policy sets out how the Plan will contribute towards a healthier community. Further detail on active design is set out in paragraph 13.13

Policy SP38 - Healthy and Inclusive Communities

The Council will work with relevant organisations, communities and developers to promote, protect and improve the health of Thanet's residents, and reduce health inequalities.

Proposals will be supported that:

1) **bring forward accessible community services and facilities, including new health facilities;**
2) **safeguard existing community services and facilities;**
3) **safeguard or provide open space, sport and recreation;**
4) **promote healthier options for transport including cycling and walking;**
5) **improve or increase access to a healthy food supply such as allotments, farmers' markets and farm shops;**
6) **create social interaction and safe environments through mixed uses and the design and layout of development;**
7) **create greener neighbourhoods and improve biodiversity and access to nature.**

QEQM Hospital Margate

5.5 Land is identified on the policies map for the future expansion of the hospital to meet future needs to the south-east of the existing hospital. Part of this land was previously designated as Green Wedge land, but has been released exceptionally to meet the health and social needs of local people. However, in order to safeguard the Green Wedge in the longer term, new development at the hospital should involve the minimum fresh land-take necessary. Accordingly the Council will expect all elements of detailed expansion proposals to make the most efficient use of the existing and allocated site. This should include appropriate use of multi-storey development as far as is compatible with the effective working of the site and the creation of a pleasant environment for both patients and staff, and limiting visual impact on the Green Wedge.

5.6 To minimise the visual impact of new development on the Green Wedge, it would be desirable for open uses, such as car parking, to be located on this site rather than amongst the high-density development within the existing hospital. Existing tree screens along Ramsgate Road and along the footpath should be retained wherever possible. In the interests of sustainable pedestrian and cycle movement it is desirable that a route as direct as possible is retained for the existing footpath connecting Ramsgate Road with St Peter's Road.

5.7 The hospital has frontages to Ramsgate Road and St Peter's Road, both of which are Primary Distributors in the local road hierarchy and where it is important to maintain free flow of cross-town and longer distance traffic. In supporting improvement and expansion of the hospital it is essential that the opportunity be taken to rationalise and improve current access arrangements. Specific proposals will be required to reflect a traffic impact assessment of such proposals and to incorporate suitable access improvements to accommodate any resultant increases in traffic and appropriate access for 'Blue Light' vehicles.

5.8 The hospital is already a major generator of traffic in the area, and the Council will wish to see the implementation of a Travel Plan for the hospital, which can be implemented in parallel with development permitted by this Policy. An essential element of this Plan should be to encourage the greater use of public transport by staff and visitors. The creation of new staff accommodation on site should help to work towards this objective.

Policy SP39 - QEQM Hospital, Margate

Land to the south-east of the existing QEQM Hospital, Margate, is identified for release for expansion of the hospital. No other development will be permitted on this site. Development for hospital purposes should meet the following criteria:

1) **proposals should be designed to involve the most efficient use of land, consistent with the need to provide a pleasant environment for patients and staff;**
2) **development proposals should demonstrate how they will integrate with the hospital site as a whole;**
3) **proposals should incorporate the retention of the existing footpath and provision of a substantial landscaping screen;**
4) **proposals should incorporate a comprehensive review of access arrangements associated with the hospital and access provision should reflect the findings of a specific traffic impact assessment;**

5) proposals should be supported by a travel plan;
6) the level of car parking associated with new development should be limited to the minimum necessary.

5.9 In addition to the hospital allocation the Thanet Clinical Commissioning Group (CCG) has identified a need for a new medical centre at Westwood. There are a number of strategic allocations in the Westwood area and a new medical centre is required to meet the needs of the new community arising out of these developments.

Policy SP40 - New Medical Facilities at Westwood

New medical facilities are required at Westwood to meet the needs generated by the strategic allocations. The Council will work with the CCG, developers and other appropriate organisations to identify a suitable site.

Community and Utility Infrastructure

5.10 The National Planning Policy Framework requires local plans to make provision for infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change. It also requires the provision of health, community and cultural infrastructure, together with utility infrastructure such as gas, electricity, emergency services and fibre-optic cables.

5.11 It is important that there is sufficient community infrastructure to support new development. This includes provision of adult social services, education, health facilities, libraries, childcare and youth services. This is dealt with more fully in policy CM01 and supporting text.

5.12 Advanced high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.

5.13 The Council is working with Kent County Council and other services providers to ensure sufficient infrastructure is provided for. An Infrastructure Delivery Plan has been prepared alongside the Local Plan to identify infrastructure requirements. Further guidance is set out in the implementation policy SP02.

5.14 The following policies seek to achieve the objectives of accommodating the development needed whilst providing and improving access to community and utility infrastructure.

Policy SP41 - Community Infrastructure

Development will only be permitted when provision is made to ensure delivery of relevant and sufficient community and utility infrastructure. Where appropriate, development will be expected to contribute to the provision of new, improved, upgraded or replacement infrastructure and facilities.

Provision of Schools

New and Expanded School provision

5.15 Kent County Council, as education authority, has identified from the population and growth forecasts set out in this plan that Thanet's primary and secondary schools will need to expand through both onsite expansion and new provision. The Council will work with KCC and developers to identify and safeguard land to accommodate any required expansions. There is a requirement for a new secondary school at Westwood to meet the needs of the strategic allocations. The Council will work with KCC and developers on the identification of a suitable site.

Policy SP42 - Primary and Secondary Schools

The Council will support the expansion of existing and development of new primary and secondary schools in Thanet to meet identified needs and will work with Kent County Council in identifying, allocating and safeguarding other sites as required .

As a result of identified future growth, provision is made in the plan for additional schools at:

- **Birchington: 2FE primary school (Policy SP16)**
- **Westgate: 2FE primary school (Policy SP17)**
- **Westwood: equivalent 6FE primary school (Policies SP18, SP19 and SP20); 6FE secondary school (Policy SP20)**
- **Ramsgate (Manston Green): 2FE primary school (Policy SP15)**

6- Transport Strategy

Safe and Sustainable Travel

6.1 The National Planning Policy Framework (NPPF) states that transport policies have an important role to play in facilitating sustainable development and in contributing to wider sustainability and health objectives. Key messages include that the transport system needs to be balanced in favour of sustainable transport modes, giving people real choice about how they travel. Local Plan policies are expected to aim for a balance of land uses to encourage people to minimise journey length for employment, shopping, leisure, education and other activities.

6.2 Transport is a critical factor to Thanet's aspirations for sustainable economic regeneration. Thanet's residents need to go to work, school, shops and to access other services as part of their daily lives. Goods need to be moved to support employment and economic growth. Thanet does not at present suffer significant levels of congestion, traffic noise, pollution and delays such as experienced in urban centres elsewhere in Kent. A high proportion of Thanet's population has no access to a car. However this has potential to change and some traffic congestion already occurs at certain junctions at peak times. Thanet has an attractive environment and is a pleasant place to live and work. Its environment is also a potential asset in attracting investment. The intention is to maintain that situation while attracting and accommodating appropriate development in support of regeneration. Accordingly, key actions will be to manage mobility by putting in place an efficient and effective, sustainable transport system.

6.3 With Port Ramsgate, Thanet has a potentially significant international Gateway function important for economic development across the region. The introduction of high speed trains connecting Thanet with the High Speed 1 (HS1) service has reduced journey times from Ramsgate to London by over 30 minutes. Manston Business Park is a location of strategic importance. A travel plan will be required alongside planned growth to promote sustainable travel, particularly by the workforce.

6.4 Kent County Council's Local Transport Plan (Delivering Growth without Gridlock, 2016-2031) identifies strategic transport projects to support Kent's sustainable economic growth. One of the identified strategic priorities is journey time improvements and Thanet Parkway Railway Station. It also identifies a number of local priorities for Thanet:

- Inner circuit of new and improved highway routes, including improved links to Westwood Cross
- Bus priority measures
- Improve sustainable transport options in Westwood
- Westwood Relief Strategy - Westwood Road to Margate Road Link
- Margate junction improvements
- Ramsgate Port investment
- Public realm improvements in the coastal towns

6.5 The Council is also working with Kent County Council to prepare a Transport Strategy for the district which supports the development proposed through the draft Local Plan.

6.6 The Transport Strategy is informed by transport modelling of the draft Plan proposals, and

seeks to address key transport issues, including those related to the development identified in this Plan. It includes proposals for cars, public transport, walking and cycling. The key new road infrastructure is set out under Policy SP47.

6.7 Thanet's services and most employment sites are clustered in and around the coastal centres and Westwood. These are close to Thanet's existing communities, including the deprived neighbourhoods, and highly accessible by public transport including the frequent "Loop" bus.

6.8 An efficient and convenient public transport system and direct walking and cycling routes need to be at the heart of the transport network to reduce the risk that growth may cause traffic congestion, noise and air pollution, or isolate disadvantaged communities.

6.9 Within the context of an established development pattern, the most significant change likely to generate demand for travel will result from new housing development. It is necessary, therefore, to consider the location of development in areas accessible to a range of services on foot and by public transport, preventing urban sprawl and improving local high streets and town centres. Methods such as providing showers and changing facilities in employment related development and locating cycle parking close to town centres/entrances will also help reduce the need to travel by car.

6.10 Thanet and Kent County Council are jointly preparing a Thanet Transport Strategy to help increase the efficiency and effectiveness of the transport system, achieve a shift to more sustainable travel patterns and modes and to identify the transport infrastructure and improvements required to support implementation of the Local Plan. The following sections address challenges identified in the draft Strategy.

Policy SP43 - Safe and Sustainable Travel

The Council will work with developers, transport service providers, and the local community to manage travel demand, by promoting and facilitating walking, cycling and use of public transport as safe and convenient means of transport. Development applications will be expected to take account of the need to promote safe and sustainable travel. New developments must provide safe and attractive cycling and walking opportunities to reduce the need to travel by car.

Accessible Locations

6.11 Guiding the location, scale and density of new development is an important way of reducing the need to travel, reducing travel distances, and making it safer for people to use alternatives to the car. Consistent policies directing location of travel generating uses will also guide infrastructure investment further supporting integration of transport and land use.

Policy SP44 - Accessible locations

Development generating a significant number of trips will be expected to be located where a range of services are or will be conveniently accessible on foot, by cycle or public transport. The Council will seek to approve proposals to cluster or co-locate services at centres accessible to local communities by public transport and on foot.

Transport Infrastructure

6.12 The draft Transport Strategy aims to promote walking, cycling and use of public transport as well as improvements to the road network to facilitate sustainable choice and safe and convenient travel. Where the need for improvements arises wholly or largely from proposed development the developer will be expected to contribute towards required improvements as set out in the draft Transport Strategy and the draft Infrastructure Delivery Plan (IDP).

6.13 While this Plan seeks to increase use of sustainable modes of transport, people will continue to make use of private cars and planned growth will increase travel demand. There are a number of locations where traffic flow issues need to be addressed. These are "Victoria" traffic lights Margate, Coffin House Corner Margate, Marine Terrace Margate, Dane Court Roundabout Broadstairs and the "Spitfire" junction. Any new transport links also need to serve new development and relieve the pressure on the urban route network.

6.14 The Council, together with Kent County Council, is proposing a new Inner Circuit, which is set out under the Strategic Routes Policy SP47.

Policy SP45 - Transport Infrastructure

Development proposals will be assessed in terms of the type and level of travel demand likely to be generated. Development will be permitted only at such time as proper provision is made to ensure delivery of relevant transport infrastructure. Where appropriate, development will be expected to make a proportionate contribution to the provision, extension or improvement, of walking and cycling routes and facilities and to highway improvements.

Subject to individual assessments, schemes may be required to provide or contribute to:

1) **capacity improvements/connections to the cycle network;**
2) **provision of pedestrian links with public transport routes/interchanges;**
3) **improvements to passenger waiting facilities;**
4) **facilities for display of approach time information at bus stops along identified quality bus corridors;**
5) **improvement and expansion of public transport services;**
6) **improvements to the road network in line with schemes identified through the transport strategy;**
7) **provision of electric vehicle charging points, in accordance with policy SP14.**

Connectivity

6.15 Thanet's location in the south east corner of England has previously been seen as a disincentive to investors, but now the transport infrastructure in place offers attractive business opportunities with an integrated transport hub, maximising on the potential of HS1 from Ramsgate and the port. Recent years have seen the completion of the A299 Thanet Way and its new connection to the now completed A299/A256 improvements. This road infrastructure gives direct connectivity between the ports of Dover and Ramsgate, and the rest of Britain's strategic road network.

6.16 Prospective investments in line speeds along the domestic link to HS1 will result in further significant reduction in journey times between Thanet and London. The Council will continue to lobby for investments to secure further improvements to rail journey times for CTRL including domestic services between Ashford and Ramsgate.

New Railway Station

6.17 The introduction of faster trains on the Ramsgate to St Pancras route, utilising the High Speed rail link (HS1) means that Ramsgate is only 76 minutes from London for much of the day. As a result, Thanet has the potential to become a more attractive location for people employed in London seeking to live in a more pleasant environment.

6.18 Kent County Council, through its Local Transport Plan 'Growth without Gridlock', and the South East Local Enterprise Partnership, through its Strategic Economic Plan support the provision of a new Parkway railway station to the west of Ramsgate close to Cliffsend village. In promoting delivery of the project, Kent County Council has identified a preferred location west of Cliffsend.

6.19 Thanet District Council supports the principle of a new railway station at a suitable location along the rail-side area west of Ramsgate. The following policy safeguards land at the preferred location west of Cliffsend for the Parkway project including an area for car parking and a road access to the A299/A256 roads. In addition the Council will continue to investigate and press for improvements to the running times of trains between Thanet and Ashford with a view to reducing the journey time from the Parkway to less than 60 minutes to London.

6.20 In supporting the principle of a new railway station, emphasis will be placed on its accessibility by public transport and road (including sufficient car parking) for established and planned residential areas. New housing development is proposed on the edge of Ramsgate and at the village of Cliffsend in close proximity to the new railway station.

Policy SP46 - New Railway Station

Land west of Cliffsend (as shown on the Policies Map) is safeguarded for a new railway station. Proposals will be required to specifically demonstrate all of the following:

1) **satisfactory vehicular access arrangements from the A299**
2) **suitable level of car parking**
3) **integration with wider public transport services**
4) **mitigation of any noise impacts on sensitive receptors**
5) **compatibility with the landscape character of its location**
6) **located to minimise the loss of best and most versatile agricultural land**

Strategic Road Network

6.21 The Council, with KCC, has carried out a high-level assessment of the potential of the Local Plan proposals on the strategic road network, to a methodology agreed with Highways England, notably in relation to the Brenley Corner junction with the M2, and the junctions of the A256 with the A2 near Dover.

6.22 This work has concluded that the potential impact is very limited, and not significant in the context of wider traffic patterns at these junctions.

6.23 Kent County Council and Thanet District Council are preparing a new Transport Strategy for the District, which includes proposals for new and improved roads and junctions; enhancements to bus and train services and an expansion of the cycling/walking network.

Strategic Routes

6.24 The key element of the emerging Strategy is the development of a proposed "Inner Circuit" to serve new development and reduce pressure on the existing network. This incorporates a new bypass for Birchington; a relief road for Westgate; connections to Westwood from the north-west and south; and improved connections to Manston Business Park, and should bring benefits to the wider road network. It is intended that the Inner Circuit schemes will incorporate provision for buses and cycling.

6.25 These road proposals are required to support proposed new development in the area, and the routes are safeguarded in this draft Local Plan to ensure that they can be completed in due course alongside the development set out in the draft Local Plan. As set out in the working draft of the Infrastructure Delivery Plan, this infrastructure is regarded as critical to support the development proposed in the draft Local Plan, and it is expected that all new development will contribute to the provision of all key infrastructure in a proportionate and appropriate way. The Council, with its partners, will also seek other forms of funding, to support infrastructure provision.

6.26 The exact routes identified in Policy SP47 may vary as detailed plans for the strategic urban extensions come forward and more detailed transport evidence becomes available. The review of the Local Plan will need to respond to the decision on the Development Consent Order for Manston Airport, and this may result in a variation of the alignment identified in relation to the B2050 Manston Road (from Manston Court Road to Spitfire Junction).

Policy SP47 - Strategic Routes

The following areas, as shown on the Policies Map, are safeguarded for the provision of key road schemes and junction improvements, to support the implementation of the Thanet Transport Strategy, including land at:

1) **Birchington strategic housing site**
2) **B2050 Manston Road, Birchington**
3) **Shottendane Road (from Birchington to Margate)**
4) **Shottendane Road-Manston Road - Hartsdown Road housing site**
5) **Nash Road-Manston Road housing site**
6) **Nash Road, Margate**
7) **Nash Road-Westwood strategic housing site**
8) **Manston Court Road/Star Lane (from Haine Road, Westwood to B2050 Manston Road)**
9) **From Columbus Way to Manston Road, Birchington**

The following strategic routes are sufficient in their existing form to provide for the growth envisaged in the Plan)(subject to the Local Plan review process set out in Policy SP03).

However, if further development is permitted, including further development at Manston Airport, which has a material impact on the capacity or operation of these routes, the Council will require alternative on-site highway provision where appropriate and/or proportionate contributions towards any improvements or changes to the existing routes which is thereby necessitated:

1) B2050 Manston Road (from Manston Court Road to Spitfire Junction
2) B2190 Spitfire Way (from Spitfire Junction to Columbus Avenue junction).

Junction/traffic management improvements are required at the following junctions to ensure the fully effective functioning of the Inner Circuit. Development that compromises the ability to deliver such improvements will not be permitted:

1) Victoria Traffic Lights
2) Coffin House Corner Traffic Lights

The Council expects all new development to make a proportionate contribution to the provision of this key infrastructure.

In the event that there is any delay in site acquisition or assembly in relation to any of the schemes identified in Policy SP47, the Council will, in conjunction with the County Council, make interim highway arrangements to enable allocated development schemes to proceed.

6.26 The Council is confident that, working with Kent County Council, the full Inner Circuit can be delivered during the Plan period alongside the proposed development in the Plan. The Council will work with developers and KCC to ensure that the requirements for the Inner Circuit are applied reasonably so that there is no delay to the delivery of development across the Plan period.

6.27 Potential measures to manage interim traffic impacts include:

- Localised widening within existing verge areas
- Localised narrowing and priority working systems to manage traffic flow
- Alternative routes
- Localised weight restrictions for HGVs, linked to positive signing strategies for routeing larger vehicles

7- Economy

Retention of existing employment sites

7.1 The Council considers that it is essential to retain employment premises in order to conserve stock for future use. Sites have been assessed for their compatibility with the plan's employment land strategy. The sites listed below contribute positively and are retained and protected for employment purposes accordingly.

7.2 Some sites have been identified as suitable for flexible uses. Flexible uses will be restricted to these areas. It is important that traditional employment uses on retained sites are not compromised by incompatible flexible uses that lead to conflicts such as statutory noise and nuisance complaints and highway safety issues.

Policy E01 - Retention of existing employment sites

The following sites will be retained as employment sites and the Council will support uses falling within Use Classes B1, B2 and B8 where they would not harm the living conditions of neighbouring occupiers of land or buildings:

1) All sites specifically identified under Policy SP05; and
2) Existing business sites and premises identified set out below:

- **Cromptons site, Poorhole Lane, Broadstairs**
- **Pysons Road Industrial Estate, Broadstairs**
- **Thanet Reach Business Park (part), Broadstairs**
- **Dane Valley Industrial Estate St.Peters, Broadstairs***
- **Northdown Industrial Estate St.Peters, Broadstairs**
- **Manston Business Park (part), Manston**
- **Manston Green, Manston**
- **Manston Road Depot, Margate**
- **Westwood Industrial Estate, Margate*(part)**
- **Fullers Yard, Victoria Road, Margate**
- **All Saints Industrial Estate, Margate**
- **Laundry Road Industrial Estate Minster**
- **Eurokent (part), Ramsgate***
- **Leigh Road Industrial Estate, Ramsgate**
- **St. Lawrence Industrial Estate, Ramsgate**
- **Princes Road Depot/Pioneer Business Park, Ramsgate**
- **Whitehall Road Industrial Estate, Ramsgate**
- **Hedgend Industrial Estate, Thanet Way, St.Nicholas-at-Wade**
- **Tivoli Industrial Estate, Margate**
- **Manston Road Industrial Estate (part), Ramsgate**

Proposals for alternative uses on sites identified under Policy E01 (1) and (2), and other buildings and land currently used for employment, will only be permitted where:

- **It has been demonstrated that the site is no longer suitable or viable for employment purposes following an active and exhaustive marketing process for a minimum of 12 months;**
- **The proposal would not undermine economic growth and employment opportunities in the area;**
- **The proposal would not result in a significant, or harmful reduction in the supply of land available for employment purposes for the remainder of the plan period, having regard to the type of employment land proposed for reuse and its location;**
- **The proposal would not prejudice the ongoing operation of remaining businesses nearby; and**
- **The proposal would result in a good standard of amenity for existing and future occupants.**

*** these are flexible employment sites, where wider employment generating uses will be allowed in addition to B1, B2 and B8 uses. Development must be compatible with neighbouring uses. Proposals for main town centre uses should also comply with Policy E05 - the sequential test where necessary. These uses will be expected to contribute towards the Local Employment and Training Fund.**

Flexible uses include leisure, tourism and other town centre uses which, due to scale and format cannot be accommodated within town centres. They also include uses known as sui generis which do not fall into a category in the Use Classes Order.
These include uses such as car showrooms and crèches

Home Working, Digital Infrastructure and Community Business Space

7.3 The National Planning Policy Framework (NPPF) requires the Council to plan for flexible working practices such as the integration of residential and commercial uses within the same unit.

7.4 The proportion of people that are home working is relatively high in Thanet according to the Economic and Employment Assessment 2012. It is not clear from the evidence whether these are small local business starting up from home or employees of companies potentially located outside the district. In either case this is considered beneficial to Thanet's economy as a result of money spent in the district. The co-location of home and work can reduce car use, and is therefore environmentally sustainable, particularly bearing in mind the growth of fast broadband. It is therefore considered important that improvements to digital infrastructure are supported.

7.5 Flexible office space (workhubs) with professional equipment and meeting space that can be hired and used in an ad hoc manner by home based workers can also support home working. Business advice may also be important. It is considered that these facilities can be accommodated on identified business parks or in the town centres.

7.6 Some small scale home working may not require planning permission. However, where home- working does require planning permission, consideration should be given to the impacts upon the neighbourhood, including for example traffic, noise and disturbance.

The Council supports home working proposals but wishes to ensure that any potential impact is acceptable, as set out in the following policies.

Policy E02 - Home Working

Proposals for the establishment of a business operating from a residential property will be permitted, provided that it can be demonstrated that the proposed use would not result in:

1) **detrimental impacts on residential amenity by reason of dust, noise, light, smell, fumes or other emissions;**
2) **additional traffic flows or vehicle parking in the vicinity, at a level thatwould be harmful to residential amenity or highway safety; or**
3) **the erosion of the residential character of the area.**

7.7 The Council strongly supports the installation of digital infrastructure and considers that an appropriate balance needs to be struck when considering impacts on heritage assets, conservation areas and historic landscapes.

Policy E03 - Digital Infrastructure

Proposals for the installation of digital infrastructure will be required on allocated sites in this plan.

Retro-fitting in existing urban areas and villages will be supported, subject to no unacceptable harm on listed buildings and their settings, the character or appearance of conservation areas and their settings, and historic landscapes

8- Town and District Centres

Primary and Secondary Frontages

8.1 The National Planning Policy Framework (NPPF) requires local planning authorities to define the extent of primary and secondary frontages within town centres and set policies to make clear which uses will be permitted in such locations.

8.2 Healthy shopping centres rely on control over the number and location of non-retail premises within the main shopping area. The success of any particular centre is dependent, at least in part, upon retaining a reasonably close grouping of shops selling a wide range of products. This allows customers to fulfil the majority of their shopping needs in one trip, as well as providing the opportunity for comparing the price and availability of less frequently purchased goods. The existence of non-retail businesses in primary shopping areas can inhibit these activities by reducing the range of shops, and thereby potentially reducing the number of people visiting the centre, as well as making the centre less compact and therefore less convenient. However town centres perform a greater function than just retail centres. They are hubs of the community and encompass cultural, leisure, arts and heritage uses that in turn support the tourism industry. Therefore in line with the strategy for the town centres outlined earlier it is considered appropriate to provide a generous secondary frontage in the coastal town centres in order to maintain and support this trend.

Policy E04 - Primary and Secondary Frontages

Primary and Secondary Frontages are defined for Westwood, Margate, Ramsgate and Broadstairs.

Within the Primary Frontages the following development will be permitted:

1) **Use Classes falling within A1, A2, A3, A4 and A5. (see glossary – Appendix D);**
2) **residential and other main town centre uses will be permitted above ground floor level only.**

Within the Secondary Frontages the uses referred to in the preceding clauses will be permitted at ground and upper floor level where this would not fragment or erode the active frontages to a degree that would undermine the function of the centre.

Sequential and Impact Test

8.3 Local planning authorities are required by the National Planning Policy Framework (NPPF) to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date Local Plan. Applications for main town centre uses should be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

8.4 The NPPF requires that town centre development takes place on sites within designated town centres and only where there are no suitable, viable or available sites. Should edge of centre or out of centre locations be considered, the reasons for rejecting more central sites should be clearly explained.

8.5 This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.

8.6 The NPPF also requires that applications for town centre development outside of the defined town centres above a certain threshold are accompanied by an impact test in order to assess the impact on vitality and viability of the town centres. The thresholds for Thanet are set out in policy below.

Policy E05 - Sequential and Impact Test

Proposals for main town centre uses should be located within the designated town centres of Margate, Ramsgate, Broadstairs and Westwood, as shown on the policies map. Where this is not possible due to size, format and layout town centre uses should be located on the edge of town centres or on employment land designated for flexible uses. Outside these defined centres applicants should demonstrate that there is no sequentially preferable location within the catchment of the proposed development.

Applications for development above the following thresholds outside town centres should be accompanied by an impact assessment:

1) Urban area* - 1,000 square metres
2) Rural area* - 400 square metres.

The impact assessment should include:

- **the impact of the proposal on existing, committed and planned public and private investment in a town centre or town centres in the catchment area of the proposal; and**
- **the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.**

Applicants should demonstrate flexibility on issues such as format and scale and will be expected to provide the Council with robust evidence of this.

Where an application fails to satisfy the sequential test or is likely to have an adverse impact on one or more of the above factors, it will be refused.

***As defined by the Boundary of Urban Area (SP24) on the Policies Map. The Villages are in the rural area.**

District and Local Centres

8.7 District and Local Centres perform an important role in the retail hierarchy catering for basket and top up shopping located in sustainable locations often walkable from residential areas. Developments in local parades and centres should primarily serve the community within which they are located with catchment areas of not more than 800 metres.

8.8 Thanet's District Centres consist of Cliftonville, Birchington, Westgate and Minster. There are number of smaller local centres throughout the district.

8.9 The important function of District and Local Centres, particularly the services they provide for the elderly and infirm should not be compromised by an overconcentration of residential accommodation.

Policy E06 - District and Local Centres

Proposals for additional shopping provision at traditional District Centres (as defined on the Policies Map) and Local Centres* will be permitted where the proposals serve the local population and are of a scale appropriate to the particular centre.

Residential accommodation will be permitted in District and Local Centres where this would not fragment or erode the active frontages of such locations to a degree that undermines the function of the centre.

***The Local Centres are located at:- (as indicated on the Policies Map)**

- **Minnis Road, Minnis Bay, Birchington**
- **Cambourne Avenue/Lymington Road, Westgate on Sea**
- **Canterbury Road, Garlinge**
- **Canterbury Road, Westbrook**
- **Ramsgate Road, Margate (Victoria Lights)**
- **Holly Lane/Northdown Road, Margate**
- **Summerfield Road, Palm Bay, Margate**
- **St Peter's, Broadstairs**
- **Margate Road/Northwood Road, Ramsgate**
- **High Street, St Lawrence, Ramsgate**
- **Hereson Road, Ramsgate**
- **Grange Road, Ramsgate**

9 - Tourism

Tourist Accommodation

9.1 A strategic priority of this Plan is the provision of sufficient quality tourist accommodation necessary to increase tourist spend and help to extend the tourist season.

9.2 Existing hotel provision in the district caters well for the budget hotel market and this has been increasing in recent years, but Thanet is lacking in hotels at the top end of the market. There is also a shortage of family holiday accommodation. Hotel facilities must be attractive to tourists to capitalise on the trend for shorter breaks in the UK and demand for better overall quality and service. There is increasing demand for boutique and designer hotels fuelled by more sophisticated tastes.

9.3 Other than caravan accommodation Thanet has relatively few self-catering facilities. Touring and camping is a popular choice of tourist accommodation and is an up and coming market. Thanet is currently underprovided with these types of facilities and the Council aims to take advantage of this high demand.

9.4 It is therefore important to provide for new, and to protect tourist accommodation of all types and for all budgets to attract a range of staying visitors to the area, which the following policies seek to achieve.

Policy E07 - Serviced Tourist Accommodation (Hotels, Guest Houses and B&Bs)

The Council will permit the development of new serviced tourist accommodation, including extensions and improvements to existing accommodation, in appropriate locations such that:

1) **It is of form, scale and design appropriate to its surroundings;**
2) **It does not cause unacceptable impact on the road network or highway safety;**
3) **It is accessible by a range of means of transport (wherever possible in rural areas);**
4) **If it is located in a rural area, that it respects the character of the local countryside and is sensitive to its defining characteristics; Outside of the urban area development should respect landscape character and nature conservation value; and**
5) **Sufficient mitigation should be provided to prevent against any material increase in recreational pressure on designated nature conservation sites.**

Policy E08 - Self Catering Tourist Accommodation

Proposals for the development, diversification, upgrade or improvement of self-catering accommodation will be permitted provided that:

1) **it is sustainably located;**
2) **it is of a form, scale and design appropriate to its surroundings;**
3) **in relation to a caravan and camping park, that it does not cause unacceptable impact on the local road network or highway safety, and wherever possible is well related to the primary and secondary road network; and**
4) **if it is located in a rural area, that it respects the character of the local countryside and is sensitive to its defining characteristics;**
5) **Sufficient mitigation should be provided to prevent any material increase in recreational pressure on designated nature conservation sites.**

Policy E09 - Protection of Existing Tourist Accommodation

Proposals that would result in the loss of existing tourist accommodation with 10 or more bedrooms will not be permitted unless it can be demonstrated that the hotel/guesthouse or self-catering accommodation is no longer viable* for such use.

*** In order to demonstrate that the existing tourist accommodation is not viable, evidence will be required to show that the facility has been marketed extensively for at least a year and at an open market value which is attributable to its use as tourist accommodation with consideration given to alternative forms of holiday accommodation. Evidence will also be required of occupancy rates for the previous 3 years, and any other relevant factors such as previous marketing or business plans, locational factors and ease of access for visitors by a range of means of transport. In assessing whether the accommodation is not viable the Council may seek the independent views of industry experts.**

Thanet's Beaches

9.5 Thanet possesses a large number of sandy beaches, whose characters range from intensively holiday-oriented beaches (eg: Main Sands, Margate) to undeveloped beaches with a natural character and appearance (eg: Grenham Bay, Birchington). The different types of beach offer opportunities for different types of recreational activity. In the interests of choice, the Council believes that it is desirable to ensure that the differences of character are maintained, and where appropriate, enhanced. Most beaches along the Thanet coast are internationally important for their wintering bird populations.

9.6 The Council's Destination Management Plan is considering potential locations for additional beach development, including accommodation, where it would be appropriate and viable. It is also investigating ways to improve the management of the beaches for the benefit of the tourism economy.

9.7 The following policies divide the beaches into three broad categories, in order to direct and restrict development appropriately to maintain and enhance their individual function and character, and to protect the designated nature conservation sites.

9.8 It should be noted that the intermediate category includes beaches which have scope for some further development, as well as those which are fully developed within the terms of the policy.

9.9 To provide for a variety of tastes and choice in the type of recreational activities, associated service facilities and degree of solitude on Thanet's coastline, the following policies will apply to beach development.

Policy E10 – Thanet's Beaches

Major Holiday Beaches

On those beaches identified as major holiday beaches below, the Council will support proposals for the provision and upgrading of a wide range of recreational facilities and services including tourist accommodation:

1) **Main Sands, Margate**
2) **Ramsgate Main Sands**
3) **Viking Bay, Broadstairs**

Proposals must also comply with the heritage policies of this plan and the National Planning Policy Framework.

At Margate Main Sands recreational facilities will be concentrated on that part of the beach at the junction of Marine Terrace and Marine Drive and the built form shall not project above the level of the seafront promenade.

Development proposals must avoid or fully mitigate against any impact upon the designated nature conservation sites, and will be subject to the Habitats Regulations.

Intermediate Beaches

On those beaches identified as intermediate beaches below, and where scope exists for such development, the Council will support proposals for small scale tourism and leisure development (e.g. tourist accommodation, kiosks supplying food and refreshments, beach huts and beach furniture), subject to the scale of provision being consistent with the intermediate status of the beach and satisfactory design and siting of development:

1) **Dumpton Gap (part)**
2) **Joss Bay**
3) **Louisa Bay**
4) **Minnis Bay (part)**
5) **St Mildred's Bay**
6) **Stone Bay**
7) **Walpole Bay**
8) **Westbrook Bay**
9) **Western Undercliff, Ramsgate**
10) **West Bay**

Development proposals must avoid or fully mitigate against any impact upon the designated nature conservation sites, and will be subject to the Habitats Regulations.

Undeveloped Beaches

On, or adjacent to undeveloped beaches identified on the Policies Map, priority will be given to the maintenance and enhancement of their natural, remote and undeveloped character. New development including new built facilities, the provision of public car parking facilities and new or improved vehicular access to serve such beaches will not be permitted. In the event that there is an overriding need for development/necessary infrastructure that cannot be met or located elsewhere, such proposals must avoid or fully mitigate against any impact upon the designated nature conservation sites, and will be subject to the Habitats Regulations.

Language Schools

9.10 Thanet contains a considerable number of language schools and a large percentage of students using these services stay with Thanet families or as paying guests. In 2013 language schools turnover was an estimated £19.7 million with approximately £6.3 million paid to an estimated 2,800 host families in the district. Students' total spend in Thanet was an estimated £33.6 million and language schools created around 1,000 jobs. (TDC - Economic Impact of Language Schools/EFL Providers 2013 - Final Report)

9.11 English language schools in Thanet are therefore a major contributor to the local economy, and offer potential for encouraging the next generation of visitors to this part of Kent. The Council wishes to encourage growth in this sector of the economy.

9.12 However language schools can cause issues with noise and disturbance particularly where there are concentrations of such facilities in an area potentially resulting in large gatherings of young people. These issues need to be balanced with the benefit to the local economy, as set out in the following policy.

Policy E11 - Language Schools

Language schools will be permitted subject to:

1) **The number of students to be accommodated, the hours of operation, the range of facilities provided and the relationship with adjoining properties not resulting in an unacceptable impact on the living conditions of adjacent occupiers through noise, additional on-street parking or general disturbance;**
2) **The use of the property as a language school not resulting in an over-concentration of such uses in a particular locality to a level which is harmful to the character and appearance of the area.**

Quex Park

9.13 Quex Park Estate is set in 250 acres of parkland and trees in Thanet's otherwise wide open landscapes.

9.14 The major attraction and point of interest is the Powell Cotton Museum which is one of the finest collections of natural history and ethnographic artefacts in existence.

9.15 The Quex Park Estate contains a wealth of heritage assets. The Mansion House dates back to the early 1400s but this was demolished between 1769 and 1849 by John Powell who replaced it with an elegant Regency home. There are also acres of historic gardens and natural woodland with traditional Victorian layout and landscaping which includes built heritage of a walled garden and green houses.

9.16 Other heritage assets at Quex Park include the Three Towers - the Round Tower built in 1814, the Waterloo Tower built in 1819 and the clock tower above the listed coach house. The turret clock, by Benjamin Lewis Vulliamy, was installed in 1837 and chimes the quarters and the hour.

9.17 Quex Park farms 607 hectares in-house plus a further 607 hectares under contract agreements with other local farmers. The profitability of farming alone was not able to provide for the upkeep of the historic buildings and parkland despite registration for charitable status. As a result the Estate has diversified its many redundant buildings.

9.18 Therefore as well as the museum, house and gardens, Quex Estate incorporates Quex Barn farmers' market and restaurant, Jungle Jims children's indoor and outdoor play area, the Secret Garden centre, a paintballing arena, the Quex Maize Maze, the Craft Village, Build a Base (an indoor games arena) and Mama Feelgoods Boutique café. In addition to these individually managed enterprises the Estate also hosts weddings. The Estate as a whole employs in the region of 140 people.

The following policy seeks to promote further development of the Quex Park Estate to support its diversification as a local enterprise, providing valuable economic and tourism benefits whilst protecting the Parks character, heritage and biodiversity.

Policy E12 - Quex Park

Farm diversification projects and tourism and leisure development at Quex Park Estate will be supported where they contribute to the upkeep of the Quex House and Gardens and the Powell-Cotton Museum and promote the Estate as a destination for tourism and leisure.

Projects should be in keeping with the parkland character of the Estate, conserve and enhance the heritage assets and their settings, the Park's biodiversity, and meet the requirements of Policy SP26.

Applications that are likely to have a significant impact on the highway network must be accompanied by a Transport Assessment in accordance with Policy TP01. In other cases a transport statement may be required.

10- The Rural Economy

10.1 The National Planning Policy Framework (NPPF) requires that Local Plans support the sustainable growth and expansion of all types of business and enterprise in the rural areas, promote the development and diversification of agricultural and other land based rural businesses, support sustainable rural tourism and leisure developments that benefits businesses in the rural area and promote the retention and development of local services and community facilities. There is also the requirement for the Local Plan to address the needs of the food production industry and any barriers to investment that planning can resolve. The Council wishes to support a sustainable rural economy and rural economic development of an appropriate scale and the following policies seek to address this.

New build development for economic development purposes in the rural area

10.2 The NPPF states that planning policies should support economic growth in rural areas in order to create jobs and prosperity by supporting sustainable growth and expansion of all types of business and enterprise in rural areas, through well designed new buildings.

Development should have regard to the Kent Downs AONB Farmstead Guidance produced by English Heritage (now known as Historic England), Kent Downs AONB, KCC and Kent Design.

Policy E13 - Development for new business in the countryside

Well-designed new development for economic development purposes for new businesses will be permitted in sustainable locations, at a scale and form compatible with their rural location.

Conversion of rural buildings

10.3 An important consideration for the rural economy and rural diversification is the reuse of redundant buildings. The National Planning Policy Framework (NPPF) states that planning authorities should support the expansion of all types of business and enterprise in rural areas through the conversion of existing buildings.

10.4 Such conversions might be particularly desirable where buildings are listed, or have other landscape value, and their long-term retention may be sought for these reasons.

10.5 Disused rural buildings may hold species such as bats or barn owls, protected by the Wildlife and Countryside Act 1981 (as amended) and Conservation of Habitats and Species Regulations 2017. The conversion of such buildings should make provision for their continued use by protected species which are present. If this is not possible, mitigation should be provided nearby.

Policy E14 - Conversion of rural buildings for economic development purposes

Where it can be demonstrated that the building is not needed for agricultural use the conversion of rural buildings to other uses for economic development purposes will be permitted where all the following criteria are met:

1) **their form, bulk and general design are in keeping with the character of the surrounding countryside;**
2) **the proposed use is acceptable in terms of its impact on the surrounding area and the local highway network;**
3) **it can be demonstrated through a structural survey that the building is capable of conversion;**
4) **any alterations associated with the conversion would not be detrimental to the distinctive character of the building (or its setting), its historic fabric or features.**
5) **if the building forms part of a complex of agricultural or industrial buildings, a comprehensive strategy is put forward which shows the effects on the use of the remaining complex.**
6) **where the building contains protected species any negative impacts should be fully addressed following the "avoid, mitigate and compensate" hierarchy.**

Farm Diversification

10.6 The NPPF requires that planning policy should promote the development and diversification of agricultural and other land-based rural businesses.

10.7 The Council wishes to support proposals for diversification that will strengthen and protect the productive base of the farm unit that allows the farmer to continue to farm. The Council will expect an outline farm plan to be submitted with any planning application, indicating how the new diversification schemes integrates with and contributes to the overall business plan for the farm. By granting planning consent for acceptable diversification projects, the Council is indicating its long term support for a continuing viable agricultural community in Thanet.

10.8 However, farm diversification projects have the potential to result in adverse effects, for example, traffic and landscape impacts, and the depletion of financial and land resources. Applicants will therefore need to carefully assess the implications of new proposals, both for their own benefit, and to enable the Council to give support to acceptable and viable schemes. The following policy seeks to achieve this balance:

Policy E15 - Farm Diversification

Proposals to diversify the range of economic activities on a farm will be permitted if all the following criteria are met:

1) **The proposal is compatible with the agricultural operations on the farm, and is operated as part of the farm holding.**
2) **The loss of best and most versatile agricultural land is minimised.**
3) **The likely traffic generation could be safely accommodated on the local highway network.**

Proposals should, where possible, utilise available existing farm buildings.

Best and most versatile agricultural land

10.9 The Agricultural Land Classification system (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system and the presence of best and most versatile agricultural land should be taken into account alongside other sustainability considerations when determining planning applications.

10.10 The National Planning Policy Framework (NPPF) requires that planning authorities should take into account the economic and other benefits of best and most versatile land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality. For the purposes of Policy E16 significant development is considered to be any planning application that is “major development” as defined by The Town and Country Planning (Development Management Procedure) (England) Order 2015. The majority of agricultural land in Thanet is best and most versatile and therefore the following policy applies.

Policy E16 - Best and Most Versatile Agricultural Land

Except on sites allocated for development by virtue of other policies in this Plan, planning permission will not be granted for significant development which would result in the irreversible loss of best and most versatile agricultural land unless it can be clearly demonstrated that:

1) **the benefits of the proposed development outweigh the harm resulting from the loss of agricultural land,**
2) **there are no otherwise suitable sites of poorer agricultural quality that can accommodate the development, and**
3) **the development will not result in the remainder of the agricultural holding becoming not viable or lead to likely accumulated and significant losses of high quality agricultural land.**

Applications for solar parks on best and most versatile agricultural land should comply with Policy CC06 - Solar Parks

10.11 The National Planning Policy Framework also states that the planning system should protect and enhance valued soils and prevent the adverse effects of unacceptable levels of pollution. This is because soil is an essential finite resource that provides important ‘ecosystem services’, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. As part of the government’s ‘Safeguarding our Soils’ strategy, Defra has published a Code of practice for the sustainable use of soils on construction sites. The Council would encourage developers to have regard to this.

10.12 The National Planning Policy Framework (NPPF) requires that Local Plans support the

needs of the food production industry. Agricultural related businesses are those that are not part of a farm business, such as producing and packing operations. These value adding operations are an important part of the rural economy but their scale and location should respect the character and appearance of the rural area as set out in SP04.

11 - Housing

Identification and Release of Housing Land for Development

Allocated sites

11.1 Sites allocated for housing (including strategic site allocations) are shown on the maps and featured in a list of housing site allocations in Appendix B. Notional dwelling unit capacities indicated are for the purposes of illustrating total land supply and do not signify that consent will be granted for particular numbers of dwellings at any site. Capacity on individual sites will be considered in light of planning policy and usual development management considerations.

11.2 The geographical extent indicated for site allocations affecting greenfield land represents the anticipated maximum land requirement. Proposals will be expected to consider, and where possible accommodate, notional maximum dwelling capacities indicated together with all other relevant policy requirements within a lower level of greenfield land take.

11.3 Sites will be released for development over specific time periods. The purpose of this is to ensure that the rate of release and take up is reasonably related to expected need and demand, taking account of the economic strategy and geared to planned infrastructure provision. Indicative phasing is shown as "notional delivery period" in the list at Appendix B.

11.4 This Local Plan does not identify or allocate potential housing sites likely to accommodate four or less dwellings. Such proposals will be assessed in relation to policy HO1.

11.5 Land allocated for residential use will be safeguarded for that purpose in the interest of maintaining a suitable, sustainable and sufficient land supply and reducing the need to find less sustainable alternatives.

Unidentified housing sites

11.6 Sites not previously identified and allocated in Local Plans (sometimes referred to as "windfall" sites") have contributed significantly in recent years to housing delivery in the district. It is anticipated that these will continue to come forward. Such opportunities can serve to make effective use of previously developed land and contribute towards the housing land supply. For the purposes of the following policy, previously developed land is as defined in the National Planning Policy Framework (NPPF) and does not include residential gardens.

11.7 In the case of any allocation or unidentified housing site affecting a site within defined town centre primary frontages, within Margate seafront and harbour arm or Margate Old Town, residential development will be restricted to above ground floor level (in accordance with policies E04 and SP10)

Policy HO1- Housing Development

Permission for new housing development will be granted on:

1) Sites allocated for this purpose, as listed below and shown on the Policies Map

SITE ADDRESS	CAPACITY
Queens Arms Yard, Margate	24
Cottage Car Park, New Street, Margate	32
Margate Town Centre (south of New Street), Margate	27
Adjacent to 9 Minnis Road, Birchington	11
End of Seafield Road, Ramsgate	16
Adjacent to 21 Royal Road & 9 Townley Street, Ramsgate	18
Gas works, Boundary Road, Ramsgate	96
Land at Wilderness Hill and Dane Road	14
79-85 High Street, Ramsgate	14
Gas Holder Station, Addington Street, Margate	22
WW Martin, Dane Park Road, Ramsgate	14
10 Cliff Street, Ramsgate	11
Complete Car Sales, Willsons Road, Ramsgate	10
Highfield Road, Ramsgate	25
Land at Victoria Road & Dane Road, Margate	35
Haine Farm, Haine Road, Ramsgate	35
Land off Northwood Road, Ramsgate	45
Dane Valley Arms, Dane Valley Road, Margate	13
Builders Yard, The Avenue, Margate	10
Land at Waterside Drive, Westgate	12
Suffolk Avenue, Westgate	23
r/o Cecilia Road, Ramsgate	23
Margate Delivery Office, 12-18 Addington Street, Margate	10
Industrial Units, Marlborough Road, Margate	10
Gap House School, 1 Southcliff Parade, Broadstairs	10
Foreland School, Lanthorne Road, Broadstairs	14
Thanet Reach southern part, Broadstairs	80
Part of Pysons Road, Broadstairs	26
Lanthorne Court, Broadstairs	56
Former Club Union Convalescent Home, Reading Street, Broadstairs	24
Adj to 60 Harold Road and r/o 40-56 Harold Road, Cliftonville	14
Adj to 14 Harold Road, Cliftonville	10
Part of allotment gardens, Manston Road	80

2) Non-allocated sites within the confines of the urban area and villages as shown on the policies map, subject to meeting other relevant Local Plan policies.

All development proposals should also:

3) comply with the relevant requirements of SP14;
4) demonstrate that adequate infrastructure will be in place to serve each unit.

Alternative development on non-strategic sites allocated for residential development will not be permitted.

11.8 Housing delivery will be monitored annually, and a housing implementation strategy will be put in place to facilitate delivery across the plan period including action that may be taken if necessary to maintain a rolling 5 year supply of deliverable housing sites.

Non-strategic Housing Allocations

Policy HO2 - Land on west side of Old Haine Road, Ramsgate

Land is allocated for up to 100 new dwellings with an approximate average density of 35 dwellings per hectare (net) at the west of Old Haine Road, Ramsgate. Proposals will be judged and permitted only in accordance with a masterplan for the whole site which should include:
1) pre-design archaeological evaluation;
2) appropriate landscape treatment that also ensures an appropriate transition between the development and the adjacent open countryside;
3) a proportionate contribution to necessary off-site highway improvements in accordance with Policy SP47.

Proposals will be accompanied by a Transport Assessment which shall assess the impact on the local road network.

Policy HO3 - Land fronting Nash Road and Manston Road, Margate

Land is allocated for up to 250 new dwellings with an approximate average density of 35 dwellings per hectare (net) at Nash Road and Manston Road Margate.

Proposals will be judged and permitted only in accordance with a masterplan for the whole site, which should include:-
1) any necessary upgrade of utility services;
2) linkages to new and existing public transport infrastructure, including bus and rail services;
3) the provision of a local distributor link road between Nash Road and Manston Road, including a new roundabout junction at Manston Road;
4) appropriate arrangements for surface water management.

All development proposals must include a phasing and implementation plan to include the

phasing of development, infrastructure and landscaping

Masterplanning will be informed by and address:

1) **the provision of landscaping that also ensures an appropriate transition between the development and the adjacent open countryside;**
2) **pre-design archaeological assessment;**
3) **the preservation or enhancement of the setting of the listed building Salmestone Grange and the scheduled ancient monument; and**
4) **a design and layout that respects the presence of the crematorium on the adjoining site Proposals will be accompanied by a Transport Assessment.**

Policy HO4 - Land south of Brooke Avenue Garlinge

Land is allocated for up to 34 new dwellings with an approximate average density of 35 dwellings per hectare (net) south of Brooke Avenue, Garlinge.

Proposals for the development of the site will be informed by and address:

1) **an archaeological evaluation; and**
2) **a landscaping scheme that also ensures an appropriate transition between the development and the adjacent open countryside.**

Policy HO5 - Land at Haine Road and Spratling Street, Ramsgate

Land is allocated for up to 100 new dwellings with an approximate average density of 35 dwellings per hectare net at Haine Road and Spratling Street, Ramsgate.

Proposals for the development of the site will be informed by and address:

1) **suitable access arrangements together with suitable footway connections;**
2) **the provision of a priority junction including a dedicated right turn lane for vehicular access to the site;**
3) **appropriate landscaping treatment that also ensures an appropriate transition between the development and the adjacent open countryside;**
4) **any necessary upgrading of utility services on site.**

Policy HO6 - Land south of Canterbury Road East, Ramsgate

Land is allocated for up to 27 new dwellings with an approximate average density of 35 dwellings per hectare net on the south side of Canterbury Road East.

Proposals for the development of the site will be informed by and address:

1) **an archaeological evaluation;**
2) **an ecological evaluation;**

3) appropriate landscaping which addresses the desirability to retain hedgerows and trees for their landscape and biodiversity value.

Policy HO7 - Land at Melbourne Avenue, Ramsgate

Land is allocated for up to 49 new dwellings with an approximate average density of 35 dwellings per hectare net at the former Newington Nursery and Infant School, Melbourne Avenue, Ramsgate.

Proposals for the development of the site will be informed by and address

1) an ecological assessment;
2) the retention of the existing area of woodland in the south western part of the site known as "The Copse" for community use;
3) appropriate landscaping.

Proposals will be accompanied by a Transport Statement.

Cliftonville and Margate

11.9 The adjoining wards of Cliftonville West and Margate Central contain Thanet's most deprived neighbourhoods. This is manifested in high levels of economic dependency, and a fragmented community. The area has a predominance of cheap and poor quality rented accommodation often attracting vulnerable and transient people. The Cliftonville Development Plan Document (DPD) contains planning policies restricting additional accommodation in forms likely to fuel or perpetuate these problems.

11.10 The Council and its partners including Kent County Council and the Homes and Communities Agency are implementing a concerted programme "Live Margate" to focus and stimulate further investment in making Margate and, in particular, these two wards, an area where people aspire to live. A central feature of the programme is purchasing existing properties and turning them into quality family homes. Many properties in these wards have 3-4 storeys and would be suited to multigenerational living (with two or more generations living under the same roof). If house prices continue to rise there may be an increase in demand for multigenerational houses. The following policy supports proposals resulting from or compatible with the Live Margate initiative. In addition to relevant policies in the Cliftonville DPD, the following policy will apply within the DPD area as shown on the Policies Map.

Policy HO8 - Cliftonville West and Margate Central

Proposals to provide residential accommodation in those parts of Cliftonville West and Margate Central (as identified on the Policies Map) will be expected to:

1) provide high quality homes in accordance with good design principles;
2) increase the number of family homes;
3) contribute to the creation of mixed settled communities in which families and individuals will want to live;
4) make a positive contribution to the street scene and environmental quality of the area.

Housing in Rural Settlements

11.11 Most of Thanet's villages consist of freestanding rural settlements. These comprise Acol, Cliffsend, Manston, Minster, Monkton, Sarre and St Nicholas at Wade. Each makes its own contribution to the character and diversity of the Thanet countryside, and the Council considers that it is essential for them to retain their separate physical identity and vibrant communities. There are some settlements that, due to their mutual proximity, are potentially vulnerable to coalescence through the development along the road frontages that link them; for example, Minster to Monkton and Manston to Ramsgate. Policies protecting the open countryside provide appropriate safeguards for this.

11.12 The National Planning Policy Framework (NPPF) notes that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. In support of the Local Plan's housing objectives the rural settlements are considered to have some scope for new housing development in order to meet local needs and increase locational choice within overall objectively assessed need. A separate housing topic paper considers the scale of housing that could be accommodated at each of Thanet's rural settlements. This has helped to inform the following policy.

11.13 Appendix B allocates specific sites for housing development including at some of the rural villages. These are listed below.

11.14 The following policy indicates the scale of housing development that may also be permitted on other sites in the rural settlements of Minster, Cliffsend, St Nicholas at Wade, Monkton, Manston, Acol and Sarre.

Policy HO9 - Housing in Rural Settlements

Housing development will be permitted within the confines of the rural settlements subject to the provisions of policy HO1 and the criteria below:

1) **The proposal being compatible with the size, form, character and scale of the settlement; and**
2) **In the case of major development proposals accessible community services will be available.**

The sites listed below are specifically allocated for residential development.

Table 9 – Sites allocated for residential development at Rural Settlements

Site	Capacity
Tothill Street, Minster	250
Land at Manor Road, St Nicholas	10
Land at Walter's Hall Farm, Monkton	20
Land south side of A253, Cliffsend	62
Land north of Cottington Road, Cliffsend Builders Yard south of 116-124 Monkton Street, Monkton	41 20
Former Jentex site Canterbury Road West, Cliffsend	56
Foxborough Lane (South Side), Minster	35
Land at The Length, St. Nicholas	25
Young's Nursery, Arundel Road, Cliffsend	12

In addition to the requirements set out in Policies HO10-HO15, the following development principles also apply:

- **Former Jentex site, Canterbury Road West, Cliffsend. Allocated for up to 56 dwellings. Early consultation with Environment Agency and an assessment of potential contamination of ground and groundwater together with appropriate remedial measures required.**
- **Builder's Yard south of 116-124 Monkton Street, Monkton. Allocated for up to 20 dwellings. In light of former builder's yard use an assessment of potential contamination together with appropriate remedial measures may be required.**
- **Land at south side of Foxborough Lane, Minster. Allocated for up to 35 dwellings. Potential for bat and reptile presence will require further investigation and mitigation may be required.**
- **Land at The Length, St. Nicholas. Allocated for up to 25 dwellings.**
- **Young's Nursery, Arundel Road, Cliffsend. Allocated for up to 12 dwellings.**

Policy HO10 - Land at Tothill Street, Minster

Land is allocated for up to 250 dwellings with an approximate average density of 35 dwellings per hectare at Tothill Street, Minster.

Proposals for the development of the site will be informed by and address

1) **the provision, location and type of the requisite open space;**
2) **provide vehicular access to Tothill Street and links southwards with existing development restricted to pedestrian and cycle routes in order to limit additional traffic movement in the vicinity of Monkton Road and High Street;**
3) **provide an emergency access;**
4) **provide improvements to the Tothill Street/A299 Roundabout and a proportionate contribution to off-site junction improvements at Spitfire Way.**

In light of the site's proximity to the cemetery and former transport depot, and its location in an area with sensitive groundwater requiring continued protection, consultation with the Environment Agency and contamination assessment is likely to be required.

Policy HO11 - Land at Manor Road, St Nicholas at Wade

Land is allocated for up to 36 dwellings with an approximate average density of 35 dwellings per hectare at Manor Road, St Nicholas at Wade

Proposals for the development of the site will address the provision, location and type of the requisite open space

Policy HO12 - Land at Walter's Hall Farm, Monkton

Land is allocated for up to 18 dwellings at an approximate average density of 35 dwellings per hectare at Walter's Hall Farm, Monkton.

Proposals for the development of the site will be informed by and address:

1) **archaeological evaluation and**
2) **respect the setting of the listed building at Walters Hall Farmhouse.**

Policy HO13 - Land south side of A253, Cliffsend

Land is allocated for up to 62 dwellings at an approximate average density of 35 dwellings per hectare on the south side of the A253, Cliffsend.

Proposals for the development of the site will be informed by and address:

1) **a pre-design archaeological evaluation;**
2) **where possible, provide footpaths and cycleways to the proposed Parkway station;**
3) **a contamination assessment to investigate potential pollution in light of the site's proximity to the former Jentex site;**
4) **access arrangements onto the A253 and avoid access or additional traffic onto Foad's Lane.**

Policy HO14 - Land north of Cottington Rd, Cliffsend

Land is allocated for up to 40 dwellings with an approximate average density of 35 dwellings per hectare north of Cottington Road, Cliffsend.

Proposals for the development of the site will be informed by and address:

1) **further archaeological assessment including fieldwork;**
2) **a targeted assessment of the impact of development on the setting of St. Augustine's Cross;**
3) **a transport statement will be needed to take account of traffic impacts onto Foad's Lane area, and proposals will be expected to where possible, provide footpaths and cycleways to the proposed Parkway station.**

Policy HO15 - Land south side of Cottington Road, Cliffsend

Land is allocated for up to 23 dwellings at an approximate average density of 35 dwellings per hectare on the south side of Cottington Road, Cliffsend

Proposals for the development of the site will be informed by and address

1) **further archaeological assessment including fieldwork;**
2) **a targeted assessment of the impact of development on the setting of St. Augustine's Cross;**
3) **a flood risk assessment.**

A transport statement will be needed to take account of traffic impacts onto Foad's Lane area, and proposals will be expected to where possible, provide footpaths and cycleways to the proposed Parkway station.

Rural Housing Need

11.15 The National Planning Policy Framework (NPPF) expects a responsive approach to local housing needs in rural areas, and indicates that release of rural exception sites may be an appropriate means of responding to local need for affordable homes.

11.16 Any such release would be conditional upon the first and all subsequent occupiers being first time buyers who are already village residents or their children, village residents living in unsuitable accommodation, dependents of village residents, people whose work is based in the village, or people with local connections who have been forced to move away from the village due to a lack of affordable or suitable housing.

11.17 Provision for some new village housing is made through other policies. Proposals on exception sites which include market housing or low cost housing will only be permitted where they form a small element of the scheme and it would provide significant additional affordable housing to meet local needs.

11.18 Any consent will be subject to a legal agreement to ensure the housing is available to meet local needs in the long term.

Policy HO16 - Rural Housing Need and Exception Sites

Planning permission will be granted for affordable housing development adjacent to rural settlements that:

1) **is of a scale and size appropriate to its location and the level of services available to its residents, is of a type and mix that meets local needs as identified in a verified local needs survey; and**
2) **the location, size and form of which is sensitive to its setting and the defining characteristics of the area.**

Permission will be granted for an element of market housing within any such development provided that it can be demonstrated that it is the minimum necessary to facilitate the provision of the affordable housing.

Planning permission will be subject to a planning obligation that secures priority occupation of the affordable housing by persons already resident in the relevant settlement or who have local family connections.

Agricultural dwellings

11.19 The National Planning Policy Framework (NPPF) states that the development of isolated homes in the countryside should be avoided unless there are special circumstances such as the essential need for a rural worker to live permanently at or near their place of work in the countryside.

11.20 Much of Thanet's countryside is in agricultural use. Planning permission will only be granted for a farm dwelling where an agricultural need has been demonstrated. In this context, need means the need of the particular farm business, rather than the owner or occupier of the farm or holding.

11.21 The Council takes the view that, in Thanet, agricultural need is directly related to the security of certain types of livestock, and horticultural produce. Thanet's agricultural land is largely in arable production which, by its nature, is not as susceptible to damage as other forms of agriculture.

11.22 The pattern of agricultural holdings in Thanet is well-established and stable, and the agricultural area is generally in close proximity to the urban areas. In view of this, the Council believes that there is little justification for new agricultural dwellings. Proposals for agricultural dwellings required for security purposes will be expected to be supported by information demonstrating that alternative measures such as CCTV have been considered.

Policy HO17 - New Dwellings for Rural Workers

The provision of a new dwelling for rural workers in the district will be permitted only where it is demonstrated that there is an essential need for them to live at or near their place of work and the proposal is acceptable in terms of access, design and location.

Where planning permission for a new dwelling is granted on the basis of agricultural requirements, a condition or legal agreement will be required to restrict occupation of the dwelling to agricultural workers and their dependents, or persons last employed in agriculture.

Care and Supported Housing

11.23 The range of accommodation needed by various groups in the community extends beyond conventional dwellings to more specialised forms of accommodation such as sheltered

housing (specialist accommodation typically individual apartments with on-site support in secure surroundings), extra care housing (typically individual apartments for older people with varying levels of care need and benefiting from shared facilities such as laundry, lounges or garden), residential care homes and nursing homes providing 24/7 care. Kent County Council has prepared a strategy (Kent Social Care Accommodation Strategy) to help deliver choice and access to high quality accommodation to vulnerable adults eligible for care and support. A key principle of this is to ensure people are not isolated from their communities and are able to live healthily and safely in their own homes. The accommodation strategy is informed by estimates of projected demand for need for particular types of accommodation. However, gaps in provision will be identified and addressed to reflect the objective of independent living and promoting appropriate housing and support to reduce reliance on residential and nursing care.

11.24 There is a growing need for specialist housing for older persons, as identified in the SHMA. In order to meet the forecast change in population of people aged 75 and over, the SHMA identifies a potential need for 1,522 units of specialised accommodation for older persons over the plan period (76 units per annum).

11.25 Thanet has historically been overprovided with some forms of accommodation which has caused concerns regarding importation and concentration of vulnerable and dependent people. For example in spring 2013 it was estimated that nearly two thirds of the 525 looked after children in Thanet were placed from areas outside the district; the majority of placed children being from outside Kent. While sympathetic to the needs of such people, the Council does not regard this overprovision of accommodation to meet demand arising outside the local area as sustainable or conducive to a balanced community. Therefore in considering individual proposals the Council will have regard to evidence of local need and, where applicable, the potential contribution development could make to the accommodation strategy for adult social care clients in Kent (Kent County Council).

11.26 The needs of the district for supported housing are an important consideration, and proposals meeting such need and in line with the Accommodation Strategy will be supported. Sheltered housing proposals will be supported where it is demonstrated that proposals would accommodate expected needs arising within the district.

11.27 For the purposes of planning policy, proposals for retirement homes, sheltered housing and extra care housing will, unless circumstances indicate otherwise, be regarded as residential dwellings and subject to usual planning policies for residential development. Household projections indicate an increase of 591 people living in registered care accommodation over the plan period (30 per annum). Where accommodation provides a higher level of care, such as nursing homes, then such uses will be regarded as Class C2 and specifically subject to clause 2 of the following policy.

11.28 The following policy seeks to facilitate an appropriate level of provision of good quality accommodation in line with the objective of supporting a balanced and inclusive community, and enabling independent living as far as possible.

Policy HO18 - Care and Supported Housing

The Council will seek to approve applications that provide accommodation for those in the community with care needs (including the provision of facilities and services which will support independent living).

Where such accommodation falls within Use Class C2 proposals will be expected to demonstrate they are suitably located to meet the needs of the occupiers including proximity and ease of access to community facilities and services.

Houses in Multiple Occupation including student accommodation

11.29 Accommodation within a building can be regarded as non-self-contained where unrelated households share one or more facilities such as a bathroom or kitchen. Houses in Multiple Occupation (HMOs) are an example where a high degree of sharing of facilities is typical, and where living arrangements, being more intense than single family occupation, can give rise to noise, nuisance, more callers, a higher parking requirement and visual deterioration of buildings and gardens.

11.30 While the Council does not wish to encourage proliferation of HMOs as a permanent measure, it does recognise that such sharing arrangements can provide a source of cheap rented accommodation, including affordable accommodation for students and supported housing. The previous Local Plan applied a criteria based policy, the principles of which are considered to remain valid.

11.31 In 2010 the Government introduced new legislation signifying that planning permission would no longer be required for change of use of a dwelling house to a house in multiple occupations for up to 6 unrelated people. The Council subsequently approved an Article 4 direction so that planning permission would still be required for such change of use in Thanet.

11.32 The extent to which non-self-contained accommodation may generate the problems referred to above depends not only on intensity of occupation, sharing of facilities and management of the building, but also the nature of the area in which it is situated, the type of building, and the concentration of similar uses in its vicinity.

11.33 Alternative use of family homes as private student accommodation in the form of multiple occupations has caused local concerns focused on the neighbourhood around the Broadstairs University campus. Christ Church University and East Kent College are highly important for delivering skills required by the workforce, meeting the expectations of existing and potential employers and stemming out migration of young people. Supporting the functions of our higher and further education establishments includes the need to recognise demand arising for suitably located decent accommodation for students. At the same time it is essential to ensure that satisfying such demand does not result in undue concentration of non self-contained accommodation in order to avoid local disturbance and to maintain a mixed and settled community.

11.34 In 2014 the percentage of properties in use as private sector student accommodation in the form of HMOs at the residential estate adjoining the campus was estimated at 2.4%. While such uses have generated local concern, including that recent changes of use might signal an ongoing trend, the Council does not consider that restriction on further change of use is currently justified in principle. Nonetheless, these concerns point to the need to incorporate within policy an indicative ceiling level of cumulative impact in order to maintain mixed and settled communities. Having assessed the circumstances in the district and approaches applied

in other locations, the Council considers 5% represents an appropriate level. Bearing in mind the potential for displacement pressure that such restriction may generate, this level is considered appropriate across the district. In order to address potential for localised concentration within this headroom, the 5% is applied on the basis of a 50 metre radius or exceed or further exceed 1 HMO in any group frontage of 20 dwellings houses.

11.35 The Cliftonville Development Plan Document (DPD) imposes a restriction on HMOs, and in the area it applies to that DPD takes precedence over the following policy.

Policy HO19 - Houses in Multiple Occupation

Proposals for Houses in Multiple Occupation (HMO's), either through conversion of existing buildings or new built development, will not be permitted in those parts of the Cliftonville and Margate Central Wards as illustrated on the policies map.

Elsewhere proposals will be permitted where the development:

1) **does not give rise to an unacceptable impact on the living conditions of neighbouring residents through noise or general disturbance;**
2) **does not result in an intensification or concentration of such uses which is detrimental to the amenity and character of the neighbourhood (having regard to the criteria set out in para 11.34 by way of guidance)**
3) **provides suitable arrangements for car parking, or adequate on-street parking is available within the vicinity of the site and**
4) **provides suitable arrangements for the storage and collection of waste**

Gypsy and Travelling Communities

11.36 The 2011 Census identified a total of 69 households in Thanet with a White: Gypsy or Irish Traveller' ethnicity. Of these, 1 household lived in a caravan or other mobile or temporary structure and 68 households lived in bricks and mortar (house, bungalow, flat, maisonette or apartment). The bi-annual DCLG Traveller caravan count identified no caravans over the last six counts up to July 2017. Likewise, the annual Travelling Showperson caravan count (undertaken each January) also found no Travelling Showpeople caravans in Thanet during the past four counts (2014-2017). There are no authorised Gypsy and Traveller sites or Travelling Showpeople yards in Thanet.

11.37 The Thanet Gypsy and Traveller Accommodation Assessment (GTAA) 2017/18 has become available since the publication and submission of the Reg.19 Plan. It analyses the latest available evidence to identify the accommodation needs of Gypsies and Travellers, Travelling Showpeople and houseboat dwellers from across the area. This data has been analysed to provide a picture of current provision and activity across the Thanet District and an assessment of future need.

11.38 The GTAA 2017/18 has found evidence of Gypsy and Traveller pitch need over the next five years (2018/18 to 2021/22) equating to 5 pitches under the cultural definition, or 1 pitch under the PPTS 2015 definition of Gypsy/Traveller. This takes account of existing evidenced need (one household who is PPTS-compliant) and an estimate of need arising from households

currently living in bricks and mortar accommodation (assumed not to fulfil the PPTS definition).

11.39 For the remainder of the Local Plan Period (up to 2030/31) the GTAA has identified a cultural need for 2 pitches and a PPTS need for 2 pitches. This takes account of a longer-term projection of need based on demographic modelling. The need over the total Plan Period is 7 permanent and 5 transit pitches. There is thus a need to identify pitches for the plan period and this work will have begun before the adoption of the Plan but will not be completed before then. In light of the early review of the plan to commence within 6 months of adoption in accordance with the Secretary of State's direction, it is intended to identify and allocate the necessary number of permanent sites within the review process. Until then the Council will act proactively to accommodate emerging needs on a temporary and, if possible, permanent basis.

Policy HO20 - Accommodation for Gypsy and Travelling Communities

The need over the total Plan Period is for 7 permanent pitches and 5 transit pitches. The change of use of land to provide accommodation for Gypsy and Travelling communities will be permitted provided the proposed site is:

1) **suitable for its intended use (including any associated business activity) and can be accommodated without unacceptable impact on its surroundings and surrounding land uses and the living conditions of persons living in the vicinity of the site;**
2) **has reasonable access to local facilities and services, particularly schools, employment and healthcare, and**
3) **not within a flood risk area; and**
4) **will not have an unacceptably detrimental impact on local environmental quality including Green Wedges or sensitive landscape areas.**

Pending the next review of the Plan the Council will take proactive steps to accommodate all emerging needs of Gypsy and Travelling communities within the District on temporary sites and, wherever possible, permanent sites which meet the above criteria. The Council shall address the identified need and monitor need in three stages: to continue to work with families to identify suitable short term sites; to commence immediately to identify suitable long term sites and to grant permission for them; and, to identify additional sites required to meet total provision in the next plan review

Making best use of the existing stock

11.40 The National Planning Policy Framework (NPPF) expects empty housing and empty buildings to be identified and brought back into use in line with local housing and empty homes strategies. As indicated in the Council's housing strategy, the Council is committed to bringing empty properties back into use.

11.41 Thanet has a substantial stock of empty property and vacant dwellings and has an active and robust programme for bringing those properties back into use. The Local Plan identifies an allowance of 540 housing units to come from empty properties being brought back into use. This is based on the position that the properties in question have been empty for a period of 4 years or more. Over that period it can be argued that those properties have been vacant and unused

for such a long period that they are no longer available in the housing market and therefore not part of the active housing stock. Such properties brought back into use are returned to the market, so can be included as new housing stock. This will need to be regularly monitored, and is dependent on the Council's Empty Homes programme continuing through the plan period.

Policy HO21 - Residential use of empty property

Proposals to bring vacant property into residential use will be approved where:

1) it is compatible with nearby uses; and
2) the proposal would not conflict with any other policy.

11.42 To complement policies aimed at increasing the overall housing stock it is important to retain the existing housing stock in such use.

Policy HO22 - Retention of existing housing stock

Proposals which would lead to the net loss of existing housing (class C3) will be permitted only where:

1) the proposal relates to the provision of community facilities for which there is a genuine local need; or
2) the residential use is not appropriately located; or
3) the building is unsuitable for residential use in its present form and is not capable of being readily improved or altered to make it suitable; or
4) subject to the heritage policies of the Plan, the proposal provides a way of protecting or utilising an important heritage asset.

Proposals for tourism or retail uses may be permitted if any of the above criterion can be satisfied and there is conformity with policies E07, or E08 (as applicable).

In all cases the proposed use should be compatible with, and cause no harm to, the character and appearance of the area and the living conditions of neighbouring residents

Ancillary accommodation for a family member

11.43 Residential annexes are a common form of development that is generally proposed in order to allow relatives to live with their family with a degree of independence. The benefits of this include:

- Allows family members to provide the care and support required
- Reduces the stress and impact on local services, ie nursing homes, home visits from care professionals etc.
- Cost effective and affordable solution to supported living
- Provides a measure of independence, while still being close to support
- Can provide accommodation for family members unable to purchase a house through the open market

In many cases, such proposals are considered to be acceptable by the Council.

11.44 However, such annexes would rarely be suited for occupation as separate living accommodation unrelated to the household occupying the main dwelling for a number of reasons including lack of self-containment, inadequate separate access, amenity space and lack of privacy.

11.45 Planning permission will therefore normally be subject to a condition to ensure that the occupation of the unit remains ancillary to the main dwelling.

Policy HO23 - Ancillary Accommodation for a Family Member

Proposals to provide an annexe for ancillary accommodation will permitted where the proposed annexe is:

- **Within the curtilage of the principal dwelling and shares its vehicular access;**
- **Is occupied only in connection with the main dwelling in single family use;**
- **Is in the same ownership as the main dwelling;**
- **Designed in such a way as to easily allow the annexe to be used as an integral part of the main dwelling when it is no longer needed for independent occupation;**
- **Has no boundary demarcation or sub division of the land between the main dwelling and the annexe;**
- **Of a scale subservient to the principal dwelling and complies with the Council's design policies.**

Fostering and Child Care Accommodation

11.46 The Council, with its key partners, is concerned about the impact of new foster homes, or similar facilities, being located in the district, and in particular, in the Cliftonville West Ward, where there is already a very high concentration of foster homes. Parts of Margate and Cliftonville experience multiple layers of risk and significant deprivation, and are the subject of substantial inter-agency efforts to improve the environment and lives of people already resident in the area.

11.47 The Margate Task Force was set up in 2010, and is a multi-award-winning, integrated team, co-located at the Council's offices, made up of 14 different agencies and 30 staff, working in two of the most deprived wards in Kent (Margate Central and Cliftonville West). MTF aims to identify the most complex social issues and deliver a joint 'street level' service to respond to risk and vulnerabilities.

11.48 There is evidence from Kent Police, the Clinical Commissioning Group, Kent County Council and others to suggest that the concentration of these premises in this area causes a range of problems, including:

- children placed in these facilities being at increased risk;
- a significant impact on, and diversion of, the resources of key agencies, undermining the delivery of core services in the area; and
- Harm to the area in which these homes are located.

11.49 Until the profile of these areas change positively, through ongoing management and planning initiatives and intervention, they are not areas which currently possess the necessary characteristics conducive to a positive fostering environment. This approach is supported by Kent Police, the Clinical Commissioning Group and Kent County Council. The policy applies to proposals which include more than 6 residents (including staff).

Policy HO24 – Fostering Homes & Childcare Facilities

Proposals for new foster homes, or similar childcare facilities, requiring planning permission, will not be permitted within the Cliftonville West Ward as identified on the Policies Map.

Proposals for foster homes, or similar childcare facilities, requiring planning permission, elsewhere in the district will be supported where the Council is satisfied, in consultation with Kent Police, the Clinical Commissioning Group and Kent County Council, that:

- **The location of the proposal will not lead to an increased risk to the personal safety and welfare of children placed in these facilities;**
- **There is no significant impact on, and diversion of, resources of key agencies through increasing intervention, undermining the delivery of core services in the area generally and weakening the availability of resources for all those in need;**
- **Proposals do not result in harm to the character of the neighbourhood and the living conditions of local residents.**

12 - Natural Environment and Green Infrastructure

12.1 Designated sites of international, national and local value and extensive areas of wetland and farmland habitat harbour both protected and priority species. Diagram 1 shows the hierarchy of these designations from international, national to local importance. International and European designations and protected species are addressed in policies (SP27 and SP30).

Diagram 1 - Hierarchy of Nature Conservation Designations

International Designations
Thanet Coast Special Area of Conservation (SAC) Sandwich Bay Special Area of Conservation (SAC) Thanet Coast and Sandwich Bay Special Protection Area (SPA) Ramsar site Margate and Long Sands Special Area of Conservation (SAC) Outer Thames Estuary Marine Special Protection Area (SPA)
National Designations
Sandwich Bay & Hacklinge Marshes Site of Special Scientific Interest (SSSI) Thanet Coast SSSI Thanet Coast Marine Conservation Zone Pegwell Bay (MCZ) National Nature Reserve (NNR)
Local Designations
Local Wildlife Sites (LWS): Monkton Chalk Pit; St Peters Churchyard; Golf Course Roughs Kingsgate; Woods and grassland Minster Marshes; Ash Level & South Richborough Pasture; Churchyard St Nicholas at Wade; Churchyard St Mary Magdalene Monkton; Ramsgate Cemetery; Cliftonville Grassland, Foreness Point. **Monkton Local Nature Reserve (LNR)** **Roadside Nature Reserves (RNR):** Cliff Promenade North Foreland, Stonelees A256, Monkton Chalk Pit, Chalkhole Farm Flete

12.2 Sites of Special Scientific Interest (SSSI) are nationally designated sites under Section 28 of the Wildlife and Countryside Act 1981, which have important wildlife or geological value. This Act as amended by the Countryside and Rights of Way Act 2000 imposes a duty on public bodies exercising statutory functions which may affect SSSIs, to take reasonable steps to further enhance the features for which the site is designated. The nationally designated sites (SSSI and National Nature Reserve), also cover the coastline, and have similar features to the international sites, including over 30 nationally rare species of terrestrial and marine plants, 19 nationally rare and 149 nationally scarce invertebrate species and roost sites for migrating and wintering birds. Thanet has two SSSIs which are Thanet Coast SSSI and the Sandwich Bay and Hacklinge Marshes, one National Nature Reserve at Pegwell Bay which straddles the District boundary with Dover. The Thanet Coast is also a designated Marine Conservation Zone.

Protection of Nationally Designated Sites (SSSI), National Nature Reserve (NNR) and Marine Conservation Zones (MCZ)

Policy GI01- Protection of Nationally Designated Sites (SSSI) and Marine Conservation Zones (MCZ)

Development which would materially harm either directly, indirectly or cumulatively, or detract from the scientific or nature conservation interest of a Site of Special Scientific Interest, National Nature Reserve or Marine Conservation Zone will not be permitted.

Exceptionally, where it can be demonstrated that the need for the proposed development is compelling and overrides the national importance of the site, and it has been demonstrated that no suitable alternative site exists, mitigating measures will be required to maintain the integrity of the site, to the satisfaction of the appropriate authority.

The proposed development will, wherever possible and appropriate, include measures to enhance and improve connectivity to designated sites.

Locally Designated Wildlife Sites

12.3 The District has habitats and geological features which are of local significance. These are designated as Local Nature Reserves, Local Wildlife Sites and Regionally Important Geological Sites. Thanet has two Local Nature Reserves located at Monkton and Pegwell Bay, and eight Local Wildlife Sites: TH01 Monkton Chalk Pit, TH07 St Peter in Thanet Churchyard, TH09 Golf Course Roughs Kingsgate, TH12 Woods and Grasslands Minster Marshes, TH13 St Nicholas-at- Wade Churchyard, TH14 St Mary Magdalene Churchyard Monkton, TH15 Ramsgate Cemetery, TH16 Cliftonville Grassland Foreness Point. These sites host locally important habitats.

12.4 There are also four Roadside Nature Reserves which have been identified for their habitats and connections to areas of rich biodiversity, and include important features such as calcareous grassland, lizard orchids and diverse populations of butterflies and dragon flies. These are TH01 Cliff Promenade North Foreland, TH02 Stonelees A256, Pegwell Bay, TH03 Monkton Chalk Pit, Monkton, TH04 Chalk Farm Flete, Margate.

12.5 The Council considers it important to protect locally designated wildlife sites and the following policy seeks to maintain the biodiversity and wildlife at these locally designated sites.

Policy GI02 - Locally Designated Wildlife Sites

Development which would have a detrimental impact on locally designated wildlife sites will not be permitted unless suitable mitigation can be provided either on or off site within Thanet. Exceptionally, where a strategic need for a proposed development is identified which outweighs the importance of the locally designated sites and cannot be located elsewhere, an equivalent area of habitat will be created elsewhere at a suitable location well related to other existing habitats.

Wherever possible and appropriate, new developments will provide a net environmental gain in accordance with Policy SP30, and include measures to enhance and improve wildlife connectivity to designated wildlife sites.

Regionally Important Geological Sites (RIGS)

12.6 Regionally Important Geological / Geomorphological Sites (RIGS) are non-statutory Earth Science sites designated by locally based RIGS groups. Thanet has three Regionally Important Geological Sites (RIGS) that are important for historical, scientific research or educational reasons. These are located at Monkton Nature Reserve, Pegwell Bay and St Peter's Quarry. Their designation is a way of recognising and protecting features for the future. The importance and significance of these sites are acknowledged through the following policy.

Policy GI03 - Regionally Important Geological Sites (RIGS)

At RIGS sites, development which would result in the loss or obstruction of geological features of importance will only be permitted where a strategic need for the proposed development is identified which outweighs the importance of the locally designated sites and cannot be located elsewhere.

Requirements for New Open Space

12.7 An Open Space Strategy was carried out in 2018 which assessed Thanet's open space provision. The results and recommendations are set out in Table 12 which shows a deficit in all typologies against the Field in Trust guidelines. The following policies seek to deliver these recommendations for open space provision in new development. Further advice is given in Chapter 4 Environment Strategy. This sets out the intention of the Council to apply the Fields in Trust Guidelines to new developments in line with the draft recommendations in the strategy.

12.8 Table 12 sets out the provision guidelines, tables 10 and 11, set out the accessibility criteria and the Quantity Benchmark Guidelines for equipped/designated play space, respectively.

Table 10: Fields in Trust Accessibility Criteria

Open Space typology	**Walking guideline (Walking distance metres from dwellings)***
Parks and Gardens	710m (approximately 10 minutes)
Natural and semi natural greenspace	720m (approximately 10 minutes)
Amenity greenspace	480m (approximately a 6 minute walk)
Equipped/designated play areas	LAPs 100m LEAPs 400m NEAPs 1,000m
Other Outdoor provision MUGAs and skateboard parks	700m

*Accessibility guidelines are provided as walking distance from dwellings. Indicative walking distances can be determined from the accessibility guidelines as set out below.

- 250m = 2 - 3 minutes' walk
- 400m = 5 minutes' walk
- 800m = 10 minutes' walk
- 1,200m = 15 minutes' walk
- 1,600m = 20 minutes' walk

Table 11: Recommended Application of Quantity Benchmark Guidelines - Equipped / Designated Play Space

Scale of development no. of dwellings	**LAP**	**LEAP**	**NEAP**	**MUGA**
5-10	Y			
10-200	Y	Y		Contribution
201-500	Y	Y	Contribution	Y
501+	Y	Y	Y	Y

Source: Fields In Trust - Guidance for Outdoor Sport and Play Oct 2015

Table 12: Requirements for New Open Space

Open Space typology	Existing provision Total no. of sites	Ha	Current provision ha/1000	Fields in Trust guidelines	Requirement by 2031	Projected Deficit / oversupply 2031
Amenity Greenspace	137	67.11	0.52	0.6ha per 1,000 per population	96.9	-29.79
Provision for children and young people	31	3.61	0.03	0.25ha per 1,000 population	40.38	-76.77
Allotments	16	24.46	0.17	0.2ha per 1,000 population	32.3	-7.84
Natural and semi-natural greenspace	14	100.51	0.71	1.8ha per 1,000 population	290.7	-190.19
Public parks and gardens	26	74.54	0.53	0.8ha per 1,000 population	129.2	-54.66

Amenity Green Space and Equipped Play Areas

12.9 Thanet's three main coastal towns each have a 'flagship' playground, as well as other standard playgrounds. There are currently also five skate parks in Thanet.

12.10 The cumulative impact of smaller housing developments and population increase will put pressure upon existing amenity green spaces and existing play facilities. With the drive to provide more housing on brownfield land in urban areas, whether it is new build or conversion, 'smaller' sites are likely to be developed. New family housing should provide gardens to ensure the provision of "doorstep" playspace. High quality areas of amenity space and children's play areas will contribute to quality of life and help social interaction.

12.11 Children's playspace should be adequately equipped and safely and conveniently available to all new residential developments of a size and type likely to meet the new demand. The location of facilities should, however, take into account the potential impact of noise and other disturbance on neighbouring properties. In addition to play space for younger children, facilities for teenagers should also be considered. New development will be expected to make provision for amenity green space and equipped play areas in line with the Fields in Trust guidelines as set out in tables 10, 11 and 12 and the approach set out in chapter 4. Provision will also need to be made for the continued maintenance of such facilities.

12.12 The provision of open spaces should be considered at an early stage in the design process and consider:

- accessibility in terms of highway safety and proximity to dwellings served
- security of children using amenity space and play areas (including whether the site and access to it is overlooked by dwellings) and
- Convenience of siting in relation to noise sensitive development (e.g. dwelling units designed for, or particularly suited to, occupation by the elderly).
- Making provision for biodiversity through appropriate landscaping schemes
- Addressing climate change for example, considering the effects of extreme temperatures through the provision of shaded areas by planting trees

12.13 The Planning Obligations & Developer Contributions Supplementary Planning Document (SPD) gives details of how financial contributions can be made towards the upkeep and maintenance of existing play areas if on site provision is not possible. The SPD will be subject to review if the Council implements the Community Infrastructure Levy. The following policy seeks to ensure the recommended provision of amenity and children's play space is provided for.

Policy GI04 - Amenity Green Space and Equipped Play Areas

New residential development will make provision for appropriate amenity green space and equipped play areas to meet the standards set in tables 10, 11 and 12. The type and amount of open space to be provided will depend on:

1) the size and location of the development;
2) existing open space provision near the development site; and
3) the number of people likely to live in the proposed development.

New family dwellings* will be expected to incorporate garden space in order to provide a safe "doorstep" play area for young children.**

In exceptional circumstances where it would be impractical to provide adequate and suitably located playspace as part of the development, then a financial contribution may instead be acceptable to offset the costs resulting from the additional use and need for increased maintenance and play equipment at suitably located existing playspaces and amenity areas.

The developer will be responsible for the funding and arrangement of the ongoing maintenance and management of amenity and play areas which will be secured through a legal agreement.

*Family dwellings are considered to be those having two or more bedrooms.

** Doorstep playspace is defined as playspace for young children which is immediately adjacent to, closely visible and safely accessible from the dwellings served.

Outdoor Sports Facilities

12.14 The National Planning Policy Framework (NPPF) states that planning policies should plan positively for the provision of sports venues, guard against the unnecessary loss of facilities and that access to high quality open spaces and opportunities for sport and recreation

can make an important contribution to the health and well-being of communities.

12.15 Outdoor sports facilities include pitches, greens, courts, athletics tracks and miscellaneous sites such as croquet lawns and training areas. These also include facilities owned by the local authority, education authorities or facilities within the voluntary, private or commercial sectors that serve the outdoor leisure needs for their members or the public.

12.16 The Open Space Strategy (2018) includes a more up to date assessment of the current provision of sports facilities and sets out the requirements for future provision.

12.17 The Council will seek financial contributions from developers for the provision of new facilities or the upgrade or renewal of existing facilities where on site provision of outdoor sports facilities is not possible. For new provision, the Council have regard to the Sport England Sports Facility Calculator when preparing proposals to determine the need generated by their development. The Planning Obligations & Developer Contributions Supplementary Planning Document gives details of how financial contributions can be made and how they will be calculated.

Protection of Playing Fields and Outdoor Sports Facilities

12.18 The important contribution that sport and recreation, as well as community facilities, can make in improving people's quality of life is now widely accepted. Participation in sport and recreation can improve the health and well-being of an individual, whilst sports clubs and community facilities can improve social interaction and provide a sense of community pride.

Policy GI05 - Protection of Playing Fields and Outdoor Sports Facilities

Built development will not be permitted on playing fields or on land last used as a playing field unless one or more of the following applies:

1) **it is demonstrated that there is an excess of playing field provision in the area, for current and future uses of both the school and the community; or**
2) **the proposed use is ancillary to the primary use as a playing field and does not affect the quantity or quality of pitches or adversely affect their use; or**
3) **the proposed development is on land incapable of forming a pitch or part of a pitch and does not result in the loss of, or inability to make use of, a pitch; or**
4) **the playing field or fields that would be lost as a consequence of the proposed development would be replaced, prior to the commencement of the development, by a playing field or fields of at least a similar or improved quality and size in a suitable nearby location and subject to equivalent or improved management arrangements; or**
5) **the proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to sport and recreation as to outweigh the detriment caused by the loss of the playing field or playing fields**

In each case the playing field should not make an important visual contribution to the amenity of the area and its loss should not be detrimental to the character of the area.

Landscaping and Green Infrastructure in New Developments

12.19 A positive natural environment can have economic benefits by making the area a place where people want to live. New developments should contribute to and enhance the natural environment.

12.20 Green infrastructure can be created through landscaping and design by providing wildlife corridors and stepping stones in new developments, creating links between existing habitats. This can contribute to people's health and well-being by keeping people in touch with their natural environment, providing opportunities for residents to manage their local environment and reinforce a sense of community.

12.21 Landscaping can create a pleasant setting for development, provide shade from the sun and pollution attenuation as trees and shrubs absorb water and dust. It should be an integral part of the design of a development, rather than consisting of 'offcuts' of leftover land or as a way of camouflaging poor design.

12.22 Landscaping designs should, in the first instance, be related to each plot of land so that each future owner would be responsible for its upkeep, reducing the burden on Council resources. If this is not possible or desirable, commuted payments through legal agreements may be negotiated in appropriate circumstances. Accordingly, landscaping matters should be considered at the earliest stages of the design process. For developments that fall within the identified landscape character areas, further guidance is available within the landscape strategy for each character areas in the 2017 assessment.

12.23 Thanet has relatively few trees. The Council will therefore seek to retain existing trees as part of any proposed developments through the making of Tree Preservation Orders and through use of planning conditions where appropriate. British Standard BS5837: 2012 (Guide for Trees in Relation to Design, Demolition and Construction) gives guidance regarding the best approach to new site development in relation to existing trees.

12.24 The Council seeks to retain hedges and other semi-natural habitat, such as ponds and species-rich grassland, together with new planting, as they lend maturity to a development and can enhance biodiversity and wildlife habitats, through the following policy.

Policy GI06 - Landscaping and Green Infrastructure

Major development proposals and all other proposals which are likely to have significant landscape implications shall be supported by a landscape survey. The landscape survey should describe the current landscape features on the application site, and demonstrate how the proposed development will provide landscaping and Green Infrastructure to enhance the setting of the development, where possible and appropriate, to:

- **Retain historic features including boundaries and layouts**
- **Create new wildlife corridors and stepping stones**
- **Soften hard building lines and the impact of new buildings**
- **Create an attractive environment for users and occupiers**
- **Establish a sense of enclosure with hedges and trees**

- **Provide screening from noise and sun**
- **Create new wildlife habitats and improve biodiversity including the integration with surface water management**
- **Improve connectivity between new and existing features**

The developer will need to satisfy the Council that adequate arrangements to ensure continued maintenance of landscaping has been made. The Council may seek to secure arrangements for this purpose through a planning agreement.

12.25 Jackey Bakers sports ground is Thanet's main area for sports and recreation purposes. The site provides the best opportunity to both enhance existing facilities, and in the longer term, to increase the level of facilities.

12.26 Any new sports development may be supported by a limited development of D2 (leisure facilities) or A3 (restaurants) or D1 (community facilities) uses to subsidise the sporting use and ensure it is viable. Any such proposal will need to be subject to a full justification being made when any application is submitted and will be judged against the amount of land retained for open sporting purposes. There are current proposals for a new astro-turf pitch and pavilion with changing facilities.

Policy GI07 - Jackey Bakers

Jackey Bakers sports ground will be promoted as the long-term primary sports venue for Thanet. Proposals which will provide a 3G pitch and improve the facilities for football, rugby, hockey and other sports will be supported. Proposals will need to include a new clubhouse with improved changing and social facilities.

Where fully justified, the Council will permit ancillary development on order to maintain the sports use. This could include limited development of D2 (leisure facilities), D1 (community facilities) and A3 (restaurant facilities).

13 - Quality Development

Sustainable Design

13.1 Sustainable design can make an important contribution to sustainable development and aid a reduction in carbon emissions. The Government's approach to reducing carbon emissions is evolving. There are a number of measures that can be considered in the design of new development that will help reduce energy consumption and provide resilience to increased temperatures, such as:

- the use of landform
- layout
- provision of adequate space for recycling and composting
- building orientation to maximise summer cooling through natural ventilation in buildings and increasing passive solar gain
- tree planting
- landscaping

13.2 Landscaping can be particularly beneficial as it can provide stepping stones, wildlife corridors or new habitats, and contribute to Thanet's Green Infrastructure network. In terms of adapting to climate change, integrating vegetation (i.e. planting on building walls and roofs) can help to reduce solar gain as vegetation has a much higher reflective capacity than masonry, as well as providing a cooling effect through evapo-transpiration. Planting can also help mitigate against poor air quality by presenting a large surface area for filtering air. A large tree can deliver the same cooling capacity as five large air conditioning units running for 20 hours a day during hot weather. New planting can help provide more comfortable, cooler spaces via summer shading.

13.3 Within the context of an established development pattern, the most significant change likely to generate demand for travel will result from new housing development. It is necessary, therefore, to consider the location of development in areas accessible to a range of services on foot and by public transport, preventing urban sprawl and improving local high streets and town centres. Methods such as providing showers and changing facilities in employment related development and locating cycle parking close to town centres/entrances will also help reduce the need to travel by car.

13.4 Building insulation is a simple way of maximising energy efficiency and thereby reducing energy demands. Poor insulation is one of the leading causes of energy wastage in homes. In areas of deprivation this can lead to households being in fuel poverty. The definition of Fuel Poverty is when a household has to spend 10% or more of its income on energy to maintain acceptable levels of warmth. This is considered to be a temperature of 21°C- 23°C in the main living area of a home and 18°C in other areas. Fuel poverty is influenced by three key factors - the cost of fuel, the income of the household and the energy efficiency of the home. The energy efficiency of the home is one area that planning can influence through policy.

13.5 The latest figures from Department for Business, Energy and Industrial Strategy 2015 (updated 2017) for Thanet show that 11.3% households in Thanet were defined as being fuel poor which has increased from 10.3% in 2013 (DECC figures) Source: DECC Fuel Poverty Statistic 2013 (Low Income High Cost model indicator)

(https://www.gov.uk/government/collections/fuel- poverty-statistics#2013-statistics)

13.6 In addition, since the introduction of Energy Performance Certificates in 2007, the District is still only achieving low levels of A to C energy efficiency in new builds for example, 0.4% of EPCs lodged in 2016 achieving an "A" energy rating, 7% achieving EPC rating B and 22% achieving energy rating C. *Source: https://www.gov.uk/government/statistical-data-sets/live-tables-on- energy-performance-of-buildings-certificates*

13.7 To help reduce fuel poverty and improve the energy rating, all new homes should seek to maximise energy efficiency through improved insulation eg roof, wall, floor insulation and energy efficient windows. Other initiatives can include on site options such as LED street lights, photovoltaic (solar) panels, electric vehicle charging, near site options - eg financial contributions towards site based district heating scheme, retro fitting of low/zero carbon technologies to local communal buildings. Off-site options - investment in energy from waste plants, investment in district heating pipe work. These are addressed in the Climate Change chapter.

13.8 For existing residential developments there are a number of other initiatives such as the Kent and Medway Warm Homes scheme which is a partnership project between Kent County Council and district councils to support residents in Kent and Medway to save energy in their home. In addition Kent Housing Group consulted on the Kent Fuel Poverty Strategy in 2016 and is producing an Action Plan.

13.9 The requirements to provide these could have an impact on the viability of development in Thanet. The Council commissioned a Whole Plan Viability Study to ensure that policies in the Plan and has concluded that development in Thanet remains viable after taking these requirements into account.

13.10 The following policy seeks to ensure that new development achieves the necessary levels of sustainable design and construction and should be read in conjunction with the policy on the new technical standards.

Policy QD01 - Sustainable Design

All new buildings and conversions of existing buildings must be designed to reduce emissions of greenhouse gases and have resilience to function in a changing climate. All developments will be required to:

1) **Achieve a high standard of energy efficiency to the equivalent of Level 4 of the Code for Sustainable Homes (subject to HE05 where applicable). Where viability is an issue, it will be incumbent on an applicant to demonstrate to the satisfaction of the Council why this standard cannot be achieved.**
2) **Make the best use of solar energy passive heating and cooling, natural light, natural ventilation and landscaping.**
3) **Provide safe and attractive cycling and walking opportunities to reduce the need to travel by car.**

All new buildings and conversions of existing buildings must be designed to use resources sustainably. This includes, but is not limited to:

4) **Re-using existing buildings and vacant floors wherever possible;**
5) **Designing buildings flexibly from the outset to allow a wide variety of possible uses;**
6) **Using sustainable materials wherever possible and making the most sustainable use of other materials;**
7) **Minimising waste and promoting recycling, during both construction and occupation.**

General Design Principles

13.11 The historic environment can add value to new development by creating a sense of place and distinctiveness. New developments need to be designed in a way that respects and complements their surroundings, and enhance areas that are less attractive. There are many areas in Thanet which are considered to possess certain valuable qualities such as their open form of development, the separation between buildings and the positive contribution made by landscaping. The design, scale and grouping of existing buildings, the spaces between them, the texture, type and colour of materials, enclosure, land contours and views all contribute to the character and identity of a place. An attractive well-designed environment can foster economic regeneration. Heritage England provides advice and guidance on Heritage and Sustainable Growth. Materials should normally be of a local type and harmonise with those of adjoining development (where these present a pleasing appearance). Architectural style should respect that of other development in the locality. Innovation in decoration can, if sensitively considered, enhance the identity and character of a building and place. New innovative modern design will be acceptable where it reflects local context and distinctiveness, is fit for purpose and exhibits durability.

13.12 Buildings and the spaces around them should be thought about holistically, with the landscape and public realm, including open space provision, being as important as the building itself. Successful landscape design will integrate development into its surroundings and enhance the function, character and amenity value of spaces and boundaries. Taking account of existing landscape features, such as trees, is crucial in creating high quality and responsive schemes. Existing trees can provide a sense of maturity to new developments and play an important role in softening and integrating development into the district. Landscape design extends beyond the curtilage of new buildings to include streets, parks and other open spaces and should help to support an attractive and high quality public realm. This policy does not seek to control the design of individual gardens unless these are a key part of a heritage asset.

13.13 Well-designed open spaces and parks not only help to create a high quality environment but they help to encourage a more active lifestyle thereby improving the health of the local community. The Open Space Strategy 2017 highlights that one of the key issues facing the district is relating to health with 68.4% of residents being classed as having weight issues which are "excessive" and "obese". In order to meet the objective of promoting the physical and mental well-being of the community as set out Strategic Priority 4, the Council will expect developers to have regard to the Active Design Guidance produced by Sport England. This sets out 10 principles of active design which have been identified by drawing from urban design practice and practical examples to promote environments that offer individuals and communities the greatest potential to lead active and healthy lifestyles. The 10 principles are: activity for all; walkable communities; connected walking and cycling routes; co-location of community facilities; network of multifunctional open space; high quality of street and spaces; appropriate infrastructure; active buildings; management maintenance monitoring and evaluation; and

activity promotion and local champions.

13.14 Landscape proposals should result in high quality amenity spaces, which receive adequate sunlight (in accordance with best practice guidance) and which work with the buildings to help define thresholds and boundaries and to provide opportunities for private usable amenity space through gardens, roof terraces and balconies.

13.15 Maintenance and management plans must be provided with any proposals and considered early in the design process. Schemes which include species that support local distinctiveness enhance biodiversity and cope with climatic changes will be supported.

13.16 The function of a building is a major determinant of its built form. However, a principal aim in designing new development should be to respect and complement the merits of existing built and natural features including landscape, while still expressing and accommodating the function of the building through design.

13.17 Some buildings (e.g. public buildings) need to be of larger scale than others. However, the scale and proportion of existing development should generally be respected. It may be possible to break down the bulk of a large building (e.g. by insertion of horizontal design features) to achieve a satisfactory appearance in relation to adjoining plot widths and proportions and to break bland expanses down to a scale sympathetic to that of existing buildings.

13.18 Density is a measure of the number of dwellings which can be accommodated on a site or in an area and can affect the appearance and characteristics of development in the following ways:

- The space between buildings
- Amenity and private access
- Parking
- Provision/retention of trees and shrubs
- Levels of surface water run off

13.19 Some parts of Thanet are already densely developed. Former holiday areas such as Cliftonville have seen significant numbers of conversions of large buildings (often previously used as hotels) into flatted accommodation which has, in some cases, had a detrimental impact due to small, poor quality developments, absent landlords, and a transient population. To help address this, the Council will implement the optional internal space standards as set out in Policy QD04. Other areas of the district benefit from lower density developments. The density of residential developments is not prescribed in this Plan, as, in all instances, the compatibility with the character of the area and the mix of housing to meet local needs or demand will influence design and layout.

13.20 The National Planning Policy Framework (NPPF) states that local planning authorities should consider policies to resist inappropriate development of residential gardens where development would cause harm to the local area.

13.21 In Thanet, applications have been refused for development on garden land due to the impact the proposal would have on the character and appearance of the area. Some parts of the district enjoy a high quality environment, with spacious surroundings, and development within a garden could have a detrimental effect. Residential gardens also form part of Thanet's

Green Infrastructure providing biodiversity and wildlife habitats. However, there could also be instances where a development within a garden could be in keeping with the pattern of development, forms part of a comprehensive development, enhances the streetscene, or is situated where the property would be a frontage development.

The following policy seeks to ensure all new development respects and enhances local character.

Policy QD02 - General Design Principles

The primary planning aim in all new development is to promote or reinforce the local character of the area and provide high quality and inclusive design and be sustainable in all other respects. Development must:

1) **Relate to the surrounding development, form and layout and strengthen links to the adjacent areas.**
2) **Be well designed, respect and enhance the character of the area paying particular attention to context and identity of its location, scale, massing, rhythm, density, layout and use of materials appropriate to the locality. The development itself must be compatible with neighbouring buildings and spaces and be inclusive in its design for all users.**
3) **Incorporate a high degree of permeability for pedestrians and cyclists, provide safe and satisfactory access for pedestrians, public transport and other vehicles, ensuring provision for disabled access.**
4) **Improve people's quality of life by creating safe and accessible environments, and promoting public safety and security by designing out crime.**

External spaces, landscape, public realm, and boundary treatments must be designed as an integral part of new development proposals and coordinated with adjacent sites and phases. Development will be supported where it is demonstrated that:

5) **Existing features including trees, natural habitats, boundary treatments and historic street furniture and/or surfaces that positively contribute to the quality and character of an area are should be retained, enhanced and protected where appropriate.**
6) **An integrated approach is taken to surface water management as part of the overall design.**
7) **A coordinated approach is taken to the design and siting of street furniture, boundary treatments, lighting, signage and public art to meet the needs of all users.**
8) **Trees and other planting is incorporated appropriate to both the scale of buildings and the space available, to provide opportunities for increasing biodiversity interest and improving connectivity between nature conservation sites where appropriate.**

Residential development on garden land will be permitted where not judged harmful to the local area in terms of the character and residential amenity, the intrinsic value of the site as an open space is not considered worthy of retention, and will not conflict with any other requirements of other design policies and Policy HO1.

Living conditions

13.22 The increasing dominance of private housing and policies to maximise use of land have caused concern about homes having levels of "liveable" space. Where homes are of a substandard size people may be forced into buying them because of lack of alternatives and as a result do not stay in them long before they find they have to move on. This can be disruptive especially for families with young children and can affect education if children are having to move schools frequently, also inhibits community cohesion and "putting down roots". Application of the national spaces standards can help to address this.

13.23 There are opportunities to facilitate meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity. Safe and accessible developments with clear and legible pedestrian routes and high quality open space will also help achieve this by encouraging the active and continual use of public areas.

13.24 Designing out crime and designing in community safety should be central to the planning and delivery of new development. Section 17 of the Crime and Disorder Act 1998 places a duty on councils to do all they reasonably can to reduce crime and disorder locally and improve people's quality of life as a result. New developments will need to demonstrate that their design has sought to introduce measures to reduce crime and address the needs of public safety. Design can help achieve a safer environment including in the following ways:

- Well defined routes, spaces and entrances
- Ensuring different uses do not conflict
- Ensuring publicly accessible spaces are over-looked
- Places that promote a sense of ownership
- Physical protection (i.e. security features)
- Places where human activity creates a sense of safety
- Future management and maintenance

Policy QD03 - Living Conditions

All new development should:

1) **Be compatible with neighbouring buildings and spaces and not lead to the unacceptable living conditions through overlooking, noise or vibration, light pollution, overshadowing, loss of natural light or sense of enclosure.**
2) **Be of appropriate size and layout with sufficient usable space to facilitate comfortable living conditions and meet the standards set out in QD04.**
3) **Residential development should include the provision of private or shared external amenity space/play space, where possible.**
4) **Provide for clothes drying facilities and waste disposal or bin storage, with a collection point for storage containers no further than 15 metres from where the collection vehicle will pass.**

Technical Standards

13.25 In March 2015, the Government introduced new technical standards covering water usage, internal space requirements, accessibility and adaptability. In respect of water efficiency, the Planning Practice Guidance states that where there is a clear local need, local planning authorities can require new dwellings to meet the tighter building regulations optional requirement of 110 litres/person/day, rather than the 125 litres/person/day. Thanet is within a water stress area as identified by the Environment Agency in their publication "Water Stressed Areas Final Classification July 2013". Both the Environment Agency and Southern Water support a reduction in daily usage per person/day for internal use in water stressed areas therefore new developments will be expected to meet the water efficiency optional requirement of 110litre /person/day.

Internal space standards:

13.26 Paragraph 50 of the National Planning Policy Framework states that local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. The National Planning Practice Guidance further qualifies this by recommending that where a local planning authority wishes to require an internal space standard they should do so by reference in their local plan (paragraph 18).

13.27 The Council believes that everyone has the right to a high standard of residential accommodation with sufficient space to meet their own needs. There has been a general trend for houses today to be comparatively smaller than ones built a hundred years ago and these trends have led to calls for the introduction of national space standards for housing. The requirement of a minimum space standard can add to the attractiveness of the development and increase the marketability of properties, thereby widening the potential sale and rental markets. The Council has successfully applied a standard for flat conversions as part of the Cliftonville Development Plan Document, where small room sizes were an issue in connection with flat conversions. (Conversion to Flats Guidelines - 1988).

13.28 In order to ensure that new housing is built to a high standard of design and provide adequately for the changing needs of future occupants thereby improving the quality of life, the Council is intending to implement the National Described Space Standard (March 2015).These are replicated in table 13 for ease of reference. The policy will apply to all tenures and it will be up to the applicant to demonstrate why these standards cannot be met within their development.

Table 13 - National Described Space Standards

Number of bedrooms (B)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37)*	-	-	1.0
	2p	50	58	-	1.5
2b	3p	61	70	-	2.0
	4p	70	79	-	
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

13.29 It certain circumstances it may be necessary to make an exception to development meeting these standards e.g. in the conversion of historic buildings where the implementation of the standard would be detrimental to the character and integrity of the building. In such circumstances the applicant will be required to demonstrate the case for not meeting these standards.

Policy QD04 -Technical Standards

All new development will be expected to meet the new technical standards as follows:

1) internal space standards as set out in Table 13;
2) water efficiency standard of 110litres/person/day.

Accessible and Adaptable Accommodation

13.30 Paragraph 7 of the NPPF states that one of the three dimensions to sustainable development is a social role which should support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being. Paragraph 50 further states that local authorities should deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. Local planning authorities should also plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).

13.31 The District has an ageing population base and the recent 2014 based Sub-National Population Projections (published May 2016) project that the 60+ age group in Thanet will grow by 39% from 41,000 in 2014 to 57,000 by 2031. This has implications for the demand for different types of housing and meeting the needs of an ageing population in situ. An increase in the elderly population can be expected to result in an increase in people with dementia and mobility problems. The SHMA estimated that the number of people with a long term health problem or disability will increase by 32% over the Plan period. It is important that sufficient homes are built that have the flexibility to adapt to the range of life stages of the occupants. Some of these households will inevitably require adaptions to properties to provide the flexibility to accommodate their changing needs whilst others may require more specialist accommodation or support. There is clear evidence of need for properties which are capable of accommodating people's changing needs. This general trend can be evidenced from the Council's housing register (September 2016) which shows that there are 51 households on the register who are dependent on a wheelchair and a further 73 households who use a wheelchair for part of the day. Therefore there are currently 124 households currently in need of wheelchair adaptable accommodation. However, this may not include those households who currently have mobility problems and may become dependent on a wheelchair in the future.

13.32 The increase in persons with a long-term health problem/disability, as evidenced by the SHMA, together with the Council's own data from the housing register, provides clear evidence of a need for adaptable homes. The SHMA recommends that on this basis, the Council should consider whether it should require a proportion (such as 10%) of new homes to be wheelchair-accessible or whether new housing should be built to new National Housing Standards.

13.33 In order to meet the changing needs of this increasing age group, the Council will encourage developers to consider the future needs of households when designing residential units. The Council requires as a minimum, 10% of all new development should be designed to building regulation optional requirement M4 (2) accessible and adaptable dwellings. In respect of the new Building Regulation optional requirement M4 (3) wheelchair user dwellings, the

Council will require a proportion of new dwellings to meet this standard based on local need relating to the number of households requiring wheelchair adaptable homes in suitable locations, that are currently on the Council's housing register. This supports the general aim of the Plan to improve the quality of life and health of the residents of the District and ensuring a high standard of design. These standards aim to future proof new development in a sustainable way ensuring adaptability to changing needs and achieving longevity of design.

Policy QD05 - Accessible and Adaptable Accommodation

Accessibility provision in new developments as required by Building Regulations Part M4 shall be provided as follows:

1) **10% of new build developments will be expected to be built in compliance with building regulation part M4(2) accessible and adaptable dwellings;**
2) **5% of the affordable housing units on housing developments will be expected to be built in compliance with building regulations part M4(3) wheelchair user dwellings.**

The above requirements will only be reduced if it would make the proposed development unviable or site specific factors prevent their inclusion.

13.34 The technical standards have been assessed in the viability study and no viability issues have been identified. Only in exceptional circumstances will the Council consider deviations from the space and accessibility standards for example where there are viability concerns, or the practical implementation will affect the character or have a detrimental impact on a local heritage asset. If viability is thought to be an issue with a particular development the Council will assess viability considerations in line with the implementation Policy SP02.

Advertisements

13.35 Some advertisements need advertisement consent, and it is important that they are controlled through planning policy as they can form an integral part of the streetscene or they can be intrusive and discordant. It is also important to make sure that they are not a danger to the public or highway safety. It is particularly important to consider their impact when they are located in conservation areas.

Policy QD06 - Advertisements

Applications for advertisements will be considered in relation to their effects upon amenity and public safety. Regard will be paid to the surrounding location, manner of illumination (if proposed), material composition, design and relationship to the land, building or structure to which they are to be affixed. Advertisements should not dominate but should be in balance with the character, townscape and architecture of the buildings on which they are situated. Regard should be paid to the proximity of any listed buildings or structures, and any impact to their setting.

In and adjoining conservation areas the Council will require that the design and siting of advertisements does not detract from, and preferably makes a positive contribution to, the character and/or appearance of the area.

Telecommunications

13.36 The National Planning Policy Framework (NPPF) states that when preparing local plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband.

13.37 Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications is continuing to grow. The Council is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is the Council's aim to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.

Policy QD07 - Telecommunications

Proposals for telecommunications development will be permitted provided that the following criteria are met.

1) **the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character and appearance of the surrounding area;**
2) **if on a building, apparatus and associated structures should be sited and designed to minimise impact to the external appearance of the host building:**
3) **if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the Council;**
4) **if proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.**

When considering applications for telecommunications development, the Council will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.

14 - Heritage

Archaeology

14.1 Thanet, the former island located at the north eastern point of Kent and in close proximity to continental Europe, has long been a gateway to new settlers, ideas, trade and custom into Britain and on the frontline of invasion and defence. Some of the great events in the nation's early history have taken place in or close to Thanet including the arrival of the Romans, Anglo-Saxons and Christianity. The result is an incredible wealth of archaeological remains throughout the island dating from earliest prehistoric times to the present day. Across Thanet's towns, villages and countryside, archaeological investigation is regularly making new discoveries of remains that are of regional and national importance and that in many cases exhibit a character that is unique to the former island. The archaeology of Thanet stands comparison with any area of the country.

14.2 Much of Thanet's archaeology lies shallowly buried beneath the plough soils of the island's agricultural lands. Here aerial photography and top soil stripping ahead of major infrastructure and other development works has in recent years revealed extensive buried archaeological landscapes, particularly of prehistoric, Roman and Anglo-Saxon date, that are changing our understanding of settlement and other activities at those times. Within the towns and villages, as well as remains of these earlier periods are often found remains, sometimes more deeply buried, associated with the medieval development of the settlements and extending through their periods of growth and industrial development to their 19th and 20th century prominence. Elsewhere across Thanet can be found buried and standing remains associated with the defence of the coast and the former airfield at Manston, the industrial heritage of the area and the development of the historic landscape. Much of this rich archaeological resource can be particularly vulnerable to new development both in undeveloped and brownfield sites.

14.3 It is not possible for this summary for the Local Plan to provide a comprehensive overview of the archaeology of Thanet, however particular themes particularly relevant for land-use planning are:

- Deposits and features associated with the formation of the island and the creation of the Wantsum Channel and its later reclamation for agricultural land;
- The evidence of early hunter gatherer peoples on Thanet which can be seen in the Pleistocene deposits of the island particularly at Pegwell Bay and Manston;
- The rich and extensive ritual and funerary buried landscapes of the Neolithic and Early Bronze Age periods. Particular highlights are the major monuments of the causewayed enclosures at Chalk Hill, Pegwell and the remains of hundreds of late Neolithic and Bronze Age barrows;
- Extensive buried landscapes of the settlements, farmsteads, trackways and agricultural lands of the later prehistoric peoples of Thanet. Recent investigations on major development schemes such as East Kent Access 2 and Thanet Earth have illustrated the layout and development of large tracts of the later prehistoric landscape. Evidence of major enclosed sites has been found in several places for example North Foreland, Dumpton, Pegwell Bay and Fort Hill, Margate;
- A rich Romano-British landscape that saw the development of villa estates (for example at Tivoli and Minster), a pattern of coastal and inland settlement that saw the construction of

sunken-featured buildings of a type rarely found outside Thanet, linked by a network of roads and trackways, and the establishment of small cemeteries of both inhumation and cremation burial rites. The inhabitants of Thanet at this time would have borne witness to the arrival and departure of the Romans at nearby Richborough and lived under the influence of that major port of entry;

- The arrival of the Anglo-Saxons is celebrated in Thanet through the tradition of the arrival of Hengist and Horsa (AD 449) at Ebbsfleet near Cliffsend. Remains of the new settlers can be seen in the rich cemeteries that can be found throughout the island and the occasional evidence of dispersed settlement that has been found on a number of sites and is difficult to locate other than through stripping of large areas;
- AD 597 saw the arrival in Thanet of a mission from Pope Gregory in Rome led by the monk Augustine. The growth of the church and its influence on Thanet can be seen in the establishment of the convent at Minster, the presence of a number of monastic granges and parish churches. Evidence for the early development of the villages can also be traced in the fabric of surviving historic buildings and buried deposits in the core of the settlements.
- Archaeological deposits connected with the origins and development of Thanet's main towns of Margate, Broadstairs and Ramsgate, their ports and development as 19th and 20th leisure resorts survive both in the ground and the fabric of the standing remains. Large numbers of wrecks are present around the coast e.g. Goodwin Sands.
- Remains of coastal and other anti-invasion defences and the important military and civilian airfield at Manston which had its origins in the First World War and continued as an important military airfield into the Cold War.

14.4 In response to their likely potential impact on important archaeological remains, the Council considers it essential for new development proposals to assess and understand the effect that they may have on the significance of archaeological remains whether known or as yet undiscovered. Because Thanet's heritage is such a valuable and irreplaceable resource the following policy applies.

Policy HE01 - Archaeology

The Council will promote the identification, recording, protection and enhancement of archaeological sites, monuments and historic landscape features, and will seek to encourage and develop their educational, recreational and tourist potential through management and interpretation.

Developers should submit information with the planning application that allows an assessment of the impact of the proposal on the significance of the heritage asset. Where appropriate the Council may require the developer to provide additional information in the form of a desk-based or field assessment. Planning permission will be refused without adequate assessment of the archaeological implications of the proposal.

Development proposals adversely affecting the integrity or setting of Scheduled Monuments or other heritage assets of comparable significance will normally be refused.

Where the case for development which would affect an archaeological site is accepted by the Council, preservation in situ of archaeological remains will normally be sought. Where this is not possible or not justified, appropriate provision for investigation and recording will be required. The fieldwork should define:

1) **the character, significance, extent and condition of any archaeological deposits or structures within the application site;**
2) **the likely impact of the proposed development on these features;**
3) **the means of mitigating the effect of the proposed development.**

Recording should be carried out by an appropriately qualified archaeologist or archaeological contractor and may take place in advance of and during development. No work shall take place until a specification for the archaeological work has been submitted and approved by the Council. Arrangements must also be in place for any necessary post- excavation assessment, analysis and publication of the results, and deposition of the archive in a suitable, accessible repository.

Development in Conservation Areas

14.5 Conservation areas are designated by the Council where there is a valued distinctive character which the Council considers deserve special protection. Key elements of a conservation area include the architectural design or historic interest of buildings; the materials, colour and texture; the contribution of green and open spaces; street patterns and spaces between buildings; and views in and out of the area. The Council will review the boundaries of existing conservation areas and will consider the designation of new conservation areas as necessary and as resources allow.

14.6 The Council will not permit development which fails to retain those essential features upon which the character of a conservation area depends. These features may include natural features, trees, hedges, walls, fences, open areas and ground surfaces, as well as buildings and groups of buildings.

14.7 The character of conservation areas depends on the relationship of buildings to each other and their settings, in the local and wider context. The effect of a proposed development on the character or appearance of a Conservation Area is always a material consideration in the determination of planning applications. All development should preserve or enhance that character or appearance or local distinctiveness. It is also important that the spaces around and within the conservation area are retained, where they add to its character. The first step in the design process must, therefore, be an appraisal of the qualities of the area and the opportunity to reflect and improve on them. Such an appraisal should be submitted as part of a planning application.

14.8 Particular attention should be paid to conserving attractive views out of and into the area, including those from more distant or higher vantage points. Consideration should also be given to the assessment and mitigation against any negative impact the proposal might have on the townscape, roofscape, skyline and landscape.

Policy HE02 - Development in Conservation Areas

Within conservation areas, development proposals which preserve or enhance the character or appearance of the area, and accord with other relevant policies of this Plan, will be permitted, provided that:

Proposals for New Buildings

1) They respond sympathetically to the historic settlement pattern, plot sizes and plot widths, open spaces, streetscape, trees and landscape features;
2) they respond sympathetically to their setting, context and the wider townscape, including views into and out of conservation areas;
3) the proportions of features and design details should relate well to each other and to adjoining buildings;
4) walls, gates and fences are, as far as possible, of a kind traditionally used in the locality;
5) conserve or enhance the significance of all heritage assets, their setting and the wider townscape, including views into and out of conservation areas;
6) demonstrate a clear understanding of the significance of heritage assets and of their wider context.

Proposals for Extensions

7) The character, scale and plan form of the original building are respected and the extension is subordinate to it and does not dominate principal elevations,
8) Appropriate materials and detailing are proposed and the extension would not result in the loss of features that contribute to the character or appearance of the conservation area.

New development which would detract from the immediate or wider landscape setting of any part of a conservation area will not be permitted.

Listed Buildings and their setting

14.9 The NPPF sets out the general approach to conserving and enhancing the historic environment and the impact of development on designated and non-designated heritage assets and conservation areas (paragraphs 126-141). The Council will assess proposals to alter or extend a listed building against the need to preserve the special architectural or historic interest which led to the building being listed. There is a general presumption in favour of the preservation of listed buildings, and consent to demolish or partly demolish such buildings will only be granted in exceptional circumstances.

14.10 The setting of listed buildings may be affected by development. It is important that applications for planning permission for development affecting listed buildings, or their settings, include full details of the proposal so that an informed decision can be reached and will be supported where they preserve or better reveal the significance of the Listed Building.

Local Heritage Assets

14.11 Local heritage assets, including buildings, structures, features and gardens of local interest, are an important element of the rich history of a settlement and reinforce local distinctiveness and sense of place.

14.12 The National Planning Policy Framework (NPPF) requires local planning authorities to have an up to date understanding of the local historic environment and its significance. Although not likely to meet the current criteria for statutory listing, local heritage assets are important to their locality by reason of their cultural, architectural and historical contribution.

14.13 The retention of local heritage assets may be achieved through appropriate adaptive re-use or change of use. A high quality historic built environment can aid economic regeneration and investment.

14.14 Unlike statutory listed buildings or Registered Parks and Gardens, Local Designated Asset status does not put any extra planning constraints on a property; rather it would be a material consideration if a development was proposed (i.e. the historical and architectural quality of the building would be taken into consideration). In addition, it is intended that the locally designated Asset Register will raise the profile of and give recognition to the buildings and parks that are of special importance to Thanet.

14.15 The NPPF supports the introduction of locally designated heritage assets and heritage best practice encourages further support to this important local designation by the introduction of Article 4 (2) to all locally designated single dwellings within a conservation area.

14.16 Authorised works to single dwellings are permitted under Article 3 of the Town and County (General Permitted Development) Order 1995 as amended by the Town and County Planning General Permitted Development (Amendment) Order 2008 which came into force from 1st October 2008.

14.17 Many of these small scale permitted development works such as the replacement of as built timber windows and doors with plastic in modern styles can significantly harm the character and appearance of historic buildings and areas.

14.18 When a building is statutory listed this problem is avoided by the requirement for listed building consent. In the case of unlisted buildings (even those locally listed) Article 3 of the General Permitted Development Order allows a vast range of works to be carried out without the need to apply for planning permission.

14.19 Within conservation areas permitted development rights are more limited than elsewhere but even so those works can still degrade the character of individual buildings as a result of inappropriate changes.

14.20 A local planning authority can restrict the permitted development rights of property owners to carry out certain categories of development that would otherwise be automatically allowed through the making of an Article 4 direction. These directions can be made to cover one or more properties and they can restrict one or more classes of development.

14.21 The effect of an Article 4(2) Direction is not that development within the particular class in Schedule 2 of the General Permitted Development Orders cannot be carried out but simply that it is no longer automatically permitted, but instead must be subject to a specific planning application (for which there is no fee). This does not necessarily mean that the local planning authority will refuse permission for the works but it does enable the authority to retain some control over the design and detailing of the proposed development and to grant permission subject to appropriate conditions. The introduction of these directions is not intended to prevent all change, but rather to manage the way building and landscape alterations are carried out.

14.22 Before undertaking any works to a designated heritage asset, the significance of that asset must be clearly understood, as well as the potential impact of the development. Where listed buildings are concerned, it is important to address the full impact of modern building standards concerning aspects such as fire prevention, sound and thermal insulation, energy-efficiency savings and disabled access. Pre-application meetings are strongly recommended to ensure that standards can be accommodated without jeopardising the special interest of the building. Applicants considering works to a listed building are also advised to consult best practice guidance.

Policy HE03 - Heritage Assets

The Council supports the retention of local heritage assets, including buildings, structures, features and gardens of local interest. Local heritage assets will be identified in a local list as part of the Heritage Strategy.

Proposals that affect both designated and non-designated heritage assets, will be assessed by reference to the scale of harm, both direct and indirect, or loss to, he significance of the heritage asset in accordance with the criteria in the National Planning Policy Framework.

Historic Parks and Gardens

14.23 Thanet has a number of important parks; gardens, planned squares, cemeteries and churchyards. These areas provide significant amenity areas for the immediate environs and support and enhance the setting of significant designated and non-designated heritage assets. Parks and gardens of particular historical importance are listed by English Heritage in a Register of Historic Parks and Gardens - Albion Place Gardens in Ramsgate is included in this register. Kent County Council's Historic Environment Record also includes a number of important gardens and urban spaces locally.

14.24 Planned parks such as Ellington Park and Dane Park were opened to the public in 1898 and include features such as ornate bandstands and fountains. Less formal areas include grounds to substantial historic houses such as George V in Ramsgate (former residence of Sir Moses Montefiore), Pierremont Park and Northdown Park. The cemeteries at Margate and Ramsgate include a selection of fine memorials, cemetery buildings and mature trees.

14.25 Planned squares are evident within the towns and are typically set pieces subordinate to buildings. These are a particular feature of the coastal towns. Examples include Hawley Square in Margate and Vale Square in Ramsgate where high quality amenity space is closely related to the setting of listed buildings with a high degree of openness and permeability.

14.26 Both registered and non-registered parks and gardens are important because of their design or design history, the plants they contain; their historic significance; or their relationship with adjacent buildings and structures. In many cases, the designed open space is an important element of the design of the surrounding built environment. The Council will resist changes that would harm the character or setting of important parks and gardens, important plant material (particularly trees), views and other features. In recognising the importance of these heritage assets the following policy applies.

Policy HE04 - Historic Parks and Gardens

Proposals that affect historic parks and gardens will be assessed by reference to the scale of harm, both direct and indirect, or loss to and the significance of the park or garden.

Works to a heritage asset to address climate change

14.27 The Council is committed to tackling climate change and reducing the carbon emissions of Thanet. At the same time, the Council is committed to conserving the historic environment, particularly preserving and enhancing the character and appearance of its heritage assets. The Council's aim, therefore, is to ensure a balanced approach between protecting the heritage assets of Thanet and ensuring that they contribute to tackling climate change and reducing the carbon emissions of the district. Such measures could include seeking to encourage and enable the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings (including listed buildings) and conservation areas, whilst safeguarding the special characteristics of these heritage assets for the future.

14.28 The Council has been involved in a joint initiative with the Kent School of Architecture to consider the impact of climate change and energy efficiency on the historic environment. It secured funding from the Technology Strategy Board for a project that looked at how Victorian Seaside houses would perform environmentally in the climate of the year 2080. A building on Dalby Square was chosen as a test bed. The Council worked with Kent School of Architecture who found that terraced Victorian houses can perform environmentally better than some modern dwellings. The findings of this ground breaking study will be published by the Kent School of Architecture as a Climate Change Toolkit for Victorian houses. Further advice on the adaptation of the historic environment in response to climate change issues can be found in the Historic England (formerly English Heritage) publication: Climate Change and the Historic Environment (2008). Adaptive re- use of a building gives significant carbon savings in terms of embodied energy in the fabric of the building, so the focus will be on enhancing the performance of traditional buildings as much as practicable without damaging their significance. Minimal intervention will be required, along with assurance that the works do not harm the building's integrity or significance.

14.29 Planning applications will need to demonstrate a thorough understanding of the building in question via the submission of the following information:

- surveys of existing construction, to include walls, floors, ceilings and roofs;
- submission of baseline energy consumption data before and after improvements have taken place;
- measured data of existing environmental performance of the building's fabric;
- an indication of any national performance standards being targeted as a result of works; and
- recommendations on the environmental performance measures to be implemented in order to achieve the standard.

14.30 Prior to looking at alternative means of generating energy, it is important to investigate and put into practice all possible means of conserving energy (hierarchical approach). The Chartered Institution of Building Services Engineers' guidance on Building Services in Historic Buildings sets out four principal aims when seeking to enhance the sustainability of heritage assets:

- Preserve historic fabric;
- Extend the beneficial use of older buildings;
- Reduce carbon emissions, using the hierarchical approach; and
- Specify environmentally conscious materials.

Policy HE05 - Works to a Heritage Asset to Address Climate Change

Proposals to enhance the environmental performance of heritage assets will be supported where a sensitive and hierarchical approach to design and specification ensures that the significance of the asset is not compromised by inappropriate interventions.

Any works should be undertaken based on a thorough understanding of the building's performance.

15 - Climate Change

15.1 Adaptation is an essential part of addressing the impacts and opportunities created by our changing climate. The Intergovernmental Panel on Climate Change (IPCC) defines adaptation as "adjustments in natural or human systems in response to actual or expected climatic stimuli or their effects, which moderate harm or exploit beneficial opportunities". There is a statutory duty on local planning authorities to include policies in their local plan designed to tackle climate change and its impacts. These can range from policies that reduce the need to travel, flood risk and coastal change, sustainable construction and design and renewable low carbon technologies. Local plans can also address appropriate adaptation and mitigation measures to combat climate change.

Fluvial and Tidal Flooding

15.2 Flooding has become a significant issue and the National Planning Policy Framework (NPPF) states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but without increasing the risk of flooding elsewhere. This is known as the 'Sequential Test' and is accompanied by an 'Exception Test' to be applied where necessary. Any development that takes place in an area at risk of flooding must incorporate appropriate flood resilient and resistant measures (in line with paragraph 103 of the NPPF). The Strategic Flood Risk Assessment sets out other generic mitigation measures that could be applied to developments in flood risk zones such as ensuring sleeping accommodation of residential development is above ground floor level. Other measures could include those that prevent or limit the amount of water entering the property, flood resilient building techniques such as the siting of electrical controls at higher levels, raising floor levels and the use of sustainable drainage systems and flood barriers.

15.3 Thanet has few areas of low lying land that are at risk of flooding from the sea. The two primary sources of flooding in the district are fluvial and tidal; fluvial flooding from the Wantsum Channel, and tidal flooding from extreme tide levels. The majority of development proposed in this Plan has been directed away from the identified Flood Risk Areas.

15.4 The densely populated Old Town area of Margate falls within an area of low lying land. The financial cost of damage to property in the Old Town area resulting from a major flooding event could be as much as £70m. Such a flooding event could also put the safety of residents and the public at risk. Recent flood defence works have significantly reduced this risk. The Council's flood risk assessment presents advice and recommendations on the implications of flood risk and climate change. Site specific Flood Risk Assessments may be required for developments within identified areas at risk from flooding.

15.5 Areas at risk of flooding are shown on the flood maps on the Environment Agency's website and are updated regularly - www.environment-agency.gov.uk. These should be referred to when considering development in areas at risk from flooding as these are regularly updated.

The following policy seeks to ensure that development is not put at risk by flooding.

Policy CC01 - Fluvial and Tidal Flooding

New development in an area identified as being at risk of flooding and falling within Flood Zones 2 and 3, will only be permitted if it can be demonstrated that it satisfies the Sequential Test and, where required, the Exception Test as set out in the NPPF.

Development proposals in these areas shall be accompanied by a Flood Risk Assessment, including developments over 1 hectare in Flood Zone 1, which should address flood risk from all sources of flooding including surface and groundwater flooding.

Any development that takes place in a flood risk area will be expected to incorporate flood resilient measures.

Surface Water Management

15.6 Management of surface water is important in terms of reducing the risk of pollutants draining into the groundwater and bathing waters, and reducing the risk of surface water flooding.

15.7 The Thanet Surface Water Management Plan (SWMP) 2013 assessed historic flooding incidents, and identified the causes of this flooding as surface water, sewer, tidal or blocked drains or gullies. SWMPs identify areas which may be vulnerable to surface water flooding as a result of flooding occurring elsewhere (eg excessive drainage into a site from flooding occurring further along a watercourse). An Action Plan has been developed which identifies a range of recommended actions for the reduction of flood risk across the Thanet area.

15.8 The following actions are identified for the Council, which could be achieved through the planning process:

- Ensure all new developments, where possible, consider the use of Sustainable Urban Drainage Systems (SuDs)
- Ensure new developments do not increase the risk of surcharge of the sewer network within their catchment
- Promote benefits of rainwater reuse and recycling
- Support KCC in the use of SuDs in identified areas

15.9 SuDs are designed to control surface water run-off close to where it falls to and mimic natural drainage as closely as possible minimising pollution and the impacts of flooding (NPPG). Surface water runoff in built up areas tends to flow rapidly into the sewer system, which places a burden on the sewerage network and increases flood risk downstream as piped systems have limited capacity. SuDs can slow the rate at which water disperses, thus reducing the risk of flooding.

15.10 SuDs are more sustainable than traditional drainage methods and they provide opportunities to:

- Reduce the causes and impacts of flooding;
- Remove pollutants from urban run-off at source;
- Combine water management with green space with benefits for amenity, recreation and wildlife.

15.11 The provision of sustainable drainage within new development became a material consideration in planning decisions from April 2015. Kent County Council is the Lead Local Flood Authority (LLFA) for the county and as such they are the statutory consultee in the planning process to oversee the provision of SuDs for major development within the District. The LLFA provides technical advice and guidance on the surface water drainage strategies, designs and maintenance arrangements proposed by developers for any new major development. Kent County Council has prepared a Drainage and Planning Policy Statement (September 2015) containing guidance on how to integrate sustainable drainage systems into the master planning of large and small developments. Developers should consult and refer to this guidance and any future updates, when preparing applications incorporating SuDs schemes. All applications incorporating a SuDs scheme will also need to include details of a robust maintenance scheme to be agreed with the appropriate authority.

15.12 Sustainable Drainage Systems may have both direct and indirect impacts on the historic environment and historic buildings are often more vulnerable than modern buildings to flood damage to their foundations. Kent County Council has produced guidance on 'The Historic Environment and Sustainable Drainage' and they maintain the County Historic Environment Record (HER). When preparing SuDs schemes developers should fully consider the potential impact on the historic environment and ensure that any avoidable damage is mitigated.

15.13 Kent County Council has prepared guidance on the process from application to adoption of SuDs 'Drainage and Planning Policy Statement 2017'. Developers should consult KCC's guidance and any future updates, when preparing applications for SuDs schemes. KCC should be consulted early on in the process and further information is available from http://www.kent.gov.uk/waste-planning-and-land/flooding-and-drainage/sustainable-drainage-syst ems.

15.14 Infiltration methods are unlikely to be appropriate in some parts of Thanet due to the quality of the groundwater. Groundwater from the chalk rock beneath Thanet is used to supply water for drinking water, agriculture, horticulture and industry. It also feeds the springs that emerge along the coast and near the marshes. The groundwater is extremely vulnerable to contamination as substances (natural substances and man-made chemicals) are able to pass rapidly through the thin soils and the natural fissures (cracks) in the chalk rock to the groundwater below the ground surface. The acceptability and construction details of infiltration devices is not only based on whether the site is in a Groundwater Source Protection Zone, it also depends on whether the ground conditions are suitable (i.e. free from contamination) and if there are adequate unsaturated area to help reduce any discharge. Proposals for infiltration methods within the Groundwater Source Protection Zone should be discussed with the Environment Agency as it may be possible for SuDs to be lined, or for water to be treated prior to infiltration.

15.15 Under the Water Framework Directive (WFD), the Kent Isle of Thanet Groundwater Body has been classified as poor status for the groundwater quality and quantity. The groundwater is impacted by nitrates, pesticides, solvents and hydrocarbons at levels that are of concern.

15.16 The quality of the groundwater also has an impact on Thanet's bathing waters. The Bathing Water Directive which aims to protect public health and the environment from population has been revised and now introduces tighter water quality standards. This was fully implemented in 2015. Thanet has 13 beaches which have been designated as 'Bathing Waters' under the Bathing Water Directive. Thanet received seven European Blue Flag Awards for its beaches in 2015. These are awarded to beaches that have met and maintained a series of stringent environmental, educational, safety and access related criteria. In addition to this Thanet has been awarded three Seaside Awards for Margate Main Sands, Westbrook Bay and Viking Bay, which rewards beaches in England that achieve the highest standards of beach management. There is also 1 shellfish water designated under the EU Shellfish Waters Directive.

15.17 Walpole Bay has previously failed to meet current EC mandatory bathing water standards and is therefore considered to be at significant risk of not meeting the revised Bathing Water Regulations.

15.18 Bathing waters can be nominated for designation or delisting in the annual DEFRA review. The quality of bathing water quality can be affected by pollution that arises from a variety of sources and the amount of pollution from individual sources may be small but the combined effect can be significant. Diffuse pollution, from agricultural or other sources, can run off land or percolate through it into rivers which drain into the sea.

15.19 The following factors could contribute to poor bathing water quality in Thanet:

- Pollution from sewage - bacteria from sewage can enter our waters as a result of system failures or overflows or directly from sewage works.
- Water draining from farms and farmland - manure from livestock or poorly stored slurry or poor practices in the application of manure on to land can wash into rivers and streams resulting in faecal material entering the sea.
- Animals and birds on or near beaches - dog, bird and other animal faeces can affect bathing water as they often contain high levels of bacteria (much higher than treated human waste).
- Water draining from populated areas - water draining from urban areas following heavy rain can contain pollution from a variety of sources, including animal and bird faeces or incorrect connections of wastewater from houses and businesses into surface water drainage
- Domestic sewage - misconnected drains and poorly located and maintained septic tanks can pollute surface water systems.

15.20 The loss of blue flags or the failure of any of Thanet's beaches to meet the requirements of the revised Bathing Water regulations or for Shellfish water failure could have knock-on implications on perception of water quality at neighbouring beaches as well as the local economy and tourist and fishing industry. To ensure development does not negatively impact bathing and shellfish water quality it is important to ensure drainage infrastructure is adequate i.e. sewer capacity is available (or financially viable to increase) and surface water drainage is managed. The following policy seeks to ensure surface water run-off is managed appropriately.

Policy CC02 - Surface Water Management

New development is required to manage surface water resulting from the development using sustainable drainage systems (SuDs) wherever possible. SuDs design, together with a robust long term maintenance plan should be included as an integral part of the master planning and design process for new development and should, wherever possible, incorporate multi-functional benefits for people and wildlife. Developers should demonstrate how the guidance produced by the Lead Local Flood Authority (LLFA) has been taken into account and applied when submitting a planning application for any major development. Approval of the design and measures to be implemented for the long term maintenance of SuDs will be required prior to development being permitted.

When preparing SuDs schemes developers should fully consider the potential impact on the historic environment and ensure that any damage is mitigated. Proposals for SuDs at sites within the Groundwater Source Protection Zone as shown on the Policies Map, or sites near the Groundwater Source Protection Zone, must demonstrate that the methods used will not cause detriment to the quality of the groundwater.

Sites identified as a Tidally Sensitive Area (as identified in surface water management plans) will need to incorporate Sustainable Drainage Methods and a maintenance schedule where appropriate, at the design stage of a planning application, and a Flood Risk Assessment will be required before planning permission can be granted.

Coastal Development

15.21 There are a number of other discrete areas of flood risk around the coastline; however, the majority of coastline is at risk of erosion and not flooding. Coastal defences have an approximate lifespan of 50 years. If there appears to be an economic justification for maintaining them then they will be maintained; however, feasibility work does not always indicate that a project will be successful in achieving funding, and in such cases defences may cease to be maintained.

15.22 The Isle of Grain to South Foreland Shoreline Management Plan (SMP) provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. It also includes an action plan to facilitate implementation of the SMP policies and monitor progress. The following policy seeks to ensure that new development is not put at risk from coastal erosion which may put people or property at risk, or potentially reduce the lifespan of those dwellings.

15.23 The Marine Management Organisation (MMO) will deliver UK marine policy objectives for English waters through statutory Marine Plans and other measures. Thanet is within the South East Marine Plan area and a marine plan for this area is under development. Until a Marine Plan has been published, the UK Marine Policy Statement should be used for guidance and licensing on any planning activity that includes a section of coastline or tidal river. A marine licence from the MMO may be required for coastal developments and early consultation with the MMO is advised.

Policy CC03 - Coastal Development

Proposals for new development within 40 metres of the coastline or clifftop must demonstrate to the satisfaction of the Council that it will not:

1) **expose people and property to the risks of coastal erosion and flooding for the life of the development; or**
2) **accelerate coastal erosion due to increased surface water run off; and**
3) **impact on natural habitats through the process of coastal squeeze or otherwise restrict the capacity of the coastline to adjust to sea-level rise and climate change.**

Renewable energy

15.24 There are a number of options for obtaining energy from renewable sources in new or existing developments. These include:

- Solar photo-voltaic panels
- Wind turbines
- Solar water heating
- Ground source heat pumps
- Biomass and biofuel

15.25 The Council will encourage new developments to make provision for renewable installations in their master planning and will encourage the retrofitting of such installations to existing buildings, subject to the criteria in policy CC04. The following policy seeks to encourage the use of renewable energy installations in new and existing development whilst mitigating against any detrimental effects.

Policy CC04 - Renewable Energy

Proposals for major new developments shall demonstrate that they will make maximum use of renewable energy or micro- generation equipment and to this end shall include a feasibility assessment taking into account site location and viability. Proposals for renewable energy or micro-generation facilities in new developments should ensure that:

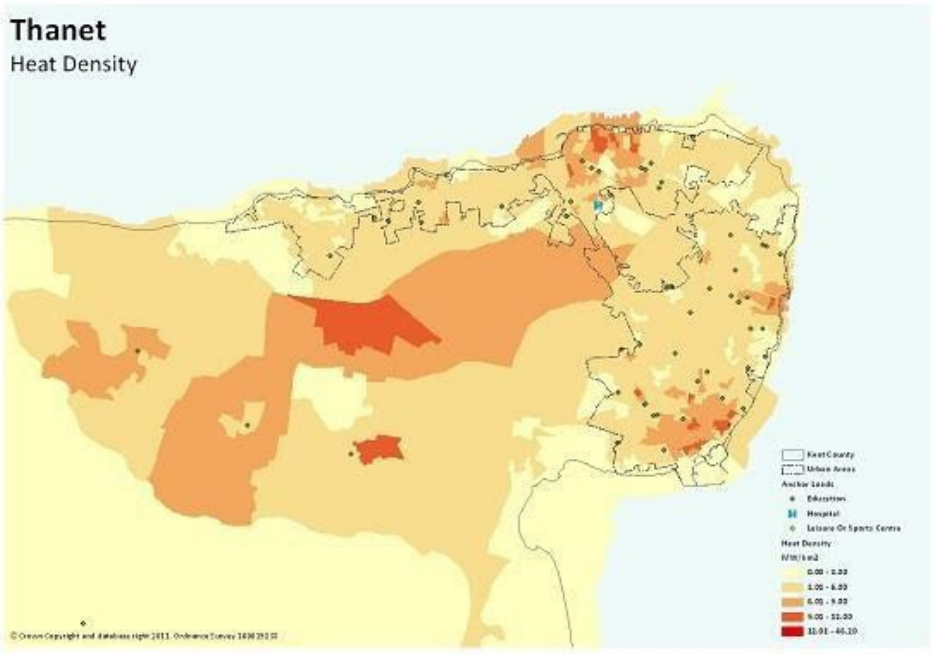
1) **There are no significant adverse impacts on the surrounding area such as visual, noise and amenity;**
2) **Visual and landscape impacts have been minimised in the design and layout of the scheme;**
3) **There is no significant impact on residential amenity of local residents;**
4) **There is no adverse impact on heritage assets or their setting;**
5) **There is no significant impact on the landscape setting, habitats, biodiversity or wildlife assets, particularly protected species and habitats;**
6) **They do not have an impact on the best and most versatile agricultural land unless that it can be demonstrated that it is necessary and no alternative lower grade land is available.**

District Heating

15.26 District heating schemes supply heat from a central source directly to homes and businesses through a network of pipes carrying hot water. This means that individual homes and business do not need to generate their own heat on site.

15.27 Large energy users, or 'anchor loads' are an essential part of a district heating network to provide a base heat demand that will allow a system to run efficiently. Anchor loads could be large energy users such as industry, schools, hospitals or leisure centres with heated swimming pools. Map 4 is a heat map for Thanet showing potential areas suitable for district heating.

Map 4 - Thanet's Heat Density



15.28 District heating is most suitable where there is a high density of built development, and especially where there is a mix of building types This diversity of energy demand helps to keep combined heat and power (CHP) or boiler plant running in a more steady state for longer - which is more efficient.

15.29 The Renewable Energy for Kent report identifies the following scale and types of district heating networks which may come forward:

Small local networks: Typically between 10 and 50 homes in a street or a block. Gas fired boilers or biomass boilers supplying heat only.

Medium size networks: Typically over 200 homes and normally with an 'anchor building' (i.e. a school, hospital or leisure centre).

Large networks: A number of small and medium sized networks linked up and perhaps taking heat from a large biomass or energy from waste power station.

15.30 The following policy seeks to encourage district heating schemes where appropriate and feasible. Energy statements are a useful tool for considering the energy strategy for major sites. These could consider any of the following aspects:

- the overall energy strategy for the site
- the energy demands for the development
- an assessment of the feasibility of the available renewable and low carbon technologies
- assessment of the likely energy savings and emissions
- costs of technology where viability is a concern
- other potential impacts of renewable energy and low carbon technologies
- long term management of energy supply on site

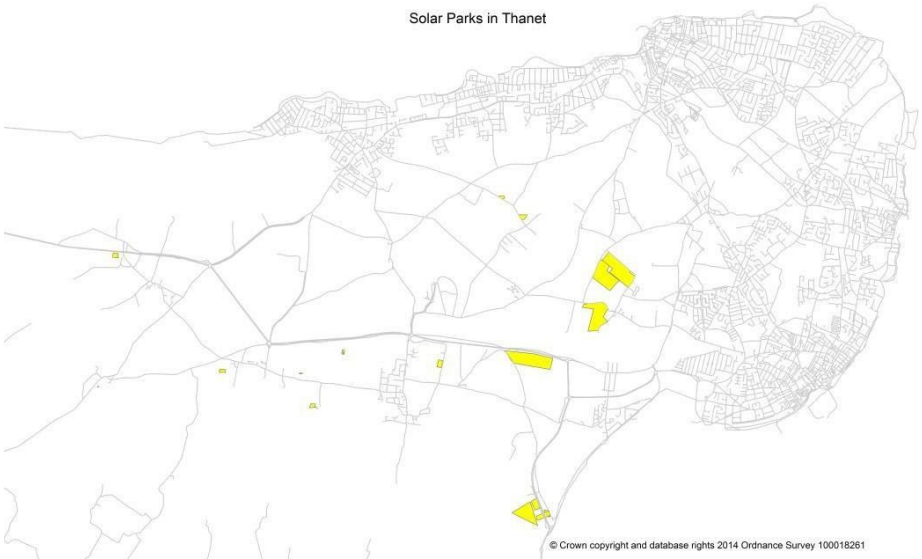
Policy CC05 - District Heating

Support will be given to the inclusion of district heating schemes in new development. Major development proposals should be supported by an Energy Statement to demonstrate that the inclusion of such a scheme has been considered. Where a district heating scheme cannot be provided the developer should set out the reasons for this.

Solar Parks

15.31 There have been a number of developments for renewable energy applications in the district to help reduce emissions. A number of solar parks have been granted permission - these are mainly located in fields, or parts of fields, are temporary (most have a 25 year lifespan), and the land can revert to its original use when the panels are removed.

Map 5 - Solar Parks



15.32 The siting for a solar park will usually be near to a connection to the national grid due to cost implications for connection, and will require the erection of a fence surrounding the site for security reasons.

15.33 Map 5 shows sites where permission has been granted for solar parks at the time of writing. It may be possible that other sites could be considered for further development of solar parks. Further sites should be located on previously developed land or non-agricultural land wherever possible. There are potential negative impacts to the countryside, landscapes, and to best and most versatile agricultural land. For proposals on agricultural land, the developer will be expected to demonstrate how the land can still be used for agricultural purposes.

15.34 The developer will be required to outline a management programme to demonstrate that the areas beneath and around the panels will not become overgrown, and to assist with the eventual restoration of the site, normally to its former use.

Policy CC06 - Solar Parks

Applications for solar parks will only be permitted if there is no significantly detrimental impact on any of the following:

1) Thanet's historic landscapes;
2) visual and local amenity, including cumulative effects;
3) heritage assets and views important to their setting.

Proposals on agricultural land must demonstrate that the proposal will comply with all of the following:

4) Cause minimal disturbance to the agricultural land and
5) Be temporary, capable of removal and reversible, and allow for continued use as such on the remaining undeveloped area of the site;
6) Provide biodiversity enhancements.

The need for renewable energy does not automatically override environmental considerations.

Solar park proposals will be assessed for their impact on the Thanet Coast SPA and Ramsar site in order to ensure no loss of functionally linked land and provide mitigation if required.

15.35 The Richborough area, which straddles the district boundary with Dover, has become a focus for waste treatment, renewable and low carbon energy industries. The former Richborough Power Station provides a potential location for such facilities, as well as a connection to the national grid. Thanet and Dover Councils have approved applications for solar parks and anaerobic digesters in the surrounding area, a peaking plant facility and site-wide infrastructure to facilitate the creation of energy from waste site, on the former Richborough Power Station site.

15.36 The Council recognises the potential of the site to help to mitigate against climate change. Therefore in liaison with Dover District Council and Kent County Council (as the Minerals and Waste Authority), the Council will continue to explore, with the promoters of any

schemes, how this potential can be realised. Particular regard would need to be had to environmental, transport and wildlife impacts together with visual impact on landscape and on the gateway location to and from Thanet.

15.37 The Kent Minerals and Waste Sites Local Plan 2013-2030 and Waste Sites Plan look to this area as a potential location for energy from waste, green waste treatment and for the treatment/material recycling facilities. Development proposals in this area should also refer to these plans and the relevant National Planning Statements.

15.38 The Secretary Of State for Transport has issued directions under the Town and Country Planning (General Development Procedure) Order 1995 to safeguard the route corridor of the Channel Tunnel Rail Link Project. This includes additional land that may be required for associated works/development. (Such direction and works are not proposals of the District Council, and the routes in question will not be determined through the development plan process but through other statutory procedures which will provide appropriate opportunities for any objections by those directly affected by the project).

15.39 Safeguarding directions for development affecting the route corridor for the channel tunnel rail link project apply to land at Richborough. In accordance with the direction, the Council will consult HS1 (south) limited before granting planning permission or resolving to carry out/authorise development within the limit of land subject to consultation.

Policy CC07- Richborough

Proposals for the development of renewable energy facilities at Richborough will be permitted if it can be demonstrated that the development will not be detrimental to nearby sites of nature conservation value or heritage assets and that any potential effects would be fully mitigated.

16 - Safe and Healthy Environment

16.1 The National Planning Policy Framework (NPPF) states that the planning system should contribute to and enhance the natural and local environment. It should prevent both new and existing development from contributing to or being put at unacceptable risk of pollution by soil, air, water or noise or land instability, and remediate and mitigate despoiled, degraded, derelict contaminated and unstable land where appropriate. Consideration must be given to the impacts of noise on health and quality of life from new developments, and the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.

16.2 Environmental pollution and impacts on human health are important issues, and the Council is keen to ensure that Thanet's environmental quality is maintained and enhanced. The following policies aim to address a number of environmental issues to help achieve this.

Potentially Polluting Development

16.3 Activities with the potential to pollute are controlled by wide ranging powers under pollution control legislation. However, the effects of development that might cause the release of pollutants to water, land or air, or from noise, dust, vibration, light, odour or heat, are material considerations when deciding whether or not to grant planning permission. The Council will require any application to include sufficient information to enable the risk of pollution to be assessed.

Policy SE01 - Potentially Polluting Development

Development with potential to pollute will be permitted only where:

1) Applicable statutory pollution controls and siting will effectively and adequately minimise the impact upon existing and proposed land uses and the environment including the effects, including cumulative effects, on health, the natural environment such as significant natural and heritage assets, or general amenity resulting from the release of pollutants to water, land or air or from noise, dust, vibration, light, odour or heat; and

In determining individual proposals, regard will be paid to:

2) The economic and wider social need for the development; and
3) The visual impact of measure needed to comply with any statutory environmental quality standards or objectives.
4) where there is an impact and the development is acceptable, a suitable mitigation is proposed to the satisfaction of the pollution control regimes.

Permission for development which is sensitive to pollution will be permitted only if it is sufficiently separated from any existing or potential source of pollution as to reduce pollution impact upon health, the natural environment or general amenity to an acceptable level, and adequate safeguarding and mitigation on residential amenity.

Landfill Sites and Unstable Land

16.4 Sites that have been used for the deposit of refuse or waste may generate explosive or otherwise harmful gasses. Thanet has approximately 26 such sites which are all listed in the National Landfill Atlas held by the Environment Agency.

16.5 A former landfill site will be unlikely to be actively gassing after 40-50 years of its closure. The Council is required to consult the Environment Agency, as Waste Regulation Authority, before granting consent for development within 250m of land which is, or has within 30 years of the relevant application, been used for the deposit of refuse or waste.

16.6 If an application for a new development/redevelopment or major change of use on or adjacent to a site included in the landfill atlas is received, then a full site-investigation report including gas monitoring will be required.

16.7 Where the presence of gas is discovered or it is suspected that it may be present during site development, the Council will require the applicant to arrange for an investigation to be carried out to determine its source and for satisfactory and effective remedial measures to prevent hazards from migrating gas (including accumulation into property or other confined spaces) during the course of development and during subsequent use of the site. Specialist design and construction advice will usually have to be sought by the developer in this regard.

16.8 For development on unstable land, it may be necessary for the developer to carry out specialist investigations and assessments to determine the stability of the site proposed for development and identify any remedial measures that will be needed to deal with instability. Areas known to the Council where land instability is likely to be an issue include:

- Minster Marshes
- Monkton Marshes
- Sarre Marshes
- Wade Marshes
- Land overlying Ramsgate and Margate caves
- Land overlying disused railway tunnel between Ramsgate main sands and the railway line at Broadstairs

Policy SE02 - Landfill Sites and Unstable Land

In considering planning applications on or near landfill sites, or where there is otherwise reason to suspect that potential danger from evolving or migrating gas may be present, or on land for which known or suspected instability might render it unsuitable for development, the local planning authority may require a specialist site investigation and assessment by the developer to identify any remedial measures required before determining such planning applications.

Development or redevelopment, including change of use, will only be permitted where:

1) **the applicant/developer has demonstrated either that there is no unacceptable risk caused by the development or that appropriate remedial measures can overcome such risk;**
2) **the development would not adversely affect neighbouring land; and**

3) any necessary remedial measures can be achieved without unacceptable environmental impact.

Where the local planning authority is satisfied that the risks from landfill or ground instability can be overcome, planning consent may be granted subject to conditions or a legal agreement specifying the necessary measures to be carried out.

Land affected by Contamination

16.9 Some sites in Thanet are known to be affected by contamination. The allocation of sites should not be taken as an indication that they are free from any hazardous/physical constraints, or that they are not in the vicinity of other installations handling hazardous substances.

16.10 Development on land affected by contamination will require a site investigation and assessment to establish the levels of contamination present and identify any remedial measures to clean the site to make it suitable for its proposed end use and remediate risks to the wider environment.

16.11 The Council has adopted a revised Contaminated Land Strategy (January 2019) which sets out the Council's position on the remediation of brownfield land in relation to the EPA 1990 Part IIa duties and links with the planning regime.

Policy SE03 - Land affected by Contamination

Development proposals that would enable contaminated sites to be brought into beneficial use will normally be permitted, so long as the sites can be rendered suitable for the proposed end use in terms of the impact on human health, public safety and the environment, including underlying groundwater resources.

Development on land known or suspected to be contaminated or likely to be adversely affected by such contamination will only be permitted where:

1) an appropriate site investigation and assessment (agreed by the Council) has been carried out as part of the application to establish whether contamination is present and to identify any remedial measures necessary to ensure that the site is suitable for the proposed end use;
2) the proposed remedial measures would be acceptable in planning terms and would provide effective safeguards against contamination hazards during the development and subsequent occupation of the site.

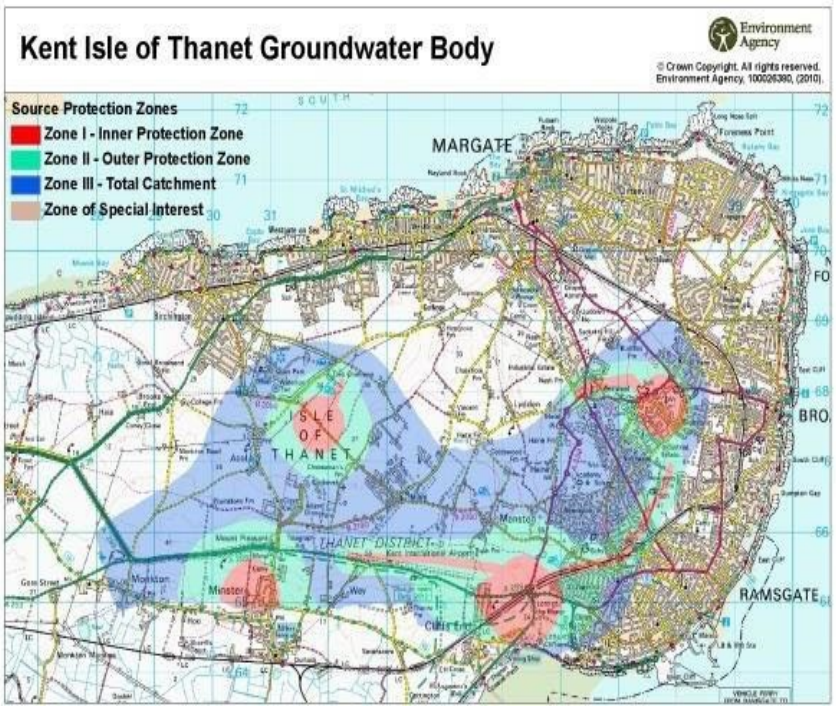
Planning conditions will be attached to any consent to ensure that remedial measures are fully implemented, before occupation.

In the case of sites where contamination is only considered to be a possible risk, a site investigation will be required by condition. Sites where contamination is believed to have been removed or where the full site history is unknown should not be able to be considered as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the untended use of the land.

Groundwater Protection

16.12 Thanet's groundwater is of poor quality and is vulnerable to contamination due to Thanet's thin soils and cracks in the chalk rock, which means pollution would soak through quickly to the groundwater. However the groundwater is used to supply water for drinking water, agriculture, horticulture and industry and also feeds the springs that emerge along the coast near the marshes, so it is important that there is no further contamination to the groundwater. Thanet's groundwater zones are shown on the Policies Map, and in more detail on Map 6.

Map 6 - Thanet's Groundwater Protection Zones



16.13 Thanet's groundwater is extremely vulnerable to contamination as substances (natural substances and man-made chemicals) are able to pass rapidly through the thin soils and the natural fissures (cracks) in the chalk rock to the groundwater below the ground surface.

16.14 Once the chalk and groundwater is contaminated at a site by a substance it can take decades to clean-up. The Council and the Environment Agency have worked hard to prevent contamination by consistently applying Groundwater Protection policies to any proposed land-use changes in Thanet to reduce potential future impact.

16.15 Under the Water Framework Directive (WFD), the 'Kent Isle of Thanet Groundwater Body' has been classified as poor status for the groundwater quality and quantity. The groundwater is impacted by nitrates, pesticides, solvents and hydrocarbons at levels that are of concern. Thanet's groundwater is currently a candidate Water Protection Zone (WPZ). These zones are used in areas identified as being at high risk as a 'last resort' when other mechanisms have failed or are unlikely to prevent failure of WFD objectives. WPZs are a new regulatory tool to address diffuse water pollution. They are designed to help enforce measures to prevent pollution and improve water quality where standards set out in the Water Framework Directive (WFD) are not being met. It is hoped that sufficient measures can be taken, by various organisations and individuals, that will help remediate the problems with Thanet's groundwater

and avoid a WPZ designation.

16.16 The poor groundwater quality cannot be attributed to just one source. In Thanet there are considerable risks to the groundwater from both urban and rural activities. These risks are intensified by the compact nature of the district. Hazards to Thanet's groundwater include petrol stations, gas works, drainage from roads, leakage from sewers, pesticide storage, septic tanks, sheep dips, and farm buildings. Uses that can cause pollution to the groundwater include dry cleaners, mechanics, scrap metal, photo processing, and some sustainable drainage systems.

16.17 Well designed SuDs in suitable locations can improve the volume of groundwater available without affecting the quality; however locations and depths of discharge to ground must be carefully designed to ensure that they are appropriate and do not cause further degradation. SuDs must be designed so that pollutants are removed prior to discharge, and where possible, properly designed in order to improve the groundwater quantity. Discharges to the ground in sensitive areas should be approved by the Environment Agency.

16.18 Drainage and provision of water are addressed by Policies SP02 and SP14 for housing development and general pollution prevention Policy SE01.

Policy SE04 - Groundwater Protection

Proposals for development within the Groundwater Source Protection Zones identified on the Policies Map will only be permitted if there is no risk of contamination to groundwater sources. If a risk is identified, development will only be permitted if adequate mitigation measures can be implemented. Proposals which involve the use of piled foundations on contaminated sites must demonstrate that they will not cause disturbance of any ground so as to cause turbidity in water supply and/or create pathways enabling contaminated materials to reach the groundwater.

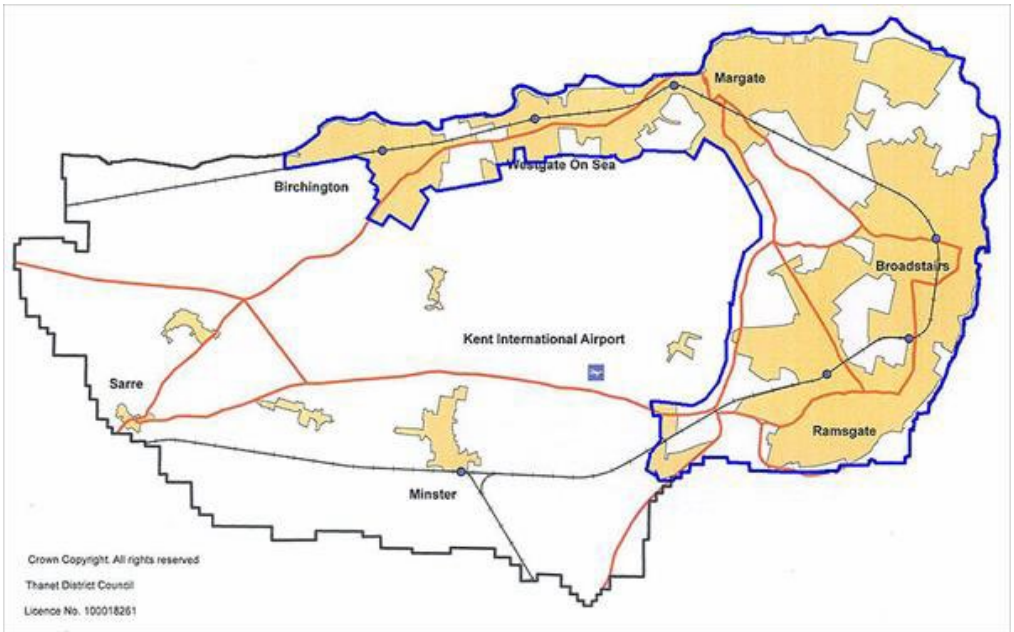
Proposals for Sustainable Drainage systems involving infiltration must be assessed and discussed with the Environment Agency to determine their suitability in terms of the impact of any drainage into the groundwater aquifer.

Air Quality

16.19 The Environment Act 1995 established a local air quality management regime which requires local authorities to review and assess ambient air quality in their areas against health-based standards for a number of specific pollutants as set out in regulations. It is then required to produce an Air Quality Action Plan. If there is a risk that levels of air pollution in any part of an authority's area will be higher than the prescribed objectives then the authority is required to designate an Air Quality Management Area (AQMA).

16.20 Thanet generally has good air quality; however there are areas at The Square in Birchington, the junction of Hereson Road/Boundary Road and High Street St Lawrence, Ramsgate where air quality is poor due to pollution from road transport. An urban wide Air Quality Management Area has been declared to enable effective management of air quality. The transport strategy that accompanies the plan is aiming to address this issue by proposing road improvements and new links to form an "inner circuit". Further details are available in Chapter 6 New Strategic Routes Policy.

Map 7 - Thanet Urban Air Quality Management Area



16.21 Planning is an effective tool to improve air quality. It can be used to locate development to reduce emissions overall, and reduce the direct impacts of new development, through policy requirements.

16.22 An AQMA makes consideration of the air quality impacts of a proposed development important. However, there is still a need to regard air quality as a material factor in determining planning applications in any location. This is particularly important where the proposed development is not physically within the AQMA, but could have adverse impacts on air quality within it, or where air quality in that given area is close to exceeding guideline objectives itself.

16.23 The Council has produced an Air Quality Technical Planning Guidance August 2016, in conjunction with the Kent and Medway Air Quality Partnership. The guidance sets out the approach that should be adopted from pre-application stage through to submitting details to the local planning authority. The process involves initial screening to see if the development does not require any assessment and/or mitigation or if the development requires an air quality assessment and/or an emissions mitigation assessment. Advice from the Council's air quality officer should be sought early on in the process.

16.24 Developments that require the submission of an Air Quality Assessment include the following:

1) If the development is likely to have a significant impact upon an AQMA;
2) If the development has the potential to cause a deterioration in local air quality (i.e. once completed it will increase pollutant concentrations);
3) If the development is located in an area of poor air quality (i.e. it will expose future occupiers to unacceptable pollutant concentrations) whether the site lies within a designated AQMA or, if so advised by the Local Authority, or a "candidate" AQMA;
4) If the demolition/construction phase will have a significant impact on the local environment (e.g. through fugitive dust and exhaust emissions).

16.25 The types of development that are likely to require an air quality assessment are identified in the Kent and Medway Air Quality Partnerships Technical Planning Guidance August 2016, although the Council's air quality officer will confirm whether an air quality assessment is required or if an emissions mitigation assessment will suffice.

16.26 Where an air quality and/or an emissions mitigation assessment are required, they should be carried out by the developer's air quality consultant.

16.27 The Air Quality Technical Planning Guidance provides advice on the level of information required, the process, assessment and possible mitigation and applicants are encouraged to refer to this document. It is vital that air quality is discussed at the pre-application stage where possible, to avoid delays in the processing of the planning application. Applicants should always seek to use the most up to date information on air quality when carrying out an assessment. Early consultation with the Council's air quality officer is recommended to determine whether an air quality assessment is required before submitting a planning application.

16.28 In order to improve air quality generally within the District, the Air Quality Technical Planning Guidance encourages the use of less polluting transport, by requiring proposals for new residential development of 10 or more units and commercial/industrial developments above a certain size, to provide electric car charging points.

16.29 This approach compliments the Council's aim to improve the health and wellbeing of its residents. The Council will also work with the relevant providers of public transport to provide less polluting forms of transport through a Quality Bus Partnership.

Policy SE05 - Air Quality

All major development schemes should promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions on air quality. Development will be located where it is accessible to support the use of public transport, walking and cycling.

New development must ensure that users are not significantly adversely affected by the air quality and include mitigation measures where appropriate.

All developments which either individually or cumulatively are likely to have a detrimental impact on air quality, will be required to submit an Air Quality and/or Emissions Mitigation Assessment, in line with the Air Quality Technical Planning Guidance 2016 and any subsequent revisions.

The Air Quality Assessment should address the cumulative effect of further emissions.

The Emission Mitigation Assessment should address any proposed mitigation measures through good design and offsetting measures that would prevent the National Air Quality Objectives being exceeded or reduce the extent of the air quality deterioration. These will be of particular importance within the urban AQMA, associated areas and areas of lower air quality.

Proposals that fail to demonstrate these will not be permitted.

Noise Pollution

16.30 The National Planning Policy Framework (NPPF) outlines that local plan policies and development management decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development. It states that where conflict does arise, impacts must as far as possible be mitigated against and be reduced to a minimum.

16.31 The Government's Noise Policy Statement for England stated priority is to:

'***Avoid significant adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development'.***

16.32 The second aim is to mitigate and minimise adverse impacts, and the third is to contribute to the improvement of health and quality of life through effective management control of noise.

16.33 Noise is a material consideration when determining planning applications. The Government's National Planning Practice Guidance[i] states that consideration should be given to:

- Whether or not a significant adverse effect is occurring or likely to occur;
- Whether or not an adverse effect is occurring or likely to occur; and
- Whether or not a good standard of amenity can be achieved.

16.34 The guidance provides the following noise hierarchy to determine when noise could be a concern:

Table 14 - Noise Hierarchy

Perception	Examples of outcomes	Increasing effect level	Action
Not noticeable	No effect	No observed effect	No specific measures required
Noticeable and not intrusive	Noise can be heard, but does not cause any change in behaviour or attitude. Can slightly affect the acoustic character of the area but not such that there is a perceived change in the quality of life.	No observed adverse effect	No specific measures required
		Lowest Observed Adverse Effect Level	

Noticeable and intrusive	Noise can be heard and causes small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; closing windows for some of the time because of the noise. Potential for non-awakening sleep disturbance. Affects the acoustic character of the area such that there is a perceived change in the quality of life.	Observed Adverse Effect	Mitigate and reduce to a minimum
		Significant Observed Adverse Effect Level	
Noticeable and disruptive	The noise causes a material change in behaviour and/or attitude, e.g. having to keep windows closed most of the time, avoiding certain activities during periods of intrusion. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	Significant Observed Adverse Effect	Avoid
Noticeable and very disruptive	Extensive and regular changes in behaviour and/or an inability to mitigate effect of noise leading to psychological stress or physiological effects, e.g. regular sleep deprivation/awakening; loss of appetite, significant, medically definable harm, e.g. auditory and non-auditory	Unacceptable Adverse Effect	Prevent

16.35 The guidance suggests four broad types of mitigation against noise:

- **engineering:** reducing the noise generated at source and/or containing the noise generated;
- **layout:** where possible, optimising the distance between the source and noise-sensitive receptors and/or incorporating good design to minimise noise transmission through the use of screening by natural or purpose built barriers, or other buildings;
- **using planning conditions/obligations** to restrict activities allowed on the site at certain times and/or specifying permissible noise levels differentiating as appropriate between different times of day, such as evenings and late at night, and;
- **mitigating** the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building.

Further information and guidance can be found in the following sources:

- Chartered Institute of Environmental Health, Acoustic and Noise Consultants and Institute of Acoustics: Professional Practice Guidance on Planning and Noise
- British Standard 4142: Methods for rating and assessing industrial and commercial sound

- British Standard 5228 Code of practice for noise and vibration control on construction and open sites
- British Standard 6472 Vibration
- British Standard 8233 Guidance on sound insulation and noise reduction for buildings

Policy SE06 - Noise Pollution

In areas where noise levels are relatively high, permission will be granted for noise-sensitive development only where adequate mitigation is provided, and the impact of the noise can be reduced to acceptable levels.

Development proposals that generate significant levels of noise must be accompanied by a scheme to mitigate such effects, bearing in mind the nature of surrounding uses. Proposals that would have an unacceptable impact on noise-sensitive areas or uses will not be permitted.

Noise Action Plan Important Areas

16.36 Noise Action Plans have been prepared in line with the terms of the Environmental Noise Directive and cover noise from roads, railways and agglomerations. There are 26 road related 'Important Areas' and 2 rail Important Areas in Thanet. (These correspond with hotspots identified in the AQMA). The Defra maps are available here: http://www.extrium.co.uk/noiseviewer.html#

16.37 Within the identified areas, residential development will need to include mitigation measures to reduce the impact of noise on residential amenity. Such measures may include screening/barriers, double glazing, locating windows so they are not opposite the noise source. Developers should liaise with Kent County Council as the Highway Authority to agree appropriate mitigation.

Policy SE07 - Noise Action Plan Important Areas

Proposals for residential development within identified Important Areas in the Noise Action Plan must incorporate mitigation measures against the impact of noise on residential amenity.

Light Pollution

16.38 Light pollution is identified as a statutory nuisance under the Clean Neighbourhoods and Environment Act 2005. Poorly designed or installed lighting can be obtrusive by introducing a suburban character into rural areas, and also wastes electricity. Different forms of light pollution are identified as:

- Light Spillage - artificial illumination that results in the spillage of light that is likely to cause irritation, annoyance or distress to others
- Light Trespass - the spilling of light beyond the boundary of the property on which

the light source is located
- Light Glare - the uncomfortable brightness of a light source when viewed against a dark background
- Sky Glow - the brightening of the night sky above our towns and cities

16.39 Due to Thanet's open landscapes and vast skies, poor outdoor lighting can have a substantial adverse effect on the character of the area well beyond the site on which the lighting is located.

16.40 Inappropriate lighting has been shown to have major impacts on wildlife. The impacts of light pollution on bat species and potential mitigation measures are particularly well documented.

16.41 The Council refers to the Institution of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light[i]. The guidance identifies environmental zones and corresponding lighting environments as shown in table 15.

[i] https://www.theilp.org.uk/documents/obtrusive-light/

Table 15 - Environmental Zones

Zone	Surrounding	Lighting Environment	ILP examples	Corresponding areas in Thanet
E0	Protected	Dark	UNESCO starlight reserves, IDA dark sky parks	None
E1	Natural	Intrinsically dark	National Parks, Areas of Outstanding Natural Beauty etc	Landscape Character Areas associated with Pegwell Bay and former Wantsum Channel, the European Marine Sites
E2	Rural	Low district brightness	Village or relatively dark outer suburban locations	Rural areas outside of the built confines Including Green Wedges
E3	Suburban	Medium district brightness	Small town centres or suburban locations	Urban areas and villages
E4	Urban	High district brightness	Town/city centres with high levels of night time activity	Amusement area at Margate Seafront

16.42 The Institute of Lighting Professionals recommends the following standards within these areas:

Table 16 - Obtrusive Light Limitations for Exterior Lighting Installations - General Observers

Environmental Zone	Sky Glow ULR [Max %] (1)	Light Intrusion (into windows) Ev [lux] (2)		Luminaire intensity I [candelas] (3)		Building Luminance Pre-curfew (4)
		Pre-curfew	Post-curfew	Pre-curfew	Post-curfew	Average, L
E0	0	0	0	0	0	0
E1	0	2	0 (1*)	2,500	0	0
E2	2.5	5	1	7,500	500	5
E3	5.0	10	2	10,000	1,000	10
E4	15	25	5	25,000	2,500	25

ULR = Upward Light Ratio of the Installation is the maximum permitted percentage of luminaire flux that goes directly into the sky.
Ev = Vertical Illuminance in Lux - measured flat on the glazing at the centre of the window. I = Light Intensity in Candelas (cd)

L = Luminance in Candelas per Square Metre (cd/m2)

Curfew = the time after which stricter requirements (for the control of obtrusive light) will apply; often a condition of use of lighting applied by the local planning authority. If not otherwise stated - 23.00hrs is suggested.

* = Permitted only from Public road lighting installations

1) **Upward Light Ratio** - Some lighting schemes will require the deliberate and careful use of upward light, e.g. ground recessed luminaires, ground mounted floodlights, festive lighting, to which these limits cannot apply. However, care should always be taken to minimise any upward waste light by the proper application of suitably directional luminaires and light controlling attachments.
2) **Light Intrusion (into Windows)** - These values are suggested maxima and need to take account of existing light intrusion at the point of measurement. In the case of road lighting on public highways where building facades are adjacent to the lit highway, these levels may not be obtainable. In such cases where a specific complaint has been received, the Highway Authority should endeavour to reduce the light intrusion into the window down to the post curfew value by fitting a shield, replacing the luminaire, or by varying the lighting level.
3) **Luminaire Intensity** - This applies to each luminaire in the potentially obtrusive direction, outside of the area being lit. The figures given are for general guidance only and for some sports lighting applications with limited mounting heights, may be difficult to achieve.
4) **Building Luminance** - This should be limited to avoid over lighting, and related to the general district brightness. In this reference building luminance is applicable to buildings directly illuminated as a night-time feature as against the illumination of a building caused by spill light from adjacent luminaires or luminaires fixed to the building but used to light an adjacent area.

Further information, guidance and advice is available from the ILE website https://www.theilp.org.uk/resources/free-resources/ and developers are recommended to refer to these.

Policy SE08 - Light Pollution

Development proposals that include the provision of new outdoor lighting or require specific lighting in connection with the operation of the proposed development will be permitted if it can be demonstrated that:

1) **It has been designed to minimise light glare, light trespass, light spillage and sky glow through using the best available technology to minimise light pollution and conserve energy;**
2) **There is no adverse impact on residential amenity and the character of the surroundings;**
3) **There is no adverse impact on sites of nature conservation interest and/or protected and other vulnerable species and heritage assets;**
4) **There is no adverse impact on landscapes character areas, the wider countryside or those areas where dark skies are an important part of the nocturnal landscape;**
5) **It does not have an adverse impact on long distance views or from vantage points;**
6) **Where appropriate, mitigation measures are proposed.**

In addition a lighting strategy may be required for major developments or those developments with specific lighting requirements or for those that are in or adjacent to sensitive locations.

A Landscape and Visual Impact Assessment will be required for proposed developments that fall in to the E1 category, as set out in Table 15 Environmental Zones.

Proposals that exceed the Institution of Lighting Professionals standards will not be permitted.

17 - Communities

17.1 Social, cultural and community facilities are an integral part of developing inclusive and cohesive communities.

17.2 One of the core principles of the National Planning Policy Framework (NPPF) is to take account of and support local strategies to support health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities to meet local needs.

17.3 The NPPF also states that planning policies and decisions should plan positively for the provision and use of shared space, community facilities and other local services, and to guard against the unnecessary loss of such facilities. It states that planning policy should promote the retention and development of local services and community facilities in villages. Further guidance and advice on the design of new facilities is set out in the Sport England Active Design guidance as referenced in paragraph 13.13.

17.4 The NPPF affords protection to existing open space, sports and recreational buildings and land (including playing fields) stating that they should not be built on unless the land is surplus to requirements, or the development will result in better provision of open space or sports and recreational provision.

17.5 Community facilities are defined in this Plan as local and village shops, meeting places, sports venues, nurseries, cultural buildings, public houses, places of worship, public rights of way, other local services including those for education and medical purposes, which enhance the sustainability of communities and residential environments. It also includes, vacant land that was last lawfully used as a community facility or previously occupied by a building whose last lawful use was for a community facility.

17.6 The provision of new facilities can be important in promoting sustainable development by reducing the need to travel and providing a service for those who do not have access to transport.

17.7 To be all inclusive, new community facilities should be designed in accordance with the Changing Places specification set out in Kent County Council's Kent Adult Social Services Glossary document dated October 2008 or any successor document or as modified by legislation or best practice or otherwise agreed which complies with the Disability Discrimination Act.

17.8 Paragraph 42 of NPPF recognises the vital role that high-speed broad band technologies and other communication networks play in enhancing the provision of local community services and facilities. Local authorities and other public sector providers are increasingly reliant on digital infrastructure to provide services and to interact with their customers. It is therefore becoming increasingly important for community facilities to also have this access as this will safeguard their future use making them more viable and adaptable for a range of uses. This will enable them to adapt to the changing demands thereby safeguarding their viability as a commercial concern. The Council will expect proposals for new community facilities to include the provision of high speed broadband to help facilitate the creation of a community hub thereby making the facility more viable in the long term.

Policy CM01 - Provision of New Community Facilities

Proposals for new, or extensions of, or improvements to existing community facilities will be permitted provided they:

1) **are of a scale to meet the needs of the local community and in keeping with the character of the area;**
2) **are provided with adequate parking and operational space;**
3) **are accessible by walking or cycling to the local community;**
4) **are located within or adjacent to the community or settlement they serve;**
5) **would not significantly impact upon the amenity of neighbouring residents;**
6) **either provide or have the ability in the future, to make provision for broadband to facilitate the creation of a community hub network and provide flexible business space.**

Protection of Existing Community Facilities

17.9 Community facilities including local shops, services and public houses play a vital economic and social role in both urban and rural areas and their retention can assist in meeting the needs of the local community and reducing the need to travel. The Council recognises that there is a risk that such facilities may be lost to more financially profitable uses, and that such facilities are often difficult to replace. It is therefore considered that the loss of existing facilities should be resisted where they provide for a current or future local need.

17.10 Such facilities that are important to the community should be retained unless genuine but unsuccessful attempts have been made to retain the premises in a community use. To assess applications for the change of use or redevelopment of existing community facilities, the Council will require a thorough analysis of the existing operation and attempts made to secure the future viability of the community use. In all cases, the applicant must demonstrate that:

- the need for the existing or alternative community facilities has been researched and that there is insufficient viable demand;
- opportunities to support the facility by the introduction of other services have been explored, where the dual use of premises for a number of community functions may help support the viability of facilities;
- efforts have been undertaken to secure the viability of the facility through applications for grant aid, business advice and discussions with community groups, parish Councils, Thanet District Council, Kent County Council and other national or local bodies with a direct interest in service provision; and
- the site has been actively marketed for its existing use and alternative community uses, at a realistic price and for a reasonable period of time of at least a year, proportionate to the type and scale of the facility.

17.11 The following policy seeks to ensure that existing community facilities are protected where there is a need for them.

Policy CM02 - Protection of Existing Community Facilities

Proposals which would result in the loss of a community facility will not be permitted unless it can be demonstrated:

1) **there is alternative local provision which is accessible to the local community and the proposal will not undermine the ability of the community to meet its day to day needs; or**
2) **every reasonable attempt has been made to secure an alternative community use and the site is not viable for redevelopment to provide alternative community facilities; or**
3) **alternative provision of at least equivalent, or where possible, improved community benefit is provided in a convenient accessible location to serve the existing community.**

Margate Cemetery Expansion

17.12 Margate Cemetery is nearing capacity and a need has been identified for its expansion. A site of approximately 4.2 ha has been identified to the east of the existing cemetery to accommodate the additional land requirement.

Policy CM03 - Expansion of Margate Cemetery

Land of approximately 1 hectare is allocated and safeguarded for the expansion of Margate Cemetery and ancillary uses as shown on the Policies Map.

18 - Transport

Transport Assessments and Travel Plans

18.1 Development proposals may need to be accompanied by and judged against transport assessments or statements to assess the impact of development on the highway network and what improvements to transport infrastructure may be needed to accommodate them. Proposals likely to have significant transport implications will also require submission of a travel plan indicating measures to improve accessibility and promote sustainable and low carbon emission travel, such as electric vehicle charging infrastructure. Where feasible, development schemes should incorporate links to walking and cycling networks and/or contribute proportionately to their extension, rationalisation and improvement. Proposals should have regard to the route networks promoted in the walking and cycling strategies and integrate with them and with public transport routes and services. Many people will still choose to travel by car, and development may also need to provide or contribute to improvements to the road network to reduce congestion and improve pedestrian movement and safety.

18.2 The Council will require new development proposals to address any adverse transport impacts. With larger developments, equivalent to 100 dwellings or more, a Transport Assessment would usually be necessary. Smaller developments may only need a Transport Statement. However, some smaller developments may have a disproportionate impact on the network by reason of their location; the nature of the proposed development; or the timing of the development relative to other developments or the provision of new transport infrastructure. The Council, in conjunction with KCC Highways, will consider each proposal on its own merits and provide advice to applicants accordingly.

Policy TP01 - Transport Assessments and Travel Plans

Development proposals would have significant transport implications shall be supported by a Transport Assessment and where applicable a Travel Plan. These should show how multi-modal access travel options will be achieved, and how transport infrastructure needs arising from the expected demand will be provided.

In relation to other developments, a Transport Statement will be required, which addresses any transport impacts arising from the development and any mitigation measures that are needed to minimise the identified impact.

Walking

18.3 Walking and cycling generally improve overall health and fitness levels, can reduce the number of cars on the network, reduce congestion, improve air quality and save money for the individual. Creating active street frontages, with more people walking and cycling, also reduces crime levels and can act as a catalyst for more people to become active. The quality, safety and convenience of access by foot, bicycle and public transport are all key factors in encouraging people to select alternative modes to the private car.

18.4 Thanet has a road network which largely accommodates footways on both sides, not only in the main towns and seaside settlements but also along the distributor routes connecting them. In the rural areas the Public Rights of Way network offers walkers (and sometimes horse riders and cyclists) a good connection across open countryside to the coast, rural settlements and end destinations, with some circular walks offering superb views of both coast and countryside combined. The Thanet Coastal Path follows the longest stretch of chalk coastline in the country, the route having been set up in the 1990s. The Viking Coastal Trail is good for casual walkers, offering good views out to sea. There are other signposted walks in Thanet, including the Turner and Dickens Walk linking Margate and Broadstairs.

18.5 In 2005 "Feet First," a local walking strategy for Thanet was published. This identifies barriers to walking in the district and aims to promote and enable walking, for example by specifying a network of routes for improvements.

Policy TP02 - Walking

New development will be expected to be designed so as to facilitate safe and convenient movement by pedestrians including people with limited mobility, elderly people and people with young children.

The Council will seek to approve proposals to provide and enhance safe and convenient walking routes including specifically connection to and between public transport stops, railway stations, town centres, residential areas, schools and other public buildings.

Cycling

18.6 Cycling can provide an alternative to the private car for short trips and form part of longer journeys by public transport. Popularity of cycling as a healthy, enjoyable, efficient, pollution-free and cheap means of transport is dependent on safe, continuous, direct and attractive cycleways, together with facilities for secure cycle storage at interchange points and destinations.

18.7 The Viking Coastal Trail roughly encircles the former Isle of Thanet providing connections between the towns, leisure and heritage attractions. It forms part of the National Cycle Network and connects to the Oyster Bay Trail to Whitstable. Other routes have designated facilities to make cycling more attractive, such as the shared use footway/cycleways adjacent to New Haine Road. Provision of toucan crossings and facilities such as cycle parking at stations, shopping centres and other key locations, also help to improve the attractiveness and popularity of cycling in the district.

18.8 The Council has published a Thanet Cycling Plan (developed in association with local cycling groups), and, in conjunction with the County Council, will seek provision of a network of cycle routes using existing routes and where appropriate extensions to the primary route network. This includes part of the Sustrans national cycle network, which runs through Thanet, together with priority links between residential areas, places of work, schools, stations and town centres. The Council will seek every opportunity to introduce cycle routes in accordance with Thanet Cycling Plan.

18.9 Thanet Cycling Plan aims to establish a comprehensive safe network of cycle routes catering for all journey purposes, and features existing and proposed routes. The Cycling

Plan may be updated periodically to reflect the evolving network, and its proposed cycle routes are not therefore featured in this document.

18.10 New development generating travel demand will be expected to promote cycling by demonstrating that the access needs of cyclists have been taken into account, and through provision of cycle parking and changing facilities. Secure parking facilities and changing/shower facilities will encourage use of cycling. Cycle parking provision will be judged against the standards set out in the cycle parking standards Appendix C.

Policy TP03 - Cycling

The Council will seek the provision at the earliest opportunity of a network of cycle routes. Development that would prejudice the safety of existing or implementation of proposed cycle routes will not be permitted.

New development will be expected to consider the need for the safety of cyclists and incorporate facilities for cyclists into the design of new and improved roads, junction improvements and traffic management proposals.

Substantial development generating travel demand will be expected to provide convenient cycle parking and changing facilities.

New residential development will be expected to provide secure facilities for the parking and storage of cycles.

Bus and rail

18.11 Public transport has a major part to play in the realisation of a sustainable lifestyle by reducing car usage and pollution. Thanet has the lowest level of car ownership in Kent, which means that public transport is vital for personal mobility. A good public transport network is therefore important so that both these issues are addressed.

18.12 The Council has no direct control over the provision of bus and rail services. However, in its planning and other functions the Council will support the continuation and improvement of an effective public transport service for both bus and rail. Developer contributions will be used to facilitate implementation of such improvements. In addition the Council will expect new developments to take into account the needs of public transport. This could include various measures such as designing in waiting areas or the provision of sign posting and bus shelters.

18.13 Thanet is served by seven railway stations and has direct services to London, Canterbury, Ashford and Dover.

18.14 In December 2009 HS1 services commenced from Ramsgate to London St. Pancras reducing rail journey times to 1 hour and 16 minutes. For purposes of comparison, the mainline journey time to London Victoria is around 2 hours and to London Charing Cross up to 2 hours and 30 minutes. The three principal stations are Ramsgate, Broadstairs and Margate with routes in three directions:

- London via Faversham and Chatham
- London via Canterbury and Ashford

- Dover and Folkestone via Sandwich

Buses

18.15 Buses have an important role to play in providing a flexible alternative to the private car. This Plan supports development that will facilitate greater use of and improvement to bus services. New development will be expected to provide or contribute towards appropriate improvements.

18.16 In 2000 a Quality Bus Partnership (QBP) was formed between Stagecoach, Thanet District and Kent County Council with the aim of increasing local bus patronage. The formation of the Partnership has seen investment in roadside infrastructure and new vehicles as well as other initiatives to improve services, such as the high frequency LOOP and STAR services. However, there are still areas of congestion and inefficiencies on the highway network that prevent the bus services running as well as they might. The QBP will continue to work to remove these restrictions.

18.17 All bus routes within Thanet are supported by an established QBP between three partners - the commercial bus operator (Stagecoach), Kent County Council and Thanet District Council. This group meets quarterly and includes attendance by Council members from both Local Authorities.

18.18 The purpose of the QBP is to co-ordinate all matters which might affect bus operation, including potential investment opportunities, which could range from new bus stock, localised highway improvements to compliment bus routes to new highway infrastructure associated with new development proposals.

18.19 The re-development of the bus route network in 2004 and the subsequent support for bus services through the QBP have established underlying growth in the bus network. Whilst the projected increases in passenger numbers in future years appear less dramatic in percentage terms they actually constitute greater absolute growth.

Policy TP04 - Public Transport

Development proposals will be expected to take account of the need to facilitate use of public transport. The Council will seek to approve proposals consisting of or incorporating:

1) improvement of passenger and waiting facilities;
2) measures to improve personal security;
3) improved accessibility for people with mobility limitations;
4) bus/rail interchange facilities;
5) secure cycle storage.

Coach parking

18.20 Tourism in Thanet depends to a large extent on coach business. Coach travel is to be encouraged as an acceptable alternative to car based visitor travel. Dedicated sites to park

coaches are therefore required. Sites at Dreamland and Vere Road in Broadstairs are currently used for such purposes. Replacement provision for coach parking, displaced by development at the Rendezvous, Margate, is needed;

18.21 Ramsgate has no designated coach park, and Broadstairs has limited provision which may prove to be insufficient at peak times. The Council will seek appropriate solutions to accommodate demand on a temporary basis until such time as a specific site may be justified and identified through a review of potential coach parking sites.

Policy TP05 - Coach Parking

Land at Vere Road, Broadstairs, as identified on the Proposals Map will be retained for use as coach parking to serve the tourist trade.

The Council will consider the need to identify a site to accommodate demand for coach parking at other locations.

Car parking

18.22 The availability of car parking is a major influence on choice of means of travel. This Plan recognises the need to maintain some car parking provision, for example to provide choice of travel to urban centres, while restricting provision in new development in order to optimise site development potential, and promote sustainable transport choice.

18.23 The Council will expect new development to make efficient use of sites and optimise site development potential. Accordingly it will encourage well designed schemes that correspondingly minimise the proportion of the site used to accommodate the appropriate level of car parking.

18.24 It is anticipated that during peak periods demand for off-street car parking may be created by developments or activities that encourage large numbers of visitors to the area and may exceed current capacity. The Council will proactively seek and encourage suitable opportunities and solutions to manage and accommodate demand for car parking.

Policy TP06 - Car Parking

Proposals for development will be expected to make satisfactory provision for the parking of vehicles, including disabled parking.

Suitable levels of provision will be considered in relation to individual proposals taking account of the type of development, location, accessibility, availability of opportunities for public transport, likely accumulation of car parking, design considerations and having regard to the guidance referred to below. Parking provision in the town centres will also be assessed in relation to the provisions of Policies SP10-SP12.

In considering the level of parking provision in respect of proposals for residential development (use class C3), the Council will have regard to the guidance provided in Kent Design Review: Interim Guidance Note 3 - Residential Parking or any subsequent guidance.

In considering the level of parking provision in respect of proposals for other development, the Council will have regard to the indicative guidance in Kent Vehicle Parking Standards 2006 (Appendix C), or any subsequent guidance.

Where the level of provision implied in the above guidance would be detrimental to the character of a conservation area or adversely affect the setting of a listed building or ancient monument then a reduced level of provision may be accepted.

Within the town centres of Margate, Ramsgate and Broadstairs (as defined on the Policies Map) new development proposals will not be required or expected to provide on site car parking spaces. Where feasible such proposals should consider measures to encourage occupiers to make greater use of public transport.

18.25 The attractiveness of town centres for business, shoppers, residents and tourists depends amongst other things on an adequate level of car parking and effective enforcement of traffic regulations to prevent illegal parking on the highway and on public footpaths. In town centres the objective is to reduce the dominance of the private car in favour of walking, cycling and public transport, and to maximise site development potential. Accordingly the approach is to make better use of parking facilities that already exist, rather than providing more, and to apply charging and enforcement policies designed to encourage use of town centre public car parks for short term parking, and to prevent displacement of parking pressures beyond the immediate town centre area.

18.26 In district centres including Birchington and Northdown Road, non-car transport and optimum use of existing public and on street provision for short stay will be encouraged through appropriate charges and enforcement.

18.27 Outside the areas referred to above, the Council will monitor the situation, and consider appropriate measures and mechanisms to address any problems identified.

Policy TP07 - Town Centre Public Car Parks

In the town centres of Margate, Ramsgate and Broadstairs, as shown on the Policies Map, the existing level of off-street public car parking will be retained. Development resulting in the loss of space at such car parks will be permitted, providing the following criteria are met:

1) **the proposal includes satisfactory replacement provision as part of the development or on an alternative site considered appropriate and compatible with the operational requirements of the Council's parking service, or**
2) **exceptional release would enable provision at an alternative location for which there is greater demand and which is compatible with the operational requirements of the Council's parking service, or**
3) **evidence demonstrates that the car park is under used and/or loss of spaces would be compatible with the operational requirements of the Council's**

parking service.

Freight and service delivery

18.28 Effective delivery of goods and services is essential to the health of Thanet's town centres, local business and economic regeneration. Road freight traffic needs to be directed to routes fit for the purpose. Thanet's business parks, industrial estates and the Port of Ramsgate are directly accessible through the primary road network. However, town centre roads are generally unsuited to accommodate large vehicles, and off-street servicing facilities are limited. Proposals for new development in town centres will therefore be expected to include adequate off-street servicing. Where feasible, off-street loading areas, enabling goods to be delivered to shops in smaller loads, will be encouraged in new developments.

Policy TP08 - Freight and service delivery

Wherever capacity exists or is capable of being provided, new development proposals will be expected to demonstrate adequate off street servicing.

Car parking at Westwood

18.29 Due to its historically ad hoc pattern of growth, Westwood has a number of large, free car parks in locations which encourage shoppers to drive between them to visit its various retail stores. As a multi-purpose destination, Westwood is collectively over-provided with car parking. The Council will seek to encourage non-car travel to Westwood. Within the area shown on the map below, it will restrict parking provision, and encourage developers to work with the Council to reduce existing parking provision, develop better access, services and facilities for customers who wish to walk, cycle or arrive by public transport. The Council will seek to achieve this through cooperation with developers and in determining development applications to extend existing or build new commercial development.

18.30 A key objective of the Westwood Relief Scheme is to remove private vehicles from the area around the A256/A254 intersection in favour of a pedestrian friendly public realm enabling safe and convenient movement on foot between various commercial destinations and a smoother flow of through traffic passing around the area. Delivery of the scheme will require some reconfiguration of the road network and land use in the vicinity including potentially locating and rationalising car parking so that access by vehicle is from outside the pedestrian friendly area.

18.31 The most appropriate way for this to be achieved is through a Supplementary Planning Document which sets out the long-term objectives for the area in more detail; and identifies particular schemes or opportunities for bringing this about. Policy SP07 sets this out in more detail.

Policy TP09 - Car parking provision at Westwood

At Westwood, new commercial development proposals will be expected to demonstrate specific measures to encourage customers to arrive at the site by means other than car. Such measures could include restricting total levels of car parking provision and would be the subject of a legal agreement.

1) **car parking provision in new development at the indicative maximum level set out in the guidance at Appendix C will require specific justification.**
2) **where new development is proposed at sites with existing car parking then shared use of car parking will be expected and total provision, assessed on the basis of resultant total floor space of existing and new development, shall not exceed the maximum levels of provision referred in Appendix C.**
3) **where extensions to premises are proposed then no new car parking provision will be permitted. Replacement of any car parking lost as a result of such development will not be permitted unless special justification can be demonstrated.**
4) **Proposals for development that may impact upon demand for car parking will be considered in light of compatibility with the Westwood Relief Strategy.**

Traffic Management

18.32 The emerging Transport Strategy identifies a range of issues to be addressed, and which may require traffic management based solutions. Such issues include the need to address deficiencies in the highway network or junction capacity affecting efficient running of bus services, causing congestion or affecting air quality and the need to improve connectivity and address barriers to walking and cycling.

Policy TP10 - Traffic Management

Development required to implement traffic management measures designed to realise the best use of the highway network in terms of safety, traffic capacity and environmental conditions will be approved.

Appendix A - Superseded Policies

Table 1 lists the policies that are to be replaced by the policies in Table 2 - below. The Cliftonville Development Plan Document adopted in February 2010 still applies.

TABLE 1: SUPERSEDED POLICIES

Policy Number	Policy Name
Economic Development & Regeneration	
EC1	Land Allocated for Economic Development
EC2	Kent International Airport
EC3	Kent International - surface transport issues
EC4	Airside Development Area
EC5	Land at, and east of, the airport terminal
EC6	Fire Training School
EC7	Economic Development Infrastructure
EC8	Ramsgate Waterfront
EC9	Ramsgate New Port
EC10	Margate Old Town and Harbour
EC11	Business Hotels
EC12	Retention of Employment Sites
EC13	Office Accommodation
EC14	Working from Home
Housing	
H1	Residential Development Sites
H2	Dwelling Supply
H3	Phasing
H4	Windfall Sites
H5	Monitoring
H6	Residential Development Site – Westwood

Policy Number	Policy Name
H7	Residential Development and Amenity Site – Minster
H8	Size and Type of Housing
H9	Better Use of Land for Housing
H10	Areas in Need of Special Action
H11	Non-self contained residential accommodation
H12	Retention of existing housing stock
H13	Residential Amenities
H14	Affordable Housing Negotiations on Housing sites
H15	Rural Local Needs Housing
H16	New Agricultural dwellings
Town Centres & Retailing	
TC1	New Retail Development
TC2	Westwood Cross Town Centre
TC3	Town Centre Expansion
TC4	Mixed Use Area
TC5	Retail Warehouse Stores
TC6	Assessment of Applications
TC7	Margate, Ramsgate and Broadstairs Core Centres
TC8	District and Local Centres
TC9	Hot Food Takeaways
Transportation	
TR1	Location of Development
TR2	Appropriate Use of Road Hierarchy
TR3	Provision of Transport Infrastructure
TR4	New Road and Highway Improvements
TR5	Off-street parking in town centres

Policy Number	Policy Name
TR6	Ramsgate Station Goods Yard
TR7	Roadside services
TR8	Rail Link Safeguarding Direction
TR9	Ramsgate Renaissance
TR10	Coach Parking
TR11	Pedestrian Movement
TR12	Cycling
TR13	Public Transport Facilities
TR14	Provision of Facilities for Sustainable Transport
TR15	Green Travel Plans
TR16	Car Parking Provision
TR17	Retention of existing Car Parking
TR18	Car Parking at Westwood and Out of Centre Locations
TR19	Traffic Management Measures
TR20	Telecommunications
Design	
D1	Design Principles
D2	Landscaping
D3	Extensions to Dwelling Houses
D4	Design Statements
D5	Advertisements
D6	Satellite Antennae
D7	Areas of High Townscape Value
D8	Seafront Architecture
D9	Accommodation for Elderly Relatives
D10	Agricultural Buildings

Policy Number	Policy Name
Heritage	
HE1	Listed Buildings of Special Architectural or Historic interest
HE2	Change of Use of Listed Buildings
HE3	Listed Rural Buildings
HE4	Planning Controls in Conservation Areas
HE5	Conservation Area Consent
HE6	Demolition in Conservation areas
HE7	Non-listed buildings in Conservation Areas
HE8	Street Furniture
HE9	Importance of Archaeological Resource
HE10	Scheduled Ancient Monuments
HE11	Archaeological Assessment
HE12	Archaeological Sites and Preservation
HE13	Royal Sea Bathing Hospital
HE14	Montefiore Site
Tourism	
T1	Tourist Facilities
T2	Serviced Accommodation
T3	Self-Catering Accommodation
T4	Former Hoverport Site, Pegwell Bay
T5	The Lido Site
T6	Language Schools
T7	Amusement Uses
T8	Dreamland
T9	Rural Tourism

Policy Number	Policy Name
Sport & Recreation	
SR1	New Facilities
SR2	Jackey Baker's
SR3	Maximising Use of Facilities
SR4	Provision of New Sports Facilities
SR5	Playspace
SR6	Amenity Areas
SR7	Urban Fringe
SR8	Formal Countryside Recreation
SR9	Informal Countryside Recreation
SR10	Public Open Space
SR11	Private Open Space
SR12	Playing Fields
SR13	Allotments
SR14	Community Woodland
SR15	Golf Courses & Country Park
SR16	Equestrian Uses and Buildings
SR17	Statutory Rights of Way
SR18	Major Holiday Beaches
SR19	Intermediate Beaches
SR20	Undeveloped Beaches
SR21	Development on Seafront Esplanades
Countryside & Coast	
CC1	Development in the Countryside (Urban and rural Confines)
CC2	Landscape Character Areas
CC3	Local Landscape Features
CC4	Island Approach Routes

Policy Number	Policy Name
CC5	Green Wedges
CC6	Village Separation Corridors
CC7	Rural Lanes
CC8	Power Lines
CC9	Best & most versatile Farmland
CC10	Farm Diversification
CC11	Agriculture Related Development
CC12	Farm Retail Units
CC13	Coastal Park Initiative
CC14	Development Along the Coast
CC15	Coastal Defence Works
CC16	Undeveloped Coast
CC17	Undeveloped Clifftop Sites
Rural Settlements	
R1	General Levels of Development
R2	Village Gaps
R3	Village Services
R4	Village Shops
R5	Conversion of Rural Buildings
R6	Traffic in the Villages
Nature Conservation	
NC1	Habitats
NC2	Nature Reserve and SSSIs
NC3	Local Wildlife Sites
NC4	Habitat Management and Creation
NC5	Lower Stour Valley
NC6	RIGS Sites

Policy Number	Policy Name
Environmental Protection	
EP1	Potentially Polluting Development
EP2	Landfill Sites
EP3	Unstable Land
EP4	Derelict and Contaminated Land
EP5	Local Air Quality Monitoring
EP6	General Noise Control
EP7	Aircraft Noise
EP8	Aircraft Noise and Residential Development
EP9	Light Pollution
EP10	Wantsum Channel Flood Risk Area
EP11	Margate Flood Risk Area
EP12	Surface Water Run-Off
EP13	Groundwater Protection Zones
EP14	Renewable Energy
Community Facilities	
CF1	Community Facilities
CF2	Development Contributions
CF3	Training Facilities
CF4	QEQM Hospital, Margate
CF5	Margate Cemetery
CF6	New Education Site

TABLE 2: SUPERSEDING POLICIES

Policy Number	Policy Name
Strategic proposals	
SP01	Spatial Strategy - Housing
SP02	Implementation
SP03	Local Plan Review
Economic Strategy	
SP04	Employment Growth
SP05	Land Allocated for Economic Development
SP06	Manston Business Park
SP07	Manston Airport
Town Centre Strategy	
SP08	Thanet's Town Centres
SP09	Westwood
SP10	Margate
SP11	Ramsgate
SP12	Broadstairs
Housing Strategy	
SP13	Housing Provision
SP14	General Housing Policy
SP15	Strategic Housing Site - Manston Green
SP16	Strategic Housing Site - Birchington
SP17	Strategic Housing Site - Westgate on Sea
SP18	Strategic Housing Site - Westwood
SP19	Strategic Housing Site - Land fronting Nash and Haine Roads
SP20	Strategic Housing Site - Land at Manston Court Road/Haine Road
SP21	Strategic Housing Site - Land north and south of Shottendane Road
SP22	Type and Size of Dwellings
SP23	Affordable Housing
Environment Strategy	
SP24	Development in the Countryside
SP25	Safeguarding the Identity of Thanet's Settlements
SP26	Landscape Character Areas
SP27	Green Infrastructure
SP28	Protection of the International and European Designated Sites
SP29	Strategic Access Management and Monitoring Plan (SAMM) policy
SP30	Biodiversity and Geodiversity Assets
SP31	Biodiversity Opportunity Areas
SP32	Protection of Open Space
SP33	Local Green Space
SP34	Provision of Accessible Natural and Semi Natural Green Space, Parks, Gardens and Recreation Grounds

Policy Number	Policy Name
SP35	Quality Development
SP36	Conservation and Enhancement of Thanet's Historic Environment
SP37	Climate Change
Community Strategy	
SP38	Healthy and Inclusive Communities
SP39	QEQM Hospital, Margate
SP40	New Medical Facilities at Westwood
SP41	Community Infrastructure
SP42	Primary and Secondary Schools
Transport Strategy	
SP43	Safe and Sustainable Travel
SP44	Accessible locations
SP45	Transport Infrastructure
SP46	New Railway Station
SP47	Strategic Routes
Economy	
E01	Retention of existing employment sites
E02	Home Working
E03	Digital Infrastructure
Town and District Centres	
E04	Primary and Secondary Frontages
E05	Sequential and Impact Test
E06	District and Local Centres
Tourism	
E07	Serviced Tourist Accommodation
E08	Self Catering Tourist Accommodation
E09	Protection of Existing Tourist Accommodation
E10	Thanet's Beaches
E11	Language Schools
E12	Quex Park
The Rural Economy	
E13	Development for new business in the countryside
E14	Conversion of rural buildings for economic development purposes
E15	Farm Diversification
E16	Best and Most Versatile Agricultural Land
Housing	
HO1	Housing Development
HO2	Land on west side of Old Haine Road, Ramsgate
HO3	Land fronting Nash Road and Manston Road
HO4	Land south of Brooke Avenue Garlinge
HO5	Land at Haine Road and Spratling Street, Ramsgate
HO6	Land south of Canterbury Road East, Ramsgate

Policy Number	Policy Name
HO7	Land at Melbourne Avenue, Ramsgate
HO8	Cliftonville West and Margate central
HO9	Housing in Rural Settlements
HO10	Land at Tothill Street, Minster
HO11	Land at Manor Road, St Nicholas at Wade
HO12	Land at Walter's Hall Farm, Monkton
HO13	Land south side of A253, Cliffsend
HO14	Land north of Cottington Rd, Cliffsend
HO15	Land south side of Cottington Rd, Cliffsend
HO16	Rural Housing Need and Exception Sites
HO17	New dwellings for Rural Workers
HO18	Care and Supported Housing
HO19	Houses in Multiple Occupation
HO20	Accommodation for Gypsy and Travelling Communities
HO21	Residential use of empty property
HO22	Retention of existing housing stock
HO23	Ancillary accommodation for a family member
HO24	Fostering Homes & Childcare Facilities
Green Infrastructure	
GI01	Protection of Nationally Designated Sites (SSSI) and Marine Conservation Zones (MCZ)
GI02	Locally Designated Wildlife Sites
GI03	Regionally Important Geological Sites (RIGS)
GI04	Amenity Green Space and Equipped Play Areas
GI05	Protection of Playing Fields and Outdoor Sports Facilities
GI06	Landscaping and Green Infrastructure
GI07	Jackey Bakers
Quality Development	
QD01	Sustainable Design
QD02	General design principles
QD03	Living Conditions
QD04	Technical Standards
QD05	Accessible and Adaptable Accommodation
QD06	Advertisements
QD07	Telecommunications
Heritage	
HE01	Archaeology
HE02	Development in Conservation Areas
HE03	Heritage Assets
HE04	Historic Parks and Gardens
HE05	Works to a heritage asset to address climate change

Policy Number	Policy Name
Climate Change	
CC01	Fluvial and Tidal Flooding
CC02	Surface Water Management
CC03	Coastal Development
CC04	Renewable energy
CC05	District Heating
CC06	Solar Parks
CC07	Richborough
Safe and Healthy Environment	
SE01	Potentially Polluting Development
SE02	Landfill Sites and Unstable Land
SE03	Contaminated Land
SE04	Groundwater Protection
SE05	Air Quality
SE06	Noise Pollution
SE07	Noise Action Plan Important Areas
SE08	Light Pollution
Communities	
CM01	Provision of New Community Facilities
CM02	Protection of Existing Community Facilities
CM03	Expansion of Margate Cemetery
Transport	
TP01	Transport Assessments and Travel Plans
TP02	Walking
TP03	Cycling
TP04	Public Transport
TP05	Coach Parking
TP06	Car Parking
TP07	Town Centre Public Car Parks
TP08	Freight and service delivery
TP09	Car parking provision at Westwood
TP10	Traffic Management

Appendix B Housing Allocations and Permissions

Please note that the allocations table includes those sites with planning permissions for completeness. These are also listed in the permissions table however, these sites are only included in the planning permissions calculations therefore there is no double counting.

Site Address	Total units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026/ 27	2027/ 28	2028 /29	2029 /30	2030/ 31	2031/ 32
STRATEGIC SITES														
Westgate Policy SP17	2000	0	25	75	100	150	200	250	250	250	250	250	200	
Birchington Policy SP16	1600	0	0	50	100	150	150	200	200	200	150	150	150	100
Westwood Policy SP18	1450	0	0	50	150	150	150	150	150	150	150	150	100	100
Land At Manston Court Road / Haine Road Westwood Village SP20	1400	0	50	110	120	130	140	140	140	120	150	150	150	
Manston Green 14/0050 SP15	785	0	50	100	100	100	100	100	100	100	35	0	0	
Land At Manston Road & Shottendane Road SP21	550	0	30	90	90	90	90	90	70	0	0	0	0	
Euro Kent Land At New Haine Road 11/0910	496	0	0	50	50	50	50	70	70	70	70	16	0	
Euro Kent Land At New Haine Road 17/1485	54	0	0	10	20	24	0	0	0	0	0	0	0	

Site Address	Total units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026/ 27	2027/ 28	2028 /29	2029 /30	2030/ 31	2031/ 32
Land Fronting Nash And Haine Roads SP19 Phase 5 15/0250	469	0	0	50	50	75	75	75	75	69	0	0	0	
Land Fronting Nash And Haine Roads SP19 Phase 4 14/0320	204	0	50	50	50	54	0	0	0	0	0	0	0	
Land Fronting Nash And Haine Roads SP19 Phase 3C 17/0726	97	0	20	30	30	17	0	0	0	0	0	0	0	
NON STRATEGIC SITES OUTSIDE URBAN AREA														
Land Off Nash/Manston Rds, Margate HO3	250	0	20	70	70	70	20	0	0	0	0	0	0	
Westwood Lodge, Poorhole Lane Broadstairs 15/0788	151	0	0	20	50	50	31	0	0	0	0	0	0	
Land At Haine Rd & Spratling St, Ramsgate HO5 16/1374	100	0	5	15	30	30	20	0	0	0	0	0	0	
Land West Of Old Haine Road, Ramsgate HO2	100	0	0	50	50	0	0	0	0	0	0	0	0	
Land Adjacent To Former Manston Allotments Manston Road Ramsgate	80	0	20	30	30	0	0	0	0	0	0	0	0	
Land South East Of Brooke Avenue, Westbrook HO4 16/0376 18/1416	43	20	23	0	0	0	0	0	0	0	0	0	0	

Site Address	Total units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026/ 27	2027/ 28	2028 /29	2029 /30	2030/ 31	2031/ 32
South Of Canterbury Rd, Ramsgate HO6 16/1416	14	14	0	0	0	0	0	0	0	0	0	0	0	
MIXED USE SITES														
Cottage Car Park, New Street, Margate	32	0	0	0	0	0	0	0	15	17	0	0	0	
Margate Town Centre, (South Of New Street, Margate)	27	0	0	0	0	0	0	0	5	10	12	0	0	
Queen Arms Yard, Margate	24	0	0	0	0	24	0	0	0	0	0	0	0	
NON STRATEGIC URBAN AREA SITES														
Manston Road Industrial Estate South Site Flambeau Europlast Ltd 15/0187	120	0	0	30	60	30	0	0	0	0	0	0	0	
Gas Works Boundary Road, Ramsgate	96	0	0	30	50	16	0	0	0	0	0	0	0	
Thanet Reach Southern Part Millenium Way	80	0	0	20	40	20	0	0	0	0	0	0	0	
Lanthorne Court Broadstairs	56	0	0	20	36	0	0	0	0	0	0	0	0	
Former Newington Nursery & Infants Nursery & Infants Melbourne Avenue HO7	49	0	0	20	29	0	0	0	0	0	0	0	0	

Site Address	Total units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026/ 27	2027/ 28	2028 /29	2029 /30	2030/ 31	2031/ 32
Manston Road Industrial Estate North Site Adjacent To The Beacon 16/1715	48	0	0	10	20	18	0	0	0	0	0	0	0	
Land Of Northwood Road, Ramsgate	45	0	0	20	25	0	0	0	0	0	0	0	0	
Land At Victoria Road & Dane Rd, Margate	35	0	0	10	15	10	0	0	0	0	0	0	0	
Haine Farm, Haine Road, Ramsgate	35	0	0	15	20	0	0	0	0	0	0	0	0	
Part Of Pysons Road	26	0	0	10	16	0	0	0	0	0	0	0	0	
Highfield Road, Ramsgate	25	0	0	10	15	0	0	0	0	0	0	0	0	
Former Club Union Convalescent Home, North Of Reading Street Broadstairs	24	0	0	10	14	0	0	0	0	0	0	0	0	
Suffolk Avenue, Westgate	23	0	0	11	12	0	0	0	0	0	0	0	0	
R/O Cecilia Road, Ramsgate	23	0	0	0	0	0	0	0	10	13	0	0	0	
Gas Holder Station, Addington Street Margate	22	0	0	11	11	0	0	0	0	0	0	0	0	
Adjacent To 21 Royal Road & 9 Townley Street	18	0	0	0	0	0	0	0	9	9	0	0	0	
End Of Seafield Road	16	0	0	16	0	0	0	0	0	0	0	0	0	

Site Address	Total units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026/ 27	2027/ 28	2028 /29	2029 /30	2030/ 31	2031/ 32
Land At Wilderness Hill And Dane Road	14	0	0	0	14	0	0	0	0	0	0	0	0	
Ww Martin, Dane Park Road, Ramsgate	14	0	0	7	7	0	0	0	0	0	0	0	0	
Foreland School, Lanthorne Rd, Lanthorne Rd,	14	0	0	7	7	0	0	0	0	0	0	0	0	
Dane Valley Arms, Dane Valley Road, Margate	13	0	0	7	6	0	0	0	0	0	0	0	0	
Land At Waterside Drive, Westgate	12	0	0	0	12	0	0	0	0	0	0	0	0	
Adjacent To 9 Minnis Road, Birchington	11	0	0	0	0	0	0	0	5	6	0	0	0	
10 Cliff Street, Ramsgate	11	0	0	0	11	0	0	0	0	0	0	0	0	
Complete Car Sales, Willsons Road, Ramsgate	10	0	0	0	10	0	0	0	0	0	0	0	0	
Builders Yard, The Avenue, Margate	10	0	0	0	10	0	0	0	0	0	0	0	0	
Margate Delivery Office, 12-18 Addington Street	10	0	0	0	0	0	0	0	10	0	0	0	0	
Ind Units, Marlborough Rd, Margate	10	0	0	5	5	0	0	0	0	0	0	0	0	
Gap House School, 1 Southcliff Parade, Broadstairs	10	0	0	5	5	0	0	0	0	0	0	0	0	

Site Address	Total units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026/ 27	2027/ 28	2028 /29	2029 /30	2030/ 31	2031/ 32
Furniture Mart, Booth Place, Grotto Hill	9	0	0	0	9	0	0	0	0	0	0	0	0	
Magnet And Southern, Newington Road, Ramsgate	8	0	0	0	8	0	0	0	0	0	0	0	0	
Shottendane Farm, Margate	8	0	0	8	0	0	0	0	0	0	0	0	0	
Adjacent To 8 Chapel Place, Ramsgate	6	0	0	0	0	0	0	0	6	0	0	0	0	
Ro 7_10 Marine Gdns - 5 Dwellings	6	0	0	0	0	6	0	0	0	0	0	0	0	
38, 38a And 42 St Peters Road, Broadstairs	5	0	0	0	5	0	0	0	0	0	0	0	0	
Units 1-4 Monkton Place Ramsgate	5	0	0	0	5	0	0	0	0	0	0	0	0	
1 Thanet Road, Margate	5	0	0	0	5	0	0	0	0	0	0	0	0	
79-85 High Street, Ramsgate See 17/1508	0	0	0	0	0	0	0	0	0	0	0	0	0	
Laleham School, Northdown Park Road, Margate See 14/0518	0	0	0	0	0	0	0	0	0	0	0	0	0	
Fort Hill, Arcadian See 15/0532 16/1240	0	0	0	0	0	0	0	0	0	0	0	0	0	

Site Address	Total units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026/ 27	2027/ 28	2028 /29	2029 /30	2030/ 31	2031/ 32
RURAL SITES														
Tothill Street Minster HO10	250	0	30	60	60	50	50	0	0	0	0	0	0	
Site "A" South Side Of A253, Cliffsend See 17/0152 HO13	62	0	20	20	22	0	0	0	0	0	0	0	0	
Jentex Oil Depot Canterbury Road West Ramsgate	56	0	0	0	0	20	20	16	0	0	0	0	0	
Land North Of Cottington Rd (West Of Beech Grove) 17/0151 HO14	41	0	15	15	11	0	0	0	0	0	0	0	0	
Land South Side Of Foxborough Lane	35	0	0	10	25	0	0	0	0	0	0	0	0	
Land At The Length, St. Nicholas See 17/1342	25	0	0	5	10	10	0	0	0	0	0	0	0	
South Side Cottington Rd, Cliffsend. HO15	23	0	10	13	0	0	0	0	0	0	0	0	0	
Land At Walter's Hall Farm, Monkton HO12	20	0	10	10	0	0	0	0	0	0	0	0	0	
Builders Yard South Of 116-124 Monkton Street, Monkton	20	0	0	10	10	0	0	0	0	0	0	0	0	
Land At Manor Rd, St Nicholas See 15/0770 (Residual Figure) HO11	10	5	5	0	0	0	0	0	0	0	0	0	0	
CLIFTONVILLE SITES														

Site Address	Total units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026/ 27	2027/ 28	2028 /29	2029 /30	2030/ 31	2031/ 32
Rear Of 59-65 Harold Rd	9	0	0	0	0	0	0	0	9	0	0	0	0	
Adj To 60 Harold Rd And Rear Of 40-56 Harold Rd	14	0	0	0	0	0	0	0	7	7	0	0	0	
Adj To 14 Harold Rd	10	0	10	0	0	0	0	0	0	0	0	0	0	
St George's Hotel See 05/0018	0	0	0	0	0	0	0	0	0	0	0	0	0	

Extant Planning Permissions (under construction and not started) as at 31st March 2019

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
140050	Land East And West Of, Haine Road, Manston Green	785		50	100	100	100	100	100	100	100	35	0	0
110910	Land At New Haine Road (Eurokent)	496			50	50	50	50	70	70	70	70	16	
171485	Eurokent Land At New Haine Road RAMSGATE	54			10	20	24							
150250	Land North Of Haine Road Broadstairs And West Of Nash Road Margate Phase 5	469			50	50	75	75	75	75	69			
140320	Land North Of Haine Road Broadstairs And West Of Nash Road Margate Phase 4	204		50	50	50	54							
170726	Land North Of Haine Road Broadstairs And West Of Nash Road Margate Phase 3C	97		20	30	30	17							
151303	St Lawrence College College Road Ramsgate	166		10	20	30	30	30	30	16				
150788	Westwood Lodge Poorhole Lane Broadstairs	151			20	50	50	31						
150187	Flambeau Europlast Ltd, Manston Road, Ramsgate, Ct12 6hw	120			30	60	30							
/03/1200	Pleasurama Amusement Park Marina Esplanade Ramsgate	107					20	30	30	27				
161374	St Stephens, Haine Road, Ramsgate,	100		5	15	30	30	20						

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
/04/0700	Royal Sea Bathing Hospital Canterbury Road Margate	91		20	30	30	11							
/05/0018	St Georges Hotel Eastern Esplanade Margate	87					20	20	20	27				
100573	Former Police Station Cavendish Street Ramsgate	82					10	10	20	20	22			
140518	Laleham School Northdown Park Road Margate	70	10	20	20	20								
120210	Former Allotment Gardens Manston Road	64	23	20	21									
170152	Land East Of 40 Canterbury Road West Ramsgate	62		20	20	22								
161715	Land South Of Manston Road Adjacent To The Beacon (Former Car Storage Site) Manston Road Ramsgate	48			10	20	18							
181416	Land Rear Of 2 To 28 Kingston Avenue Margate	43	20	23										
170151	Land North Of Cottington Road And East Of Lavender Lane Ramsgate	41		15	15	11								
161522	Red House Farm Manston Court Road Margate	40		10	20	10								
151204	Land Adjacent And Rear Of Ashbre St Nicholas At Wade	39	1	10	10	10	8							
160654	66 Monkton Road Minster Ramsgate	35		10	10	15								
150537	Cliffsend Farm Cottages Cliffs End Road Ramsgate	31	3	10	10	8								

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
171159	Westcliff House 37a Sea Road Westgate	31			10	10	11							
171447	Land Adjacent Little Orchard St Nicholas At Wade	30			10	10	10							
150956	Land Adjacent Holy Trinity School 99 Dumpton Park Drive Broadstairs	28	13	15										
171342	Land North East Of The Length ST Nicholas At Wade	25			5	10	10							
161473	Land South Of Briary Close, Margate	24			5	9	10							
160417	Land Between , Adjoining Manston Green Industries Ramsgate	23			5	8	10							
170150	Land Adjacent To Oakland Court Cliffsend	23		10	13									
170860	Farleys 46 - S4 Chatham Street Ramsgate	23		10	4	5	4							
171763	Manston Court Bungalows 5 Manston Road Manston Ramsgate	22			5	10	7							
160003	67 - 69 Northdown Road Margate	21		21										
160952	131- 137 King Street Ramsgate	18			14	4								
170842	64 Edgar Road Margate	15	15											
160424	Sheridans Cliff Road Broadstairs	14	14											

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
161416	Land Adjoining 1 Chilton Lane And Canterbury Road East Ramsgate	14	14											
170321	Court Stairs Country Club Pegwell Road Ramsgate	14		7	5	2								
171231	Fard Industries Limited 237 Ramsgate Road Margate	14	14											
171508	81 - 85 High Street Ramsgate	14			7	7								
181446PN 06	Apollo House Chapel Place Ramsgate	14	14											
161752	Land At Haine Lodge Spratling Lane Ramsgate	13			4	4	5							
180459	Institute Of St Anselms Lonsdale Court Hotel 51 - 61 Norfolk Road Margate	13		11	2									
180790	24- 27 Marine Terrace Margate	13		6	7									
160934	43 Star Lane Margate	12			6	6								
160967	Land Adjacent 15 Southall Close Minster	12		2	5	5								
171125	7 - 9 Addington Road Margate	12	6	6										
171326	8-12 High Street Broadstairs	12		6	6									

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171523	Land West Of Hundreds Farm House Canterbury Road Westgate	12			12									
130694	Bown Of London 1 Archway Road	11	11											
160647	Shottendane Nursing Home, Shottendane Road, Margate	11			11									
161289	5-6 Mansion Street, And 5-7 Fort Road, Margate,	11			5	6								
171216	Primark 46a - 48 High Street Margate	11			5	6								
180642	8 Beach Avenue Birchington	11	5	6										
150770	Land Rear Of Manor Hall And Heritage Park Manor Road St Nicholas At Wade	10	5	5										
160974	98 King Street Ramsgate	10			10									
161160	Disused Railway Line College Road Margate	10	5	5										
161290	Thornton Bobby Ltd 240 - 242 Northdown Road Margate	10			7	3								
180430	Land Rear Of 163 To 173 Pegwell Road Ramsgate	10	4	6										
180445	3-4 Chatham Place Ramsgate	10	10											
/03/0249	Land Of Manston Road Ramsgate	10	10											

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
/03/0249	Manston Court Bungalows 5 Manston Road Manston Ramsgate	10	10											
140096	Garages At Kingston Close Ramsgate	9	9											
150142	Cambay Lodge 91 Kingsgate Avenue Broadstairs	9	9											
170286	49 - 50 Hawley Square Margate	9			9									
171691	White Lodge 44 - 46 Madeira Road Margate	9	4	4	1									
180265	17 - 21 Warwick Road Margate	9	9											
180555	39 - 43 Sea Road Westgate	9			3	6								
181480	17 Regency Court St Augustines Road Ramsgate	9			9									
181503	Land North West Of Former Seabathing Hospital Canterbury Road Ramsgate	9		3	3	3								
140976	2a Park Road Ramsgate	8	5		3									
150532	Land Adj To 12-14 Fort Road Margate	8		4	4									
161705	Garages Adjacent Pikes Lane, Sussex Street Ramsgate	8		8										
171755	6 No Foreland Road Broadstairs	8		2	2	2	2							

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
180518	Adams Gas 2 Bath Road Margate	8			4	4								
180608	41 - 43 Victoria Road Margate	8		4	4									
181713PN 06	Orbit Housing Associationfoy House 27 - 29 High Street Margate	8		8										
140404	Land Adj Clifftop & Redriff North Foreland Avenue	7			3	4								
170358	Springfield Nursing Home Hengist Road Westgate	7			3	4								
170792	3 Carlton Avenue Broadstairs	7	7											
171605	Land On The South Side Of Duke Street Margate	7			7									
180851	Redriff Convent North Foreland Avenue Broadstairs	7		7										
131023	Garage Block 34-36 St Peters Road Broadstairs	6			6									
140847	140 King Street Ramsgate	6		3	3									
150087	139-141 High Street Ramsgate	6				6								
160377	125 Southwood Road Ramsgate	6	6											
170314	Land East Side Of Summer Road St Nicholas At Wade	6			3	3								

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
171319	Land At 57 59 61 63 And 67 Eaton Road Margate	6				6								
171673	45 - 49 Sea Road Westgate	6			3	3								
180227	14 Cecil Square Margate	6	6											
180238	20 - 24 Harbour Street Ramsgate	6			6									
100248	Cliff Cottage Herschell Road Birchington	5				5								
120270	Land At 34 To 36 Bellevue Road And 25-27 Bellevue Avenue Ramsgate	5		2	3									
141066	Lord Nelson 11 Nelson Place Broadstairs	5				5								
150961	8 Westleigh Road Westgate On Sea	5	5											
160759	Land Rear Of Orchard House 17 Church Street Broadstairs	5			2	3								
161109	Land On The East Side Of Leicester Avenue	5		5										
170941	18 Western Esplanade Broadstairs	5		5										
171020	7 First Avenue And 2 Eastern Esplanade Margate	5				5								
171174	Seafields, Cliff Rd, Birchington	5		2	3									

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
180103	53 Albion Road Broadstairs	5			2	3								
180757	Land West Of 33a Alexandra Road, Broadstairs	5			2	3								
181203	Land Adjacent Brooksend Lodge Canterbury Road Birchington	5		2	3									
/06/0177	10-14 Vicarage Crescent Margate	5				5								
140875	31 Eastern Esplanade Margate	4	4											
151293	Land Rear Of 33 Summerfield Road Margate	4	2	2										
151297	Ivor Thomas Amusements Limited 100 Grange Road Ramsgate	4	4											
160724	15a Tothill Street Minster Ramsgate	4		2	2									
161067	22-23 Marine Terrace Margate	4		4										
170364	Margate Royal British Legion Club Legion House 18 St Johns Road Margate	4		4										
170415	Winchmore Guest House 8 Grosvenor Place Margate	4	4											
171008	12 Weigall Place Ramsgate	4			2	2								

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
171305	130 Gladstone Road Broadstairs	4		2	2									
180276	15 Warwick Road Margate	4	4											
180833	White Stag 70 Monkton Street Monkton	4		4										
180877	105 Grange Road Ramsgate	4	2	2										
181098	135 Monkton Road Minster	4			4									
181233	The Old Forge High Street Garlinge Margate	4		2	2									
110540	Land Rear Of 19 To 23 Harold Road And 9 To 15 Albion Road Margate	3			3									
120158	16 The Vale Broadstairs	3		1	2									
131013	30 Dalby Square Margate	3	3											
140087	Garages Adj 82-90 Chichester Road	3	3											
140103	Garages Rear Of 5 And 7 St Mary's Road Minster Ramsgate	3				3								
140616	36-42 Marine Terrace Margate	3	3											
160383	79 High Street Ramsgate	3			3									

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
160993	Land Rear Of 6 To 8 Parkwood Close Broadstairs	3	1	1	1									
161418	Yard Rear Of 8 Arnold Road Margate	3			3									
170127	Bown Of London 1 Archway Road Ramsgate	3	3											
170195	Land Adjacent 12 To 14 Fort Road Margate	3		3										
170212	5 Beach Houses Royal Crescent Margate	3	3											
170447	The Yard St Annes Gardens Margate	3			3									
170572	Green Lawns 16 Sowell Street Broadstairs	3		1	2									
171112	17 Upper Dumpton Park Road Ramsgate	3			3									
171515	2 - 4 Arthur Road Margate	3	3											
171610	7 Westbrook Road Margate	3		3										
180015	38 St Mildreds Rd Westgate-On-Sea	3			3									
180247	64 High Street Broadstairs	3		3										
180587	15 - 16 Hawley Square Margate	3		3										

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
180870	Essured Cars Uk Limited 30 Albion Road Broastairs	3	1	2										
181383	2-4 Cowley Rise Margate	3		3										
181545	Newington Post Office 85 Newington Road Ramsgate	3	3											
100041	10-14 Vicarage Crescent Margate	2				2								
110602	31 High Street Minster Ramsgate	2	1	1										
120005	31 High Street Minster Ramsgate	2		2										
120765	Land Adjacent 30 And 32 High Street And 9 Cavendish Street Ramsgate	2		2										
130132	The Acorn Inn 6 Park Lane Birchington	2					2							
140242	Land Rear Of 1 To 7 Coronation Close Broadstairs	2				2								
150098	10 Effingham Street Ramsgate	2				2								
150202	1 Godwin Road Margate	2		2										
150310	Garages To Rear Of 55 Newington Road Ramsgate	2	2											
160545	101- 103 High Street Margate	2		2										

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160800	Hoo Farm 147 Monkton Road Minster	2			2									
161047	Land At Junction Of Sowell Street Broadstairs	2		2										
161151	7 Paragon Ramsgate	2	2											
161387	2-6 Station Approach Birchington	2	2											
161551	28 Ethelbert Crescent Margate	2			2									
161716	Garage Block Between 108 And 110 Clements Road Ramsgate	2	2											
170295	Plots 5, 6 And 7 Youngs Nursery Arundel Road Ramsgate	2	1	1										
170305	Land Rear Of Ashbre Manor Road St Nicholas At Wade Birchington	2			1	1								
170400	46 St Mildreds Road Westgate On Sea	2			2									
170746	Land Adjacent 35 Victoria Parade Ramsgate	2			2									
170892	85 Dane Road Margate	2		2										
170931	Post Office 48 High Street Ramsgate	2			2									
171081	62 Princess Margaret Avenue Ramsgate	2		2										

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171127	14 The Parade Margate	2		2										
171291	Former Builders Yard Rear Of 28/30 High Street Broadstairs	2		2										
171713	4 Effingham Street Ramsgate	2		2										
171795	Land West Of Hazeldene Ramsgate Road Sarre Birchington	2			2									
180057	Euro Parts 188 Northdown Road Margate	2		2										
180544	Hoo Farm Monkton Ramsgate	2		2										
180676	171 Grange Road Ramsgate	2			2									
180812	71 Eaton Road Margate	2		2										
181025	115a Canterbury Road Margate	2		2										
181179	2 Albert Terrace Margate	2		2										
181275	Land To The Side Of 51 Holly Lane Margate	2			2									
181295	50 High Street Ramsgate	2			2									
181301	52 Gordon Road Westwood Margate	2		2										

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181324	E J Lovelt And Sons 20 Princes Crescent Margate	2		2										
181553	104 Northdown Road Margate	2		2										
181727	Crown And Sceptre The Street Acol Birchington	2	2											
190005	First Steps Nursery 25 - 29 Thanet Road Margate	2			2									
110615	19 High Street Margate	1		1										
121003	Land Rear Of 122 Grosvenor Place Margate	1		1										
130787	Land Adjacent To 39 High Street Minster Ramsgate	1			1									
140178	Land Between 26 And 30 Princes Gardens Margate	1	1											
140241	Land Adjacent 4 Oakdene Road Ramsgate	1			1									
140698	4 Bellevue Road Ramsgate	1		1										
140837	1 Knights Avenue Broadstairs	1	1											
140880	Rear Of 37 Palm Bay Avenue Margate	1	1											
140934	Land Rear Of 31 Royal Road Ramsgate	1			1									

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150348	42 Chatham Street Ramsgate	1		1										
150431	Land Adjacent To 34 St Mildred's Avenue, Ramsgate	1		1										
150809	9 Western Esplanade Broadstairs	1	1											
160066	144 Grange Road Ramsgate	1			1									
160140	47 Albert Road Ramsgate	1	1											
160171	Land Rear Of 1a Minster Road Ramsgate	1			1									
160194	6 Albion Place Ramsgate	1	1											
160284	Kingsgate Newsagents Parwood George Hill Road Broadstairs	1		1										
160300	Land Adjacent 2 Shaftsbury Street Ramsgate	1			1									
160315	171 Westwood Road Broadstairs	1		1										
160465	39a High Street Ramsgate	1		1										
160512	Land Rear Of 25 To 27 Buckingham Road Margate	1	1											
160517	Land Rear Of 18 Saxon Road Westgate	1			1									

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160536	7 Grange Road Broadstairs	1		1										
160568	58 Park Road Ramsgate	1	1											
160611	36 Grange Road Ramsgate	1			1									
160638	Land Adjacent 2 Linden Avenue Broadstairs	1		1										
160718	Cliff Cottage Coastguard Cottages Pegwell Road Ramsgate	1			1									
160746	5 Ramsgate Road Broadstairs	1		1										
160837	9 Augusta Road Ramsgate	1	1											
161020	1 Dellside Wayborough Hill Minster	1		1										
161091	1 Booth Place Margate	1		1										
161102	Land Rear Of 13 And 15 Albion Street Broadstairs	1			1									
161105	Land Rear Of 24 Devon Gardens	1		1										
161209	31 Grosvenor Place Margate	1		1										
161232	Mizuri Norman Road Broadstairs	1	1											

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161241	41 Crescent Road Ramsgate	1		1										
161299	10 Sparrow Castle, Margate	1	1											
161322	15 - 16 The Broadway Broadstairs	1		1										
161354	40 Canterbury Road West Ramsgate	1		1										
161361	7 Arthur Road Margate	1		1										
161403	59 Camden Road Broadstairs	1			1									
161407	Post Office 22-23 Cecil Square Margate	1		1										
161471	17 Parsonage Fields Monkton	1		1										
161517	Barn Owls Preston Road Ramsgate	1			1									
161628	Land Adjacent 84 Tivoli Road Margate	1			1									
161641	Land Adjacent 34 Brooke Avenue Margate	1		1										
161648	11 Northdown Road Broadstairs	1	1											
161650	Land Adjacent To 11 Northdown Road Broadstairs	1		1										

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161681	Building Adjacent To Sheriffs Court Farm Sheriffs Court Lane Minster	1		1										
170253	42 Crescent Road Birchington	1		1										
170257	Land Adjacent Wild Thyme, Bramwell Court Minster Ramsgate	1		1										
170303	9 Augusta Road Ramsgate	1	1											
170617	6 Shakespeare Passage Margate	1	1											
170621	5 Clifton Gardens Margate	1		1										
170715	16/16a Cuthbert Road Westgate On Sea	1			1									
170903	124 High Street Ramsgate	1			1									
170916	Garages Between 22 And 26 Nash Court Gardens Margate	1	1											
170991	160a Northdown Road Margate	1		1										
171005	Land Adjacent 4 Victoria Road Margate	1		1										
171026	Public Conveniences Westbrook Promenade Margate	1			1									
171047	The Forge Bedlam Court Lane Minster Ramsgate	1			1									

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171054	Land Adjacent 7 Southwood Gardens Ramsgate	1			1									
171065	Land Rear Of 154 Grange Road Ramsgate	1	1											
171079	83 Sea Road Westgate On Sea	1			1									
171090	27 Elm Grove Westgate On Sea	1			1									
171257	61 Norfolk Road Margate	1		1										
171271	Emmanuel Church Victoria Road Margate	1		1										
171313	1 Ethel Road Broadstairs	1		1										
171359	Homebasics 25 - 27 Queen Street Ramsgate	1			1									
171366	156 King Street Ramsgate	1		1										
171554	21 The Retreat Ramsgate	1		1										
171599	2a Park Road Ramsgate	1	1											
171664	Stone Cottage Haine Road Ramsgate	1			1									
171670	Land Adjacent 89 St Johns Avenue Ramsgate	1		1										

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171699	146 Northdown Road Margate	1			1									
171703	Lagny Plumstone Road Acol Birchington	1	1											
171772	145 Canterbury Road Margate	1	1											
171779	3 Royal Esplanade Margate	1	1											
171799	Thanet Press Margate	1		1										
180001	Land Side Of Bayview Windsor Rd Ramsgate	1		1										
180011	King Edward Vii Dane Valley Road Margate	1		1										
180013	Land East Of The Granary Upper Hale Court Canterbury Road St Nicholas At Wade	1			1									
180061	Land Adjacent To Albion Road Neame Road Birchington	1		1										
180082	Land Adj 49 Manston Rd Ramsgate	1	1											
180150	38 Rockstone Way Ramsgate	1			1									
180167	Building 1 Bartletts Farm Cottage Potten Street ST Nicholas At Wade	1	1											
180212	17 Victoria Avenue Westgate	1			1									

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180303	Land Adjacent To Sub Station Effingham Stret Ramsgate	1			1									
180317	Land Rear Of 10 Freemans Road Ramsgate	1	1											
180335	Land On The South West Side Of Northdown Road Broadstairs	1		1										
180338	Land Adjacent 40 Canterbury Road West Ramsgate	1		1										
180341	Land Adjacent To 59 Princess Margaret Avenue Ramsgate	1			1									
180347	12 St Johns Crescent Ramsgate	1	1											
180388	Garages Rear Of 28 Augusta Road Ramsgate	1		1										
180449	Land Adjacent 5 Westover Rd Broadstairs	1		1										
180490	45 Ellington Road Ramsgate	1	1											
180499	(Plot 13) Land Adjacent To Clifftop North Foreland Avenue Broadstairs	1		1										
180526	Land Adjacent To 47 Whitehall Road Ramsgate	1			1									
180548	3 Gallwey Avenue Brichington	1		1										
180570	18 St Mildreds Road Ramsgate	1	1											

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180574	Morgans 46 High Street Margate	1			1									
180576	Land To The Side Of Mill Haven Mill Row Birchington	1			1									
180584	182 High Street Margate	1	1											
180605	58 Tothill Street Minster	1			1									
180610	Wellington Cottage Down Barton Road St Nicholas At Wade	1		1										
180628	21 Stone Road Broadstairs	1	1											
180672	Stable Block Adjacent To Dellside Wayborough Hill Minster	1			1									
180694	Garage Block Dundonald Road Ramsgate	1	1											
180783	Land Rear Of Walters Hall Oast Monkton Street Monkton	1	1											
180796	12 - 14 Garfield Road Margate	1		1										
180806	Plot 9 Land Adjacent To Clifftop North Foreland Avenue Broadstairs	1		1										
180829	Jims Garage Services 10 Clifton Place Margate	1	1											
180834	Cliftonville Court Edgar Road Margate	1	1											

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180837	85 Gladstone Road Broadstairs	1	1											
180850	38 Belgrave Road Margate	1		1										
180856	Ivy Cottage The Pathway Broadstairs	1		1										
180884	Land Rear Of 7 Kingsgate Avenue Broadstairs	1		1										
180890	Land Adjacent 1 Dellside Wayborough Hill Minster	1			1									
180938	Land Adjacent 51 Carlton Avenue Broadstairs	1	1											
180941	32 Sea View Road Broadstairs	1		1										
181074	Land Rear Of 35 Nelson Place Broadstairs	1		1										
181099	Land Adjacent To 11 Manston Road Ramsgate	1		1										
181145	1 - 3 Alma Road Ramsgate	1		1										
181254	Plot 12 Land Adjacent To Clifftop And Surrounding Redriff North Foreland Avenue Broadstairs	1		1										
181280	Plot 2 Land Adjacent To Clifftop And Surrounding Redriff North Foreland Avenue Broadstairs	1		1										
181331	Kreative Kutz 43a High Street St Peters Broadstairs	1		1										

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181365	20 Queens Avenue Birchington	1		1										
181373	Public Conveniences Viking Bay Harbour Street Broadstairs	1	1											
181417	Plot 11 Land Adjacent To Clifftop And Surrounding Redriff North Foreland Avenue Broadstairs	1		1										
181421	Land Adjacent 2 Park Place Margate	1			1									
181468	Land Adjacent 25 Upper Dane Road Margate	1		1										
181554	22 St Mildreds Road Ramsgate	1			1									
181631	68 King Street Margate	1		1										
181647	Land Rear Of 2 Eaton Road Margate	1		1										
181750	14 Welsdene Road Margate	1			1									
/05/0158	The Forge The Length St Nicholas At Wade	1			1									
181127PN 11	8 College Road Margate	1		1										
190040PN 06	44 - 46 Queen Street Ramsgate	1			1									
150185	62 High Street Minster Ramsgate	0												

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150699	145 Canterbury Road Margate	0		0										
151335	Thalasa Cliff Road Birchington	0	0											
160340	(Land Adj To) 62 Princess Margaret Avenue Ramsgate	0												
161240	Land Adjacent 12 To 14 Fort Road Margate	0												
161295	102 Park Avenue Broadstairs	0		0										
170223	4 St James Avenue Ramsgate	0		0										
180098	Cedarholme Epple Bay Avenue Birchington	0	0											
180176	Seafields Cliff Road Birchington	0			0									
180293	Ashmount Lower Northdown Avenue Margate	0		0										
180360	10 Domneva Road Westgate On Sea	0	0											
181089	137 Monkton Road Minster	0			0									
181604	7a High Street Minster	0			0									
181675	Yelton Second Avenue Broadstairs	0												

Application Number	Site Address	Total extant units	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31
161638	18 Artillery Road Ramsgate	-1	-1											
170270	32 Ramsgate Road Margate	-1	-1											
170339	43 Alpha Road Birchington	-1		-1										
170403	46 Hereson Road Ramsgate	-1		-1										
170433	60 St Peters Road Margate	-1		-1										
170973	3 Augusta Road Ramsgate	-1	-1											
180005	St Peters Prestbytery 117 Canterbury Road Westgate On Sea	-1			-1									
180687	2 Emptage Court Dane Hill Margate	-1	-1											
180961	11 Canterbury Road Margate	-1		-1										
181215	91 Norfolk Road Margate	-1	-1											

Appendix C - Parking Standards

Guidance on car parking provision (indicative maximum provision)

Retail	**Indicative maximum spaces**
Food retail up to 1,000m2	1 per 18m2 (includes staff parking)
Food retail over 1,000m2	1 per 14 m2 (includes staff parking)
Non food retail	1 per 25m2 (includes staff parking)
Financial and Professional services	**Indicative maximum spaces**
	1 per 20m2 (includes staff parking)
Restaurants & cafes	**Indicative maximum spaces**
Restaurants	1 per 6m2 plus 1 per two staff
Transport cafes	1 per 15m2 plus 1 per two staff
Drinking establishments	**Indicative maximum spaces**
	1 per 10m2 plus 1 space per two staff
Hot food takeaways	**Indicative maximum spaces**
	1 per 8m2 plus 1 space per two staff
Business	**Indicative maximum spaces**
Offices up to 500m2	1 per 20m2
Offices 501m2 to 2,500m2	1 per 25m2
Offices over 2,500m2	1 per 30m2
High tech/Research/Industrial	1 per 35m2
General industrial	**Indicative maximum spaces**
Up to 200m2	3 spaces
Over 200m2	1 per 50m2
Storage & distribution	**Indicative maximum spaces**
Storage & Distribution	1 per 110m2
Wholesale Trade Distribution	1 per 35m2
Hotels	**Indicative maximum spaces**
Hotels, motels, boarding & guest houses	1 per bedroom plus 1 per two staff
Other	1 per unit/pitch plus 1 per three units of five person capacity or greater plus 1 per two staff
Residential Institutions	**Indicative maximum spaces**
Nursing homes/residential care homes	1 per six beds or residents plus 1 per resident staff plus 1 per two other staff
Hospitals & Hospices	2 per three beds plus 1 per two staff
Residential schools, colleges or training	1 per fifteen residents plus 1 per resident staff plus 1 per two other

centres	staff
Non residential institutions	**Indicative maximum spaces**
Primary & secondary schools	1 per staff plus 10%
Further & higher education	1 per seven students plus 1 per staff
Libraries/art galleries/museums/public exhibition hall	1 per 60m2
Places of worship	1 per five seats
Medical centres/clinics/surgeries (including veterinary surgeries)	4 per consulting room/treatment room plus 1 per two staff
nurseries/crèches & playschools	1 per 4 children plus 1 space per two staff
Day care centres	1 per four attendees plus 1 per two staff
Law courts	6 per courtroom plus 1 per two staff
Assembly & Leisure	**Indicative maximum spaces**
Cinemas, concert halls, conference centres, bingo halls	1 per five seats
Social clubs, discotheques, dance halls, ballrooms	1 per 22m2
Multi-activity sports & leisure centres, swimming pools, ice rinks, health & fitness centres, gymnasia	1 per 22m2 plus 1 per fifteen seats where appropriate
Marinas & other boating facilities	1 per mooring or berth
Stadia	1 per 15 seats
Bowling greens/centres/alleys, snooker halls, tennis/squash, badminton clubs	3 per lane/court table plus 1 per fifteen spectator seats where applicable
Outdoor sports facilities, playing fields	1 per two participants plus 1 per fifteen spectators
Golf courses & driving ranges	3 per hole/bay
Equestrian centres, riding stables	1 per stable
Historic house & gardens, country parks	1 per 400 visitors

Theme parks/leisure parks	1 per two hundred visitors per annum
Other	1 per 22m2
Other	**Indicative maximum spaces**
Car sales	1 per 50m2 plus 1 per two staff
Petrol filling stations	1 per 20m2
Night clubs/casinos	1 per 22m2
Theatres	1 per 5 seats
Retail warehouse clubs	1 per 25m2
Amusement arcades	1 per 22m2
Residential hostels	1 per six residents plus 1 per resident staff and 1 per two other staff
Vehicle servicing and repair	4 per service bay plus 1 per 2 staff
Taxi, vehicle hire, coach & bus depots	1 per four registered vehicles plus 1 per two staff
Open commercial use (e.g. scrap yards, recycling centres)	To be assessed individually plus 1 space per two staff

Guidance on cycle parking provision

Retail	**Provision (cycle parking spaces)**
Up to 1,000m2	1 per 200m2 customer & 1 per 200m2 employees
Up to 5000m2	1 per 400m2 customer & 1 per 400m2 employees
Over 5000m2	1 per 2500m2 customer & 1 per 2500m2 employees
Financial and Professional services	**Provision (cycle parking spaces)**
	1 per 1000m2 customer & 1 per 200m2 employees
Restaurants & cafes	**Provision (cycle parking spaces)**
	1 per 10 seats customers & 1 per 20 seats employees
Drinking establishments	**Provision (cycle parking spaces)**
	1 per 10 seats customers & 1 per 20 seats employees
Hot food takeaways	**Provision (cycle parking spaces)**
	1 per 10 seats customers & 1 per 20 seats employees
Business	**Provision (cycle parking spaces)**
	1 per 200m2 employees & 1 per 1000m2 visitors
General industrial	**Provision (cycle parking spaces)**
	1 per 200m2 employees & 1 per 1000m2 visitors
Storage & distribution	**Provision (cycle parking spaces)**
	1 per 200m2 employees & 1 per 1000m2 visitors
Hotels	**Provision (cycle parking spaces)**
	1 per 10 bed spaces
Residential Institutions	**Provision (cycle parking spaces)**
Residential institutions & hospitals	1 per 10 bed spaces
Residential schools,colleges and training centres	1 per 5 students.

Dwellings	**Provision (cycle parking spaces)**1 per dwelling
Individual residential dwellings	1 per bedroom
Flats & maisonettes	1 per unit
Sheltered accommodation	1 space per 5 units
Non residential institutions	**Provision (cycle parking spaces)**
Primary schools	1 per 50 pupils
Secondary schools and further & higher education	1 per 5 pupils/students
Medical centres/surgeries	1 per two consulting/treatment rooms
Other (including libraries and places of worship)	1 per 50 seats or 100m2
Assembly & Leisure	**Provision (cycle parking spaces)**
Leisure and entertainment venues	1 per 300 seats customers & 1 per 300 seats employees
Sports facilities	1 per 10 participants plus 10% plus 1 per 10 staff

Appendix D - Glossary

This Local Plan was produced under transitional arrangements and therefore includes definitions from the NPPF 2012.

Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.

Air Quality Management Areas: Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

Article 4 direction: A direction which withdraws automatic planning permission granted by the General Permitted Development Order.

Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.

Biodiversity Net Gain: is an approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity it encourages developers to provide an increase in appropriate natural habitat and ecological features over and above that being affected.

Biodiversity Opportunity Areas (BOA): BOAs are areas that were originally identified in the Kent Biodiversity Strategy 2015, as suitable areas for a combination of biodiversity enhancement, restoration and gain. They offer the best opportunities for establishing large habitat areas and/or networks of wildlife habitats and can aid in the delivery of Green Infrastructure and resilient ecological networks.

Birds and Habitats Directives: European Directives to conserve natural habitats and wild fauna and flora.

Climate change adaptation: Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunities.

Climate change mitigation: Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions

Coastal Change Management Area: An area identified in Local Plans as likely to be affected by coastal change (physical change to the shoreline through erosion, coastal landslip, permanent inundation or coastal accretion).

Community Infrastructure Levy: A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Community Right to Build Order: An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site-specific development proposal or classes of development.

Decentralised energy: Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.

Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Development Consent Order (DCO): A DCO is the means of obtaining permission for developments categorised as Nationally Significant Infrastructure Projects (NSIP). This includes energy, transport, water and waste projects.

Development Management: Development Management is the process by which planning applications are determined.

Development Plan: This includes adopted Local Plans and neighbourhood plans and is defined in Section 38 of the Planning and Compulsory Purchase Act 2004.

DPD: Development Plan Document. These are policy documents on a specific topic that make up part of the Development Plan. The Cliftonville Development Plan Document was adopted by the Council in February 2010 and is still in force.

Economic development: Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).

Ecological networks: These link sites of biodiversity importance.

Ecosystem services: The benefits people obtain from ecosystems such as, food, water, flood and disease control and recreation.

Edge of centre: For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres

of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local c circumstances.

EEA: Economic and Employment Assessment.

ELR: Employment Land Review.

European site: This includes candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in regulation 8 of the Conservation of Habitats and Species Regulations 2010.

Geodiversity: The range of rocks, minerals, fossils, soils and landforms.

Green infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities and biodiversity.

Green Wedge: The Green Wedges provide a clear visual break between the towns, providing a settlement separation function. The Green Wedges are distinct from other types of open space as they provide a link between the open countryside and land which penetrates into the urban areas.

GTAA: Gypsy and Traveller Accommodation Assessment. An assessment of the future need for accommodation for the gypsy and traveller community.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.
Heritage asset includes designated heritage assets (such as listed buildings and structures, Scheduled Ancient Monuments) and assets identified by the local planning authority (including local listing).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

HMOs: Houses in Multiple in Occupation: Housing which is occupied by 3 or more unrelated individuals sharing basic amenities.

HRA: Habitats Regulations Assessment. The Conservation of Habitats and Species Regulations 2010 transposes EU Directive 92/43/EEC on the conservation of natural habitats of wild flora and fauna into UK national law. The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites. Assessments for significant effects on habitats must be carried out and mitigation measures identified.

Infrastructure Delivery Plan (IDP): IDPs are produced by planning authorities alongside their local plans, to identify the key infrastructure that is required to support the level of development proposed in the Plan. This may include utilities provision; transport infrastructure such as road or rail; or social infrastructure such as schools and medical facilities.

International, national and locally designated sites of importance for biodiversity: All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

Landscape Character Areas: An analysis of the character of the landscape based on predetermined objective criteria and characteristics. The process of landscape characterisation involves the classification and description of areas of homogeneous character in which the constituent elements occur in repeating patterns. It is an objective analysis, describing the components that make an area different from another, conveying an informed picture of the landscape but avoiding personal preference or valued judgements about the importance of one area relative to another.

LAP: Local Areas for Play

LEAP: Local Equipped Areas for Play

Local Enterprise Partnership: A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

Local Green Space: Local Green Space is a designation that provides special protection for green areas of particular importance to local communities and are designated through either the local or neighbourhood process.The NPPG sets out criteria that have to be met in order for land to be designated.

Local Plan: The plan for the future development of the local area, drawn up by the local planning authorities in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004.

Localism Act: The Localism Act was introduced in 2011. Its aim was to devolve powers from central government into the hands of individuals, communities and councils.

Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Marine Conservation Zone: Marine Conservation Zones are areas that protect a range of nationally important, rare or threatened habitats and species in waters around England.

MUGA: multi use games area.

National Planning Policy Framework (NPPF): This is the Government's statement of planning policy which must be taken into account in preparing Local Plans, which should be consistent with national policy. Where a local plan is silent on an issue planning decisions will be made in accordance with national policy.

National Planning Practice Guidance (nPPG): Planning Practice Guidance is produced by Central Government in relation to specific topics and Local Plans need to take the guidance into account in the formulation of new policy.

NEAP: Neighbourhood Equipped Areas for Play

Neighbourhood plans: A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Older people: People over retirement age, including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.

Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Out of centre: A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Out of town: A location out of centre that is outside the existing urban area.

People with disabilities: People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

Plan period: This Local Plan runs until 2031.

Planning condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning obligation: A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Playing field: The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2010.

Pollution: Anything that affects the quality of land, air, water or soils, which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.

Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in

built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Primary shopping area: Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

Primary and secondary frontages: Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

Priority habitats and species: Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Ramsar sites: Wetlands of international importance, designated under the 1971 Ramsar Convention.

Renewable and low carbon energy: Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and

repeatedly in the environment – from the wind, air, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Rural exception sites: Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

SAMM: Strategic Access, Management and Monitoring Plan - plan to mitigate the additional recreational pressure at the coast as a result of new housing developments. A tariff is collected for every residential development to contribute towards measures in place to mitigate against bird disturbance.

SCI: Statement of Community Involvement.

Self-build and custom-build housing: Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Shoreline Management Plans: A plan providing a large-scale assessment of the risk to people and to the developed, historic and natural environment associated with coastal processes.

SHLAA: Strategic Housing Land Availability Assessment providing information to assess and allocate the best sites for new homes.

SHMA: Strategic Housing Market Assessment.

Site of Special Scientific Interest (SSSI): Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Special Areas of Conservation (SAC): Areas given special protection under the Habitats and Conservation of Species Regulations 2017 (as amended).

Special Protection Areas (SPA): Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds, protected under the Habitats Regulations 2017 (as amended).

Stepping stones: Pockets of habitat that, while not necessarily connected, facilitate the movement of species across otherwise inhospitable landscapes.

Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA): A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant environmental effects. The SA broadens this out to assess the economic, social and environmental effects.

Sui Generis: Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: betting offices/shops, pay day loan shops, theatres, larger houses in multiple occupation, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, launderettes, taxi businesses and casinos.

Supplementary Planning Documents (SPD): Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary Planning Documents are a material consideration in planning decisions but are not part of the development plan.

Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.

Town centre: Area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance.

Transport assessment: A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.

Transport statement: A simplified version of a transport assessment where the transport issues arising out of development proposals are limited and a full transport assessment is not required.

Travel plan: A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed.

Use Classes: The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'.

Part A	A1 Shops A2 Financial and professional services A3 Restaurants and cafés A4 Drinking establishments A5 Hot food takeaways
Part B	B1 Business B2 General industrial B8 Storage or distribution
Part C	C1 Hotels C2 Residential institutions C2A Secure Residential Institution C3 Dwellinghouses C4 Houses in multiple occupation
Part D	D1 Non-residential Institutions D2 Assembly and leisure

Wildlife corridor: The term 'wildlife corridor' is used to refer to any linear feature in the landscape that can be used for migration or dispersal of wildlife. Wildlife corridors offer the possibility of linking habitats and reducing the isolation of populations.

Windfall sites: Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.



Thanet Local Plan 2006

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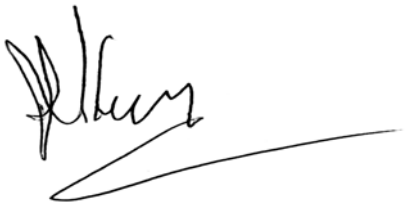
Foreword

It has taken some five years of hard work and a great deal of consultation and debate to arrive at this adopted Local Plan. I believe that effort has been worthwhile as we now have a Plan that provides a comprehensive set of planning policies to guide development in Thanet over the next few years.

We have a vision of a more prosperous District with a better quality of life for our residents and this Plan puts in place a strategy that seeks to achieve that vision. It also ensures that our wonderful built and natural environment is properly protected from unacceptable development.

This Plan has already influenced the pattern of development in this area. The allocation of land at Westwood for a new town centre was a radical and innovative move to provide better quality facilities for our residents that previously they had to travel for many miles outside the district to obtain. The Westwood Town Centre is now a reality and will soon be joined by a new residential community of 1,000 homes.

This will be the last Local Plan produced for Thanet and we now have to look forward to 2021 and beyond as work begins on a Local Development Framework for the area. The name of the Plan is not important. What is important is that we continue to encourage prosperity and seek a better future for ourselves and our children, while conserving our great history and natural heritage.





Councillor John Kirby
Cabinet Member for Development Services

June 2006

Introduction and Policy Content

The Isle of Thanet

The Isle of Thanet is an attractive and pleasant coastal District situated at the eastern end of Kent in the south-east of England and in close proximity to the Continent. The area contains the attractive and historic seaside towns of Margate, Ramsgate and Broadstairs, each with their own identity and character and with a wealth of history and historic buildings. Thanet has a number of interesting and agreeable coastal and rural villages and possesses a long coastline lined with cliffs and containing many sandy bays and beaches. The area benefits from a mild and dry climate.

The District has a population of just over 127,000 people, mainly resident in the towns, which spread around the coast. The Island is connected to the rest of Kent by three main roads and rail routes leading to Canterbury, Dover and along the north coast direct to London. Communication with London in particular has improved significantly over the last few years with the dualling of the A299, the Thanet Way. The recently privatised Kent International Airport (Manston) and the international ferry port at Ramsgate add to the facilities and appeal of the area and represent significant opportunities for investment.

Despite its location in the south-east of England and its attractive environment, Thanet has suffered from long-term economic and social problems. Unemployment has, for many years, been well above the Kent average and social deprivation exists in many parts of the District. The decline of the tourist industry, the concentrations of cheap property and the relative remoteness of the area, along with other factors, have all contributed to these persistent and difficult problems. There is also a preponderance of small, low-skill based companies in Thanet offering relatively low wages.

In itself this Local Plan cannot resolve the economic and social problems being experienced. What it can do, however, is, in land use terms, provide the policies and guidance that will facilitate the investment necessary to reduce these problems while protecting the fine natural and built environment which the Island enjoys.

Background to and Purpose of the Plan

The first District-wide Local Plan for Thanet was adopted in April 1998 and was designed to run until 2001, although many of the policies will remain fully relevant beyond that date. This first review Plan will replace and supersede that Plan and is designed to give guidance to 2011.

One of the purposes of a Local Plan is to identify the issues and opportunities that are arising in an area and then to set out the Council's views on how they would like to see the area develop over a period of time. A Local Plan should provide the following:

- **Guidance** for local people, developers and other interested parties in relation to the District Council's land use policies and proposals.

- **Encouragement** to inward investors by providing a degree of certainty on which they can make informed decisions.

- **Control** over the location and impact of new development on the local environment.

Format of the Plan

A Local Plan comprises the following:

- **Written Statement**: This sets out the text of the District Council's policies and proposals for future development. In this plan these policies and proposals are distinguished by the use of capitals and bold text. The text around the policies and proposals gives a reasoned justification for the policy or proposal.

- **Proposals Map**: This map identifies, on an Ordnance Survey base, the areas to which particular policies and proposals apply. It consists of a District-wide map at a scale of 1:15,000 and inset maps, which are shown on the reverse of the Main Map and give a more detailed and clearer picture, at a scale of 1:5000, of certain parts of the District.

The plan also incorporates a number of maps within the text designed to give a clearer picture of the application of certain policies and proposals.

This Plan, together with the Structure Plan, Minerals Local Plan and Waste Local Plan forms the Development Plan for the area.

Policy Context

The Plan must also take account of National, Regional and County planning policies and guidance and of the resources likely to be available for implementation.

Government guidance and the Structure Plan recognise the economic problems that Thanet has experienced over the years, and encourage greater levels of economic activity and the creation of new jobs. They also recognise the environmental quality of the area – the coast, good air quality, high quality agricultural land, important nature conservation areas, rich historical heritage, and so on – and seek to ensure the continued protection of these environmental and social assets.

Regional Planning Guidance

Regional Planning Guidance seeks to promote the sharing of the region's prosperity, improving access to jobs, housing, transport, education, health and leisure, and public participation and decision making.

Within this framework, Thanet is identified as a Priority Area for Economic Regeneration. This reflects the fact that Thanet has had Tier 2 and Tier 3 Assisted Area status under the Regional Selective Assistance programme and Objective 2 status under European Structural Funds. In such areas, the draft Strategy seeks to reduce unemployment year-on-year towards the regional average. This approach would take into account the "environmental wealth" of these areas, and, in particular, development would be constrained by national and international environmental designations.

The Guidance also recognises that there are areas of wildlife habitat resource of national and international importance. It states that development plans must take these into account and give priority to their protection. It also states that development plans should ensure that the best and most versatile agricultural land is given an appropriate level of protection from development.

The SEERA Strategy

In June 2001 the South East England Regional Assembly published its strategy, entitled "A Better Quality of Life in the South-East", with a vision of a prosperous region delivering a high quality of life and environment for everyone, now and in the future.

The strategy contains 25 objectives to achieve this vision and those most directly related to land-use planning amongst these are the following:

- To ensure that everyone has the opportunity of a decent and affordable home
- To stimulate economic revival in priority regeneration areas
- To improve efficiency in land use through the re use of previously developed land and existing buildings and encourage urban renaissance
- To conserve and enhance the Region's biodiversity
- To ensure high and stable levels of employment so everyone can benefit from the economic growth of the Region
- To sustain economic growth and competitiveness and ensure a better distribution of economic activity across the Region

The Kent Structure Plan

The Kent Structure Plan, adopted in 1996, takes a very similar approach to the approach of this Local Plan. Policy EK2 identifies the need to address the long term economic problems of the area through the development of business parks and infrastructure. This is balanced by the need to protect the separate

identities of the Thanet towns, the high quality agricultural land and the areas of national or international importance for nature conservation.

The Kent Structure Plan encourages local planning authorities to "seek to achieve a sustainable pattern and form of development which will reduce the need to travel, facilitate the conservation of energy and other natural and environmental resources, and minimise pollution".

The Kent Structure Plan is soon to be replaced by the Kent and Medway Structure Plan (KMSP). It is anticipated that the KMSP will continue the general strategic approach to Thanet, and recognise the need to cater for development that will reduce the District's reliance on other centres for employment, retail and other economic and social needs.

The Council's Corporate Plan

The Corporate Plan sets out a number of specific objectives, which relate to different aspects of the Council's activities. This Local Plan reflects the Corporate Plan's vision for Thanet as an economically successful, visually attractive, safe and stimulating place in which to live and work, and aims to help deliver certain of its objectives.

Sustainable Development in the Local Context

The Council has given a commitment to look at sustainable development issues in more detail in this Review. The most widely accepted definition of sustainable development is:

"…*development which meets the needs of the present without compromising the ability of future generations to meet their own needs"*.

The Government sets out four aims for sustainable development:

(1) Effective protection of the environment (not just minimising the impact of development)
(2) Maintenance of high and stable levels of economic growth and employment
(3) Prudent use of natural resources and
(4) Social progress, which recognises the needs of all

Government advice is that local plans should contribute to sustainable development. It states that a sustainable planning strategy should:

- provide for the nation's needs for commercial and industrial development, food production, minerals extraction, new homes and other buildings, while respecting environmental objectives
- use already developed areas in the most efficient way, while making them more attractive places in which to live and work

- conserve both the cultural heritage and natural resources, taking particular care to safeguard designations of national and international importance and
- shape new development patterns in a way which minimises the need to travel.

The Council believes that, in drawing up its Plan Strategy to develop a "self-contained" community in Thanet, it has taken an innovative, but balanced approach to implementing the Government's guidance on sustainable development.

The Plan has also been subject to strategic environmental appraisal, in which sustainable development has been a key component, across a range of issues.

Monitoring and Review

The current Local Plan review comes at a critical time when the key strands, ingredients and opportunities underpinning sustainable regeneration need to be drawn together. The Plan covers a wide range of land-use planning issues and will significantly influence public and private sector investment programmes and land-use decisions. Land-use needs and considerations can only be projected ahead for a short time as a result of changing social and economic circumstances. It is therefore essential that matters which may affect the development and planning of the District are kept under review and that the relevance and effectiveness of policies are monitored to ensure that the Local Plan continues to provide an up to date, responsive and effective local planning strategy.

Under the new planning system introduced by Government in 2004, the Council proposes to undertake and publish annual reviews of policy performance against Plan objectives through an Annual Monitoring Report. In preparing such reviews the Council will involve a range of stakeholders to ensure that the process is transparent and based on appropriate evidence, and to strengthen commitment to delivery of objectives.

The Council will review the development needs and pressures, availability of resources and investment programmes in all sectors, implications of prevailing government advice and strategic policy, and the Council's and community's aspirations, as an essentially continuous process. This will involve collection and analysis of information and intelligence from a wide range of sources.

This Plan is intended to cover the period to the year 2011. It thus only identifies land use provisions related to development needs envisaged within that period. The Council aims to review the Plan in its entirety at least every five years, and a comprehensive review will commence almost immediately on adoption of this Plan. Changes in circumstances e.g. evolving strategic policy, new development opportunities that need to be accommodated, circumstances affecting investment programmes by all sectors and the need to conform to changes in strategic policy, may trigger the need for more frequent review and alteration of certain aspects of the Plan. The Council will therefore pursue

review/alteration of all or parts of the Plan at any time, as may be necessary. It will carry out public consultation in line with appropriate legislative procedures in advance of any proposals for policy changes.

The critical aims of the Plan are to accommodate needs for sustainable economic and other essential development while safeguarding and enhancing the built and natural environment. Thus, fundamental aspects requiring regular review include the adequacy of land provision in respect of projected development needs for employment and housing land (which are monitored on an annual basis), and any impact on a range of environmental assets e.g. wildlife habitats lost to development. Environmental Appraisal of the Plan will, in itself, inform monitoring and review of the environmental aspects of local plan policies.

Monitoring will indicate whether the Local Plan is achieving its stated objectives, and help to identify where policies and proposals need to be strengthened, maintained or changed. It will also inform decisions on which aspects of the Plan may need to be reviewed and when. The Plan therefore contains a range of *targets* against which progress in implementation and the effectiveness and continued relevance of specific policies can be monitored. These *targets* aim to provide meaningful yardsticks for monitoring, and are related to specific areas of policy.

Each target includes an *indicator* stating the factors against which the achievements can be measured, together with a *monitoring* source from which the indicator will be obtained. The inclusion of targets will also help the Council in fulfilling its commitment to the principles of Best Value.

It has not been possible to establish measurable and meaningful targets for all aspects of the Plan. In certain instances indicators and monitoring sources are still included to provide helpful indication on plan implementation and trends. These may enable additional targets to be established in the future. Existing targets can be augmented or refined as appropriate on reviewing the Plan.

1. Plan Strategy

1. Plan Strategy

Background Situation

1.1 Thanet is an area of high unemployment and is also an area with high levels of social and economic deprivation. In March 2002 the unemployment rate in Thanet was 7.0% compared with the average for Kent of 2.6% and a national figure of 3.1%. The DETR indices of deprivation for 2000 show that Thanet was ranked as easily the most deprived District in Kent and as the 60th most deprived District in the whole of England (out of 354 Districts). Pier Ward in Margate is ranked as the 77th most deprived ward in England (out of 8,414 wards), with Ethelbert Ward, also in Margate coming 194th. For income levels Pier Ward is the 16th most deprived ward in England and for employment is 12th.

1.2 Against this background, the Council sees the Local Plan as a key component in the regeneration of the economy of Thanet.

1.3 It is the Council's view that, essentially, Thanet is an area capable of sustained regeneration through development of its inherent advantages. An outstanding environment, attractive historic towns and seafronts, a coastline of exceptional quality, proximity to European markets and improving access to London - all make for the components of what should be an attractive and desirable location both to live and to invest.

1.4 If this view is correct, then one has to ask why has the regeneration of the economy not already taken place? The answer is principally that the market does not yet appreciate what is available. Despite major efforts by the Council and its regeneration partners to break down the perception of a peripheral location, the area is still regarded by the London-based development industry as somewhat isolated from the main area of economic activity in London and the M25/M4 corridor. However, it is the Council's view that Thanet is an opportunity waiting to be discovered.

1.5 The strategic thinking behind the development of this Local Plan will provide the basis and the opportunity for that discovery to take place and for the sustained economic regeneration of the area. It will not happen overnight. The Plan period is 10 years and whilst every effort will be made to achieve a sustainable economic recovery in a shorter period, experience shows that progress towards matching the economic success of other areas will take time. However, it is the Council's view that, with support from Central Government, the Regional Development Agency, Kent County Council, and other locally-based private and public sector partnerships, which the Council has developed, the time is right.

The Strategy

Thanet as a Single Development Opportunity

1.6 Successive Local Plans have tended to err on the cautious side - caught between a desire to see new development opportunities occur while trying to protect all aspects of the environment. This dilemma has previously resulted in an unwillingness to take risks or to provide the necessary bold steps towards recovery. Competition for resources between the component towns in the District has resulted in efforts to take a single bold development step forward being thwarted by misguided even-handedness. The result has been a rather bland and unexciting strategy together with a set of plan proposals, which have failed to ignite the interest of national developers and investors.

1.7 This Plan proposes a new and radical approach in that, whilst it recognises and encourages the essential differences between the component towns and villages, it does not attempt to treat the component areas even-handedly. Thanet is principally a relatively compact single urban area and the development opportunities, to be sufficiently attractive, must be considered in a Thanet-wide context. Development sites are, therefore, identified where they will best serve the entire community and where achieving those development opportunities will also achieve the maximum economic and social benefits for the whole of the community.

1.8 To that extent the Local Plan looks at Thanet as a single opportunity and not as a collection of individual towns and villages – much as those towns and villages will continue to be nurtured for their contribution to the quality and diversity of the social and environmental mix that is Thanet. One of the objectives of the Local Plan is to manage the change being promoted in a confident but sensitive manner to ensure the necessary development is promoted and achieved while conserving that which is best of the natural and man-made qualities of the area.

A Comprehensive Approach to Regeneration

1.9 Experience has told us that potential inward investors have aspirations not unlike those of the local population. In seeking to direct the location of new investments, the availability of grant aid and proximity to similar investment opportunities, are important. But so too are the issues of quality of life – the availability of an attractive environment, opportunities for good quality housing, quality retailing and leisure opportunities and a wide range of training and education facilities. These are all part of the fabric of a society that makes for an attractive place to live, work and to invest.

1.10 To that end this Local Plan takes an approach to regeneration that seeks to address all of these issues simultaneously and strives to create the opportunities to improve the quality of life of all of its citizens. It endeavours to address these matters in a bold, open, and upfront way, that perhaps has not been reflected in past approaches. It will, if successful, upset the status quo and in doing so will undoubtedly upset some of those who wish to see slow or

no change to this area. No apology is made for this approach. It is the Council's view that it owes it to future generations to provide the quality of life that the majority of its citizens wish to enjoy - to firmly focus on achieving an equal footing with other areas in the South-East such that we can tap the latent attractiveness and opportunities that have not, as yet, been realised.

A Self-Contained Community

1.11 The strategy approach is to provide for a self-contained community where all of the opportunities associated with the quality of life issues referred to above, are available locally. The people of Thanet have the right to expect to be able to find the quality and quantity of services they seek within their own locality, without the necessity to travel elsewhere to obtain them. At present, Thanet is a net exporter of employees to other areas with 11,000 people living within the Thanet area travelling every day to seek employment elsewhere, whilst only 2,000 come to Thanet to seek employment.

1.12 In addition, every week, thousands of people travel to centres outside the District to avail themselves of the leisure and retail experiences that those higher quality centres provide. Those other centres are no bigger than Thanet in population, but offer a wider range of retail and leisure opportunities which attract large numbers of the Thanet population. In the year 2000 some £99 million of retail expenditure went outside the District to Canterbury and other centres. This is not only damaging to the Thanet economy but also contrary to the aims of Government policy. This Plan sets out clear policies to address and correct these issues and to offer the people of Thanet the opportunity to find their employment, retailing, education, training, housing and environmental needs locally, if they so choose.

1.13 A self-contained community, more self-sufficient, but without being isolationist, is what we wish to foster through the policies set out in the following chapters. A self-contained community, less reliant on the services offered at more distant locations, but still wishing to participate in all that is good in the wider Kent area, will result in a community that is more economically buoyant and self-confident and is less dependent on having to travel out of the area to find the facilities to support the quality of life its citizens desire and deserve.

1.14 A key element in achieving this strategy will be reconciling the implementation of development proposals set out below and the maintenance of a quality environment that will ensure the area remains attractive to visitors, residents and inward investors alike. This plan contains a significant number of policies designed to safeguard and protect the most important aspects of the environment and these are an integral part of the approach to securing a better quality of life for all within Thanet.

Summary of Local Plan Approach

1.15 The Council believes that the "self-containment" approach to new development opportunities, together with a comprehensive approach to the regeneration of the area, is reflected in the Policies contained in the Local Plan. There are four main development proposals in the Local Plan, which underscore this approach:

1 The **continued emphasis on employment development**, particularly the development of the **Central Island Initiative** – the airport and the adjacent business parks. More rapid development will help strengthen and broaden the area's economic base, making it less vulnerable to economic change in the future, and reduce the level of commuting from the District to other centres.

2 The development of **a new town centre at Westwood**, with expanded retail and leisure facilities to serve the District. This will not only strengthen the local retail base, improving services and facilities for local people, and retain a greater proportion of retail expenditure within the District, but will also help to reduce the need to travel to other centres to fulfil these demands.

3 The development of **additional housing in the Westwood area** to cater for the housing needs generated by the enhanced employment opportunities in East Kent during the Plan Period. The additional housing, to be located adjacent to the new town centre, will help to reinforce a mixed town centre approach at Westwood, and provide a more sustainable location for new housing in the District, in pursuance of the Government's sustainable development objectives.

4 The **promotion of mixed-use developments** with an emphasis on leisure and tourism at Ramsgate, Margate and other areas.

Targets

A measure of the success of the Local Plan Strategy (and other corporate activities) will be:

- A reduction in unemployment in Thanet to that of the corresponding Kent average, during the Plan Period
- An increase in average wages in Thanet to that of the Kent average by 2011
- An increase in GDP in Thanet to match the Kent average GDP, during the Plan Period
- A reduction in the percentage of retail expenditure by Thanet residents outside the District to 25% of the gross retail expenditure by 2011

2. Economic Development & Regeneration

2. Economic Development & Regeneration

Introduction

2.1 Thanet has historically experienced severe economic problems, associated with a restricted manufacturing base and a declining tourism sector. This position is demonstrated by a range of economic indicators, in particular, an unemployment rate persistently and significantly above the Kent and national average. At the time of the preparation of the Isle of Thanet Local Plan (March 1993), the local unemployment rate stood at 16.4%, compared with the South-East average of 9.4% and a Kent average of 11.1%. In March 2002, Thanet's unemployment rate was 7.0%, as against a South-East average of 2.6%, a Kent average of 2.6%, and a National average of 3.1%. In April 2006 Thanet's unemployment rate was 3.9% against a Kent average of 2.3%, a South-East average of 2.5% and a national average of 2.5%.

2.2 Although the fall in unemployment is welcome, the rate remains significantly higher than the South-East and Kent averages. The difference between the unemployment rate in this district and the South-East is also widening. It is also predicted that Thanet's economically active population will grow by 3% during this Plan period, increasing the total labour supply by some 1200 people.

2.3 The Council's vision for the Plan period is to see the business parks and the airport being developed at a much more substantial rate than previously, with a wide range of companies and economic activity. As a consequence of an upturn in economic activity, average earnings, per capita GDP and unemployment levels in Thanet should reduce significantly towards the Kent averages.

2.4 The development of Kent International Airport as an important regional hub and business location, and its proximity to the business parks ensures a key role for the airport in the economic regeneration of the area. The development of the business parks will also assist in, and be assisted by, the development and expansion of Ramsgate New Port.

Objectives

1 TO ALLOCATE AND MAINTAIN SUFFICIENT LAND RESOURCES TO FACILITATE SUSTAINABLE GROWTH AND DIVERSIFICATION IN ECONOMIC ACTIVITY;

2 TO PROVIDE A STRATEGY FOR THE ENCOURAGEMENT OF EMPLOYMENT GENERATION IN ORDER TO REDRESS THE PERSISTENTLY HIGH LEVELS OF UNEMPLOYMENT, TO TAKE ADVANTAGE OF THE LOCATIONAL OPPORTUNITIES THAT THE DISTRICT HAS IN COMMUNICATION LINKS WITH EUROPE, WHILST CONTINUING TO MEET THE CHALLENGE OF THE CHANNEL TUNNEL AND SINGLE EUROPEAN MARKET; AND

3 TO HELP CREATE THE CONDITIONS NECESSARY TO BRING ABOUT A SIGNIFICANT REDUCTION IN UNEMPLOYMENT LEVELS TOWARDS THE KENT AVERAGE, AND TO RAISE LOCAL GDP SIGNIFICANTLY TOWARDS THE KENT AVERAGE BY THE END OF THE PLAN PERIOD.

2.5 In seeking to realise the vision, Thanet has a number of factors in its favour. Thanet's proximity and excellent transport links to mainland Europe are major locational advantages. The area has an excellent physical environment and climate, the facilities of an international airport, an active seaport and attractive and available land for development which are all very positive factors in encouraging inward investment and job creation. The availability of relatively low-cost labour and land together with the initiatives that have already been put in place in respect of environmental improvements to the Thanet towns also add to the above physical attributes.

2.6 The next few years will be a challenging time for Thanet. However, the Council considers that, with funding programmes in place, improving communications, a proactive approach to developing the business parks and the development of a holistic approach to the regeneration of the area, Thanet is well placed to significantly improve its economic performance and position.

2.7 Regional Planning Guidance advises that development plans should take a long-term and holistic approach to economic development. It is now also generally recognised that economic development programmes need to be part of a wide-ranging regeneration strategy.

2.8 Encouraging growth and diversification of the economy and fostering employment generation are central issues in formulating Thanet's planning policies. While land-use policies alone are unlikely to produce a regeneration of the area's economy, it is essential, if Thanet is to take advantage of its strengths and opportunities and of the initiatives that have been made available to aid recovery, that sufficient land, in the right locations and with adequate infrastructure, is made available to provide opportunities for a range of market sectors.

2.9 This strategy needs to address wider issues within the local economy – the quality and provision of education and training facilities and opportunities; Community Economic Development; the range, quality and location of housing; as well as the availability of shopping, leisure and recreational facilities. The Local Plan seeks to address all these issues in a comprehensive way.

2.10 In terms of training, for example, the Thanet Lifelong Learning Partnership has developed a local strategy for training, which includes the delivery of training services, Basic Skills provision, widening participation in education and training; and workforce development training. Where appropriate, this needs to be reflected in the Local Plan in terms of land and buildings likely to be needed for such provision (see Policy CF3).

2.11 The Community Economic Development programme includes the development of sustainable social enterprises; support for the training priorities mentioned above; the promotion of social inclusion through the arts, sports and other activities; establishment of an equal opportunities network; and the development of safe transport networks to encourage participation. Once again, the Local Plan needs to address any land-use implications associated with these issues.

2.12 In order to achieve the Local Plan objectives, so far as is possible through planning policy, the District Council will:

(a) identify sufficient and suitable land, both quantitatively and qualitatively, for the growth of industry/business during the period of the Plan;
(b) support, through its planning regulatory powers, the retention of existing key industrial and serviced land and premises, where appropriate;
(c) act positively and speedily in association with other agencies to remove physical constraints that are impeding the use of land identified for employment-creating development (e.g. by establishing the policy framework for a rolling programme of development infrastructure provision on economic development sites);
(d) continue with efforts to promote Thanet and to take action to enhance the built environment in order to improve the image of the District to visitors and investors; and
(e) support the development of appropriate sites for educational and training purposes in relation to the skills of school leavers and needs of employers and the proposed training and educational programmes.

Government & European Funding

2.13 Thanet has benefited from various Government and European funding initiatives including:

- Development Area Status
- Objective 2 Status
- Regional Selective Assistance Grants
- Assisted Area Status
- Single Regeneration Budget (SRB) funding

2.14 The Council received £25 million through the ERDF and SRB funding programmes, which has significantly contributed to the consolidation of the regeneration programme in the area. However, the SRB funding closed at the end of March 2006, and whilst there are still dedicated specific areas of additional funding and investment in the District (e.g. the Cliftonville renewal area project), it is unlikely that further significant funding will be available in the near future.

Policy Background

Government Guidance

2.15 PPG12 states that "...in preparing development plans, local authorities should take account of the need to revitalise and broaden the local economy, the need to stimulate employment opportunities, and the importance of encouraging industrial and commercial development".

2.16 PPG4 states that “economic growth and a high quality environment have to be pursued together”. This is particularly true in Thanet, where the climate, the coast and other environmental advantages of the area provide the context for new economic development.

2.17 The Regional Planning Guidance for the South-East identified Thanet as a Priority Area for Economic Regeneration (PAER). The Guidance encouraged local authorities to promote economic diversity in their areas, and to make provision for high value-added business activity and the development of business clusters through various mechanisms. Each PAER has its own distinctive set of problems and will need individually tailored strategies.

2.18 In respect of the RPG guidance on business clusters, the Council considers that the land north of Sandwich, at Pfizers, at Kent International Airport and in the business parks at Manston and central Thanet can be identified as a developing cluster of manufacturing and research, and high-technology enterprise.

The SEEDA Strategy

2.19 In 1999 the South-East England Development Agency (SEEDA) published the Regional Economic Strategy (RES). This Strategy stated that the south-east had the potential to be a world-class region and certainly one of the top 10 regions in Europe. This ambition has been carried through as part of the review of the RES, which was published in 2002.

2.20 The Strategy believes that growth should be driven by productivity gains, not by resource intensive and low-added activity, applying as much to manufacturing and the rural economy as it does to IT and financial services. The initiatives in the RES incorporates global best practice to increase start-up survival and growth rate of young companies and include the completion of a network of ‘Enterprise Gateways’ and ‘Enterprise Hubs’.

2.21 Enterprise Gateways are new to the RES and provide business incubation networks for entrepreneurs and young companies, focusing on rural areas and areas of the Region where skills are low. Enterprise Hubs provide focal points for the development of small businesses; networking; supply chain development and the co-ordinated delivery of business support services, innovation centres, technology transfer, skills development, training and lifelong learning. -

2.22 The Council believes that it is vital for Thanet to share in the benefits that the Regional Economic Strategy identifies. With the advent of the Thanet Campus of Canterbury Christ Church University College and the Innovation Centre and managed incubator workspace at Thanet Reach, there is the foundation for the development of an Enterprise Gateway linking with other new business development in Thanet.

The Kent and Medway Structure Plan

2.23 The Kent and Medway Structure Plan also adopts a positive attitude to new investment and economic development in the light of Thanet's persistent economic problems and the future prospects for the area, and this is reflected in Structure Plan Policy TH1.

Employment Land Supply

2.24 Government guidance, in Planning Policy Guidance Note 4, states that local planning authorities should allocate sufficient land to meet the economic development needs of their areas.

2.25 Encouraging growth and diversification of the economy and fostering employment generation is a central issue in formulating Thanet's planning policies. While land use policies alone are unlikely to produce a regeneration of the area's economy, it is essential, if Thanet is to take advantage of its strengths and opportunities and of the initiatives that have been made available to aid recovery, that sufficient land, in the right locations and with adequate infrastructure, is made available to provide opportunities for a range of market sectors.

2.26 Policy EP2 of the Kent and Medway Structure Plan sets guidelines as to the level of floorspace provision to be made for economic development purposes in each district. For the period 2001-2021 these guidelines indicate that 304,000 sqm should be provided for a full range of industrial and warehousing uses (Use Classes B2-B8), business development and financial and professional services (Use Classes A2/B1).

2.27 The previous Local Plan allocated about 135 hectares (333.5 acres) for economic development at various business sites around the District, approximately 19.24 ha (14%) of which have been developed (2001). The joint Employment Land Study 2001 indicates that the outstanding Local Plan allocations help to provide a surplus of 52% over the existing Structure Plan guidelines for the Local Plan period to 2011. This position will need to be reviewed once the Structure Plan guidelines for the period to 2021 have become more definite, and this may require a partial review of the Local Plan.

2.28 The land allocated for new development or identified for retention in the Plan is intended to meet the needs of businesses either starting up or developing locally, or seeking to locate in the area, and to reflect the Council's Economic Development Strategy. Given the amount, location and type of land already allocated and the take-up rates experienced over the last few years, the

Council considers that no further economic development land needs to be provided during the Plan period. This position is recognised in the Regional Planning Guidance for the South-East. However it is important to ensure that the business parks are well designed and landscaped, and have all the necessary environmental controls so that even when they have been completed they remain an attractive location for reinvestment.

2.29 This Plan therefore continues the allocation of the balance of the Business Park sites that have not yet been developed, as follows:

Employment Allocation	Outstanding Local Plan commitment at June 2001
Manston Park, Manston	121,789 sqm
EuroKent Business Park, Ramsgate	101,519 sqm
Thanet Reach Business Park, Broadstairs	30,022 sqm
Hedgend Industrial Estate, Thanet Way	4,000 sqm
Manston Road, Ramsgate	6,000 sqm
Total	**263,330 sqm**

2.30 These allocations comprise the majority of the current land supply, the balance being made up by the development of smaller sites, such as land at existing industrial estates and on individual development sites.

2.31 Manston Park, EuroKent Business Park and Thanet Reach also form part of the Central Island Initiative, which is addressed in more detail below.

The Central Island Initiative

2.32 The aim of the Central Island Initiative (CII) is to help diversify and enhance the economy of Thanet. The Initiative is identified as one of the four main elements of the Council's 'self-containment approach' for the regeneration of Thanet. The CII focuses on the unique economic strands between the airport and the three business parks. These business parks are considered below. In August 1998, the Council adopted Supplementary Planning Guidance in relation to the CII. This guidance has now been incorporated into this Local Plan and forms the basis of Policies EC2 to EC6. It is anticipated that the various elements of the CII will generate considerable travel demand. This issue is considered in more detail in the Transport Chapter of this Plan.

Manston Park, EuroKent and Thanet Reach Business Parks

2.33 The three business parks have been identified as key components of the CII as they provide realistic economic development opportunities linked to the expanding Kent International Airport. As can be seen from the chart above, Manston Park, EuroKent and Thanet Reach Business Parks are the three largest employment sites in Thanet.

Manston Business Park

2.34 Manston Business Park was allocated for development in the Isle of Thanet Local Plan, and this is carried forward in this Plan. Manston Park is strategically located at the centre of Thanet, with easy accessibility from the centres of population, the airport, the port at Ramsgate and generally improved road links to the rest of Kent and the UK via the A299 and M2. This site is the primary inward investment site for the district.

2.35 Manston Park has a unique relationship with the airport, is less than 5 miles from Ramsgate New Port, and within easy reach of the main population centres of Thanet. The development of employment opportunities at the site will also provide a new focus for retaining skills within Thanet and could well intercept longer distance commuters who presently have to travel to Canterbury, Dover or further afield to find suitable employment.

EuroKent Business Park

2.36 The EuroKent Business Park was allocated for development in the Isle of Thanet Local Plan (1998). It comprises approximately 40ha, and is situated roughly equidistant between the three main Thanet towns. The site is located directly adjacent to Newington, a large housing estate suffering high unemployment. While it is intended that this site should be developed at a higher density than Manston Park, an attractive, landscaped site is nevertheless envisaged.

2.37 In allocating this site for employment uses, it is acknowledged that there are significant highway constraints, which will need to be overcome before it can be fully developed. As the EuroKent Business Park development proceeds, the main spine road will eventually form the major through route, thus relieving Haine Road.

2.38 The Council will require, through the mechanism of the building agreement with the developer, that the whole new road should be implemented at an appropriate point in the development of the site as determined by the requirements of the Highway Authority.

Thanet Reach Business Park, Broadstairs

2.39 Thanet Reach was identified in the Isle of Thanet Local Plan for a mix of business uses. It has since been partly developed for the Thanet Campus of Canterbury Christ Church University College, the Innovation Centre and for a variety of business and telecommunications uses. However, a substantial part of the site remains undeveloped, of which 6 hectares must be for business uses, and this allocation is carried forward into this Plan.

Hedgend & Manston Road

2.40 The business parks at Hedgend and Manston Road are more modestly sized than the three identified in the CII but they are still considered important

for the regeneration of Thanet as they provide additional choices for economic development. Due to the amount of land available at the sites, the Council believes that these sites should be allocated solely for B1, B2 and B8 uses. Policy EC1 will therefore apply.

Hedgend Industrial Estate, St Nicholas

2.41 In order to facilitate development of employment opportunities in the rural area, the Isle of Thanet Local Plan identified an extension of 1.8 hectares to the existing small Hedgend Industrial Estate, to the west of the site. The site is well-related to the Thanet Way, and provides an opportunity for the development and growth of small firms in the rural areas of Thanet.

2.42 It is extremely important that the development of the site is carried out with careful consideration as to the integration of development into the landscape. To that end the Council will expect substantial landscaped boundaries to be provided as part of any development proposal, particularly on the frontage of the improved Thanet Way to accord with Policy CC4 in the Countryside & Coast Chapter.

Manston Road, Ramsgate

2.43 Following the development of the new Tesco superstore at Manston Road, this former car storage site now comprises some 1.72ha (4.25acres) of vacant land. This site is fully serviced and has good access to the principal road network.

2.44 The site is located on the very edge of the built-up area of Ramsgate and abuts the open countryside. Any development proposed for this former storage site would therefore need to be designed in sympathy with the sensitivity of the location. It is possible that significant archaeological remains exist on this site and accordingly a field evaluation may be required in order to enable particular proposals to be considered.

POLICY EC1 - LAND ALLOCATED FOR ECONOMIC DEVELOPMENT

AT THE FOLLOWING SITES, AS SHOWN ON THE PROPOSALS MAP, LAND IS ALLOCATED FOR BUSINESS PURPOSES:

1. **MANSTON PARK, MANSTON**
2. **EUROKENT BUSINESS PARK, RAMSGATE**
3. **THANET REACH BUSINESS PARK, BROADSTAIRS**
4. **HEDGEND INDUSTRIAL ESTATE, ST NICHOLAS**
5. **MANSTON ROAD, RAMSGATE**

USE WILL BE RESTRICTED TO CLASSES B1 (BUSINESS), B2 (GENERAL INDUSTRY) AND B8 (STORAGE AND DISTRIBUTION). ON ALL SITES A LANDSCAPING SCHEME APPROPRIATE TO THE SCALE, LOCATION AND CHARACTER OF THE SITE WILL BE REQUIRED TO PROVIDE AN ATTRACTIVE ENVIRONMENT.

ON THESE SITES PLANNING APPLICATIONS SHOULD BE ACCOMPANIED BY TRAFFIC IMPACT STUDIES AND GREEN TRAVEL PLANS, UNLESS THE DEVELOPMENT IS CONSIDERED TOO SMALL TO HAVE A SIGNIFICANT TRAVEL IMPACT.

Kent International Airport, Manston

2.45 The Airfield at Manston has been in existence since 1918. From about 1962 a part of the airfield has been given over to specific use for civilian purposes (the remainder being retained in military use). The area known as the 'civil enclave' permitted a wide range of civilian operations ranging from heavy transport freight, including humanitarian relief flights, general aviation and flying school activities. In addition, a number of civilian passenger carriers operated from the airport, including such names as Silvercity, Invicta Airways, Cosmos and Yugotours. Passenger-carrying charter aircraft operated to many destinations across Europe, such that in the late 1960s and early 1970s, up to 200,000 passengers per year used the airport.

2.46 During the late 1980s and early 1990s, the Ministry of Defence began the slow reduction in their operations, culminating in the entire airport being sold in 1998 to the Wiggins Group, who sought and obtained a Civil Aviation Authority Licence to operate Manston as an entirely civilian airport. In the interim period a substantial investment has been made in improving the infrastructure of the airport (new runway surfaces, instrument landing systems, new air traffic control tower, etc) and the airport is now capable of accommodating continued growth to meet market opportunities.

2.47 During 2004/05 Plane Station (formerly known as the Wiggins Group) operated international flights to a number of destinations using the low-cost airline EU Jet. In July 2005 the airport was taken over by Infratil. It is likely that flight activity will largely be freight in the near future.

2.48 Air-traffic forecasts for the UK and indeed for the whole of Western Europe indicate a very substantial growth in demand for passenger travel in the period to 2030. Given the considerable uncertainty with such projections, the ODPM has provided a high/low range which would see the 1998 figure of 160 million passengers per annum increase to between 350-460 million passengers per annum – a growth of approximately 250%, the equivalent to 4.3% growth per annum. Faced with such forecasts, the ODPM commissioned a national review of air traffic policy.

2.49 Much will depend on the level of constraint which the Government wishes to apply to the major London airports and, therefore, on the market perception of regional airports such as Kent International Airport. The higher the level of constraint at the key London airports, the higher the potential that exists for regional airports, including Kent International Airport.

2.50 Equally, the higher the level of investment by the owners of the airport in providing improved handling facilities, better passenger facilities, new or

improved passenger terminals, etc, the more likely the airport is to attract substantial growth by attracting aircraft operators.

2.51 Kent International Airport possesses one of the longest runways in the country (effectively the sixth longest runway at present), together with the substantial areas of land available for employment purposes adjacent to the runway (in excess of 100 hectares of land with planning permission for a range of business uses). In the Council's view, this means that the airport should play an important part in the economic regeneration not just of Thanet, but of the whole of East Kent. The Council, therefore, supports fully the development of Kent International Airport and seeks to exploit the opportunities afforded by the development of the airport to encourage further development in the adjoining business parks, thus creating a major catalyst for the regeneration of the Thanet economy.

2.52 The Council is, however, conscious of the genuinely-held environmental concerns of those living under the flight paths and, therefore, whilst the Council wishes to be supportive of the development of the airport for the job creation potential, it is at the same time mindful of the environmental consequences that arise from having a successful airport within the community.

2.53 The Council will be working closely with the airport owners and expects operators to adopt best practice to ensure that the operational requirements of the airport are balanced against the genuinely-held environmental concerns of those most affected.

2.54 Legal agreements had been formed with previous airport operators. It is anticipated, that following early discussions with the new owners, similar agreements will be implemented.

2.55 In accordance with the legal agreement, the previous owners produced a green transport strategy and this will need to be updated to set strategies and targets for development to ensure that a sustainable approach is taken to maximise access to the airport by means other than the private car.

2.56 It is the Council's view that there should be a series of s106 Agreements between the owner and the Council, which will adjust the terms of the agreement with the changes in circumstances that occur with the development of the airport.

2.57 When planning consent for development at the airport is sought by the owner, the Council will judge the proposals against the airport operator's success in meeting the requirements of the relevant Section 106 Agreement and against the following criteria:

1. The level and quality of job creation resulting from the proposed development;
2. The implications of the development in respect of its likely impact on the road network and in particular in respect of how the development

complies with the Green Transport Strategy agreed between the Council and the owners; and

3. The potential impact of the development on the surrounding environment in terms of noise, air quality, ground-water protection etc.

2.58 The continued development of the airport will need to be considered in the light of the quality of the surface access to the airport and the impact of further development on existing means of transport. In particular the Council will wish to establish that a significant proportion of traffic to and from the airport is carried by public transport. In submitting development proposals, the owners will need to demonstrate that they have taken the necessary opportunities to incorporate adequate proposals for public transport, in accordance with the Green Transport Strategy.

2.59 Within this period of uncertainty regarding the level of market share, and given the absence of Government policy, the Council has to devise its policies not just for the airport, but also for the land-use implications of other consequential development. The Local Plan policy framework should neither hold back the growth of the airport, nor inhibit inward investment. Neither should it result in allocating land unnecessarily to the extent that planned development is not achieved, or investment in infrastructure to support development being made prematurely.

2.60 The Council, therefore, wishes to set out its view of how Manston will develop in the Plan period, to provide some certainty in terms of support to other development without at the same time being unrealistic about the opportunities that undoubtedly exist.

2.61 In the Council's view, there is undoubtedly a market opportunity given the forecast in growth in air travel. Even if the lower levels of forecasted growth are achieved, and past performance has certainly indicated that higher levels are achievable, there is undoubtedly a market for Kent International Airport to strive to capture. The success of Kent International Airport in capturing market share will depend upon a wide range of factors such as Government Policy, fuel prices, future airfares and a continuing growth in airfreight, etc. In addition, factors such as the level of investment in passenger and freight handling facilities, the perception of Kent International Airport as a desirable location for aircraft operators, the establishment of point to point air routes and links to international hub airports will also have a major impact on development opportunities.

2.62 The Council, in its Vision Statement (2020 Vision) published in January 2000, suggested that by 2020 the airport could be handling approximately 10 million passengers per annum. Given the right investment conditions and market opportunities, the Council considers that levels of passenger movement of that order are achievable. However, this Local Plan only sets policy until 2011. Kent County Council, as the Strategic Planning Authority for Kent, will need to make its own assessment of the implications of growth in that longer period, as the Revised Structure Plan will have a time horizon of 2021. The longer term consequences of the appropriate level of airport development and

its implications for the economy of Kent as a whole, and East Kent in particular, together with the transportation, housing and environmental consequences of such levels of development, will need to be addressed by the Strategic Planning Authority in the foreseeable future.

2.63 The District Council has a more immediate task of identifying the likely level of development within the Plan period (2011) and of identifying the appropriate level of land-use resources to meet the consequences of development in that period.

2.64 The Council has every confidence that the airport will be successful in attracting substantial numbers of passengers and substantial tonnage of airfreight. The real issue relates to the timescale for the achievement of the substantial numbers that are put forward by various parties. Estimates for passenger throughput at Kent International Airport vary between 500,000 passengers and 5 million passengers per annum by 2011. Estimates of the throughput of airfreight are less variable and depend more on the investment made by the owners in freight handling facilities, but they too vary from 65,000 tons per annum, to in excess of 300,000 tons per annum.

2.65 Given these variations, the Council has decided to adopt a cautious approach to planning for the consequences of airport development during the Plan period. Given the level of investment required to handle substantial numbers of passengers and freight, and the past history and length of time it has taken other UK airports to develop their throughput, the Council takes the position that it should plan for 1 million passengers, and 250,000 tonnes of freight per annum by the end of the Plan period. However, given the fluidity of the market and the enormous potential that exists at Kent International Airport, the Council proposes to formally review the situation during the years 2005-2006 with a view to taking a revised position in respect of the development of the airport and, therefore, if necessary also to adjust the consequential decisions in respect of other land uses in a review of the Local Plan at the appropriate time.

2.66 The planned-for development levels referred to above are in no way intended to place a ceiling on the development of the airport. The following Policies are not limited to a particular level of traffic. Thus, should national policy or market forces result in a more rapid development of the airport than currently envisaged, these Policies will remain applicable. However, the development associated with higher levels of growth may require the submission of further Environmental Statements and their analysis.

POLICY EC2 - KENT INTERNATIONAL AIRPORT

PROPOSALS THAT WOULD SUPPORT THE DEVELOPMENT, EXPANSION AND DIVERSIFICATION OF KENT INTERNATIONAL AIRPORT WILL ONLY BE PERMITTED SUBJECT TO THE FOLLOWING REQUIREMENTS:

1. DEMONSTRABLE COMPLIANCE WITH THE TERMS OF THE CURRENT AGREEMENT UNDER SECTION 106 OF THE TOWN AND

COUNTRY PLANNING ACT 1990 OR SUBSEQUENT EQUIVALENT LEGISLATION;

2. **NEW BUILT DEVELOPMENT IS TO BE DESIGNED TO MINIMISE VISUAL IMPACT ON THE OPEN LANDSCAPE OF THE CENTRAL ISLAND. PARTICULAR ATTENTION MUST BE GIVEN TO ROOFSCAPE AND TO MINIMISING THE MASS OF THE BUILDINGS AT THE SKYLINE WHEN VIEWED FROM THE SOUTH;**

3. **APPROPRIATE LANDSCAPING SCHEMES, TO BE DESIGNED AND IMPLEMENTED AS AN INTEGRAL PART OF THE DEVELOPMENT*:**

4. **ANY APPLICATION FOR DEVELOPMENT FOR THE PURPOSE OF INCREASING AIRCRAFT MOVEMENTS IN THE AIR OR ON THE GROUND, AUXILIARY POWER OR ENGINE TESTING, MUST BE SUPPORTED BY AN ASSESSMENT OF THE CUMULATIVE NOISE IMPACT AND THE EFFECTIVENESS OF MITIGATION MEASURES TO BE IMPLEMENTED IN ORDER TO MINIMISE POLLUTION AND DISTURBANCE. THE ACCEPTABILITY OF PROPOSALS WILL BE JUDGED IN RELATION TO ANY IDENTIFIED AND CUMULATIVE NOISE IMPACT, THE EFFECTIVENESS OF MITIGATION AND THE SOCIAL AND ECONOMIC BENEFITS OF THE PROPOSALS;**

5. **AN AIR QUALITY ASSESSMENT IN COMPLIANCE WITH POLICY EP5, TO DEMONSTRATE THAT THE DEVELOPMENT WILL NOT LEAD TO A HARMFUL DETERIORATION IN AIR QUALITY. PERMISSION WILL NOT BE GIVEN FOR DEVELOPMENT THAT WOULD RESULT IN NATIONAL AIR QUALITY OBJECTIVES BEING EXCEEDED;**

6. **DEVELOPMENT WILL NOT BE PERMITTED WITHIN THE AIRPORT COMPLEX TO THE SOUTH OF THE AIRSIDE DEVELOPMENT SITE IDENTIFIED IN POLICY EC4, UNLESS IT HAS BEEN DEMONSTRATED THAT THE DEVELOPMENT IS NECESSARY FOR THE PURPOSE OF AIR TRAFFIC MANAGEMENT;**

7. **ANY NEW DEVELOPMENT WHICH WOULD GENERATE SIGNIFICANT SURFACE TRAFFIC MUST MEET REQUIREMENTS FOR SURFACE TRAVEL DEMAND IN COMPLIANCE WITH POLICY EC3.**

8. **IT MUST BE DEMONSTRATED THAT NEW DEVELOPMENT CANNOT CONTAMINATE GROUNDWATER SOURCES OR THAT APPROPRIATE MITIGATION MEASURES WILL BE INCORPORATED IN THE DEVELOPMENT TO PREVENT CONTAMINATION.**

* Given the prime role of Kent International Airport in the strategy of this Plan, the District Council will carefully consider the potential adverse impacts of landscaping and nature conservation enhancements in the vicinity of the airport, given, for example, the potential to increase the risk of bird strike.

Kent International Airport - Surface Transport Issues

2.67 The development of Kent International Airport is likely to have significant implications in terms of surface transport both within the district and in the wider area of East Kent.

2.68 The Council sees potential for a rail connection to the Ramsgate-Ashford line. The Council, together with Kent County Council and other East Kent Councils, is pressing the government and the Strategic Rail Authority to deliver the benefits of a faster, better quality rail service to London, through Ashford and linked to the Channel Tunnel Rail Link. Significantly reduced journey times would address the perceived isolation of Thanet and East Kent and generate further confidence for economic investment in the District. The Council strongly supports the objective of a dedicated rail link to the airport with a station near the terminal and a possible freight interchange serving Kent International Airport and the Central Island Area. In the short term, the Council aims to promote sustainable passenger and freight movements by means of the Green Transport Strategy agreed with the developers.

2.69 This strategy was published in June 2002 and aims to minimise the potential ground transport impact and to provide a clear policy framework within which Kent International Airport can develop its transport infrastructure and services. It identifies a set of measures to help ensure the use of sustainable methods of transport, such as public transport or cycling, and to minimise any adverse traffic impacts on local communities as Kent International Airport develops.

2.70 An objective of the Strategy is that at least 10% of passenger and employee journeys should, by 2005, be by means other than the private car, with substantial increases in that percentage beyond that period. However, the setting of any deliverable targets beyond that date will only be possible in light of experience. The Strategy considers how development proposals would encourage means of travel other than the private car, including rail/bus connections between local railway stations and the airport, and development of dedicated airport coaches with direct access to the airport terminal for passengers travelling from greater distances. Green Travel Plans and Traffic Impact Studies, identifying reasonable mitigation measures will accompany, when appropriate, Kent International Airport planning proposals. The Green Travel Plans shall be prepared in consultation with this Council.

2.71 The Council estimates that by the end of the Plan period, the airport and adjacent land and business parks could generate approximately 3660 jobs. The majority of employees are likely to need to travel to work from the Thanet towns. Existing road links between urban Thanet and Kent International Airport are little more than country lanes, pass through or near villages and hamlets, and would be unable to accommodate significant commuter traffic flows without substantial investment. The Strategy states that the developer will co-operate with the local authorities and public transport providers in discouraging carborne commuter traffic in favour of alternative means of transport.

2.72 This Strategy also complements the East Kent Access Study (see Transport Chapter) and addresses traffic management measures as described in the Thanet District Transport Plan. These traffic management measures would include protecting the environment and lifestyle of adjoining villages and hamlets, and provision of facilities to encourage use of public transport, walking and cycling and discourage private car use.

2.73 The development of Kent International will at some time necessitate improvements to the B2190 and B2050, which provide access between Kent International and the strategic route network. The closure of the B2050 may be a desirable operational objective in the long term. Whilst from a planning point of view this may be desirable, any such closure would have to be subject to consultation and legislative requirements outside the Local Plan process and would be tied to other airport development proposals. Phased improvements to these roads will be required in association with growth in traffic. Similarly, other improvements to accommodate or ameliorate the impact of carborne commuter traffic flows may be required. This may involve local improvement to existing roads or provision of a new road linking central urban Thanet with Kent International Airport. The Green Travel Strategy identifies objectives relating the road network, ranging from the closure of the B2050 as a public through route to working with the Highway Authority to identify and sign airport road access routes. An important aspect for the EKA transport study will be to address the issue of traffic flows which would trigger the need to effect such improvements.

POLICY EC3 - KENT INTERNATIONAL AIRPORT, SURFACE TRANSPORT ISSUES

PROPOSALS FOR DEVELOPMENT AT KENT INTERNATIONAL AIRPORT WILL BE ASSESSED IN TERMS OF THE SURFACE TRAVEL DEMAND THEY WILL GENERATE. PROPOSALS WILL BE REQUIRED TO:

1. **DEMONSTRATE, THROUGH INDIVIDUAL GREEN TRAVEL PLANS, THAT MEASURES WILL BE TAKEN TO REDUCE CAR-BASED TRAVEL IN FAVOUR OF SUSTAINABLE ALTERNATIVES, AND EFFECTIVELY IMPLEMENT THE GREEN TRANSPORT STRATEGY FOR THE AIRPORT, INCLUDING THROUGH THE PROVISION OF PUBLIC TRANSPORT CONNECTIONS BETWEEN OTHER TRANSPORT NODES AND THE AIRPORT; AND**

2. **PROVIDE FOR SUCH HIGHWAY IMPROVEMENTS/MANAGEMENT WHICH ARE IDENTIFIED THROUGH THE PREPARATION OF TRAFFIC IMPACT STUDIES AS BEING REQUIRED TO ACCOMMODATE PARTICULAR THRESHOLDS OF DEVELOPMENT AT KENT INTERNATIONAL AIRPORT.**

Airside Development Area

2.74 In order to provide for the operational development of the airport, land north of the runway, and including the land north of the B2050, is reserved for airside development purposes. In this context, airside development is defined as uses with an operational requirement for direct access to aircraft and therefore dependent on a location immediately adjacent to the runway or capable of direct access to it via taxiways. This includes uses based on:

1. Operation of passenger handling services
2. Air cargo operations related to the site
3. Operation of aircraft maintenance and manufacturing
4. Services ancillary to the maintenance and operation of the airport

2.75 Consequently, the Local Planning Authority will oppose any development or use of land in the defined area which does not specifically require an airside location.

POLICY EC4 - AIRSIDE DEVELOPMENT AREA

LAND AT THE AIRPORT, AS IDENTIFIED ON THE PROPOSALS MAP, IS RESERVED FOR AIRSIDE DEVELOPMENT. DEVELOPMENT PROPOSALS WILL REQUIRE SPECIFIC JUSTIFICATION TO DEMONSTRATE THAT AN AIRSIDE LOCATION IS ESSENTIAL TO THE DEVELOPMENT PROPOSED. DEVELOPMENT WILL BE REQUIRED TO RETAIN SUFFICIENT LAND TO PERMIT ACCESS BY AIRCRAFT OF UP TO 65M (217FT) WINGSPAN TO ALL PARTS OF THE SITE.

Land at, and east of, Kent International Airport Terminal

2.76 Some airport terminal-related activities need to be located adjacent to the existing terminal building. This could include, for example, car parking or the physical expansion of the terminal. In order to cater for such uses, a site is identified on the Proposals Map including the existing airport terminal facilities and land immediately to the east of the terminal.

2.77 This land is identified for airport terminal-related uses and retains a reasonable gap between the expanding airport terminal area and the nearby Manston Village, which is protected by Policy CC6.

2.78 In the event that the airport develops at a quicker rate than that envisaged in this Plan, the future location of airport terminal facilities will need to be considered in the context of the airport Master Plan and the other relevant policies in this Plan.

POLICY EC5 - LAND AT, AND EAST OF, THE AIRPORT TERMINAL

UNTIL SUCH TIME AS A NEW AIRPORT TERMINAL IS BUILT, LAND AT, AND EAST OF, THE EXISTING AIRPORT TERMINAL IS IDENTIFIED ON THE PROPOSALS MAP FOR AIRPORT TERMINAL-RELATED PURPOSES. USES WILL BE RESTRICTED TO THOSE WHICH DIRECTLY SUPPORT OR COMPLEMENT THE OPERATIONAL REQUIREMENTS OF THE EXISTING AIRPORT TERMINAL. SHOULD A NEW TERMINAL BE BUILT, OTHER AIRPORT-RELATED DEVELOPMENT WILL BE PERMITTED ON THIS ALLOCATED SITE. PLANNING CONDITIONS OR PLANNING AGREEMENTS WILL BE APPLIED TO LIMIT ANY DEVELOPMENT GRANTED PLANNING CONSENT TO USES CONFORMING TO THIS POLICY.

The MoD Fire Training School

2.79 The future of Fire Training School facilities around the country is currently under joint review by the Home Office and the MoD. It is conceivable that one option will be to close the Fire Training School at Kent International Airport, and concentrate such facilities at another centre elsewhere.

2.80 In the event that the MoD's use of the site ceases, the Local Planning Authority would welcome its continued use for fire training in a different, perhaps commercial, form. Alternatively, the use of the site for a business hotel or another educational or similar institutional use related to the airport would be acceptable, as would other non-airside uses.

POLICY EC6 - FIRE TRAINING SCHOOL/MOD COMPLEX

IF THE CURRENT USE OF THE FIRE TRAINING SCHOOL OR ADJOINING LAND CEASES, THE LOCAL PLANNING AUTHORITY WILL SUPPORT THE DEVELOPMENT OF AIRPORT OR AIRPORT-RELATED USES, WHICH WOULD ASSIST IN THE EXPANSION OF THE AIRPORT. THESE COULD INCLUDE:

1. **EDUCATIONAL/TRAINING USES (SUCH AS FIRE TRAINING);**
2. **HOTELS;**
3. **CAR PARKING; OR**
4. **USES FALLING WITHIN USE CLASSES A2 AND B1, WITH AN AIRPORT ORIENTATION.**

Airport Safeguarding

2.81 The Council is acutely aware of the need to prevent development that might prejudice the future operation and expansion of the airport, or be adversely affected by Airport operations. The Local Plan contains policies relating to the expansion of the airport (Policies EC2-EC6 above), aircraft noise (Policies EP7 and EP8) and air quality monitoring (Policy EP5), which should help to ensure that this does not happen.

2.82 Furthermore, the Civil Aviation Authority has identified development safeguarding zones around the airport. Within these zones, the local planning authority is required to consult the airport operators regarding different forms of development that might affect Airport operations.

2.83 The LPA will take account of concerns expressed by the airport operators in relation to such development, in addition to its own assessment about development which might prejudice the development of the airport.

Sandwich Corridor

2.84 The Sandwich Corridor area, including Pfizer, is mainly located just beyond the administrative boundary of Thanet in Dover District. This area has historically provided employment opportunities for Thanet residents, and this will continue to be the case. This area is the subject of a major study.

2.85 Thanet Council is working with Dover District Council, Kent County Council, Pfizer, Canterbury City Council and others to undertake development and landscaping initiatives for the area as part of work being undertaken by the Area Strategic Partnership. This has three linked strands:

1. To secure job creation on existing and expanded employment sites, using principally brownfield and underused or vacant land;

2. To improve environmental quality as a whole through co-ordinated landscaping, design and re-development; and

3. To improve the communications infrastructure, in particular the A256.

Area Investment Framework

2.86 An Action Plan for the Area Investment Framework (AIF) has been produced for the East Kent Triangle, the area contained by the Districts of Thanet, Dover and Canterbury. The AIF is intended as a tool for integrated resource planning, mapping out existing and identifying gaps in investment to bring about the area's regeneration and meet its development needs.

2.87 The Action Plan aims to influence investment and funding decisions of Government, South East England Development Agency (SEEDA) and other funding agencies in support of the specific actions identified. Proposals elsewhere in this Plan cover the land use issues associated with the Action Plan.

Economic Development - Infrastructure Provision

2.88 As mentioned above, there is sufficient economic development land identified to meet the Structure Plan guidelines during the Plan period. The priority now is to make sure that the existing business parks and development land are fully serviced and available for companies to move onto.

2.89 Some of the land is already serviced (20ha/50ac at Manston Park; 8ha/20ac at EuroKent in 2000). However, the Council, in partnership with Kent County Council, Dover District Council and SEEDA, has recently developed an infrastructure strategy to provide services to the rest of the business park sites and in the Sandwich Corridor. This programme will provide infrastructure and utility connections to likely development sites within the Objective 2 areas of Thanet and the Sandwich Corridor.

2.90 Implementation will be undertaken by the Spatial Development Company, a specially created public sector delivery company set up to deliver infrastructure to these sites. It will benefit from partial European Union funding and funding from the Single Regeneration Budget. This will attract appropriate levels of additional funding from other public/private sources to deliver the critical development infrastructure during the Plan period on a rolling programme of improvements, to release land on the business parks and bring forward economic development and job creation.

2.91 As the sites made available for development through this process are taken up, payment for connections to the appropriate utilities will be required, equivalent to the full market cost of the infrastructure provided. This approach stems from European Union policy, which requires that state aid should not distort or threaten to distort competition within the European Community.

2.92 This payment will then be reinvested in further infrastructure improvements within the target area on a rolling programme of investment to achieve the world-class business environment envisaged in the South East Regional Economic Strategy. This mechanism will require the use of legal agreements in the granting of planning permission to secure payments for infrastructure provision.

POLICY EC7 - ECONOMIC DEVELOPMENT INFRASTRUCTURE

TO ENSURE THAT DEVELOPMENT OPPORTUNITIES ARE CONTINUED, WHERE INFRASTRUCTURE AND UTILITIES HAVE BEEN PROVIDED TO APPROPRIATE SITES BY THE SPATIAL DEVELOPMENT COMPANY, PLANNING PERMISSION FOR NEW DEVELOPMENT LIKELY TO DIRECTLY BENEFIT FROM THE PROVISION OF INFRASTRUCTURE WILL BE PERMITTED SUBJECT TO A LEGAL AGREEMENT (IN ACCORDANCE WITH SECTION 106 OF THE TOWN & COUNTRY PLANNING ACT; SECTION 111 OF THE LOCAL GOVERNMENT ACT; OR ANY OTHER APPROPRIATE PROVISION) SUCH THAT AN APPROPRIATE LEVEL OF PAYMENT IS MADE TO COVER THE COST OF THE PROVISION OF OR IMPROVEMENT TO SERVICE TO THE SITE.

Ramsgate Waterfront

2.93 The Seafront, Port and Royal Harbour areas are recognised as having great potential to contribute to the economic and tourism regeneration of Ramsgate. Thanet District Council in conjunction with the South East England Development Agency (SEEDA), Kent County Council and English Partnerships

have appointed a team of consultants, led by CB Hillier Parker. Together with co-consultants EDAW Ltd, Campbell Reith Hill and MDS Transmodal, CB Hillier Parker have prepared a comprehensive development framework and implementation strategy for this area.

2.94 The development framework proposes the development of a world-class marina complex based on the Royal Harbour**.** The Comprehensive Development Framework retains the commercial port activities (policy EC9) while providing for new mixed tourism, leisure, retail and residential uses on land to the west of the Royal Harbour and along the Eastern Seafront together with the refurbishment of the military arches to facilitate their use primarily as cafes and restaurants. Some improvements have already been completed such as Royal Harbour Approach, a new promenade, extension of the marina and improvements around the York Street area. Other aspects of the development framework include enhancement of the Motor Museum, enhancement of the Maritime Museum, improvement of vertical circulation (i.e. lifts), a camera obscura and improved linkages along the seafront and with the town centres.

2.95 The Royal Harbour is a Grade II* listed structure and is the focus of the Conservation Area. New development in this area will need to take full account of the character of the harbour and seafront as a listed structure within the Ramsgate Conservation Area. All new development will be required to meet the demanding standards of such a location in terms of design, enhancement and use of materials.

POLICY EC8 - RAMSGATE WATERFRONT

LAND AT AND ADJACENT TO RAMSGATE HARBOUR, AS INDICATED ON THE PROPOSALS MAP, IS IDENTIFIED FOR DEVELOPMENT FOR A MIXTURE OF LEISURE, TOURISM, RETAIL AND RESIDENTIAL PURPOSES.

ANY SUCH PROPOSALS SHOULD HAVE REGARD TO SUPPLEMENTARY PLANNING GUIDANCE FOR RAMSGATE RENAISSANCE, INCLUDING THE FOLLOWING ELEMENTS:

1. **LAND WEST OF THE ROYAL HARBOUR - NEW RESIDENTIAL AND LEISURE DEVELOPMENT; AND**

2. **RAMSGATE ROYAL HARBOUR - CONTINUED DEVELOPMENT OF MIXED LEISURE AND MARINA FACILITIES, IN PARTICULAR AT THE MILITARY ROAD ARCHES; AND**

3. **EASTERN UNDERCLIFF - MIXED LEISURE, TOURISM AND RESIDENTIAL USES.**

ALL DEVELOPMENT PROPOSALS MUST TAKE PARTICULAR CARE IN THE DESIGN, LOCATION, USE OF MATERIALS AND RELATIONSHIP OF LAND-BASED FACILITIES WITH OPEN WATER, SUCH AS TO PROTECT

IMPORTANT VIEWS AND PRESERVE OR ENHANCE THE HISTORICAL CHARACTER OF THE ROYAL HARBOUR AND SEAFRONT.

ALL PROPOSALS MUST ENSURE THE INTEGRITY OF NATURE CONSERVATION INTERESTS WITHIN THE ADJACENT SSSI-SPA-SAC-RAMSAR SITE IS MAINTAINED.

Ramsgate New Port

2.96 The development of ferry services through the Port of Ramsgate continues to be an important factor in the area's attractiveness in terms of inward investment, and this position was greatly strengthened by the completion of the Royal Harbour Approach in July 2000. The Council considers that the area of land designated for port activities is sufficient, but could be changed according to demand. Policy EC8 promotes regeneration at Ramsgate Waterfront through a mix of uses within a concept of Supplementary Planning Guidance for Ramsgate Renaissance.

2.97 In addition, the Council is conscious of the balance to be achieved between port development and the potential environmental damage to the Sandwich Bay-Thanet Coast SSSI/SPA/Ramsar Site/Candidate Marine SAC, and to the Westcliff Beach area. As a consequence, the Council, whilst wishing to give policy support to port development, wishes to do so in a way which is sensitive to the nature conservation and landscape issues which may result from the unrestricted development of port-related activities. Any development at the Port will be subject to the Habitat Regulations.

POLICY EC9 - RAMSGATE NEW PORT

FURTHER DEVELOPMENT WILL BE PERMITTED AT THE RAMSGATE NEW PORT, AS SHOWN ON THE PROPOSALS MAP, IF IT FACILITATES THE IMPROVEMENT OF RAMSGATE AS A PORT FOR SHIPPING, TRAFFIC THROUGH THE PORT, NEW ROUTES AND COMPLEMENTARY LAND-BASED FACILITIES, SUBJECT TO THE FOLLOWING CRITERIA:

1. **A DEMONSTRABLE PORT-RELATED NEED FOR ANY PROPOSED LAND-BASED FACILITIES TO BE LOCATED IN THE AREA OF THE NEW PORT, AND ALSO A DEMONSTRABLE LACK OF SUITABLE ALTERNATIVE INLAND LOCATIONS; AND**

2. **COMPATIBILITY WITH THE CHARACTER AND FUNCTION OF RAMSGATE SEAFRONT AND THE ROYAL HARBOUR AS A COMMERCIAL AND LEISURE FACILITY; AND**

3. **AN ACCEPTABLE ENVIRONMENTAL ASSESSMENT OF THE IMPACT OF THE PROPOSED DEVELOPMENT UPON THE HARBOUR, ITS SETTING AND SURROUNDING PROPERTY, AND THE IMPACT OF ANY PROPOSED LAND RECLAMATION UPON NATURE CONSERVATION, CONSERVATION OF THE BUILT ENVIRONMENT,**

THE COAST AND ARCHAEOLOGICAL HERITAGE, TOGETHER WITH ANY PROPOSALS TO MITIGATE THE IMPACT.

LAND RECLAMATION WILL NOT BE PERMITTED BEYOND THE WESTERN EXTREMITY OF THE EXISTING LIMIT OF RECLAIMED LAND.

Margate Old Town & Harbour

2.98 The Old Town of Margate is located north of the main centre of the town, near to the historic harbour. The area was once the original town centre during the early stages of Margate's development and this historic connection is reflected in the many Listed Buildings in this location, and with the inclusion of the Old Town within the Margate Conservation Area. However, despite the obvious historic charm, it has been perceived as isolated and has rarely been visited by tourists. Due to the lack of interest and investment, buildings have become run down and left empty, which perpetuates the cycle of decline.

2.99 The Council recognises that the rejuvenation of this area has a vital part to play in the revitalisation of the whole town both in terms of tourism and economic revival. A major initiative has been the formulation of the 'Margate Master Plan'. Studies have been carried out and a partnership of different organisations, including Thanet Council, Kent County Council, South-East England Development Agency (SEEDA), English Partnerships, and the South-East England Tourist Board has been established. The first public consultation period for this document was held in Spring 2004.

2.100 The aim of this new initiative is to take advantage of the special character of Margate's Old Town to attract businesses, create links to the newer parts of the town and to re-establish the area as one of cultural importance. The mix of design and range of buildings that can be found in the Old Town area also offers an ideal framework and background to encourage cultural and artistic quarters, together with offering a central location for small 'high-tech' industries, such as for information technology. The initiative also includes other aspects such as improved street lighting, sports facilities, public spaces, as well as a 'Heritage Trail', public art and organised special events.

2.101 An exciting component of the Action Plan is the establishment of the 'Turner Centre', a new contemporary art gallery, named in recognition of JMW Turner's links with Margate. This centre is planned to exhibit international, national and local works of art and be a focus for training, as well as enhancing the cultural quarters of the Old Town. The new building will be constructed adjacent to Margate Harbour and will be highly visible from the across the bay, thus drawing visitors from the railway station and beach over to the Old Town area. The availability of the site adjacent to the Droit House should enable further opportunities, such as the creation of a public space or the establishment of restaurants and cafes.

2.102 Other sites around the Old Town also provide opportunities for other tourist-related uses, including hotel development. Most notably the area

adjacent to the Harbour known as The Rendezvous is a potential site that would be appropriate for such a use or leisure use.

2.103 The Margate Old Town Action Plan will, therefore, seek to find new uses for the area's empty and under utilised buildings, to provide a range of activities all year long to ensure that the town regains its status as a major leisure destination. Proposals that are within a Listed Building will be considered in relation to their impact on the siting, character and fabric of the building. All proposals will also be considered in relation to their impact on the character of the Conservation Area. Policy H10 complements the objectives of Policy EC10 by permitting appropriate redevelopment and refurbishment of property together with environmental improvements.

POLICY EC10 - MARGATE OLD TOWN AND HARBOUR

WITHIN THE MARGATE OLD TOWN AND HARBOUR AREA, AS DEFINED ON THE PROPOSALS MAP, THE FOLLOWING USES WILL BE PERMITTED:

- **CULTURAL INDUSTRIES;**
- **RETAILING AND DISPLAY OF ANTIQUES, ARTS AND CRAFTS;**
- **ARTIST FACILITIES;**
- **MEDIA CENTRES;**
- **SMALLER STARTER OFFICE SITES FOR HIGH-TECH INFORMATION TECHNOLOGY INDUSTRIES;**
- **USES FALLING WITHIN USE CLASS A3 OF THE TOWN AND COUNTRY PLANNING (USE CLASSES) ORDER 1988;**
- **RESIDENTIAL USE;**
- **HOTELS**
- **CASINOS.**

Business Hotels

2.104 The Council recognises that part of the regeneration strategy should be to make provision for facilities for business people visiting the area and using the airport. In recent years, the development of new, quality hotels in Thanet has been very limited, and the provision of new hotel facilities is highly desirable for both business and tourism purposes. Policy EC11 seeks to encourage business hotels in the Central Island area near to the airport.

2.105 Three planning consents currently exist for new hotels in the vicinity of the airport – at The Prospect and at Garden Cottage, both at Minster, and at World's Wonder at Manston. The three current consents comprise a total of 192 bedspaces.

POLICY EC11 - BUSINESS HOTELS

THE COUNCIL WILL PERMIT THE DEVELOPMENT OF BUSINESS HOTELS AT APPROPRIATE LOCATIONS IN THE DISTRICT:

1. **WELL RELATED TO THE PRIMARY ROUTE NETWORK;**

2. **WELL RELATED TO EXISTING BUILT DEVELOPMENT, INCLUDING THE MAIN TOURIST AREAS, AND OUTSIDE THOSE AREAS RECOGNISED FOR THEIR LANDSCAPE OR NATURE CONSERVATION VALUE; AND**

3. **IF ON AGRICULTURAL LAND, LOCATED ON LAND OF LOWER QUALITY.**

Retention of Employment Land and Buildings

2.106 Government guidance in PPG4 is that local planning authorities should seek to ensure that there is a range of premises available to meet the needs of local businesses. Development plans should contain positive policies to provide for the needs of small businesses, with a variety of sites to meet differing needs.

2.107 The SERPLAN Regional Strategy for the South-East recognises that the economic development aspirations of the South-East cannot all be met by inward investment into the region. It advises that, particularly in depressed areas of the region, a twin-track approach be adopted – to continue to encourage inward investment into the areas, but also to encourage the birth and growth of local small companies, which are often the most prolific creators of new employment opportunities.

2.108 The Regional Planning Guidance for the South-East states that local planning authorities should encourage economic diversity, and provide for a range of sites for small and medium-sized businesses.

2.109 The Kent Structure Plan contains policies relating to small businesses and states that sites and buildings to meet the specific needs of small firms should be provided by a variety of means.

2.110 In Thanet, some such facilities have been provided on the larger industrial estates and on smaller separate sites. However, it is a feature of the Thanet economy that many local firms in the area are unable to afford to lease or buy even these units, and are looking for older, cheaper premises in which to start up or expand.

2.111 The Council therefore considers that it is essential that premises of this type in appropriate locations are retained in this use in the longer term. In the previous Local Plan, this situation was reflected in Policy BC5, to retain all land and buildings which were suitable for continued employment use, and which would have little local environmental impact. In this Plan, a survey of the District has taken place to identify such sites. Each site has been assessed in the light of economic development, environmental and highway requirements, and a number of the sites have been identified as being appropriate for long term retention.

2.112 The demand for business premises fluctuates with general economic conditions. Business premises or land should not be lost to uses less beneficial to the community in general due to any temporary slackness in demand. A longer-term perspective is needed in the Thanet context. In order to conserve the stock and in the interests of facilitating the establishment and expansion of small businesses, the following Policy will apply.

POLICY EC12 - RETENTION OF EMPLOYMENT SITES

THE FOLLOWING SITES, AS IDENTIFIED ON THE PROPOSALS MAP, WILL BE RETAINED FOR EMPLOYMENT USES FALLING WITHIN USE CLASSES B1 AND B8 IN LOCATIONS CLOSE TO RESIDENTIAL AREAS, WITH ADDITIONAL B2 USE AWAY FROM RESIDENTIAL AREAS:

1. **ALL SITES SPECIFICALLY IDENTIFIED UNDER POLICY EC1; AND**
2. **EXISTING BUSINESS SITES AND PREMISES IDENTIFIED ON THE PROPOSALS MAP AND SET OUT IN THE TABLE BELOW:**

SITE	LOCATION
CROMPTONS SITE, POORHOLE LANE	BROADSTAIRS
PYSONS ROAD INDUSTRIAL ESTATE	BROADSTAIRS
THANET REACH BUSINESS PARK (part)	BROADSTAIRS
DANE VALLEY INDUSTRIAL ESTATE	ST.PETERS, BROADSTAIRS
NORTHDOWN INDUSTRIAL ESTATE	ST.PETERS, BROADSTAIRS
JENTEX SITE	CLIFFSEND
MANSTON BUSINESS PARK (part)	MANSTON
MANSTON GREEN	MANSTON
ALL SAINTS INDUSTRIAL ESTATE	MARGATE
MANSTON ROAD DEPOT	MARGATE
WESTWOOD INDUSTRIAL ESTATE	MARGATE
TIVOLI ROAD INDUSTRIAL ESTATE	MARGATE
FULLERS YARD, VICTORIA ROAD	MARGATE
LAUNDRY ROAD INDUSTRIAL ESTATE	MINSTER
EUROKENT BUSINESS PARK (part)	RAMSGATE
HAINE ROAD INDUSTRIAL ESTATE	RAMSGATE
MANSTON ROAD INDUSTRIAL ESTATE	RAMSGATE
ST.LAWRENCE INDUSTRIAL ESTATE	RAMSGATE
140-144, NEWINGTON ROAD	RAMSGATE
MAGNET & SOUTHERN, NEWINGTON ROAD	RAMSGATE
PRINCES ROAD DEPOT/PIONEER BUSINESS PARK	RAMSGATE
WHITEHALL ROAD INDUSTRIAL ESTATE	RAMSGATE
HEDGEND INDUSTRIAL ESTATE, THANET WAY	ST.NICHOLAS-AT-WADE
FACTORIES, SUFFOLK AVENUE	WESTGATE

Office Development

2.113 The office market in Thanet has, in general, lacked the demand to result in speculative development. Demand for small offices for professional and financial services has been stronger, but has been met by the re use of premises in commercial locations.

2.114 The provision of office accommodation for those services which are not geared principally to visiting members of the public, has been assisted by the flexibility introduced by the Use Classes Order 1987. This allows industrial/storage premises (B2 to B8) to be converted, subject to size, to office use (Class B1 Business) without the need for planning permission.

2.115 The existing employment sites allocated in the Plan make provision for B1 uses, and this argues against significant additional office provision in the Local Plan.

2.116 On the other hand, it is strategic policy to stimulate and strengthen the expansion of economic activity. Provision is made, therefore, for office uses (A2) at the Thanet Reach site, in a central position equidistant from the Thanet towns (Policy EC1 refers) and at the proposed new Westwood Town Centre. Office proposals will also generally be considered acceptable in commercial areas and town centre locations. Such proposals will be judged in relation to policies in the Town Centres & Retailing Chapter.

POLICY EC13 - OFFICE ACCOMMODATION

IN ADDITION TO THE EXISTING EMPLOYMENT LAND ALLOCATIONS, THE PROVISION OF NEW OFFICE ACCOMMODATION WILL BE PERMITTED IN THE TOWN CENTRES, SUBJECT TO:

1. **AT WESTWOOD, IN ACCORDANCE WITH POLICIES TC2, TC3 AND TC4;**

2. **AN APPROPRIATE STANDARD OF DESIGN IN LINE WITH POLICY D1;**

3. **NO LOSS OF LAND SPECIFICALLY IDENTIFIED FOR OTHER USES IN THIS PLAN;**

4. **PROPOSALS MEETING POLICY REQUIREMENTS IN RELATION TO LISTED BUILDINGS AND CONSERVATION AREAS.**

Working from Home

2.117 PPG4 recognises that many small businesses are started by people working in their own homes, and suggests that technological innovations are likely to increase the incidence of home working. Certain forms of home

working do not require planning consent, where the proposed use is clearly ancillary to the residential use of the property.

2.118 The close juxtaposition of home and work can reduce car use, and is therefore environmentally sustainable, particularly bearing in mind the growth of tele working. Government guidance in draft PPG13 states that local authorities should take a flexible approach to the use of residential properties for home-working, consistent with the need to protect the residential environment. With this in mind, the Council considers that home working should not be seen as a long-term option where the intention is to expand the business.

POLICY EC14 - WORKING FROM HOME

PROPOSALS FOR THE ESTABLISHMENT OF A BUSINESS OPERATING FROM A RESIDENTIAL PROPERTY WILL BE PERMITTED, PROVIDED THAT IT CAN BE DEMONSTRATED THAT THE PROPOSED USE WOULD NOT RESULT IN:

1. **DETRIMENTAL IMPACTS ON RESIDENTIAL AMENITY BY REASON OF DUST, NOISE, SMELL, FUMES OR OTHER EMISSIONS;**
2. **ADDITIONAL TRAFFIC FLOWS OR VEHICLE PARKING IN THE VICINITY THAT WOULD BE HARMFUL TO RESIDENTIAL AMENITY OR HIGHWAY SAFETY; OR**
3. **THE EROSION OF THE RESIDENTIAL CHARACTER OF THE AREA.**

TARGETS

LP Implementation Target	
Policy Area	Employment Land Allocations
Relevant Policies	EC1 and EC2
Indicator	Proportion of allocated employment land taken up during Local Plan Period
Target	75% take up during the Plan period
Monitoring	Through joint Annual Employment Land Study
LP Implementation Target	
Policy Area	Kent International Airport
Relevant Policies	EC2 and EC5
Indicator	Number of jobs created, throughput volume of passengers and freight
Target	3660 jobs, 1 million passengers and 250,000 tonnes
Monitoring	In conjunction with Economical Development.
LP Implementation Target	
Policy Area	Retention of Employment Sites
Relevant Policies	EC12
Indicator	The amount (expressed in hectares) and percentage of land area lost)
Target	100% retention
Monitoring	Through joint Annual Employment Land Study

3. Housing

3. Housing

Introduction

3.1 Housing is an ingredient of fundamental importance in adopting a holistic approach to sustainable regeneration. This Chapter sets out the District Council's proposed approach in accommodating housing needs and requirements in the local plan period. A key objective will be to ensure sufficient quality housing of appropriate range and affordability can be provided to meet the aspirations of high-profile investors, management and key employees together with essential workers such as nurses and teachers necessary to sustainable economic regeneration. Thanet has a significant advantage in that flood risk does not present a constraint in identifying sufficient housing site opportunities.

3.2 Sustainable development is promoted by optimising use of previously developed ("brownfield") sites and locating housing where best use can be made of public transport, walking and cycling. The Chapter addresses housing requirements in support of economic regeneration, and deals with housing land supply, constraints and opportunities in new housing provision, safeguarding the existing stock and multiple occupation. It also addresses special housing needs including those of small households, low-income groups, and people in need of care.

3.3 The Council's vision is that by 2011 Thanet will have a wider range of housing opportunities than exists today and will be able to provide housing to meet the needs of both local people and those attracted to the area by the growing number of quality jobs that have been provided on our Business Parks and at Kent International Airport.

3.4 As the image of our towns improves so those currently vacant brownfield sites in and on the edge of the town centres will be developed with quality accommodation to meet the needs of people who want to live near to these hubs of activity.

3.5 A new community with a thousand new homes, a school and other facilities will be established and be well advanced towards completion at Westwood close to the new town centre shopping area. Here there is a mix of houses to suit all pockets and within walking or cycling distance of jobs, shops, schools and leisure activities.

Objectives

1. **TO IDENTIFY A SUFFICIENT LAND SUPPLY AND PROVIDE A CHOICE IN TYPE AND LOCATION OF HOUSING OPPORTUNITIES TO MEET BOTH COMMUNITY NEEDS AND SUPPORT THE SUSTAINABLE ECONOMIC REGENERATION OF THE AREA**

2. **TO LOCATE NEW HOUSING DEVELOPMENT ON SITES WITH GOOD ACCESS TO JOBS AND SERVICES BY PUBLIC TRANSPORT, WALKING AND CYCLING**

3. **TO OPTIMISE USE OF PREVIOUSLY DEVELOPED SITES FOR NEW HOUSING DEVELOPMENT**

4. **TO PROMOTE EFFICIENT USE OF LAND AND QUALITY LIVING ENVIRONMENTS**

5. **TO WIDEN ACCESS TO ACCOMMODATION SUITED TO MEET THE NEEDS OF THANET'S COMMUNITY INCLUDING LOW INCOME GROUPS, KEY WORKERS, SMALL HOUSEHOLDS AND MORE SPACIOUS ACCOMMODATION IN SUPPORT OF ECONOMIC REGENERATION**

Policy Background

National And Strategic Policy Background

3.6 Policy guidance on housing (PPG3) states that the planning system should provide a choice of sites suitable and available for house building. The aim is to ensure that everyone has the opportunity of a decent home and to maintain the momentum of economic growth. The Guidance promotes greater choice of housing and recognition of community housing needs including affordable and special housing. It stresses that economic growth should not be frustrated by a lack of homes for those looking to take up new employment opportunities. It also promotes sustainable patterns of development and making better use of previously developed land, (sometimes called "brownfield land"), re use and conversion of existing buildings, and locating housing where occupiers will be less dependent on cars to reach jobs, shops and services. A national target is that by 2008, 60% of additional housing should be on previously developed land.

Regional Planning Guidance

3.7 The general thrust of Regional Planning Guidance is towards a concentrated pattern of development making maximum use of opportunities for new dwelling provision in the urban areas in ways which enhance the quality of urban living. Housing distribution in the Guidance implies an average annual rate of provision for Kent of 5,700 units in the period up to 2006, with subsequent provisions for the region to be reviewed. It notes that a substantial element of affordable housing is required in the region, and that local plans should make provision to meet locally assessed needs.

3.8 The Guidance acknowledges the significant disparities in prosperity and areas of deprivation across the Region, and identifies Thanet as part of an East Kent Priority Area for Economic Regeneration (PAER). The Guidance recognises the existence of an adequate supply of employment land in East

Kent PAER and that the development of infrastructure and port diversification are the springboard for its economic regeneration. It states: “It is clear therefore that generally the provision of new employment land in the coastal area is less important than other factors in attracting investment. The quality of infrastructure and the availability of trained labour are two important factors, but of equal importance are those aspects which contribute to the quality of life; attributes such as the quality and type of available housing, the quality of the environment, range and quality of shopping and leisure facilities in towns, and the quality of schools in the area.” This Chapter of the Local Plan aims to provide for an appropriate quantity and mix of housing as key infrastructure supporting Thanet’s regeneration agenda. The emerging Regional Spatial Strategy (“the South-East Plan”) will update and roll forward existing Regional Guidance.

Structure Plan Policy

3.9 The level of housing provision, and its distribution between the Kent districts, is set by the Structure Plan. Kent and Medway Structure Plan is at an advanced stage of preparation and when adopted will supersede the 1996 Structure Plan. This Local Plan considers the housing requirements in both Structure Plans. In due course the emerging South-East Plan will set housing provisions over the longer term, and these will supersede the Structure Plan provisions. The exact nature and location of Thanet's provisions is a matter for this Local Plan.

3.10 In-migration has been a significant driver of housing requirements in Thanet District. Growth in one-person households is likely to form a significant element of projected household growth in Thanet and Kent as a whole. Although there was a substantial increase in Thanet’s housing stock in the 1990’s, and reductions in unemployment, this growth was accompanied by poor economic and employment performance.

3.11 Subject to safeguarding policies to avoid "town cramming", Structure Plan policy gives priority to maximising the use of the building stock and land within existing urban areas.

Local Plan

3.12 It remains a fundamental aim of the Local Plan to safeguard and enhance the character and amenity of the district. This includes protection of the limited separation between the urban areas, and of the separate character of the Thanet towns, provided by the designated Green Wedges. The Local Plan contains specific policies to safeguard areas of environmental character and quality, areas of open space providing important physical separation, passive or other recreational value, sites of nature conservation value, and areas and buildings of historic significance. All housing proposals will be judged in relation to these policies, and where there is overriding conflict with these policies then such proposals will be resisted.

3.13 The Plan encourages full use of opportunities arising from conversion, improvement and redevelopment of redundant land and buildings. Development of this kind can make useful additions to the dwelling stock and assist in urban regeneration. In aiming to maximise the use of the existing built-up areas to meet housing requirements there is, however, an important balance to be drawn with the need to protect the amenity and functioning of the District as a place to live, work and visit. The Local Plan addresses the need to safeguard against "town cramming", and contains policies to safeguard urban environmental quality and valuable open spaces. Individual proposals for development or redevelopment including housing will be judged in relation to these policies.

3.14 This Local Plan considers housing needs throughout the plan period and the period beyond it to 2016. The Plan promotes a mix of types of housing within quality residential environments. The aim is to provide for a variety of local needs ranging from single person/small household homes to selected opportunities for more spacious dwellings attractive to higher income family occupation and as a means of attracting quality investment in support of Thanet's economic regeneration. Key principles in identifying housing land are optimising use of previously developed urban sites and maximising housing quantities in locations where services and jobs can be conveniently accessed by public transport, on foot and by cycle. As stressed in the Design chapter, quality design is fundamental to achieve successful schemes, and will be a requirement in promoting optimum site development potential. Assessment of the capacity of previously developed urban land in Thanet has shown that greenfield land release is required in order to maintain an adequate supply of house building land.

Providing A Sufficient And Suitable Housing Land Supply

3.15 Housing is an essential ingredient in securing sustainable economic and social regeneration in the District. The housing requirements expected to be generated by prospective economic development potential identified and promoted in this Local Plan are fundamental in establishing the level of housing provision to be made in the Local Plan period. Four main sources of employment growth are identified below.

1. Expansion of activity at Kent International Airport with potential capacity for handling 1 million passengers and 250,000 tonnes of freight per annum within the plan period, together with warehousing, aircraft maintenance/repair and other airport operational activities

2. Economic development at allocated Business Parks (Manston Park, EuroKent and Thanet Reach)

3. Economic development at employment land located adjacent to the District within the Sandwich Corridor, which is expected to become available as serviced employment land within the Local Plan period

4. Expansion proposals at Pfizer Ltd., located in the Sandwich Corridor, which are expected to generate demand for additional homes in the local plan period

3.16 These employment sources may impact on Thanet's prospects for achieving sustainable economic regeneration by attracting employees (including middle-income groups) to live in the District. The Council is therefore concerned to provide a sufficient quantity and range of homes as a means of accelerating sustainable economic regeneration. In addition to quantity limitations, the current land supply consists predominantly of small sites in an urban setting, and in some instances in locations where current market value makes site development economically unviable and unattractive to providing a range of homes.

3.17 Development of the above employment sites will be dependent on provision of utilities and market take-up. Strategies to gear utilities infrastructure provision with development of employment land suggest that approximately 75% of Thanet's allocated Business Parks and an element of employment land in the Sandwich Corridor could be taken up by the end of the Local Plan period. Application of jobs to floorspace ratios suggests that sources 2 & 3 could generate some 6000 new jobs by 2011. The airport may be expected to generate a further 3,660 additional new jobs by 2011. Resultant need for new homes has been assessed on the basis that a proportion of these jobs will be taken by unemployed people, employees currently commuting outside the District for work, and by people choosing to live outside Thanet. In addition the Council believes that it should provide additional housing opportunities to attract 50% of employees associated with planned expansion at Pfizer Ltd. In total these prospective jobs are expected to generate a housing requirement of some 4,200 homes in the period to 2011.

3.18 Reflecting government guidance, this Local Plan adopts a managed approach to housing land provision. With potential reduction in projected average household size, the total level of provision may be conservative.

Housing Land Requirements in 1996 Structure Plan

3.19 The (1996) Kent Structure Plan sets the following provisions for housing (all forms of housing units) in the Thanet District. Provisions beyond 2011 and the effect of the emerging Structure Plan are referred to later in this chapter.

Table 1 - 1996 Structure Plan Provisions

MID 1991 - 2001	MID 2001 - 2006	MID 2006 - 2011
3,500	1,700	1,300

Housing Land Availability Study

3.20 Land availability has been monitored regularly, often in conjunction with the House Builders' Federation. At the time of drafting this Local Plan, the 2001 Housing Land Study provided the latest information on housing land supply compared to requirement as illustrated in Table 2 below.

Table 2

Period	Outstanding Structure Plan Requirement *	Estimated Supply	Supply Shortfall	% Shortfall
2001 - 2006	1,689	1,612	77	5%
2006 - 2011	2,989	2,240	749	25%

* Outstanding units reflects units constructed since the start of the Structure Plan period.

Table 2 shows that over the local plan period to 2011 there was a shortfall of some 750 units in relation to the 2006 Structure Plan requirement. There was also a shortfall of 77 units to 2006. The following text explains how this Local Plan addresses that shortfall. Updated information on housing land supply is featured in Table 6 below.

Housing Land Provisions In Local Plan

3.21 The 1996 Structure Plan did not anticipate the level of new job creation associated with the impact of Kent International Airport on committed employment land, nor that relating to land at the Sandwich Corridor and Pfizer's planned expansion, now envisaged in the Local Plan.

3.22 In order that current opportunities for sustainable economic development are not frustrated by lack of housing opportunities, this Local Plan identifies sufficient land to accommodate 4,200 homes in the period to 2011. Housing land provisions and take-up will be reviewed in the Plan period. Housing land release will be managed by placing allocated sites into two phasing periods (2001-2006 and 2006-2011) which dovetail with the phasing periods applied in the structure plan.

3.23 Reflecting the fact that a significant part of the housing provisions in the Plan consist of brownfield sites with existing planning commitments, it is considered reasonable to adopt a split of approximately 60%: 40% between the two phasing periods. Policy H2 apportions appropriate quantities to the two periods.

Approach To Identification of Housing Land Supply

3.24 The location of new housing presents a major opportunity for promoting a sustainable development pattern. Site identification has followed a sequential search process, considering first previously developed land and buildings in

urban areas, urban extensions and finally new development around nodes in good public transport corridors.

3.25 The Council has aimed to optimise the use of previously developed land and sites particularly where jobs, shops and services will be accessible without car reliance. Thanet is a relatively compact District and few locations in its urban belt are "remote" in these terms. Existing commitments provide a significant contribution to previously developed land opportunities.

3.26 In 2001 an Urban Housing Capacity Study was undertaken to assess the potential contribution that can be expected from these commitments and other opportunity sites, including an allowance for bonus "windfall" sites coming forward, on previously developed land. Many of the identified opportunities are from small sites, including residential conversions. However, cumulatively these contribute quite significantly to total housing provision.

3.27 The Council's Urban Housing Capacity Study has assessed the potential capacity of the urban area and anticipates that this could, theoretically, yield some 3,000 homes in the period to 2011. This includes allowance for unidentified "windfall" sites that may come forward in the period. Table 3 summarises the Study's conclusions on potential capacity in the plan period and for the two phasing periods to be applied in managing land release. The individual sites are listed at Appendix A1.The total capacity indicated in the Urban Capacity Study includes a small quantity of urban land that was not previously developed (57 units). On this basis the Study suggests a capacity of 2,943 units from previously developed land. This represents 70% of total provision in the Plan period. On this basis the Council has adopted a target of achieving 70% of housing provision on previously developed land in the Plan period.

Table 3

Period	Identified Sites Capacity	Windfall Capacity	Total Capacity	Total Local Plan Provision	Balance Needed
2001 - 2011	1,916	1,084	3,000	4,200	1,200
2001 - 2006	1,397	625	2,022	2,500	478
2006 - 2011	519	459	978	1,700	722

3.28 Table 3 indicates the balance of greenfield land needed to meet the total provisions. This Local Plan identifies sufficient greenfield land to accommodate this balance. (See heading Greenfield Land Allocations below). Sites contributing to total provision in the Plan are those identified in the Urban Capacity Study together with these additional greenfield allocations. These (excluding windfall sites) are listed Appendix A1.

3.29 The following table features the sources contributing to the total estimated dwelling capacity found in the Urban Housing Capacity Study. It also shows the possible contribution from each source within the total capacity estimate.

Table 4

2001 - 2011

Source	Identified Sites	Windfall Sites	Total	% of Total	Urban Capacity Study Category References
Subdivision of existing housing	43	155	198	7	3.2 & 4.5
Flats over shops	0	102	102	3	4.7
Empty homes	0	102	102	3	4.8
Previously developed vacant & derelict land and buildings (non-housing)	1,383	98	1,481	49	1.3, 1.4, 1.6, 1.7 & 4.3
Intensification of existing areas	96	132	228	8	2.1 & 4.4
Redevelopment of existing housing	110	4	114	4	1.2 & 4.2
Redevelopment of car parks	53	0	53	2	1.5
Conversion of commercial buildings	183	438	621	21	3.1 & 4.6
Vacant land not previously developed	48	54	102	3	1.1 & 4.1
Total Dwelling Units	**1,916**	**1,084**	**3,000**	**100**	

The above sources include review of non-housing allocations and review of capacity of existing housing allocations.

Regulating Release of New Housing Land

3.30 PPG3 has introduced a Plan Monitor Manage approach to new housing development. An essential feature of this is managed release of housing sites. The objectives of the Council's phasing policy are to regulate and gear the rate of housing provision in line with anticipated employment growth through the Plan period, to control the rate at which the greenfield site component comes forward, and to meet the Council's land recycling target.

3.31 Suitability and phasing of identified housing sites were tested using a sequential approach reflecting PPG3 and based on the criteria set out in Policy H4 below. Release of identified sites will be regulated through Policy H3, after making allowance for windfall sites coming forward over the Plan period.

3.32 Applications for windfall sites will be assessed against Policy H4 (the same criteria applied to identified sites). In order to support the Plan's housing strategy, the Council will aim to ensure that a rolling three-year supply of house building land exists across the plan period. This will be used as a general benchmark when periodically monitoring the take-up of allocated sites and incidences of windfalls against total housing provisions.

3.33 Committed and new housing sites making up total provision in this Local Plan are allocated for such purposes on the Proposals Map and listed in Appendix A1. (See note 2 to Policy H1).

Greenfield Land Allocations

Strategic Housing Site

3.34 Housing sites within the District are generally of limited size and scattered throughout the Urban Belt. This Plan identifies and allocates a greenfield site of 28.5 hectares at Westwood for housing development (Policy H6). This site provides the opportunity to create an integrated community with a mixture of dwelling types, sizes and affordability, including housing to meet the expectations of investors and employees needed to secure sustainable regeneration in the District. In its central and mixed-use location, Westwood is also considered highly sustainable. This site is recognised as a Strategic Site, essential to the strategic objective of sustainable regeneration, and one which should be developed alongside, rather than after, previously developed land. Its release is phased to reflect lead-in times for delivery of supporting infrastructure and construction.

Greenfield allocations

3.35 In allocating land to meet provisions to 2011, this plan identifies, on the Proposals Map, greenfield housing land to meet the balance identified in Table 3. Identification of greenfield housing provisions has been guided by the need to identify sustainable locations, where infrastructure provision is adequate/economically feasible, where sites are of sufficient size to accommodate a mix of housing sizes and types to support balanced communities, to provide locational choice in support of economic regeneration, and avoid any conflict with operational considerations relating to Kent International Airport. Land at Westwood is allocated as a sustainable greenfield site of sufficient size to accommodate 1,000 dwellings. Smaller greenfield sites, providing additional potential capacity of 200 dwellings, are identified at Minster to provide a degree of locational choice together with land on the east side of Manston Road, Ramsgate. A small number of sites which are not previously developed was identified in the Urban Housing Capacity Study. Some of these sites already have consent and some were already under

construction at the Study base date. These sites are expected to accommodate some 57 dwelling units in total. Being located within the urban area they are considered sufficiently sustainable and are allocated as greenfield housing sites. All greenfield sites are listed at Appendix A2. This Appendix also lists previously developed housing sites where allocation is through a different Policy to H1. A summary of total housing provisions from all sources is provided in Appendix A3.

Housing provision in the Period 2011-2016

3.36 This Plan makes provision for housing land over the period 2001 to 2011. However, a Ministerial statement issued after the Plan reached its Revised Deposit Stage has indicated that housing-land provisions should be made for a 10 year period beyond the anticipated date of the Plan's adoption. This would imply that the Plan should make provision up to 2016 and phased as shown below.

3.37 Proposed modifications to the emerging Kent & Medway Structure Plan suggest that total provision for Thanet in the period 2001 - 2016 should be 6,000 new dwellings at the rates implied within the 5-year periods shown below.

Table 5

2001 - 2006	2006 - 2011	2011 - 2016	2001 - 2016
1,700	2,100	2,200	6,000

3.38 The emerging regional Spatial Strategy ("The South-East Plan") will set housing requirements for each District over a longer-term period and will, when adopted, supersede the Structure Plan. In the interim, the Council believes the emerging structure plan provides the appropriate basis for housing land requirements to 2016.

3.39 Accordingly, this Plan anticipates the need to provide for a total of 6,000 new dwellings over the period 2001 – 2016. The 2004/5 housing land study suggests that this quantity can be met from existing and predicted (previously developed windfall) sites. In these circumstances there is no need to consider additional greenfield land release in the Plan period. The following table sets out the conclusions from the 2005 Housing Land Study against the 1996 Structure Plan requirement for the period to 2011, and against the emerging Kent & Medway Structure Plan for the period to 2016. This Study takes account of potential contributions from sites allocated in this Local Plan, together with windfall sites where planning consent has since been granted. Some of the sites included in the 2005 Study's total supply figure were only identified (through granting of planning permission) after the Urban Capacity Study exercise was completed. Such sites are not specifically allocated in this Plan and are not featured in the Appendices.

Table 6 - Dwelling Requirement: Supply

	Period 2005-2011 (Based on 1996 Kent Structure Plan requirement)	Period 2005-2016 (based on requirement of Kent & Medway Structure Plan as proposed to be modified)
Requirement of Structure Plan	6,500 (1991-2011)	6,000 (2001-2016)
Dwelling completions from start of structure plan period to 2004/5	5,069 (1991-2004/5)	1,558 (2001-2004/5)
Residual Requirement	1,431 (2005/2011)	4,442 (2005-2016)
Estimated Supply	3,912 (2005/2011)	4,634 (2005-2016)
Surplus	**+2,481** (2005/2011)	**+192** (2005-2016)

3.40 Although planning positively for an increase in the rate of dwelling completion alongside economic regeneration in the period to 2011 and beyond, the Council believes that it is important to review actual completion rates and economic growth well before that date over what will be a critical period. In the event that supply is not taken up as rapidly as anticipated then such provisions may be rolled forward to contribute to requirements post 2011.

3.41 In circumstances where longer term housing provisions have yet to be fully established, where potential capacity beyond 2011 has not yet been assessed through an appropriate study and where an anticipated increase in the local rate of dwelling completions remain to be proven the Council believes it is inappropriate to consider the need for further specific provision by way of site allocations in this Local Plan. The emerging Local Development Framework (LDF) will provide the appropriate opportunity to review housing land provisions in the longer term, taking account of housing requirements once resolved through the Structure Plan and Regional Spatial Strategy. A Housing Development Plan Document will be one of the first LDF documents to be prepared. It is expected that this will be adopted in 2008 and supersede the housing chapter of this Local Plan. The new document will look ahead to 2021 and make appropriate housing land provision.

Efficient Use of Land

3.42 The Council wishes to see efficient use of housing land. It envisages that densities of 50 or more dwellings per hectare net may be achieved through quality residential and mixed-use developments especially in accessible locations such as the town centres and adjoining quality transport corridors. Developments of less than 30 dwellings per hectare net on any site will usually require special justification. No specific densities are prescribed in this Plan as compatibility with the character of the locality, securing a mix of housing types to meet local demand, achieving attractive living environments through quality design and optimising use of land will influence design and layout. However,

this plan places emphasis on making best use of land, and optimum densities will be expected on all sites through good design.

3.43 The level of car parking provided in new residential developments can have a major impact on the quantity of dwellings which can be provided on any site. The Council intends to impose less demanding residential parking requirements based on maximum standards, and to encourage nil provision in specific locations where a range of services are accessible on foot, by bicycle or public transport. Policy TR16 refers. Planning consent will not be renewed for previous schemes where the number of units to be provided is considered to be wasteful of land.

3.44 Policy H1 reflects the District Council's intention to resist housing proposals where there are planning objections or constraints to development, and protects the identified housing land supply for such use.

POLICY H1 - RESIDENTIAL DEVELOPMENT SITES

PERMISSION FOR NEW RESIDENTIAL DEVELOPMENT WILL BE GRANTED ONLY ON SITES ALLOCATED FOR SUCH PURPOSES ON THE PROPOSALS MAP OR ON OTHER SITES WHERE THERE IS NO CONFLICT WITH STRUCTURE PLAN OR OTHER LOCAL PLAN POLICIES.

RESIDENTIAL DEVELOPMENT ON NON-ALLOCATED SITES WILL BE PERMITTED ONLY ON PREVIOUSLY DEVELOPED LAND WITHIN EXISTING BUILT-UP CONFINES, (AS DEFINED ON THE PROPOSALS MAP – POLICIES CC1 & R1), UNLESS SPECIFICALLY PERMITTED BY OTHER LOCAL PLAN POLICIES. ALL PROPOSALS FOR RESIDENTIAL DEVELOPMENT WILL BE REQUIRED TO MEET THE CRITERIA IN POLICIES H2 – H5.

ALTERNATIVE DEVELOPMENT ON SITES ALLOCATED FOR RESIDENTIAL PURPOSES WILL NOT BE PERMITTED UNLESS THERE IS AN OVERRIDING LOCAL NEED WHICH CANNOT BE MET ON AN ALTERNATIVE SITE.

THE COUNCIL WILL SEEK TO MAKE EFFICIENT USE OF HOUSING LAND. DEVELOPMENTS OF LESS THAN 30 DWELLINGS PER HECTARE NET ON ANY SITE WILL REQUIRE SPECIAL JUSTIFICATION. IN TOWN AND DISTRICT CENTRES AND OTHER LOCATIONS WITH GOOD PUBLIC TRANSPORT ACCESSIBILITY, SPECIAL JUSTIFICATION WOULD BE REQUIRED FOR DENSITIES OF LESS THAN 50 UNITS NET PER HECTARE.

PERMISSION FOR NEW RESIDENTIAL DEVELOPMENT WILL BE GRANTED OR RENEWED ONLY WHERE:

- **IT IS DEMONSTRATED THAT ADEQUATE INFRASTRUCTURE AND ACCESS WILL BE IN PLACE TO SERVE EACH UNIT READY FOR OCCUPATION, AND**

- **SATISFACTORY DETAILS ARE PROVIDED SHOWING HOW ANY PHYSICAL CONDITIONS AFFECTING THE SITE, INCLUDING LAND INSTABILITY AND CONTAMINATION, WILL BE OVERCOME**

Notes to Policy H1

1. Accessible locations referred to in the 4th paragraph of Policy H1 are defined as:

a) Within 800 metres convenient walking distance of the town centres or local centres providing a range of shops and services, and/or

b) Within both:

- 800 metres convenient walking distance of a railway station and

- 400 metres convenient walking distance of bus routes with frequent services or public transport interchanges.

2. H1 Sites are featured on the Proposals Map and in schedules in the Appendices (See note to Policies H2 & H3). These include only large sites (5+ units net), most of which were identified within the Urban Housing Capacity Study (which has a base date of 31 March 2001). It is only practical to feature such new build sites on the Proposals Map, and for conversions the Appendices should be consulted. In order to facilitate the bringing forward of committed housing land for development, the District Council maintains a separate register, which is reviewed annually, and updated quarterly to include any newly identified sites. This is available for public inspection. As it is impractical to feature small sites of less than five units net on the Proposals Map and in the appendices, the register of housing land is the appropriate source of reference.

3. In expressing density in dwellings per hectare, the term 'net' refers to inclusion within the site area of access roads, private garden space, car parking areas, incidental open space and landscaping, and children's play areas.

4. Applications to renew consent for lapsed permissions need to be assessed afresh against sustainability issues and potential densities explored in the Urban Capacity Study, and will specifically be considered in relation to Policy H1.

POLICY H2 – DWELLING SUPPLY

PROVISION IS MADE FOR A TOTAL OF 4,200 ADDITIONAL DWELLINGS WITHIN THE LOCAL PLAN PERIOD. TOTAL PROVISION WOULD BE ACCOMMODATED AS BELOW:

- **69% FROM IDENTIFIED NEW-BUILD SITES ALLOCATED ON THE PROPOSALS MAP AND LISTED IN APPENDIX A1**

- **5% FROM IDENTIFIED SITES INVOLVING CONVERSION OF EXISTING BUILDINGS, LISTED IN APPENDIX A1**

- **26% FROM WINDFALL (PREVIOUSLY DEVELOPED) SITES COMING FORWARD IN THE PLAN PERIOD**

WITHIN THE PLAN PERIOD, PROVISION IS MADE FOR 2472 UNITS IN THE PERIOD TO 2006, WITH THE BALANCE (1728 UNITS) IN THE PERIOD 2006 – 2011. RELEASE OF SITES IDENTIFIED ON THE PROPOSALS MAP, AND IN THE APPENDIX, WILL BE REGULATED THROUGH POLICY H3.

POLICY H3 - PHASING

TO MEET AND MANAGE THE HOUSING PROVISIONS SET OUT IN POLICY H2, THE COUNCIL WILL SEEK TO REGULATE THE RELEASE OF IDENTIFIED HOUSING SITES IN ACCORDANCE WITH THE EXPECTED ORDER OF DEVELOPMENT INDICATED BELOW.

SITES TO BE RELEASED FOR HOUSING DEVELOPMENT IN THE PERIOD 2001 – 2006
(Sites in List 1 of Appendix A1)

SITES TO BE RELEASED FOR HOUSING DEVELOPMENT IN THE PERIOD 2006 – 2011
(Sites in list 2 of Appendix A1)

RELEASE OF SITES EARLIER THAN INDICATED ABOVE WILL NOT BE PERMITTED WHERE THIS WOULD UNDERMINE THE OBJECTIVES OF THE COUNCIL'S PHASING POLICY.

Note to Policies H2 & H3. The sites referred to in Policy H3 making up the housing land provision (Policy H2) were identified and allocated in draft versions of the Plan and reflect the Urban Housing Capacity Study snapshot at 31 March 2001. Housing development has since been started and even completed on some such sites, and those completions correspondingly reduce the outstanding housing requirement to meet total provision in Policy H2.

For simplicity of reference all allocated sites and their notional dwelling capacity (even where completed in whole or part since 31 March 2001) have been retained in appendices A1 & A2 and on the Proposals Map. The opportunity has been taken, in updating the Plan to update the anticipated phasing of the allocated housing land at Westwood (Policy H6 & TC4).

This is reflected in Appendix A1. One or two sites allocated in previous drafts of the Plan have since been deleted during the process of adopting it. Such deleted sites are no longer featured on the Proposal Map or in these

appendices, and this has a minor impact on the total allocated housing units featured in Policy H2 and in Appendix A3. Nonetheless, as indicated in paragraphs 3.36-3.41 inclusive, the 2005 Housing Land Study shows that, including allocated sites remaining, the land supply is sufficient to meet requirements to 2016.

POLICY H4 – WINDFALL SITES

PROPOSALS FOR RESIDENTIAL DEVELOPMENT AT WINDFALL SITES COMING FORWARD WILL BE ASSESSED AGAINST POLICY H1 AND THE FOLLOWING CRITERIA:

- **LOCATION AND ACCESSIBILITY IN RELATION TO JOBS, SHOPS AND SERVICES BY MODES OTHER THAN CAR, AND POTENTIAL FOR IMPROVING SUCH ACCESSIBILITY**

- **CAPACITY OF EXISTING AND POTENTIAL INFRASTRUCTURE, INCLUDING TRANSPORT, UTILITIES AND SOCIAL FACILITIES**

- **ABILITY TO BUILD NEW COMMUNITIES TO SUPPORT NEW PHYSICAL AND SOCIAL INFRASTRUCTURE AND WITH SUFFICIENT DEMAND TO SUSTAIN APPROPRIATE LOCAL SERVICES AND FACILITIES**

- **PHYSICAL AND ENVIRONMENTAL CONSTRAINTS ON DEVELOPMENT INCLUDING CONTAMINATION AND FLOOD RISK**

Monitoring Of Supply

3.45 The District Council will continue to monitor the adequacy of the available supply of land for house building. The results of the annual monitoring process will be published, and the Council will consult on the results in assessing whether sites are coming forward in the appropriate order and rate implied in policy. The District as a whole is the appropriate policy planning area for the purposes of assessing the adequacy of supply. Maintaining a supply throughout the Plan period will be a matter to be addressed having regard to expected contributions from previously developed windfall sites.

POLICY H5 - MONITORING

THE RATE AT WHICH IDENTIFIED SITES ARE GRANTED CONSENT AND WINDFALL SITES COME FORWARD WILL BE MONITORED ANNUALLY. WHERE NECESSARY SITES MAY, FOLLOWING APPROPRIATE PUBLIC CONSULTATION, BE REASSIGNED TO THE SECOND OR FIRST PHASE WITHIN POLICY H3, EITHER TO PREVENT ANY EXCESSIVE BUILD-UP OF COMMITMENTS IN THE EARLY PART OF THE PLAN PERIOD OR TO ENSURE AVAILABILITY OF A THREE-YEAR SUPPLY OF HOUSE BUILDING LAND THROUGHOUT THE PLAN PERIOD.

Development of Greenfield Housing Land

Westwood

3.46 This Plan identifies Westwood as a Town Centre, and promotes its development as such, with associated reinforcement of its accessibility by public transport as a central District location. This role, the development of the EuroKent Business Park, establishment of Christ Church College University campus, together with existing business and industry will mean that a substantial range of employment, retail, education and leisure opportunities will be accessible at Westwood. Identification of housing land at Westwood optimises potential for concentrating new dwelling provision at a single sustainable central location. It also provides the opportunity to create an integrated community, with a mixture of dwelling types, sizes, and affordability including housing to meet the expectations of prospective employees at Kent International Airport, the Sandwich Corridor, and Pfizer. Westwood was thus identified as having a distinctive and definitive advantage in sustainability terms over other urban extension site alternatives. The secondary town centre area (Policy TC4) is expected to provide for up to 200 new homes. In addition, the adjacent greenfield site of 28.5 hectares is identified for a further 800 dwelling units and associated community facilities over the Local Plan period to 2011 in Policy H6. It is anticipated that the development programme for these 1,000 new homes (on the sites allocated under this policy and TC4) would see the first units being completed in 2008, with 470 units completed by 2011 and total completion in 2016. However, Policy H3 does allow for up to 1,000 new homes in the period to 2011, in order not to act as a brake on development of this strategic site.

3.47 Residential development at Westwood will generate the need to provide appropriate transport infrastructure. A major Traffic Assessment will be required in order to inform how a sustainable transport network and infrastructure can be provided as part of a Westwood Master Plan covering the sites subject of policies H6 and TC4. This Assessment and Master Plan will need to address safe and convenient movement for pedestrians between the residential and town centre areas, and how traffic using the A256 can be diverted around the town centre in favour of pedestrian movement, and reflecting long-term capacity at Westwood Roundabout. It is intended that a Development Brief reflecting the Master Plan will elaborate on the implications of this requirement as set out in Policy H6 below. As indicated in the Transportation Chapter, phases of residential development will be required to make provision pro-rata to provide for appropriate highway improvements both before and after completion of the 300th dwelling on sites H6/TC4. Appropriate highway improvements are expected to incorporate an A256 relief road and improvements to Star Lane. As indicated in the following policy, such works are clearly a pre requisite for development, and must be delivered before the 300th housing unit is completed. Accordingly, construction of such works would be expected to commence at the same time as, if not ahead of, the development of the first housing unit. Essential tasks of the Westwood Master Plan will be to demonstrate how residential development at sites subject of

Policies TC4 and H6 will be co-ordinated alongside the Westwood Town Centre Area (Policy TC2). Specifically the Master Plan shall provide details of:

- Layout and logical phasing programme for development on sites TC4 and H6 (including all uses included in those policies respectively)

- Pedestrian and cycle links with the primary town centre, and public transport links and facilities

- Associated highway improvements including any realignment of the A256

3.48 Development will be expected to accommodate and provide for a new two-form entry primary school of two hectares, within the site allocated under Policy H6 in accordance with terms to be agreed within the planning brief referred to in paragraph 3.47. Individual phases of residential development will also be expected to make cumulative proportionate contributions, pro rata, towards the cost of providing such a school, in order to enable construction to one-form entry capacity at such time as 350 dwellings have been completed, (either on the site subject of Policy H6 or TC4 or both) and two-form entry on completion of 600 dwellings. Development will be expected to incorporate usable amenity space together with local play area provision, and provide a community assembly facility and land for a medical care centre. The Master Plan will also assess the capability of existing/programmed sports facilities to accommodate the additional demand generated by the housing development. Where appropriate, additional provision shall be incorporated in the Development Brief, and the Council will seek developer contributions under the terms of policy CF2 as appropriate.

3.49 The Environmental Protection Chapter indicates the Council's intention to monitor air quality in line with the requirements of the Environment Act 1995. Development of the new housing at Westwood will introduce a significant new exposure group, and therefore the development will be expected to include and provide for the appropriate air-quality monitoring equipment.

POLICY H6 - RESIDENTIAL DEVELOPMENT SITE AT WESTWOOD

LAND IS IDENTIFIED FOR NEW HOUSING DEVELOPMENT AT WESTWOOD. THE PROVISIONS OF POLICY H1 SHALL APPLY EXCEPT WHERE SPECIFICALLY MODIFIED IN THE FOLLOWING POLICY.

THE FOLLOWING DEVELOPMENT WILL BE PERMITTED ONLY IN ACCORDANCE WITH AN AGREED MASTER PLAN AND DEVELOPMENT BRIEF COVERING THE SITES SUBJECT OF THIS POLICY AND TC4.

SUBJECT TO POLICY H3 DEVELOPMENT WILL BE PERMITTED WHICH PROVIDES FOR UP TO 800 NEW HOMES AT A MINIMUM AVERAGE NET DENSITY OF 40 DWELLINGS PER HECTARE WITH CAR PARKING PROVISION AT A TOTAL SITE AVERAGE NOT EXCEEDING 1.5 SPACES PER DWELLING.

SUBMITTED SCHEMES WILL BE REQUIRED TO DEMONSTRATE THAT A MIX OF HOUSE TYPES, SIZES, STYLES AND AFFORDABILITY WILL BE INTEGRATED WITHIN SPECIFIC PHASES INCLUDING 34% - 50% OF TOTAL DWELLINGS BEING A MIXTURE OF THREE- AND FOUR-BEDROOM HOMES INCORPORATING GENEROUS ROOM SIZES AND OFF STREET PARKING SPACE. AFFORDABLE HOUSING WILL BE REQUIRED AS PART OF THE DEVELOPMENT IN ACCORDANCE WITH THE REQUIREMENTS OF POLICY H14.

SUCCESSIVE PHASES OF DEVELOPMENT WILL BE REQUIRED TO MAKE PROVISION, PRO RATA, ENABLING CONSTRUCTION, IN TWO PHASES, OF A NEW TWO-FORM ENTRY PRIMARY SCHOOL ON SITE. PROVISIONS SHOULD ENABLE CONSTRUCTION TO SINGLE-FORM ENTRY CAPACITY ON COMPLETION OF 350 DWELLINGS AT WESTWOOD, AND SUBSEQUENTLY TWO-FORM ENTRY CAPACITY ON COMPLETION OF 600 DWELLINGS. A FULLY SERVICED AREA OF TWO HECTARES SHOULD BE PROVIDED FOR THE NEW TWO-FORM ENTRY SCHOOL AS AN INTEGRAL PART OF THE DEVELOPMENT AT THE COST OF THE DEVELOPER.

DEVELOPMENT WILL ALSO BE REQUIRED TO:

PROVIDE FOR ANY HIGHWAY IMPROVEMENTS IDENTIFIED AS NECESSARY IN A TRAFFIC ASSESSMENT AND DEVELOPMENT MASTER PLAN. INDIVIDUAL PHASES OF DEVELOPMENT WILL BE REQUIRED TO MAKE PROVISION PRO RATA TOWARDS SUCH IMPROVEMENTS. THE A256 RELIEF ROAD AND ITS KEY ROUNDABOUT JUNCTIONS SHALL BE DELIVERED AS A MATTER OF URGENCY, PHASED IN ACCORDANCE WITH THE MASTER PLAN, AND COMPLETED BEFORE THE 300TH DWELLING IS BUILT.

INCORPORATE AND PROVIDE FOR CONNECTIONS AND IMPROVEMENTS TO FOOTPATH AND CYCLE NETWORKS FACILITATING WALKING, CYCLING AND USE OF PUBLIC TRANSPORT (POLICIES TR11 - TR14) TO, FROM AND WITHIN THE SITE, INCLUDING A MOTORISED-VEHICLE FREE CONNECTION TO WESTWOOD TOWN CENTRE, AND PROVIDE OR CONTRIBUTE TO IMPROVEMENTS TO PUBLIC TRANSPORT SERVICES.

RESERVE A MINIMUM OF TWO HECTARES TO ENABLE PROVISION OF A MEDICAL CARE CENTRE AND PROVIDE A COMMUNITY ASSEMBLY FACILITY.

PROVIDE AND MAINTAIN APPROPRIATE EQUIPMENT FOR CONTINUOUS AUTOMATED MONITORING OF LOCAL AIR QUALITY TO INFORM THE COUNCIL'S ONGOING AIR-QUALITY REVIEW AND ASSESSMENT PROGRAMME.

INCORPORATE LANDSCAPED BUFFER ZONES ADJACENT TO ANY NEW ROAD INFRASTRUCTURE AND ALONG THE BOUNDARIES ADJACENT TO OPEN FARM LAND.

AND

RESERVE AND PROVIDE A MINIMUM OF 1.75 HECTARES AS LOCAL PLAY SPACE, (INCLUDING AN EQUIPPED PLAY AREA AND CASUAL/INFORMAL PLAYSPACE) AS REQUIRED IN POLICY SR5 TOGETHER WITH AN AREA OF USABLE AMENITY SPACE (POLICY SR6) AS AN INTEGRAL PART OF THE DESIGN OF THE DEVELOPMENT.

Note to Policy H6.

Policy H6 indicates that individual phases of development will be required to make provision pro rata towards appropriate highway improvements and that the relief road and its key junctions are to be delivered as a matter of urgency, phased in accordance with the Master Plan and completed before the 300th dwelling is built. For the avoidance of doubt, this requirement applies to dwellings provided both on land allocated under this policy and under policy TC4, and the 300th dwelling threshold will be based upon combined (cumulative total) dwelling completions from both sites.

Minster

3.50 Policy R1 indicates that new residential development at rural settlements will be restricted to minor development unless specifically permitted by policies in this Local Plan. Growing emphasis on sustainable development and the need to promote a choice in housing location, has caused the Council to re-assess Thanet's rural settlements in terms of this Policy. Minster Village, which has a population of over 3,000, a railway station, and a good range of local shops is identified as a rural settlement where more than minor residential development can be provided.

3.51 A further greenfield housing site of some 2.4 hectares is identified and allocated near Monkton Road, Minster in order to provide additional choice in location. In order to make efficient use of the site, average density shall be at a minimum of 40 dwellings per hectare net. This Plan provides for up to 50 units at the site in the period to 2006, with release of the remainder in the period 2006-2011. This quantity of housing and phased release is considered consistent with the scale of the settlement and its ability to absorb a growing community. Landscaping will specifically be required along the southern and western site boundaries in order to soften the impact of built development upon the adjacent open countryside and protect the setting of the Wantsum Channel and adjacent marshes. A financial contribution, (Policy CF2 refers) is likely to be needed to provide additional primary school places arising as a direct result of the housing development.

3.52 Principal vehicle access to the housing site would need to be provided from Monkton Road. Arrangements for adoptable access, junction layout and

sight lines would be a matter for detailed consideration following a traffic assessment. However, in order to achieve arrangements acceptable in planning and highway terms sight lines of 4.5m x 70m may be required.

3.53 In December 2001 a Housing Needs Survey for the Parish of Minster was undertaken by Kent Rural Community Council with the support of Minster Parish Council and Thanet District Council. This concluded that there is a need for up to 18-26 affordable homes, to meet current and expected local needs arising within the Parish. The Survey indicates that this should comprise a mix of two- and three-bedroom houses and a lesser number of bungalows, with a higher proportion of properties for rent than shared ownership. Based on this evidence of such need, the following policy requires that an appropriate element of affordable housing be included as part of the development of the allocated site. Such affordable housing will be expected to meet local needs specific to Minster Parish as identified in the Housing Need Survey for the Parish as priority. Occupation to meet local needs originating within the wider District will be considered after such priority has been afforded to needs associated with the Parish. The affordable housing is expected to remain available for occupation on such basis by subsequent as well as initial occupiers.

3.54 Flooding has been reported at southern Minster, apparently resulting from storm-water capacity limitations in sewerage. Any development at the site would be dependent on investigation of drainage capacity and any identified deficiencies being effectively remedied. In addition, the site lies in proximity to an area at risk of flooding, and development would only be permitted at such time as it is demonstrated that any flood risk issues can be dealt with.

3.55 Development of the site will result in additional demands upon recreational and amenity space in the village. The site's location offers the opportunity to rationalise open space provision, which is currently shared with the primary school. Proposals for residential development under this policy will be expected to include provision of additional recreational and amenity space, including grassing, landscaping, provision of fixed play equipment, and maintenance and management as set out in Policies SR5 & SR6.

3.56 There is anecdotal evidence of need in Minster for a nursing home and sheltered housing principally for Minster residents. In the event that such a need can be substantiated and cannot be addressed through existing housing allocations, then provision through means of Policy H15 may be appropriate subject to the criteria set out in that policy. The capability of existing/programmed sports facilities to accommodate the additional demand generated by the housing development will be assessed. Where appropriate, developer contributions will be sought to secure such provision under the terms of Policy CF2.

POLICY H7 - RESIDENTIAL DEVELOPMENT/AMENITY SITE AT MINSTER

LAND IS IDENTIFIED FOR NEW HOUSING DEVELOPMENT AT MINSTER AS DEFINED ON THE PROPOSALS MAP. THE PROVISIONS OF POLICY H1 SHALL APPLY EXCEPT WHERE SPECIFICALLY MODIFIED IN THE FOLLOWING POLICY. HOUSING DEVELOPMENT SHALL BE CONFINED TO THE NORTHERN PART OF THE SITE (APPROXIMATELY 2.4 HECTARES) NORTH OF THE EXISTING FOOTPATH TRAVERSING THE SITE.

HOUSING DEVELOPMENT WILL BE PERMITTED WHICH PROVIDES FOR UP TO 50 DWELLINGS IN THE PERIOD TO 2006 (WITH DEVELOPMENT OF THE REMAINDER OF THE RESIDENTIAL SITE IN THE PERIOD 2006-2011) IN ACCORDANCE WITH AN APPROVED SCHEME INDICATING PHASED DEVELOPMENT OF THE ENTIRE SITE. NET RESIDENTIAL DENSITY SHALL BE NOT LESS THAN 40 UNITS PER HECTARE. CAR PARKING PROVISION SHALL NOT EXCEED AN AVERAGE OF 1.5 SPACES PER DWELLING.

THE DEVELOPMENT WILL BE EXPECTED TO PROVIDE FOR ADDITIONAL OPEN AMENITY SPACE, INCLUDING LANDSCAPING AND AN EQUIPPED CHILDREN'S PLAY AREA, ON THE SOUTHERN PART OF THE SITE. THIS AREA SHALL BE PROVIDED, GRASSED AND EQUIPPED ON OR BEFORE COMPLETION OF THE 25TH DWELLING.

ANY DEVELOPMENT WILL BE PERMITTED ONLY AT SUCH TIME AS IT CAN BE DEMONSTRATED THAT ADEQUATE DRAINAGE CAPACITY WILL BE AVAILABLE TO ACCOMMODATE IT, AND THAT ANY FLOOD RISK ISSUES CAN BE DEALT WITH SATISFACTORILY.

DEVELOPMENT OF EACH PHASE WILL INCORPORATE A RANGE OF HOUSING TYPES INCLUDING 34% - 50% OF DWELLINGS BEING A MIXTURE OF THREE- AND FOUR-BEDROOM HOMES INCORPORATING GENEROUS ROOM SIZES AND OFF-STREET PARKING.

A FINANCIAL CONTRIBUTION WILL BE REQUIRED TOWARDS THE COST OF PROVIDING ANY ADDITIONAL EDUCATIONAL FACILITIES ARISING AS A DIRECT RESULT OF THE DEVELOPMENT.

DEVELOPMENT OF EACH PHASE WILL INCORPORATE AN ELEMENT OF AFFORDABLE HOUSING AMOUNTING TO 30% OF TOTAL UNITS TO MEET NEEDS LOCAL TO MINSTER PARISH AS PRIORITY. ENJOYMENT OF THE AFFORDABLE HOUSING AS SUCH SHOULD BE GUARANTEED FOR SUCCESSIVE AS WELL AS INITIAL OCCUPIERS FOR THE FORESEEABLE FUTURE AND THE COUNCIL MAY SEEK TO SECURE THIS BY MEANS OF A LEGAL AGREEMENT.

Manston Road, Ramsgate

3.57 As a result of underuse, the Council has resolved to rationalize its allotment holdings. This includes disposal of part of the Manston Road allotments. Such disposal will provide specific funding for much needed improvements to security and other enhancements to encourage full use of remaining allotment holdings. The 2.8 hectare site at Manston Road is allocated for residential purposes (H1) in this Local Plan, is located adjoining an existing roundabout and with a supermarket opposite. The District Council has decided that 25% of the site will be developed with affordable housing.

Size and Type of Housing

3.58 In line with Government Policy Guidance, the Council wishes to meet the housing requirements of the whole community. A Housing Needs Study of Thanet, carried out in 1997, indicated that the existing stock by type and size is over represented by smaller units, but that this may be beneficial in meeting future needs and the scale of small households in the current population. There was also under representation in three-bedroom accommodation. Compared with national levels, Thanet had a higher proportion of households with no children. Conclusions from a 2002 Housing Needs Survey indicate a shortfall against expected demand for one- and two-bedroom homes in the owner-occupied sector.

3.59 Government projections suggest that much of the projected national household growth results from changes in composition of households, in particular growth in the number of one-person households. The 1991 census indicates that Thanet had the highest percentage (30.5%) of single person households in the County. Average household size in Thanet is projected to decline (from 2.3 in 1991) to 2.14 in 2011. While consumer choice may not result in close correspondence between family size and consumption of household space, there are nonetheless planning benefits in increasing the proportion of smaller units in the housing stock to provide for choice and special needs, and to extend accessibility by expanding the stock of lower cost housing.

3.60 By contrast, perceptions of local property agents suggests that in relation to demand there are supply shortfalls in two-, three- & four-bedroom houses, with particular demand for new build three- and four-bedroom houses with garden and parking space. There is also evidence that a shortfall in spacious property of modern construction is restricting Thanet's ability to attract higher paid employees and investment by quality employers. This argues that the Plan should provide for a mixture of housing sizes and types including specifically housing suited to the needs of small households and an element of spacious property capable of underpinning sustainable regeneration, and freeing up movement through the housing stock. The Council will aim to secure a mix of housing sizes, types and affordability on individual sites, compatible with the character of the locality, in order to promote establishment of mixed and balanced communities. Policy H8 amplifies Structure Plan Policy in this context, and policies H6 & H7 provide specific guidance in relation to housing

land at Westwood and Minster. Opportunities for mixed housing may be limited on smaller sites, and the provision of small dwelling units will continue to be encouraged through conversion, change of use and redevelopment in line with policy H9. Policies H14 & H15 relate to provision of affordable housing.

3.61 New homes that are designed to standards to meet, or to be readily adaptable to meet, the needs of people with disabilities or mobility impairments can often provide a home for many residents throughout their lives. The percentage of Lifetime Homes and Wheelchair Housing set out in the Policy reflect the broad proportion of people with disabilities in the population who would benefit from these forms of housing. They are intended as targets, to be sought by negotiation with developers. The precise level of provision appropriate on any particular site will depend on a number of factors including the size of the site and its suitability for specialised housing; the nature of the proposed development; access and proximity of services and facilities; the level of provision of similar housing in the surrounding area; and the likely viability of the proposed development taking into account any exceptional development costs. The Council will consider the desirability of preparing guidance on appropriate standards for Lifetime Homes and Wheelchair Housing in the form of a supplementary planning document, subject to priorities for preparation of the LDF.

POLICY H8 - SIZE AND TYPE OF HOUSING

ON SITES WHERE 10 OR MORE RESIDENTIAL UNITS ARE PROPOSED, THE COUNCIL WILL REQUIRE A MIX OF DWELLING SIZES AND TYPES TO MEET A RANGE OF COMMUNITY NEEDS, COMPATIBLE, THROUGH QUALITY DESIGN, WITH THE CHARACTER OF THE SITE'S LOCALITY. 15% OF UNITS WILL BE EXPECTED TO BE DESIGNED AS LIFETIME HOMES AND WHEELCHAIR HOUSING.

Promoting Better Use of Land by Design

3.62 In aiming to optimise the use of previously developed land within built-up areas, the objective will be to create compact and high-quality neighbourhoods, mixed communities and to reinvigorate Thanet's urban centres as attractive areas to live and vibrant places of mixed activity. Accordingly, the Plan contains specific policies requiring quality designs to provide attractive living environments and safeguarding valuable open space. Subject to compliance with these policies, the District Council intends to encourage optimum use/rehabilitation and conversion of the existing building stock, use of suitable vacant or under-used accommodation, and maximisation of the housing contribution that can satisfactorily be made on previously developed sites, through Policy H9. Vacant sites and premises formerly in employment use may provide additional brownfield housing site opportunities, where such sites are not specifically earmarked for retention in employment related use (policy EC12).

Better use of existing stock

3.63 Because of the era and nature of its development, Thanet contains many residential buildings of substantial proportions. Conversion of such large buildings no longer suited to modern living styles or to their original purpose will continue to be regarded as a wholly appropriate way of meeting dwelling requirements. There is a need for a range of dwelling sizes to suit all pockets in the District. In encouraging such conversion through Policy H9(i) the Council will seek to secure a range of sizes of accommodation to complement Policy H8, and to help meet local needs for affordable housing. In general, proposals under H9(i) will be expected to reflect their locational context and occupier preferences so that, for example, smaller units will be provided in and around town centre core areas, and modern, family-sized units with gardens, accommodated in the wider urban areas.

Housing in town centres

3.64 The District Council wishes generally to encourage provision of new housing close to the employment, amenity, shopping and transport facilities of the town centres and commercial local centres.

3.65 Thanet's traditional shopping areas have experienced varying degrees of decline and contraction. This decline has tended to manifest itself in notable and sometimes long-standing vacancies in shop premises in secondary locations, e.g. King Street, Ramsgate. The District Council will give favourable consideration to applications for residential use in secondary commercial locations, except where there is conflict with other Local Plan policies (see note 1 to Policy H9). An appropriately designed house front or adaptation of the shopfront will usually be required in order to present a satisfactory appearance in the street scene (see reference to supplementary planning guidance in note 2 to Policy H9).

3.66 A considerable amount of accommodation attached to shops and other commercial premises in the Thanet towns is underused or vacant. The District Council wishes to encourage bringing accommodation above shops and other commercial premises into residential use. Where proposed residential accommodation is unrelated to the shop use, it is considered essential that there should be separate self-contained access.

3.67 Accommodation in commercial areas, including above shops, can provide useful additions to the housing stock, including smaller and low-cost accommodation. It can also provide a source of ready trade for local shops and services, and easy access to them for the residential occupiers who may typically have a low level of car ownership. Potential additional benefits include income and security for owners and the area generally, life outside normal business hours and stimulation of further investment in the building stock.

3.68 Supplementary guidance on conversion to flats (Conversion to Flats Guidelines) has been adopted by the District Council. These Guidelines set out comprehensive standards relating to design and layout of accommodation,

amenities, and parking requirements, which the District Council would expect to be achieved. It is important to note that buildings which have an overall floor area of less than 110 square metres (1184 square feet) are considered unsuitable for conversion to smaller units. The standards and criteria set out in the Guidelines are taken into account when determining applications for conversion of buildings to flats. Where it is not possible to meet in full the standards relating to room sizes, exceptional consideration may be given to proposals to provide residential accommodation in long-standing vacant commercial premises or as over the shop accommodation. Such exceptions may be made where a small shortfall is considered to be offset by the benefits of bringing the accommodation into residential use, and provided that all other criteria in the Guidelines can be met.

POLICY H9 - BETTER USE OF LAND FOR HOUSING

PROPOSALS TO PROVIDE RESIDENTIAL ACCOMMODATION THROUGH:

- **CONVERSION OR ADAPTATION OF NON-RESIDENTIAL BUILDINGS OR LARGER RESIDENTIAL PROPERTIES TO PROVIDE SMALLER RESIDENTIAL ACCOMMODATION**

- **USE OF EXISTING ACCOMMODATION ABOVE SHOPS**

- **CONVERSIONS AND AS AN INTEGRAL PART OF NEW SHOPPING AND OFFICE DEVELOPMENTS IN THANET'S COMMERCIAL CENTRES**

- **CHANGE OF USE/CONVERSION OF SHOP PREMISES IN AREAS NOT CONSIDERED OF IMPORTANCE TO THE COMMERCIAL VIABILITY, FUNCTIONING AND ATTRACTIVENESS OF THE ADJOINING SHOPPING AREA.**

WILL BE PERMITTED SUBJECT TO THE FOLLOWING CRITERIA:

1. **THE STANDARD OF ACCOMMODATION, RESIDENTIAL ENVIRONMENT AND CAR-PARKING ARRANGEMENTS PROVIDED/AVAILABLE ARE JUDGED TO BE SATISFACTORY (POLICIES D1 & TR16 APPLY)**

2 **THE PROPOSAL WOULD NOT RESULT IN DEMOLITION OR OTHER ALTERATIONS INAPPROPRIATE TO THE CHARACTER OF A LISTED BUILDING OR ITS SETTING OR A BUILDING SITUATED IN OR ADJOINING A CONSERVATION AREA**

3. **THE PROPOSAL WOULD NOT CONFLICT WITH LOCAL PLAN POLICIES FOR RETENTION OF EXISTING PREMISES OR LAND FOR EMPLOYMENT GENERATING USES (POLICY EC12)**

4 **EXISTING USES OR USES FOR WHICH CONSENT HAS BEEN GRANTED WITHIN OTHER PARTS OF THE BUILDING OR AT**

ADJOINING PREMISES ARE CONSIDERED COMPATIBLE WITH RESIDENTIAL USE

AND

5 THE PRIMARY COMMERCIAL FUNCTION OF THE CENTRE WOULD NOT BE PREJUDICED

PROPOSALS INVOLVING RESIDENTIAL CONVERSION OF GROUND FLOOR PREMISES IN COMMERCIAL USE IN TOWN CENTRE CORE LOCATIONS WILL NOT BE PERMITTED UNLESS THE LOCATION AND/OR SIZE OF PREMISES IS SUCH THAT CHANGE OF USE IS NOT CONSIDERED OF MATERIAL SIGNIFICANCE TO THE COMMERCIAL FUNCTION OF THE CENTRE. (See note 1)

PROPOSALS INVOLVING CHANGE OF USE/CONVERSION OF SHOP PREMISES AT GROUND FLOOR LEVEL WILL BE EXPECTED TO INCLUDE DETAILS OF A SUITABLY DESIGNED HOUSEFRONT AS PART OF THE APPLICATION. WHERE RETENTION OF AN EXISTING SHOPFRONT IS CONSIDERED APPROPRIATE, MEASURES TO PROVIDE A SATISFACTORY RESIDENTIAL APPEARANCE MUST BE INCLUDED AS PART OF THE APPLICATION. (See Note 2)

Notes

1. Town centre core locations include those areas referred to in Policies TC2 and TC7.

2. Where granted, consent will normally be subject to a condition that any agreed alterations to present a satisfactory residential appearance shall be fully implemented before residential occupation commences. General guidance on alterations/measures to present a satisfactory residential appearance, to which the Council will have regard in determining planning applications, is contained in supplementary guidance available from the District Council.

Areas In Need Of Special Action

3.69 This Local Plan identifies (on the Proposals Map) four areas meriting special attention.

1. Margate Old Town Area
2. King Street, Ramsgate
3. Upper High Street, Ramsgate
4. Cliftonville West

The objective is to achieve their revitalisation in parallel with Thanet's wider regeneration programme. In all four areas, housing and community development have a potentially significant role in overcoming their stagnation, urban decay and stimulating confidence and investment. Cliftonville West was

declared a Renewal Area in 2005 in recognition of its combination of social and environmental problems combined with poor housing. Margate Old Town, King Street and upper High Street, Ramsgate are the subject of current action programmes as part of the Council's Town Centre Regeneration and Empty Property Programme, supported by various sources of funding. Margate Old Town Action Plan encourages mixed uses including a cultural quarter, capitalising on the area's built heritage and waterfront. Policy EC10 permits certain mixed uses including housing, "living over the shop" and live-work space in support of this.

3.70 The regeneration programme for King Street, Ramsgate promotes selective redevelopment, investment and refurbishment at the concentrations of rundown and vacant property beyond the commercial core of the town centre. Programme proposals, in partnership with the private and voluntary sector, focus on residential refurbishment including "living over the shop" together with environmental improvements. The programme has been extended to include the upper High Street area.

3.71 Cliftonville West is characterised by concentrations of former hotel buildings. Decline in the long-stay holiday trade has led to concentrations of accommodation being given over to private renting and multiple occupation. This, in turn, has given rise to a polarised and deprived community and a disincentive to property investment. There is anecdotal evidence that perceptions relating to crime risk and other problems associated with deprived areas are falsely tainting Thanet's overall image as a place to live, visit and invest. The Council continues to apply its enforcement powers to curtail unauthorised uses and bring accommodation up to appropriate standards. However, a specific action programme is warranted to reinstate a balanced and confident community and stimulate property investment.

3.72 The overriding aim of the declaration of the Cliftonville West Renewal Area is to improve the condition of the area's private housing stock and general amenities. A renewal area strategy and programme is being drawn up in consultation with the community and partner organisations. Guiding objectives include the need to break the deprivation cycle associated with poor quality housing, build a more confident community and bring about a change in perception by investors. Quality housing is expected to play a major role in achieving these objectives. It is expected that the rolling strategy programme will include land purchase where necessary and be funded by a range of sources including the Council, the private sector, a housing association and SEEDA. It is anticipated that this programme will promote diversification of the tenure and ownership types in the area. Further Renewal Areas are expected to be declared in Margate under the Council's Renewal Area Programme.

3.73 In support of such area-specific programmes the following policy promotes refurbishment for housing and other appropriate uses together with environmental improvements in the areas identified (H10) on the Proposals Map. All or parts of these areas lie within or adjoin Conservation Areas. Selective redevelopment is also encouraged where compatible with

conservation policies. Such support for Margate Old Town area is expressed in Policy EC10.

3.74 Property and land that are under used, semi-derelict, vacant or in poor repair also exist outside the areas specifically identified above as being in need of special action. Such property and land are wasteful of resources and detract from local quality of life. Therefore, in addition to area-specific policies and revitalisation programmes, the Council is also developing proposals for a rolling programme of action to bring land and property back into beneficial use and to secure appropriate repairs and improvement. Action will be tailored to tackle individual circumstances by applying a mix of powers available to the Council. This initiative is expected to make a valuable contribution to the Council's regeneration objectives by providing additional homes (including an element of affordable housing) on previously developed land, recycling the use of such land and buildings, and improving the image of the District.

POLICY H10 - AREAS IN NEED OF SPECIAL ACTION

IN SUPPORT OF THE REGENERATION OF THE FOLLOWING AREAS (AS SHOWN ON THE PROPOSALS MAP), THE COUNCIL WILL PERMIT APPROPRIATE REDEVELOPMENT TO ACCOMMODATE RESIDENTIAL AND OTHER APPROPRIATE USES AND SUPPORT REFURBISHMENT OF PROPERTY TOGETHER WITH ENVIRONMENTAL IMPROVEMENTS.

1. **MARGATE OLD TOWN & HARBOUR**
2. **KING STREET, RAMSGATE**
3. **HIGH STREET, RAMSGATE**
4. **CLIFTONVILLE WEST**

Non-Self Contained Residential Accommodation

3.75 Accommodation within a building can be regarded as non-self contained where unrelated households share one or more facilities, e.g. bathroom, kitchen. Houses in Multiple Occupation (HMOs) are an example where a high degree of sharing of facilities is typical, and where living arrangements, being more intense than single family occupation, can give rise to noise, nuisance*, more callers, a higher parking requirement and visual deterioration of buildings and gardens. While the District Council does not wish to encourage proliferation of HMOs as a permanent measure, it does recognise that such sharing arrangements can provide a source of cheap rented accommodation, and are typically suited to the needs of small households. Accordingly, it wishes only to resist the establishment or continuation of those which would have an unacceptable impact on their locality. (* See operational note to Policy H11).

3.76 The extent to which non-self contained accommodation may generate the problems referred to above depends not only on intensity of occupation, sharing of facilities and management of the building, but also the nature of the

area in which it is situated, the type of building, and the concentration of similar uses in its vicinity.

3.77 Control is exercised under both Planning and Environmental Health powers, which involve different considerations. Proposals for premises in use as multiple occupation will not only be required to meet the District Council's adopted standards for HMOs, but will also be subject to the need to obtain planning consent and listed building consent, for instance relating to alterations to the building (e.g. to meet the Fire Prevention Officer's requirements). Where there are no other planning objections (Policy H11), the District Council as planning authority will be as sympathetic as possible to fire-safety requirements, and will endeavour to negotiate an arrangement which minimises impact, in planning terms, to an acceptable level.

3.78 In exceptional circumstances, e.g. where it is not possible to render accommodation fit for habitation and/or there are planning objections to the use, enforcement action may be taken under planning and/or housing legislation. In such cases, the Council, as planning authority would normally wish to encourage conversion to self-contained flats provided that a satisfactory standard of accommodation could be provided.

3.79 In considering the level of parking requirement likely to be generated by individual proposals in relation to the standards set out in the County Council's Adopted Vehicle Parking Standards, account will be taken of vehicle parking requirements generated by the authorised use and the intensity and type of non-self contained occupation proposed. Regard will also be had to the visual impact of any on-site parking arrangements. Advice on landscaping of parking areas is contained in the Conversion to Flats Guidelines (referred to in text supporting Policy H9).

3.80 A dustbin storage area should be accessible to all occupiers, and will be expected to be provided in the rear garden space. Exceptionally, alternative siting, but not in the front garden area, may be acceptable provided it is not in public view. The District Council's expectations in relation to dustbin storage are amplified in Section 6 of the Conversion to Flats Guidelines.

POLICY H11 – NON-SELF CONTAINED RESIDENTIAL ACCOMMODATION

IN CONSIDERING APPLICATIONS TO ESTABLISH OR REGULARISE NON-SELF CONTAINED RESIDENTIAL ACCOMMODATION OR BEFORE INSTIGATING ENFORCEMENT PROCEEDINGS UNDER PLANNING POWERS TO REQUIRE CESSATION OF SUCH USE, ACCOUNT WILL BE TAKEN OF:

1. **THE LIKELY OR EXPERIENCED EFFECT OF THE USE ON THE CHARACTER AND AMENITY OF THE LOCALITY RESULTING FROM NOISE*, DISTURBANCE AND VISUAL IMPACT**

2. **WHETHER THE PROPOSED OR UNLAWFUL USE WOULD RESULT OR HAS RESULTED IN AN INTENSIFICATION OR CONCENTRATION**

OF SUCH USES TO A LEVEL WHICH IS DETRIMENTAL TO THE AMENITY AND CHARACTER OF THE NEIGHBOURHOOD INCLUDING IN RELATION TO THE CONSIDERATIONS SET OUT IN (1) ABOVE;

3. **THE ADEQUACY OF PROVISION AND SUITABILITY OF ARRANGEMENTS FOR CAR PARKING ON SITE OR THE LIKELY OR EXPERIENCED IMPACT OF PARKING NEEDS BEING MET ON STREET AND**

4. **THE SUITABILITY OF ARRANGEMENTS FOR DUSTBIN STORAGE AND RUBBISH COLLECTION**

WHERE IT IS PROPOSED TO GRANT CONSENT/NOT PURSUE ENFORCEMENT ACTION, A LEGAL AGREEMENT MAY BE SOUGHT TO RESTRICT THE NUMBER OF PERSONS ACCOMMODATED WITHIN THE PREMISES AND TO SECURE ARRANGEMENTS FOR MAINTAINING THE BUILDING AND GARDENS TO AN ACCEPTABLE VISUAL CONDITION.

Operational Note

* Noise problems generated by particular individuals in non-self contained residential accommodation are essentially a management matter. In considering regularisation of non-self contained accommodation, the District Council will have regard only to the extent that noise is generated as a result of the nature of that use, i.e. resulting from intensity of occupation and living arrangements.

Retention of Existing Housing Stock

3.81 To avoid unnecessary use of greenfield housing land, in line with national planning guidance it is valid to generally encourage retention of the existing housing stock.

POLICY H12 - RETENTION OF EXISTING HOUSING STOCK

PROPOSALS WHICH WOULD LEAD TO THE LOSS OF EXISTING RESIDENTIAL ACCOMMODATION WILL BE PERMITTED ONLY WHERE IT CAN BE DEMONSTRATED THAT:

1. **THE CONTINUATION OF RESIDENTIAL USE OF THE PREMISES IS UNDESIRABLE FOR REASONS OF INCOMPATIBILITY WITH ADJACENT USES, STRUCTURAL INCONVENIENCE, OBSOLESCENCE OR LAYOUT**

2. **A CHANGE OF USE WOULD PROVIDE THE BEST REASONABLE MEANS OF PRESERVING A BUILDING OF ARCHITECTURAL OR HISTORIC IMPORTANCE (POLICY HE2 REFERS)**

3. **IT RELATES TO THE PROVISION OF COMMUNITY FACILITIES WHICH NEED TO BE SO LOCATED TO BENEFIT THE CLIENT**

COMMUNITY AND ARE COMPATIBLE WITH THE RESIDENTIAL AMENITY OF THE LOCALITY

OR

4. IT RELATES TO A PROPOSAL IN THIS LOCAL PLAN

POLICY H13 – RESIDENTIAL AMENITIES

IN PREDOMINANTLY RESIDENTIAL AREAS, THE MAINTENANCE OF RESIDENTIAL AMENITIES WILL TAKE PRECEDENCE OVER OTHER PLANNING CONSIDERATIONS. WITH THE EXCEPTION OF SPECIFIC PROPOSALS IN THIS PLAN, NON-RESIDENTIAL DEVELOPMENT WITH POTENTIAL TO ADVERSELY AFFECT LOCAL AMENITIES WILL ONLY BE PERMITTED WHERE MEASURES TO MITIGATE ANY DETRIMENTAL IMPACT ARE CAPABLE OF EFFECTIVE IMPLEMENTATION.

Explanation: This policy is intended to safeguard the stock of residential accommodation in such use, and complements the objectives of Policy H12.

Local Needs For Affordable Housing

3.82 Thanet has suffered persistently high levels of unemployment, which impacts on ability to access decent housing. A 1997 Housing Needs and Empty Property survey of Thanet found that there is a clear affordability problem in the District for low-income households. In 2002 Consultants were commissioned to undertake an updated Local Housing Needs Survey for Thanet. In quantifying need, a household was considered unable to afford private sector housing (and therefore in need of affordable housing) if its gross income is less than 1/3rd of its mortgage requirement and renting privately would take up more than 30% of its net household income. Conclusions from this study show a very substantial level of unmet affordable housing need. The Study indicates that if all housing needs for affordable dwellings are to be met in the next 5 years then an additional 4,510 dwellings would be needed over that period. The Study notes that negotiating elements of affordable housing through planning powers is a significant source in addressing such need. It indicates that given the substantial level of need found in Thanet any target for negotiating elements of affordable housing would be perfectly justified. In the circumstances it recommends that negotiations should be triggered on the basis of a site threshold of 15+ dwellings/0.5 Hectares.

3.83 Within the scope of Policy H1 the District Council will encourage proposals consisting of or including new, converted or rehabilitated housing that would demonstrably meet some local needs for affordable housing, for example through involvement of registered social landlords. The District Council also intends, through Policies H14 and H15, to enable provision of a wider range and improved standards of affordable accommodation to meet the needs of lower income groups. The term affordable housing embraces both low-cost market housing and subsidised housing. However, low-cost market housing is

unlikely to be genuinely affordable to those in housing need, as identified in the Housing Needs Survey 2002, unless it is subsidised in some way such as through provision of land at no cost, grant or discounted price, to ensure a price below that of dwellings on the open market. Whilst shared ownership might be able to help a small fraction of households in need (around 9%), for the remainder only social rented affordable housing will be of any use. Thus the vast majority of need to be met is for social rented affordable housing. In addition to Policy H14, Policy H15 also applies to the rural settlements.

3.84 In respect of Policy H14, the District Council will normally seek to ensure that where affordable housing is provided it is made and kept available for those in need (normally households eligible for inclusion on the Council's housing needs register). Involvement of registered social landlords or other bona fide charitable bodies, whose continuing interest will secure this objective, will therefore be encouraged. While tenure will be a matter for negotiation, overriding local need is currently for rented housing, at affordable (non-market) rents (that is housing accessible to households whose income is insufficient to enable them to afford adequate housing locally on the open market). Arrangements to meet these needs will be particularly encouraged.

3.85 The Housing Needs Survey indicates that there is an estimated annual shortfall of 902 affordable dwellings to address the full need for affordable housing over the next 5 years. This exceeds the total amount of housing of all types planned to be built over that period and so it would clearly be impractical to seek to meet it in full. Taking into account the size and nature of housing sites likely to come forward and the need to build balanced communities, as well as experience in other districts, Policy H14 establishes 30% as a starting point for negotiation of an element of affordable housing on eligible housing sites. What is appropriate and reasonable for any particular site will be negotiated on an individual basis. (A specific exception is land allocated under Policy H1 at Manston Road allotments, Ramsgate, where 25% of the allocated site will be reserved for social housing.) However, in assessing local need for additional affordable housing, the District Council will have regard to the current Housing Strategy and Investment Programme, the size and nature of the current housing needs register, and the number and proportion of affordable housing units available to accommodate local needs. Attention will be given to local market house prices and rents, local incomes, existing affordable housing supply, size and type of local households and the type of housing best suited to meet local needs.

3.86 Bearing in mind the 30% target for the District as a whole, the precise level of provision appropriate on any particular site will depend on a number of factors including the suitability of the site for affordable housing; the nature of the proposed development; access and proximity of services and facilities; the level of provision of similar housing in the surrounding area; and the likely viability of the proposed development, taking into account any exceptional development costs. The Council will periodically review the 30% element referred to in Policy H14 at such time as new housing survey data is available to inform whether this percentage remains appropriate.

3.87 Policies in this Plan relating to design quality and achieving attractive residential environments apply equally to affordable and market housing.

3.88 Regeneration of the town centres of Margate and Ramsgate is being promoted through a Town Centre and Empty Property Programme. This programme, supported by Single Regeneration Budget and European (ERDF) funding, English Heritage, Heritage Lottery Fund, Kent County Council and Thanet District Council and in co-ordination and partnership with a wide variety of investors, is delivering regeneration solutions. It aims to eradicate the urban decay impeding investment and regeneration in these centres. Quality affordable housing is a major driver of the programme, and land is being brought back into beneficial use for housing through close working with registered social landlords and private landlords. Quality affordable housing is also expected to be integrated within the proposed neighbourhood renewal programme for western Cliftonville (see paragraphs 3.69-3.74 above).

3.89 The 1997 Housing Needs and Empty Property Survey identified strong demand for town centre housing. Within identified priority areas there is major scope for the provision of affordable housing as part of the overall regeneration strategy. This includes conversion of buildings back to their original use in a secondary commercial/mixed use area. Such locations are generally accessible on foot to a range of services. The programme forms an integral part of the Council's Housing Strategy. The Council will, through its planning powers, encourage integration of affordable housing in all new housing developments. However, it may also consider commuted payments in lieu of on-site provision, where this will facilitate provision of affordable housing contributing to the Town Centre & Empty Property Programme regeneration strategy or to other objectives of the Housing Strategy.

POLICY H14 - AFFORDABLE HOUSING NEGOTIATIONS ON HOUSING SITES

1. **WHERE DEVELOPMENT IS PROPOSED WHICH, IN ITS COMPLETED FORM, WOULD AMOUNT TO FIFTEEN OR MORE RESIDENTIAL UNITS, OR WILL/MIGHT REASONABLY FORM PART OF AN ON-GOING/FUTURE DEVELOPMENT, CUMULATIVELY TOTALLING FIFTEEN OR MORE SUCH UNITS, THE DISTRICT COUNCIL WILL NEGOTIATE WITH THE DEVELOPER FOR THE INCLUSION OF AN ELEMENT OF AFFORDABLE HOUSING. SUCH NEGOTIATIONS WILL ALSO BE APPLIED TO ANY SITE OF 0.5 HECTARE OR MORE IRRESPECTIVE OF THE NUMBER OF DWELLINGS PROPOSED.**

2. **THE WILLINGNESS OF THE DEVELOPER TO PROVIDE AN ELEMENT OF AFFORDABLE HOUSING WILL BE A MATERIAL CONSIDERATION IN CONSIDERING THE APPLICATION.**

3. **THE SCALE OF AFFORDABLE HOUSING WHICH IS REASONABLE AND APPROPRIATE ON ANY PARTICULAR SITE WILL BE A MATTER FOR NEGOTIATION BETWEEN THE DEVELOPER AND THE DISTRICT COUNCIL. HOWEVER, AN ELEMENT OF 30% WILL**

REPRESENT THE STARTING POINT AND NEGOTIATIONS WILL BE BASED ON THE INDIVIDUAL CIRCUMSTANCES OF THE CASE, THE CHARACTER OF THE AREA AND LOCAL NEEDS, AND BE SUBJECT TO A LEGAL AGREEMENT BETWEEN THE TWO PARTIES.

4. **BEFORE GRANTING CONSENT, THE DISTRICT COUNCIL WILL REQUIRE THE DEVELOPER TO DEMONSTRATE HOW ANY AFFORDABLE HOUSING WILL BE MADE AVAILABLE TO HOUSEHOLDS UNABLE TO OBTAIN ADEQUATE HOUSING THROUGH THE PRIVATE MARKET, AND THE COUNCIL MAY SEEK TO SECURE THIS BY ENTERING INTO A PLANNING AGREEMENT AND WILL REQUIRE THE DEVELOPER TO DEMONSTRATE THAT ENJOYMENT OF THE AFFORDABLE HOUSING AS SUCH CAN BE GUARANTEED FOR SUCCESSIVE AS WELL AS INITIAL OCCUPIERS FOR THE FORESEEABLE FUTURE.**

5. **IN THE EVENT THAT THE DEVELOPER WISHES TO LOCATE THE AFFORDABLE ELEMENT ON AN ALTERNATIVE SITE WITHIN HIS OWNERSHIP AND CONTROL, THIS WILL BE ACCEPTED PROVIDED THAT SUCH DEVELOPMENT OF THE ALTERNATIVE SITE IS JUDGED ACCEPTABLE IN RELATION TO POLICY H1, AND SUBJECT TO A LEGAL AGREEMENT. ALTERNATIVELY, WHERE AN ALTERNATIVE SITE IS NOT AVAILABLE, THE COUNCIL MAY EXCEPTIONALLY CONSIDER A COMMUTED SUM IN LIEU OF DIRECT PROVISION WHERE THIS WILL FACILITATE PROVISION OF AFFORDABLE HOUSING CONTRIBUTING TO THE OBJECTIVES OF THE HOUSING STRATEGY.**

Operational Notes H14

1. For the purposes of Policy H14, the definition of affordable housing is that contained in Circular 6/98 and includes both low-cost market and subsidised housing.

2. The size of site (15 units +) at which the District Council may negotiate for affordable housing, reflects the magnitude of local need in comparison to the total housing provisions in this Local Plan.

3. An alternative site or commuted sum, as referred to in clause 5 of Policy H14, will not be an acceptable alternative in relation to the site allocated in Policy H6, in order to provide for a mixed community at Westwood.

3.90 Elements of affordable housing negotiated under the above Policy or otherwise provided will make a valuable contribution to meeting outstanding needs. However, in view of the substantial amount of unmet need, this impact will be limited, and the Council wishes to pursue all reasonable courses of action to offset it.

Rural Local Needs Housing

3.91 The Village Appraisals carried out by the Parish Councils have shown that there is a modest shortage of affordable and suitable housing in the rural settlements to meet locally generated needs. This shortfall is most notable in respect of first-time buyers, young families and elderly residents within those settlements. A specific Housing Needs Survey for Minster Parish has provided evidence of existing need within that Parish, and this is addressed within Policy H7.

3.92 The problem is not simply one of housing. The lack of housing to meet locally generated needs can have an adverse effect on the character, amenity and functioning of rural settlements. This tends to be most graphically illustrated when first-time buyers are effectively forced out of the villages because of the relatively high prices created within a restricted housing market.

3.93 This has far wider economic and social consequences than might initially be realised. Such outward movement often deprives villages of young families with children, putting village schools (an important point of social contact) at risk. In the long term, this has further implications for the provision of village services, and public transport and employment opportunities.

3.94 The Department of the Environment has recognised that such needs exist in rural areas in Planning Policy Guidance Note 3 (Housing), and the Structure Plan contains a policy enabling exceptional release of land for affordable housing at rural settlements where justified by a proven local need.

3.95 In November 1989, the Kent Planning and Housing Officers Groups issued an Advisory Note on affordable local needs housing in rural areas, for use in the preparation of Local Plan policies. Its purpose was to establish a consistent countywide policy in respect of local needs housing. This Policy is based substantially on the model policy contained in the Advisory Note, with some adaptation to meet local conditions and circumstances.

3.96 The Policy reflects the District Council's commitment to the provision of local-needs housing, which is also demonstrated by the District Council's continuing involvement in the DoE's Rural Housing Special Programme.

POLICY H15 - RURAL LOCAL- NEEDS HOUSING

EXCEPTIONALLY, PROPOSALS FOR HOUSING DEVELOPMENT TO MEET LOCAL NEEDS IN RURAL AREAS ON SITES OUTSIDE THE CONFINES OF THE RURAL SETTLEMENTS WILL BE PERMITTED, PROVIDED THAT ALL THE FOLLOWING CONDITIONS CAN BE MET:

1. **A DETAILED PARISH SURVEY, SUBMITTED WITH THE PLANNING APPLICATION, CLEARLY IDENTIFIES SUCH A NEED TO THE SATISFACTION OF THE DISTRICT PLANNING AUTHORITY, WHO WILL, IF NECESSARY, SEEK AN INDEPENDENT ASSESSMENT.**

2. THE LOCATION AND FORM OF DEVELOPMENT IS ACCEPTABLE IN TERMS OF ACCESS, PROXIMITY TO LOCAL SERVICES, ITS RELATIONSHIP TO THE RURAL SETTLEMENT, INFRASTRUCTURE PROVISION AND IMPACT ON ITS BUILT ENVIRONMENT AND ON THE ADJOINING COUNTRYSIDE, AND OTHER DEVELOPMENT CONTROL CONSIDERATIONS.

3 THE SUBMITTED PROPOSALS CONTAIN HOUSING OF A TYPE, MIX AND SCALE WHICH DIRECTLY MEET THE IDENTIFIED NEED.

4. THE FIRST AND ALL SUBSEQUENT OCCUPIERS ARE RESTRICTED TO THE GROUPS SET OUT IN THE EXPLANATION BELOW.

5. THE APPROPRIATE FINANCIAL AND TENURE ARRANGEMENTS, DETAILED IN THE PLANNING APPLICATION, HAVE BEEN MADE TO COMPLY WITH THE REQUIREMENTS OF PARTS 3 AND 4 OF THIS POLICY, TO BE INCORPORATED IN A LEGAL AGREEMENT WITH THE COUNCIL.

6. THE DISTRICT COUNCIL IS SATISFIED THAT THE REQUIREMENTS OF PARTS 3, 4, AND 5 ARE BOTH ATTAINABLE, AND ENFORCEABLE IN THE LONG TERM (i.e. FOR BOTH INITIAL AND ALL SUBSEQUENT OCCUPIERS).

7. THE PROPOSAL HAS THE SUPPORT OF THE RELEVANT PARISH COUNCIL.

8. THERE IS NO REASONABLE ALTERNATIVE MEANS OF MEETING THE IDENTIFIED NEED.

THE DISTRICT COUNCIL WILL NOT SUPPORT PROPOSALS WHICH INCLUDE:

a. MARKET HOUSING AS PART OF A CROSS-SUBSIDY SCHEME OR
b. LOW-COST HOUSING WHICH ONLY GIVES AN INITIAL ONE-TIME PURCHASE SUBSIDY

Explanation:

3.97 For the purposes of this policy, local-needs groups for whom such housing is considered appropriate are:

a. First-time buyers who are already village residents or children of village residents

b. Village residents living in unsuitable accommodation

c. Dependants of village residents

d. People whose work is based in the village

e. People, normally the children of a household with local connections, who have been forced to move away from the village due to a lack of affordable or suitable housing

3.98 For these purposes, a residential qualification is interpreted as 3 years continuous residence in the parish, or alternatively any 5 years out of the last 10. A household with local connections is defined as one having immediate family resident within the parish for a minimum of 10 years.

3.99 It is important that the client group and their particular design, financial and management requirements are clearly identified, since the District Council will expect the proposals to reflect these requirements.

3.100 The measures contained in this policy constitute a "control package" designed to ensure local-needs housing is available to meet local needs in the long term. It is therefore essential that all the requirements set out in the Policy are met and detailed in the planning application, and that the applicant is willing to enter into a legal agreement to ensure these controls are established on a permanent basis.

New Agricultural Dwellings

3.101 Annexe I of PPS7 sets out the criteria by which proposals for new agricultural dwellings should be appraised. All such proposals should be subject to a "functional" test (whether an operational need for the dwelling exists). A "financial" test may also be applied in appropriate situations (whether the farmholding is sustainable in the long term as a productive agricultural unit).

3.102 Structure Plan Policies aim to minimise the rate of new residential development in the countryside, relating it to locally generated needs, be they agricultural, forestry or social housing needs.

3.103 Planning permission will therefore normally only be granted for a farm dwelling where an agricultural need has been demonstrated. In this context, need means the need of the particular farm business, rather than the owner or occupier of the farm or holding.

3.104 The District Council takes the view that, in Thanet, agricultural need is directly related to the security of certain types of livestock, and horticultural produce. Thanet's agricultural land is almost exclusively in arable production which, by its nature, is not as susceptible to damage as other forms of agriculture.

3.105 The pattern of agricultural holdings in Thanet is well established and stable, and the agricultural area is generally in close proximity to the urban areas. In view of this, the Council believes that there is, generally speaking, little justification for new agricultural dwellings.

POLICY H16 - NEW AGRICULTURAL DWELLINGS

THE PROVISION OF NEW AGRICULTURAL DWELLINGS IN THE DISTRICT WILL ONLY BE PERMITTED WHERE IT IS DEMONSTRATED THAT:

1. THERE IS A GENUINE SECURITY CONCERN WHICH NECESSITATES THAT PROVISION

OR

2. A NEW VIABLE AGRICULTURAL UNIT REQUIRES ON-SITE ACCOMMODATION FOR OPERATIONAL PURPOSES

AND WHERE THE PROPOSAL IS ACCEPTABLE IN TERMS OF ACCESS, DESIGN AND LOCATION.

WHERE PLANNING PERMISSION FOR A NEW DWELLING IS GRANTED ON THE BASIS OF AGRICULTURAL REQUIREMENTS, A CONDITION OR LEGAL AGREEMENT WILL BE REQUIRED TO RESTRICT OCCUPATION OF THE DWELLING TO AGRICULTURAL WORKERS AND THEIR DEPENDANTS, OR PERSONS LAST EMPLOYED IN AGRICULTURE.

Residential Care Homes

3.106 There is growing recognition that each area should seek to cater for its own elderly and handicapped and that such persons are best accommodated in the community. This is reflected in the Government policy document "Caring For People"(1989).

3.107 The 1991 Census indicates that at 3%, Thanet had the highest percentage of residents in communal establishments in Kent, the County total being 1.7%.

3.108 For many years the Council operated a policy of total restriction on new residential care homes which proved unacceptable and unworkable. This was replaced by a long and complicated policy relating largely to concentration, parking and amenity. Market forces and non-land use considerations have lowered demand for new homes and it is considered that given the experience of the past and this current situation there is no necessity to address the situation with a specific policy and each application will be treated on its own merits. This situation will be monitored and kept under review with the intention of seeking a change of policy to prevent specific adverse consequences that would flow from an increase in the number of new residential homes proposed.

3.109 The social exclusion and deprivation suffered in the District is of significant concern to, and an important element to be tackled as part of, the District's regeneration efforts. Adding to the problem is the impact of children's homes in Thanet, attracted by low-cost substantial properties and fuelled by high levels of fees for difficult children. Whilst sympathetic to the needs of such young people, the Council is concerned that large concentrations (almost 39%

of East Kent Area's "looked after children" were located in Thanet in 1999/2000) of such socially excluded young people will simply add to the problems of the area. There is also evidence that once imported into Thanet a large proportion of "looked after children" tend to remain in the District into adulthood, thereby compounding a dependency culture.

3.110 The Council is currently investigating, in conjunction with Kent Social Services and Kent Police, the significance and level of impact arising from such use. Following such investigations, the District Council will consider whether it is appropriate to formulate a specific policy for regulating the quantity or location of children's homes within the District through available planning powers.

3.111 The Council will consider the need to introduce policies regulating children's homes in the light of available evidence regarding impact on local services, crime and disorder in the District, and the powers and resources of other relevant agencies to regulate and accommodate them.

Accommodation for Gypsies and Travelling Showpeople.

3.112 There is only occasional camping by gypsies in Thanet District. This can probably be attributed to lack of suitable employment opportunities and the fact that Thanet is not an "en route" stopping place. There is also anecdotal evidence that such visits are for leisure purposes. For these reasons, the District Council does not envisage a need to consider specific provision for accommodation for gypsies in the District. Any such applications in Thanet will be determined on their merits. The District Council is not aware of any local need for "winter quarters" or permanent bases for travelling showpeople.

Aircraft Noise

3.113 The District Council wishes to ensure that as far as possible, the impact of aircraft noise on noise-sensitive development including housing is limited to an acceptable level. The District Council's policies relating to aircraft noise in relation to all forms of noise sensitive development are contained in the Environmental Protection Chapter, (Policies EP7 and EP8). These Policies will be applicable in respect of applications for new residential development including residential conversion of existing buildings.

Extensions to Dwellings

3.114 Policy D3 of the Design chapter applies specifically to extensions to dwellings. Supplementary guidance " A Guide to Extending Your Home" is available separately from the District Council.

TARGETS

LP Implementation Target	
Policy Area	Location of New Housing Development
Relevant Policies	H1
Indicator	Percentage of new dwellings completed on previously developed land. (including conversion/re-use of existing buildings).
Target	70% of new dwellings should be provided on previously developed land.
Monitoring	Annual housing land study.
LP Implementation Target	
Policy Area	Efficient Use Of Housing Land.
Relevant Policies	H1
Indicator	Net densities achieved on completed housing sites over 10 units.
Target	A minimum average density of 35 dwellings per hectare net in any one year.
Monitoring	Data derived from annual housing land survey.
LP Implementation Target	
Policy Area	Efficient Use of Housing Land
Relevant Policies	H1 and H6
Indicator	Net density achieved on allocated housing site at Westwood (Policy H6).
Target	A minimum net density of 40 dwellings per hectare net.
Monitoring	Number of dwellings completed on allocated sites.
LP Implementation Target	
Policy Area	Affordable Housing
Relevant Policies	H14
Indicator	% New housing sites over 15 units net or 0.5 hectares where provision is made for an element of affordable housing.
Target	To secure provision for an element of affordable housing to meet outstanding local needs from all new housing sites of 15 or more dwellings or 0.5 hectares plus.
Monitoring	Planning consents for new residential development of 15 or more units or on sites of 0.5 hectares plus, which are subject to condition/agreement securing an element of affordable housing.

LP Implementation Target	
Policy Area	Affordable Housing
Relevant Policies	H14 & H15
Indicator	The number of affordable dwellings provided in Plan period.
Target	To report annually on actual number of affordable homes delivered.
Monitoring	Affordable homes completed to standard ready for occupation and meeting local needs identified in Housing Need Study.

4. Town Centres & Retailing

4. Town Centres & Retailing

Introduction

4.1 The approach adopted in this Local Plan is to consider the economic regeneration of the area as a holistic exercise where, in the opinion of the Local Planning Authority, the issues of quality of life and the provision of choice to local residents is an important component of the regeneration programme. In that respect, the quality and quantity of the retail offer within the District is an important consideration not just for local residents but also for potential inward investors.

4.2 Unfortunately, Thanet's existing individual town centres are considered unattractive by major retail developers because of their relative isolation, limited catchment areas and relatively small size in comparison with the local population within the District. This lack of interest in the existing centres has led to the major high street retailers concentrating their efforts on larger centres, most notably Canterbury, from whence they continue to provide quality retail facilities.

4.3 This continuous trend to concentrate at Canterbury is unsustainable in terms of the Thanet economy and unsustainable in terms of the Local Plan strategy of providing choice and quality of opportunity within the District. It is also contrary to PPG13.

Council's Objectives

4.4 The following are the District Council's objectives in developing the policies within this Chapter.

Objectives

1. **TO IMPROVE THE QUALITY OF LIFE OF RESIDENTS IN THANET THROUGH A HOLISTIC APPROACH TO REGENERATION OF WHICH RETAILING IS A MAJOR PART**

2. **TO CREATE A RETAIL OPPORTUNITY THAT WILL RESULT IN A STEP CHANGE IN THE QUALITY OF RETAILING AND LEISURE FACILITIES IN THANET, THROUGH THE DEVELOPMENT OF A NEW TOWN CENTRE AT WESTWOOD**

3. **THAT THE RETAIL OPPORTUNITY IDENTIFIED UNDER OBJECTIVE 2 ABOVE SHOULD BE A SUSTAINABLE DEVELOPMENT WHERE ADEQUATE CONSIDERATION IS GIVEN TO TRANSPORT ACCESS ON A SINGLE LOCATION SITE**

4. **THAT THE ROLES OF THE TOWN CENTRES OF MARGATE, RAMSGATE AND BROADSTAIRS CHANGE TO ADOPT A STRONGER ROLE IN THE LEISURE, CULTURAL, HERITAGE AND TOURISM MARKETS WITH THE INTENTION TO ESTABLISH AN EVENING ECONOMY RELATED TO TOURISM WITHIN THESE CENTRES**

Existing Pattern of Retailing within Thanet

4.5 Located on a peninsula on the north-eastern tip of Kent and bounded by the sea on three sides (approximately 61% of the total District boundary), Thanet has a smaller catchment area than districts located inland. However, we have the second largest urban area in Kent, with a population of some 128,000 people and a catchment of some 150,000 people. Our town centres are relatively small and constrained by the historic pattern of development and the street pattern is one of narrow streets with buildings relatively close together, making access and servicing arrangements difficult for many shops.

4.6 Shopping facilities in Thanet are spread throughout the urban area in town, district and local centres and at the edge of these centres. These shops are supported by many 'neighbourhood' shops, either individually or in a group, which serve a mainly local need and traffic passing through. Unlike the majority of other areas in the country, there is no central town in Thanet, where retail facilities can be concentrated. Instead, the three town centres are spread around the edge of the District, on the coast.

4.7 The spread of shops across the District has led to a large number of mainly small shops with only a limited number of well known 'high street' names. This pattern of small centres and local shops offers no obvious single centre which is attractive to retailers and the diverse pattern of current shopping prevents potential retailers recognising a legible hierarchy.

4.8 The large number of small shops in Thanet sell only a limited range of goods, and do not provide the quality and range of products necessary to compete with other shopping locations such as Canterbury and Bluewater. This distinct lack of quality national multiple shops within Thanet forces those with the ability to travel to other centres, in particular Canterbury, to obtain quality goods, especially with regard to clothing and footwear items. This, combined with substantial growth in the variety of retailers in Canterbury over recent years, much of it out of town, has led to continuing decline of our retail centres. The redevelopment of "Whitefriars", although not out of town, will further undermine Thanet's shopping centres.

A Wider View of Retailing

4.9 According to the Kent Household Retail Expenditure Survey carried out in 2000, Thanet District was losing in the region of £100million in retail expenditure to areas outside the District, especially Canterbury, and this situation has not changed. The survey suggests that Canterbury increased its draw from Thanet residents significantly between 1998 and 2000 and this trend is likely to continue with the proposed retail development at Whitefriars.

4.10 The lack of choice of quality shopping facilities in Thanet means that residents have to travel to centres outside the District to meet their shopping needs. Thanet has relatively low car ownership levels and the Council

considers that those that cannot travel should have greater choice closer to home and those that currently travel should not need to.

What This Means for Thanet's Economy

4.11 Losing in the region of £100 million of retail expenditure has a significant effect on the District. Thanet is recognised as an 'Assisted Area' in view of high unemployment and high levels of deprivation. Significant regeneration efforts in recent years to attract new employment and training opportunities and other facilities to raise the quality of life for Thanet residents are beginning to reap rewards, with the attraction of new businesses and employment opportunities and with the recent development of 'Thanet College' University. With this significant and continuing regeneration effort by the District Council and its many partners, the continuing loss of such a large and increasing sum of available expenditure from the District is no longer acceptable if the District is to achieve a sustainable economic recovery.

4.12 Should this expenditure be regained within the District, this would create a significant number of direct job opportunities. In turn, this increased income for Thanet residents would result in a significant amount of recycled income being spent in the local economy to meet retail and leisure needs. The Council fully accepts it will not be able to regain all the lost expenditure but the continued loss of such significant levels of both direct and recycled income from the District is hampering the regeneration efforts within Thanet.

4.13 In addition, the quality of retail and leisure facilities is one of the factors considered by inward investors when deciding whether to locate their businesses in Thanet. (Inward investors assess whether their employees and their families would be happy to locate in the area and the retail provision is an important consideration.)

A Sustainable Approach to Retailing

4.14 The District Council wishes to significantly improve the quality of retailing facilities within the Thanet area to address two issues central to the successful regeneration of Thanet.

1. To improve the quality of life for Thanet residents by:

- reducing the need for people to travel to centres outside the District to meet their shopping needs;
- enabling residents to access a range of quality retail and leisure facilities within the District creating a more self-contained economy within Thanet;
- providing residents with increased job opportunities and associated increases in their spending power.

2. To reduce the leakage of expenditure from Thanet because the District has been losing a great deal of comparison goods spending to other centres (the greater part of which is made up of sales of 'High Street' goods, principally fashion goods). If a significant part of the leaking

expenditure is recovered and spent within the District, the recycled income and spending power will provide a much needed boost to the general and retail economy of the area, associated with job opportunities.

4.15 The District has the lowest car ownership rate in Kent (61.1% of households compared to the county average of 73.3%) and with a high number of low-income residents within the district, it is not sustainable, or acceptable to the District Council to continue to expect these residents to do a round trip in the region of 35 miles to meet their retailing needs or to have to accept an inferior product. Thanet residents should be given the choice and opportunity to shop for high quality goods within the District and should not be forced to travel long distances to purchase their chosen goods. With an unemployment rate of 7.9%, (as compared with the Kent average of 3% and the national average of 3.5%) the local community cannot afford in sustainability terms to lose the jobs, the associated increased income or to continue travelling to areas outside the District.

4.16 Reducing the need for people to travel to areas outside the District for employment, education, training, retail and leisure needs will improve people's confidence and their quality of life, encourage a sustainable economy and help to achieve a sustainable community within Thanet.

4.17 The attraction of high quality retail stores in Thanet will create a variety of new jobs for Thanet residents, which will in turn increase the spending power within the District. As the spending power of residents increases within the District, having attractive quality stores where this income can be spent in the local area will retain retail expenditure within the District, improving the local economy and helping to improve people's quality of life.

4.18 New retail development brings with it other associated development, such as restaurants and leisure facilities. These developments increase the variety of employment available within the District and help to bolster the economy. They also provide a choice of leisure activities to residents whose increased spending power will demand more choice and opportunity for leisure activity. Without the retail investment, these other development opportunities are not created or are catered for elsewhere and result therefore in a non-mixed economy.

4.19 Potential inward investors considering locating in Thanet take into account the quality of life that would be available to their employees as an important factor in their decision. Through discussions with potential inward investors, it has become apparent that (the lack of) retail and leisure facilities, along with other factors of a more direct economic impact, are seen as areas of concern to inward investors, who believe their future employees may have a lower quality of life without these facilities and therefore choose to locate in areas where such facilities are available.

Leakage of Expenditure from Thanet

4.20 The Council is very concerned that the leakage of retail expenditure continues at an unacceptably high level and that local retailers face increasing competition from Canterbury's strengthening retail facilities.

4.21 New food and bulky goods stores developed at Westwood in the 1990s have helped to redress the balance in these sectors. The Kent Household Retail Expenditure Survey showed that these retail sectors in Thanet retained a significant percentage of expenditure. However, our traditional High Street centres do not offer a modern environment that is attractive to large national multiple retailers. Due to repetition of representation within each centre, they continually compete with one another for available expenditure. This has led to a shopping environment characterised by small shops offering a limited range of items that is repeated in each of the other centres where the same store name is represented.

Current Retail Trends

4.22 Current retail trends are for greater amalgamations between stores, leading to fewer shop groups. These changes to retailers at the national level affect our town-centre representation through closure of business over a number of years due to mergers and takeovers. Units within our town centres have been vacated, with some units remaining vacant or becoming charity shops.

4.23 Both the Thanet Urban Local Plan 1984 and the Isle of Thanet Local Plan 1998 supported the continued vitality and viability of our town centres. The District Council, in conjunction with other funding sources including English Heritage, the Heritage Lottery Fund and European Funding, has made significant investment in the built fabric of our towns. However, with continued streamlining of town-centre businesses at the national level, the outflow of businesses from Thanet has continued and despite the District Council's policy approach of continuing to support our traditional town centres, there has been a failure over a significant number of years to make any significant inroads into the situation. They have continued to decline relative to other centres.

4.24 In recognition that previous policy approaches have singularly failed to develop a change in the retailing pattern, the District Council considers a radical approach is now required in order to prevent further decline.

Unsuitability of Existing Centres for Modern Major Multiple Retailers

4.25 Our traditional town centres are unsuitable for the location of the major multiple retailers of today because:

- the limited size of the individual catchment areas of each town, the attractiveness of these centres to inward retail investors is poor;
- they are located in a difficult location, in terms of ease of accessibility, around the periphery of the District and on the coast;

- there is a large number of listed buildings and buildings within conservation areas;
- servicing of shops is difficult due to the narrow streets;
- the predominance of small shop units in separate ownership makes large site acquisition difficult and financially unattractive to potential developers; and
- public transport access to our town centres is difficult.

4.26 These factors make it unattractive for major multiple retailers to locate within our town centres. This became apparent during the 1980s, when several applications were received for retail proposals at Westwood and were approved by the Secretary of State either on appeal or following a call-in. These decisions have created a situation where at Westwood the creation of a retail centre is already well established but in an unplanned way following a series of unconnected disparate decisions.

Why locate the new Retail and Leisure Development at Westwood?

4.27 Westwood lies geographically at the centre of the urban confines, equidistant from, and located on the main vehicular and bus route between, the three towns, which contain over 95% of the District total population of 126,745 (mid 1998).

4.28 Due to the spread of urban development around the coast of Thanet, Westwood has and will continue to be a central area through which residents and tourists travel to reach other parts of the District. A considerable number of retail warehouse operators are represented at Westwood, as a result of Secretary of State call-in or appeal decisions (10). Westwood has therefore been recognised by the retail trade as the preferred location for new retail development in Thanet since the mid-1980s.

4.29 Westwood has provided a sustainable location for the siting of large retail stores that have been unable to find suitable sites within town and district centres or edge-of-centre locations. The acknowledged benefits offered by Westwood as a central location for 'major travel-generating uses' (11) have led to the establishment of two business parks, 'Thanet Reach' on Northwood and Westwood Roads and 'Eurokent' on Haine Road, both with new developments which have led to the creation of new job opportunities for Thanet residents. The new 'Thanet Campus' of Christ Church University College on Northwood Road, which opened in September 2000, will offer a variety of courses in business and tourism fields, to meet the specific needs of employers within Thanet, enabling students to train, qualify in their chosen fields and then gain employment on the adjacent business parks.

4.30 The mix of residential development in the vicinity, combined with the proposal to identify new housing facilities to the north of Westwood, on Haine Road, add to the viability of Westwood as a location for concentration of mixed uses.

4.31 The mix of uses that has already established at Westwood has changed the concept of Westwood; it is no longer perceived as a typical out-of-centre retail area, where only the retailing of bulky goods is established. It is recognised as being the central urban location, accessible by a range of transport methods. The establishment of new cycle ways within the area, together with the location of residential, employment and training facilities, all encourage the possibility of greater linked trips between uses, especially walking and cycling linkages.

4.32 The District Council is of the view that an opportunity now exists to create a planned and comprehensive mixed use development at Westwood, linking together existing and future uses in a sustainable manner. The wide range of commercial activities, combined with residential, employment and training facilities that have and are continuing to be developed could be comprehensively linked to encourage more linked trips between uses and less car use around Westwood.

4.33 The District Council is therefore recognising the current development of mixed uses at Westwood and moving forward by allocating land at Westwood for the development of a new town centre, where a mix of retail, restaurants/pubs, office and leisure uses can be provided in an accessible central urban location well served by public transport. It is envisaged that this development will be phased in stages, with a central town centre (Policy TC2); an area for town-centre expansion (Policy TC3); mixed use area of residential and commercial uses providing a link between the town centre and a residential site (Policy TC4) and areas specifically for retail warehouses (Policy TC5).

Why the Haine Site?

4.34 The Council's preferred location for new retail development at Westwood is land to the south of Haine Road and comprises the former Haine Hospital site together with the horticultural nursery, the ambulance station and residential properties fronting Haine Road and Margate Road (defined on the Proposals Map). The majority of this site was identified as an allocated site for bulky retail development within the Isle of Thanet Local Plan, adopted April 1998, with the remainder of the site identified within the 'area of search' (Policy S2).

4.35 Part of this site has an extant outline planning permission for 9290 square metres (100,000 square feet) of bulky goods retailing, given in December 1997. Permission was granted in June 2000 for a variation of condition on this consent, permitting the submission of reserved matters no later than five years from the date of outline approval.

4.36 The site was identified in the Lawson Price Report (8),'Retail Study of the Isle of Thanet', February 1997, as one of three sites that were considered most suitable in planning terms out of those available at Westwood, for retail development, when considered in relation to potential for linked trips with existing retail development. Of the other two sites, the Sericol site on

Westwood Road was developed in 1998 for bulky goods retailing and the Co-op Hypermarket site has recently been redeveloped and is currently trading as a Tesco Extra food store, which opened in November 2001.

4.37 An appeal into the refusal of consent for retail development on the Pearce Signs (12) site (at the corner of Haine Road and Ramsgate Road) recognised that the Haine Road site was chosen by the Council after having "taken account of advice in the studies that their location adjoining existing retail development would enable them to be integrated into the existing retail framework" (Pearce Signs Appeal Decision Letter, 7th July 1988, paragraph 22).

4.38 The site at Haine Road comprises a large area of underused land, which lends itself to redevelopment. With Sainsbury's located at the south-eastern corner of the site, an existing anchor for development is provided. The site adjoins Sainsbury's, Wickes and Wigston Warehouse (clothing and shoes) and the opportunity exists to facilitate linked trips within the Westwood area to these and other retail, employment and training sites. The development of Eurokent Business Park to the south-west for employment purposes will increase the numbers of pedestrians within the area and increase opportunity to maximise linked trips to the Haine Road site. With an area of open land to the north, the site is in a location where future expansion of a successful town centre would be a realistic option.

What do we expect from Development of the site?

4.39 The Council envisages that Westwood Cross will be a modest-sized development with a distinctive High Street atmosphere as opposed to a large indoor shopping mall of lacklustre design which can be found almost everywhere. Building design and form should reflect its town-centre character with the predominant use of 2/3 storey buildings reflecting a variety of styles of architecture, materials and roof heights, to provide the mixed character and appearance associated with traditional town centres. A mix of uses including retail shops selling a range of high-street goods, and restaurant, office and leisure uses, centred on one or more larger quality stores, for example, a department store, can be integrated to create a true town-centre environment. The Westwood Town Centre will be the prime focus for higher order core comparison retailing in Thanet. It is anticipated that the configuration of the site will be shop fronts located on an open air High Street. Featuring notably in this mixed use development will be community facilities, public squares and open spaces for meeting, sitting etc., a transport hub/bus interchange and a range of leisure uses which operate outside a traditional '9am – 5pm day'.

4.40 The District Council wishes to see an intermediate site that complements both the housing site Policy H6 and the town centre Policy TC2. Uses might include a mix of offices, hotels, residential flats and recreation uses. It is unlikely that additional significant retail development within Policy TC4 will be undertaken during the plan period and any that might be proposed will be subject to the tests of policy TC6.

4.41 The Westwood Town Centre area will be highly accessible because, as well as being central in the urban area of Thanet, the A254 Margate/Ramsgate Road running past the Westwood developments has been identified as a "Quality Bus Corridor", which means that measures will be sought to improve public transport reliability and passenger information, including approach time displays at stops. The District Council together with KCC and Local Plan Bus Operators have entered a partnership scheme to promote an attractive, reliable and convenient service.

4.42 Any new development at Westwood must be capable of demonstrating that it provides significant sustainable transport advantages. The District Council would expect a green transport approach to be adopted and any new proposal must include specific measures to encourage at least 20% of customers to travel to the site by means other than by private car. Policy TR18 in the Transportation Chapter applies. Whilst the District Council accepts that the development of a town centre on the allocated site would only require minor alterations to the existing road network, the District Council would require to be satisfied about the effects of resultant traffic flows from other new developments in the mixed use intermediate area and housing area on the capacity of the road network, and applicants will be expected to submit an appropriate Traffic Impact Study indicating the anticipated impact of the scheme and how best to create an improved traffic flow as a result of the proposed development. Negotiations with the Highway Authority will be necessary with regard to the implementation of new transport proposals to reduce the level of congestion.

4.43 The District Council recognises that part of the site identified for the core Town Centre at Westwood has an existing consent for 10,000 square metres of bulky goods retailing. Allocations to replace this bulky goods floorspace have been made (as identified on the proposals map) as policies TC3 and TC5.

4.44 Outline Planning Permission was granted for Westwood Cross, a town centre development with a gross floorspace of 350,000 sq. ft, in November 2001. The reserved matters for this application were submitted in September 2002. Also received in September 2002 was an application for the development of a small retail site to the south of Westwood Cross to eventually be integrated with the main scheme as development proceeds.

Linkages between Westwood Sites

4.45 To achieve the Council's aims of a unique development which can play a fundamental role in achieving the regeneration of Thanet, this is a development proposal which requires careful consideration of land uses and their relationships within the Westwood area, to ensure that pedestrian and cycle links in and around the area will work satisfactorily, that existing and proposed uses complement one another and that vehicular traffic is diverted away from the core area, with priority given to public transport. In view of this, all applications for development within the areas identified under Policies TC2 to TC5 inclusive will be required to clearly indicate how they link with existing developments and proposed development areas.

4.46 Applications for development of the area identified under Policy TC4 (Mixed Use Area) will be required to indicate green transport, pedestrian, cycle and vehicle routes into and around the chosen town centre site and indicate how the site can link with existing and future employment and housing development (see Policy H6) through the development of a 'Master Plan'. This 'Master Plan' will need to reflect a full Traffic Assessment of the town centre and residential elements and shall specifically provide details of:

- layout and logical phasing programme for development on sites allocated under policies TC4 and H6 (including uses included in those policies respectively), together with pedestrian and cycle links with the primary town centre;
- any realignment of the A256

Impact of Development and a New Focus for Existing Town Centres

4.47 The District Council acknowledges that supporting the development of a new town centre at the heart of Thanet will have an impact on the existing town centres. However, it also recognises that the town centres have exhibited signs of weakness for some time in terms of vitality following the loss of some of the retail stores from our town centres and long-term continued vacancy of secondary areas. The decline is unlikely to be reversible due to changes in retailer requirements and their choice is to serve smaller towns from one central location. Therefore a "do nothing" option would not secure Thanet's long-term future. The traditional even-handed approach between centres will not generate the quality of retail development to provide the level of choice appropriate for local residents.

4.48 Promoting a radical change in development in Thanet will help retain a significant proportion of the expenditure that is currently spent in Canterbury by Thanet residents and attract it back to Thanet. This in turn will create more jobs in retail and associated developments, enabling a higher level of earning and subsequent spending within the district by Thanet residents. This will be supported by additional spending power created by new employment facilities currently being developed in Thanet's business parks. It is this additional earning and spending power that will stimulate an economy based on leisure within the town centres creating a more continental café atmosphere. With attractive harbours and waterfront areas and a variety of interesting buildings and spaces, together with supporting regeneration projects, the District Council believes that the economy of our towns can be successful, creating a vibrant town-centre mixed-use economy.

4.49 Our traditional town centres are important for tourism and the establishment of speciality shopping facilities within them to complement traditional high-street retailers would provide a niche market where specialist goods can be promoted, both to local residents and to visitors alike. Such facilities might include shops retailing items such as wine, cheese, speciality foods, antiques, gifts and specialist retailers retailing goods reflecting local character. These centres form the traditional hub of civic life and with the

emergence of people taking more interest in their environment, should remain hubs of transport communications.

4.50 Adopting a more leisure and tourism-based role would improve Margate and Ramsgate from the emphasis on lower quality retail with struggling economies into high quality interesting and attractive destinations. The towns were once traditional attractive holiday resorts and the District Council considers that encouragement should be given to return to the focus of these towns centred on their harbour and waterfront areas and initiatives and policies are being put in place to achieve this. It is proposed to support the replacement of vacant shop units through the encouragement of more restaurant, café, bar and leisure uses and speciality facilities within the town centres, whilst maintaining a core shopping function. It is essential that the vitality of these areas is promoted by planning policies which permit a wide range of uses including offices and housing (i.e. living over the shop).

4.51 At the very heart of the regeneration of these town centres are the innovative development proposals that build upon the traditional character and history of our town centres. Partnership schemes such as Margate Old Town (including the impressive Turner Centre) and Ramsgate Renaissance identify future development proposals for our towns that will build upon the unique character and history of these towns and promote and encourage a tourism-based economy.

A Strategy for the Existing Town Centres

4.52 The Council's reaction to the problem is to encourage exciting alternative uses in these locations where the draw is tired, in order to remove the run-down appearance and facilitate regeneration of the viability and vitality of the town centre as a whole. This will be achieved through regeneration strategies such as the Town Centre Regeneration and Empty Property Programme.

4.53 The Council is continuing its existing regeneration programme with welcome funding assistance from a variety of partners including English Heritage, the Heritage Lottery Fund, Kent County Council and European Funding. In particular Townscape Heritage Initiatives and Heritage Economic Regeneration Schemes are being targeted to achieve the objectives of Urban Renaissance. One notable initiative is the rehabilitation of peripheral areas around the town centres to encourage conversion to residential accommodation and the concentration of commercial activities in the core area.

Broadstairs

4.54 The Council does not consider that a new focus is necessary for Broadstairs as it has marketed itself well, achieving a good mixed economy with a significant level of leisure and varied, speciality shopping. This alternative shopping complements traditional High Street retailers and includes items such as wine, cheese, speciality foods, antiques and gifts all reflecting the local character. Many activities and festivals have become regular events in Broadstairs and with its Dickensian roots it has established a very separate

identity as a unique family holiday resort. The District Council believe that Margate and Ramsgate can become as successful as Broadstairs in achieving a thriving economy with a variety of uses and it is considered that Broadstairs could act as a model for them to follow, allowing them to strengthen their economies.

Margate

4.55 Thanet District Council in conjunction with a number of partners, and most importantly local traders and residents, is developing a radical innovative scheme based around the Old Town and harbour area of Margate. An Old Town Action Plan has been produced which identifies future development proposals for the Old Town area, much of which lies within Margate Conservation Area and where many listed buildings are located. The scheme encourages mixed use into the Old Town to create an attractive cultural quarter.

4.56 Work to restore Margate to its former glory has already captured the imagination of local people. Margate was once one of the main gateways to Europe but with the decline of the holiday trade, the town has struggled to fulfil its potential. In particular, the historic Old Town area is isolated and, despite featuring many fine buildings, is rarely visited. The new initiative aims to build on the character of Margate's Old Town to attract businesses, create new links to the new parts of the town and re-establish the area as one of cultural importance.

4.57 The project will revitalise a run-down part of the town, transforming it into a vibrant area with cultural and creative industries to complement the High Street. As a centre for small businesses, especially with arts and media connections, it will also have new residential and educational facilities and will broaden the local economic base for more year-round employment. Links to the modern town centre through Cecil Square will be re-established to recreate traditional links. The historic environment will be tastefully restored, and the project will be the catalyst for improving a wider area of Margate.

4.58 The forward-thinking proposals to rejuvenate Margate have been developed jointly by the public and private sectors with a major input from local Margate residents and dedicated Action Groups, the Creative Artists' Forum, Kent Institute of Art and Design, Margate Town Partnership and Thanet Regeneration Board. The successful achievement of the plan to rejuvenate Margate is dependent upon a committed and continuing partnership between local, county and regional development agencies since it is envisaged that investment in the regeneration of Margate will total several million pounds. The District Council will be seeking funds by bidding to the European Union and UK regeneration programmes.

4.59 Building on Margate's cultural heritage and robust artistic tradition, a key proposal for the Old Town is the International Turner Centre, a contemporary arts gallery, celebrating Margate's links with the artist, JMW Turner. It is envisaged that such a centre would exhibit national and local works of art and

be a focus for training, as well as enhancing the culture and economy of the town. It is proposed that the centre will be built close to where Turner used to live, adjacent to the harbour, alongside the pier close to an area that provides future opportunities to develop restaurants and cafes, as well as creating new enhanced public open space. It is expected the Turner Centre will be a dramatic focal point that will significantly raise the profile of Margate. Other features include artists' workshops, a heritage trail, public art programme, a media centre, museums and children's quarter with the associated development of markets and related cultural special events.

4.60 The long-term initiative will see a revitalised Margate with new educational and job opportunities, a change from the 'kiss me quick image' to a more culturally oriented destination with leisure activities for local people and visitors and investment potential for cultural and media studies.

Ramsgate

4.61 The District Council in conjunction with SEEDA, KCC and English Partnerships appointed a team of consultants to prepare a comprehensive development framework and implementation strategy to co-ordinate a programme of exciting initiatives, investments and projects demonstrating commitment and confidence in the town. The Implementation Strategy, known as "Ramsgate Renaissance" will continue to build on existing and new opportunities and is focused on the Royal Harbour, seafront and adjacent urban areas, including the town centre. The vision involves establishing Ramsgate as a flagship resort on the Kent Coast. It is being promoted and progressed in partnership with leading community organisations, and private investors.

4.62 One element of the proposals is the provision of an all-weather tourist attraction of national significance, which will provide a high quality, exciting visitor destination on Ramsgate seafront. With increased ease of access from the motorway network and the opportunities offered by the port, such an attraction would attract large visitor numbers and bolster Thanet's image and economy.

4.63 Several projects relating to improvements to access to, in and around the town centre and harbour area are improving the visual appearance and attraction of the town to residents and visitors alike. The improvements to York Street, a road linking the town centre with the harbour area, are complete and provide new and interesting mixed use office, retail and residential facilities for the town centre. This street was for several years in a poor state of dereliction and decline, with many vacant and dilapidated buildings, detracting from the appearance of both the town centre and harbour areas. The redevelopment scheme was facilitated by the District Council with the help of funding from private sector partners, including North British Housing Association, SEEDA and English Heritage. Once completed, the development will bring back to life a central commercial area of the town and create a new public square.

4.64 A large section of the promenade and beachfront area at the eastern end of the harbour area has been the subject of specific improvement works,

including new public toilet and changing facilities linked to the beach, new walkways and restoration of the lift between the cliff top and the promenade. These enhancement schemes have greatly improved circulation along the beachfront area.

4.65 Smart new signing, lighting and displays of public art have all added to the interesting nature of the harbour and marina areas. The completion of the Harbour Approach Road has provided easy, direct access between the port and the country's dual carriageway and motorway networks.

4.66 Ramsgate Renaissance focuses on building on a world-class marina and expansion of the port together with the regeneration of the whole area around the Royal Harbour and the seafront. The scheme contains all the elements to create a successful major tourism destination to take advantage of its fine buildings and majestic Royal Harbour. The Council is committed to these proposals and is optimistic of success.

Other Initiatives

4.67 The District Council recognises that the current decline in the shopping function of the secondary areas beyond the town centre cores is unlikely to be reversible in the foreseeable future. Accordingly, its approach is to encourage suitable alternative uses in such locations, in order to remove any run-down appearance and facilitate regeneration of the viability and vitality of the town centre as a whole. This will be achieved through regeneration strategies such as the Town Centre Regeneration and Empty Building Initiative, as part of the Council's regeneration agenda, and will draw upon resources from all sectors including external sources of funding. This scheme is a six-year programme, which aims to redevelop properties throughout Thanet and find a new use for town centre buildings that are not being fully utilised. The scheme has been fundamental in achieving the recent removal of vacant, dilapidated properties in King Street, Ramsgate and their replacement with new homes encouraging greater residential use of the peripheral areas of our traditional town centres.

4.68 Available resources for town centre improvements will be focused upon defined core commercial areas of the town centres, and in particular locations adjacent to the core areas to help to facilitate adaptation and change where property owners are considering alternative uses for their properties. These core areas (defined on the Proposals Map), will be subject to review, having regard to vacancy rates, pedestrian flow, investment in buildings and any other factors which may be considered relevant. The extent of the core town-centre areas will be reviewed periodically as considered appropriate**.**

4.69 The District Council will, in consultation with the local community, and within the general vision of a revitalisation strategy, seek to maintain and implement a rolling programme of environmental and highway improvement schemes including traffic management, enhancement of street works and car parking in the town centres.

4.70 The Council understands the importance of and wishes to encourage locally owned shops as they serve to retain local character and expenditure.

Strategic Guidance

4.71 Planning Policy Statement 6 (Planning for Town Centres, published in 2005) states that the key government objective is to promote the vitality and viability of town centres. Other objectives include enhancing consumer choice by making provision for a range of shopping, leisure and local services, which allow genuine choice; supporting efficient, competitive and innovative retail, leisure, tourism and other sectors and improving accessibility by ensuring development is well served by a choice of means of transport.

4.72 PPS6 requires a "Plan Led" approach and advises that local planning authorities should plan for growth and manage change by selecting appropriate centres to accommodate the identified need for growth, by managing the role and function of centres and by planning for new centres where there are deficiencies in the existing network. Priority for new centres should be given to deprived areas.

4.73 In selecting sites for development local planning authorities are advised to:

a. assess the need for development;
b. identify the appropriate scale of development;
c. apply the sequential test to site selection;
d. assess the impact of development on existing centres;
e. ensure that locations are accessible and well served by a choice of means of transport.

4.74 Key considerations in preparing development plans and deciding applications are to enable the community to benefit from effective competition between retailers, to properly weigh the effect of new developments on the vitality and viability of existing town centres and the rural economy, and to ensure access and location enable choice of transport mode and do not add to polluting emissions. The guidance indicates that local convenience shops (including village shops) offer an important service for elderly, less mobile, disabled people and families with children, and that planning can help provide the environment in which such outlets can thrive.

4.75 Regional Planning Guidance (RPG9) and Planning Policy Guidance on Transport (PPG13) indicate:

1. Shopping should be promoted in existing centres, which are more likely to offer multi-purpose trips and a choice of access, particularly for those without use of a private car.

2. Where suitable central locations are not available for larger retail development, then edge of town centre sites accessible by foot from the centre and which can be served by a variety of means of transport, should be sought.

3. Local convenience shopping accessible by foot or bicycle should be encouraged in local and rural centres.

4.76 The Kent Structure Plan, adopted in December 1996, encouraged the best possible balance of shopping facilities, with emphasis on maintaining and enhancing the viability and vitality of the town centres, and on environmental sustainability in terms of accessibility to retail centres, particularly by means other than the private car.

4.77 It is noted from the Kent Structure Plan that 'In East Kent the potential for new floorspace in the short term will be influenced by wider economic and employment performance, notably at the coastal towns. There is a case on economic development grounds for encouraging new retail projects at the coastal towns which currently have an outflow of expenditure (notably to Canterbury) while adopting a selective approach to development proposals at Ashford and Canterbury', (5, page 213).

4.78 The Kent Structure Plan recognised 'The particular focus of attention for employment-creating activity and associated infrastructure should, within the context of regional guidance, be at East Kent to mitigate the immediate and persistent economic problems there', (5, page 19, para 3.17). It 'recognised that East Kent should have the highest priority in tackling persistent economic development problems' that 'have been caused by continuing structural economic change' (5, page 30, para 3.46).

4.79 Policy S8 set out the strategic context for the future development of town centres.

4.80 Policy EK2 recognises Thanet's long-term economic problems and the need to provide a choice of sites for industrial, business and distribution activities, new tourist accommodation and attractions.

4.81 Policy R1 sets out the strategic criteria for the evaluation of retail proposals. Policies R2-R4 relating to convenience, comparison and retail warehousing reflect this emphasis and the scale of current commitments to new development. Policy R3 indicates that comparison retail developments will be accommodated in town centres, and that new free-standing shopping centres will not normally be permitted. Policy R4 indicates that new retail warehouses should be directed to locations adjacent to other out of centre retail developments or on edge of town centres.

Retail Policies

4.82 The District Council has chosen to adopt a policy approach that will encourage and enable major national multiple retailers to invest and be represented in Thanet, whilst promoting expansion of tourism and leisure uses within the town centres of Margate, Ramsgate and Broadstairs to ensure their future vitality and viability. Since the second draft of the Local Plan was published in 2003 and subsequent to the Public Inquiry into the plan, the Westwood Cross Shopping Centre opened in June 2005. The benefits and impacts of that development remain to be quantified but the following policies continue to be relevant until revised through the Local Development Framework process.

POLICY TC1 - NEW RETAIL DEVELOPMENT

1. THE FIRST SEQUENTIAL PREFERENCE FOR THE LOCATION OF NEW RETAIL DEVELOPMENT IN THANET SHOULD BE IN THE CORE COMMERCIAL CENTRES OF MARGATE, RAMSGATE, BROADSTAIRS AS DEFINED ON THE PROPOSALS MAP AND IN ACCORDANCE WITH POLICY TC7;

AND ALSO AT THE CORE TOWN CENTRE OF WESTWOOD CROSS AS DEFINED ON THE PROPOSALS MAP AND IN ACCORDANCE WITH POLICY TC2.

2 OUTSIDE THESE DEFINED CORE AREAS AND EXTENDING OVER LAND AT WESTWOOD DESIGNATED IN ACCORDANCE WITH POLICIES TC3, TC4 AND TC5, ALL APPLICATIONS FOR RETAIL DEVELOPMENT WILL BE REQUIRED TO DEMONSTRATE THE NEED FOR THE PROPOSED DEVELOPMENT, AND

a. THAT THERE IS NO SEQUENTIALLY PREFERABLE LOCATION,

b. THAT THE DEVELOPMENT IS OF AN APPROPRIATE SCALE,

c. THERE IS NO UNACCEPTABLE IMPACT ON THE VITALITY AND VIABILITY OF EXISTING CENTRES, AND

d. THE LOCATION IS ACCESSIBLE.

NEED WILL BE ASSESSED ACCORDING TO EVIDENCE OF EXISTING COMMITMENTS, RESIDUAL DEMAND AND AVAILABLE EXPENDITURE WITHIN AN APPROPRIATE CATCHMENT AREA.

POLICY TC2 - WESTWOOD CROSS TOWN CENTRE

a. WITHIN THE CORE TOWN CENTRE AT WESTWOOD CROSS (AS DEFINED ON THE PROPOSALS MAP UNDER TC2), THE FOLLOWING USES WILL BE ACCEPTABLE:

USES FALLING WITHIN THE FOLLOWING USE CLASSES OF THE TOWN AND COUNTRY PLANNING (USE CLASSES) ORDER –

CLASS A1 (SHOPS)
CLASS A2 (FINANCIAL AND PROFESSIONAL SERVICES)
CLASS A3 (RESTAURANTS AND CAFES)
CLASS A4 (DRINKING ESTABLISHMENTS)
CLASS A5 (HOT FOOD TAKEAWAYS)
CLASS D2 (ASSEMBLY AND LEISURE)
CLASS B1 (A) (USE AS AN OFFICE) ABOVE GROUND FLOOR LEVEL ONLY
CLASS C3 (RESIDENTIAL) ABOVE GROUND FLOOR LEVEL ONLY.

b. THE FOLLOWING DEVELOPMENT WILL NOT BE PERMITTED WITHIN THE WESTWOOD CROSS TOWN CENTRE:

BULKY COMPARISON GOODS RETAIL WAREHOUSE STORES (1) ANY CONVENIENCE STORE WITH A GROSS RETAIL FLOORSPACE LARGER THAN 350 SQUARE METRES.

c. ALL APPLICATIONS FOR DEVELOPMENT IN THIS AREA MUST COMPLY WITH CLAUSES II – IV OF POLICY TC6.

4.83 There is a case for pursuing town-centre expansion at the Pearce Signs Site (TC3 on the proposals map). The main occupiers of the site have expressed a desire to relocate to a more appropriate site such as one of the business parks in Thanet, which makes the site ideal for allocation as it is immediately available.

4.84 Although currently divided into separate uses, any development proposals on the TC3 site must be considered as a comprehensive development of the island site within the context of a Master Plan that takes into account traffic movements both on and off the site. This is important to secure the long-term development potential of the site and avoid fragmentation.

POLICY TC3 - TOWN CENTRE EXPANSION

a. THE AREA DEFINED ON THE PROPOSALS MAP AS POLICY TC3, OUTSIDE THE CORE TOWN CENTRE AT WESTWOOD, IS DESIGNATED AS AN AREA FOR TOWN CENTRE EXPANSION.

b. THE FOLLOWING USES ARE ACCEPTABLE FOR IMMEDIATE DEVELOPMENT ON THIS SITE:

- **USES FALLING WITHIN USE CLASSES B1 (A) AND B1 (B) OF THE TOWN AND COUNTRY PLANNING (USE CLASSES) ORDER 1987;**

- **RETAIL WAREHOUSE STORES (1) WITH A GROSS FLOORSPACE NOT LESS THAN 1,000 SQUARE METRES;**

- **HOTEL.**

c. SUBSEQUENTLY, BUT NOT BEFORE THE DEVELOPMENT OF WESTWOOD CROSS HAS BEEN SUBSTANTIALLY COMPLETED (2) IN ACCORDANCE WITH POLICY TC2, THE FOLLOWING USES WILL BE ACCEPTABLE ON THIS SITE:

- **USES FALLING WITHIN USE CLASSES A1, A2, A3, A4, A5 AND D2 OF THE TOWN AND COUNTRY PLANNING (USE CLASSES) ORDER 1987;**

- **RESIDENTIAL DEVELOPMENT ABOVE GROUND FLOOR LEVEL.**

d. ALL APPLICATIONS FOR DEVELOPMENT MUST COMPLY WITH POLICY TC6.

Operational notes:

(1) Planning permission for retail warehouse stores will include a condition restricting the types of goods to be sold. The following items shall be excluded from retail sale or display for retail sale;

- Food for human consumption (other than confectionery)
- Alcoholic drinks
- Tobacco
- Fashion clothing and footwear
- Chemist/Pharmaceutical goods
- Jewellery, fancy goods and luggage
- Books, newspapers and magazines (except where this is ancillary to the sale of other types of goods sold from the units)
- Crockery, glassware, china and kitchenware (except where this is ancillary to the sale of other types of goods sold from the units)
- Perfume and toiletries
- Sports goods and equipment
- Audio and visual recordings (except where this is ancillary to the sale of other types of goods sold from the units)

(2) Substantial completion of a development will be taken as being 85% of units within that development being let.

POLICY TC4 - MIXED USE AREA

1. AN AREA OUTSIDE THE CORE TOWN CENTRE AREA AT WESTWOOD (AS DEFINED ON THE PROPOSALS MAP UNDER TC4)

IS ALLOCATED FOR A MIX OF USES, TO ACT AS AN INTERMEDIATE ZONE BETWEEN THE CORE TOWN CENTRE AND THE RESIDENTIAL AREA FURTHER TO THE NORTH.

2. **THE FOLLOWING DEVELOPMENT WILL BE PERMITTED, ONLY IN ACCORDANCE WITH AN AGREED MASTER PLAN AND DEVELOPMENT BRIEF COVERING THE SITES SUBJECT TO THIS POLICY TOGETHER WITH POLICY H6. THE MASTER PLAN SHALL SHOW HOW DEVELOPMENT IS TO BE PHASED IN CONJUNCTION WITH THE DEVELOPMENT OF WESTWOOD CROSS.**

3. **SUBJECT TO POLICY H6, RESIDENTIAL DEVELOPMENT WILL BE PERMITTED TO A MAXIMUM OF 200 UNITS.**

4. **WITHIN THIS INTERMEDIATE ZONE THE FOLLOWING USES ARE ACCEPTABLE: LARGER OFFICES AND COMMERCIAL USES WITHIN USE CLASS B1 WHICH WOULD BE INAPPROPRIATE IN THE CORE TOWN CENTRE; HOTEL; PUBLIC HOUSE; COMMUNITY FACILITIES SUCH AS LIBRARY, PLACE OF WORSHIP, COMMUNITY HALL, HEALTH CENTRE AND CRECHE.**

5. **RETAIL DEVELOPMENT IS NOT PERMITTED EXCEPT IN A PARADE OF SMALL UNITS, NOT EXCEEDING 1,200 SQUARE METRES GROSS FLOORSPACE IN AGGREGRATE, TO SERVE THE DAY-TO-DAY NEEDS OF THE HOUSING DEVELOPMENT.**

6. **ALL DEVELOPMENT MUST COMPLY WITH POLICY TC6.**

POLICY TC5 - RETAIL WAREHOUSE STORES

A SITE OUTSIDE THE CORE TOWN CENTRE AREA AT WESTWOOD, (AS DEFINED ON THE PROPOSALS MAP UNDER POLICY TC5), IS ALLOCATED FOR RETAIL WAREHOUSE STORES [(1)] WITH A GROSS FLOORSPACE IN EXCESS OF 1000 SQUARE METRES.

Operational notes:

1. See operational note (1) attached to Policy TC3.
2. All applications for development of sites within this area must comply with Policy TC6.

4.85 Within the Westwood area there are a number of sites containing existing uses to which no specific Policy is applied. However, these sites either detract from or complement the concept and vision for the Westwood area depending on their particular circumstances. In examining the detailed design issues for the town centre development at Westwood the council has taken particular care to ensure that the most prominent elevations are treated in an attractive and well-thought out manner. It is therefore important that should other sites come forward, either for complete redevelopment or for extension, that their resultant

layout, design and appearance are attractive and appropriate and that they complement the scale, form and architecture of a new town centre at Westwood. The principles of good design set out in the Design chapter and in Kent Design will be applied. The principle is particularly important for those sites lying on the immediate approaches to and surrounding the Westwood roundabout. Proposals for alternative uses on these sites will be considered in the light of their relationship with the pattern of development proposed in the Plan and against all other relevant policies.

POLICY TC6 - ASSESSMENT OF APPLICATIONS

ALL APPLICATIONS FOR DEVELOPMENT PROPOSALS SUBMITTED UNDER POLICIES TC3, TC4 AND TC5 WILL BE REQUIRED TO:

1. DEMONSTRATE THE NEED FOR ANY PROPOSED RETAIL AND LEISURE DEVELOPMENT; AND

a. THAT THE PROPOSED DEVELOPMENT IS OF AN APPROPRIATE SCALE; AND

b. THERE IS NO UNACCEPTABLE IMPACT ON THE VITALITY AND VIABILITY OF MARGATE, RAMSGATE OR BROADSTAIRS (AS DEFINED UNDER POLICY TC1), OR WESTWOOD CROSS; AND

c. THE LOCATION IS ACCESSIBLE.

RETAIL NEED WILL BE ASSESSED ACCORDING TO EVIDENCE OF EXISTING COMMITMENTS, RESIDUAL DEMAND AND AVAILABLE EXPENDITURE WITHIN AN APPROPRIATE CATCHMENT AREA.

2. SUBMIT A TRAFFIC STUDY TO DEMONSTRATE WHETHER THE CAPACITY OF THE ROAD NETWORK WILL MATCH THE CUMULATIVE TRAFFIC GENERATION ASSOCIATED WITH DEVELOPMENT IN THE VICINITY; AND HOW AND BY WHOM THE EXISTING NETWORK IS TO BE IMPROVED, IF AND WHEN IT IS NECESSARY TO DO SO.

3. SUBMIT A HIGHWAYS SCHEME TO DEMONSTRATE THE ABILITY OF THE PROPOSED DEVELOPMENT TO MANAGE TRAFFIC GENERATED BY EXISTING AND PROPOSED CUMULATIVE DEVELOPMENT AT WESTWOOD; AND THE MEANS TO FACILITATE ACCESS BY PUBLIC TRANSPORT.

4. PROVIDE SUITABLE VEHICULAR, PEDESTRIAN AND CYCLE LINKS BETWEEN EXISTING AND PROPOSED DEVELOPMENT.

IN APPROPRIATE CASES, CONDITIONS WILL BE IMPOSED ON PLANNING PERMISSION FOR RETAIL USES, TO RESTRICT THE TYPE OF GOODS TO BE SOLD (1), LIMIT THE FLOORSPACE AND TO PREVENT THE SUBDIVISION OF LARGE STORES.

NB (1) relates to the operational note attached to Policy TC3 concerning Classes of goods sold.

Margate, Ramsgate and Broadstairs Town Centres

POLICY TC7 - MARGATE, RAMSGATE AND BROADSTAIRS CORE CENTRES

THE COUNCIL'S AIM IS TO ADOPT A STRONGER ROLE IN LEISURE, CULTURE, HERITAGE AND TOURISM, AS PART OF A HOLISTIC APPROACH TO REGENERATION.

NEW DEVELOPMENT OR CHANGE OF USE THAT SUPPORTS THIS AIM WILL BE PERMITTED SUBJECT TO SATISFACTORY DESIGN, ACCESS AND WHERE APPROPRIATE, PARKING AND SERVICING ARRANGEMENTS.

THE MANAGEMENT OF PUBLIC SPACES AND LAND-USE ASPECTS OF THE TOWN-CENTRE MANAGEMENT WILL BE SUPPORTED TO CREATE AN ATTRACTIVE AND VITAL TOWN-CENTRE ENVIRONMENT.

District & Local Centres

4.86 On the basis of the scale of retail floorspace, range of shops and the definition of retail centres as set out in Annexe A of PPS6, four district centres can be identified in Thanet. These are Birchington, Cliftonville, Minster and Westgate. These centres fulfil an important convenience-shopping role and attract much walk-in trade. Cliftonville's range of shopping is boosted by staying-visitor expenditure. Birchington and Westgate are located amongst large, middle-class neighbourhoods and appear to be in a state of retail equilibrium. New housing in Birchington in recent years may have contributed to this. Minster is an important centre serving mainly the rural parishes of the district.

4.87 Cliftonville, a linear district shopping centre whose vitality is bolstered by considerable walk-in trade, kerb side parking and the tourist trade, has scope for the contraction of shopping floorspace without affecting consumer choice. The district centres of Westgate, Birchington and Minster all offer a wide range of shopping facilities to meet the needs of local people, the tourist trade and passing trade in pleasant and vibrant surroundings. It is important that the vitality of these centres is maintained. Thanet is also well served by local centres of varying sizes such as St Peter’s and Westbrook.

4.88 The District Council envisages that any new retail shops within these centres should be local shops, to serve the local catchment of the particular centre. However, it is recognised that there may be a need for local food stores that may be larger than other local shops, but these should have a maximum floorspace of 1000 square metres.

POLICY TC8 - DISTRICT AND LOCAL CENTRES

PROPOSALS FOR ADDITIONAL SHOPPING PROVISION AT TRADITIONAL DISTRICT AND LOCAL CENTRES WILL BE PERMITTED WHERE THE PROPOSALS MEET A LOCAL NEED, WIDEN THE CHOICE, QUALITY OR RANGE OF SHOPPING FACILITIES AND ARE OF A SCALE APPROPRIATE TO THE PARTICULAR CENTRE*.

*** Operational note:**

In the Council's view the appropriate scale of new retail development in existing traditional district and local centres is for stores of less than 1,000 square metres gross.

Specific Town Centre Issues

Car Parking in Town and District Centres

4.89 The attractiveness of town centres for business, shoppers, residents and tourists depends amongst other things on an adequate level of car parking and effective enforcement of traffic regulations to prevent illegal parking on the highway and on public footpaths and grass verges.

4.90 The District Council (as set out in the Thanet District Transport Plan 2001-2006) does not propose to develop or create additional off-street public car parking spaces, within the town centres of Margate, Ramsgate and Broadstairs. The Council wishes to promote better use of the existing facilities and to encourage greater use of public transport for short journeys and it is considered that providing additional off-street parking facilities would be counterproductive.

4.91 The Thanet District Transport Plan identifies the aims of the District Council to convert existing free on-street car-parking facilities within the town centres to charged parking, to encourage more efficient use of parking spaces. The level of charges will reflect the Council's aims to encourage greater use of public transport facilities and the cycling and walking network.

4.92 In view of this, all new development within the core commercial areas of the town centres will be discouraged from providing dedicated car parking spaces, over and above those necessary to service the business use, through the use of planning controls. This approach aims to retain the existing level of car parking facilities within these core areas. Policy TR17 in the Transportation Chapter applies.

Hot Food Takeaways

4.93 The District Council recognises that hot food takeaways form an important element of the mix of uses within core town, district and local centres and other locations, which attract high use including seafront areas and considers that they help to support the Council's aims of 'an evening economy'.

4.94 However, the Council is aware that conflict, relating to additional noise generation, sometimes arises between takeaway uses and other uses, especially in predominantly residential areas. The location of such uses demands careful consideration in respect of the sensitivity of neighbouring uses, including uses above takeaway premises, noise, disturbance from street level activities, smells, opening hours and quick turnover of on-street car parking.

4.95 In addition to the above, hot food takeaways generate significant amounts of litter, and spillages frequently creating unsightly staining of paving, often not in the immediate vicinity of the premises. The Council therefore considers it reasonable that such uses should contribute towards the cost of general cleaning and will therefore require applicants for new takeaways or for extensions to existing uses to make an annual financial contribution towards additional street cleaning.

4.96 The annual payment will reflect the additional cost of extended or additional street cleaning as may be required to maintain a satisfactory clean street environment. This will be a standard annual payment, irrespective of size of property.

4.97 The District Council therefore proposes the following policy to guide the development of takeaways.

POLICY TC9 - HOT FOOD TAKEAWAYS

NEW APPLICATIONS FOR HOT FOOD TAKEAWAY FACILITIES WILL BE JUDGED AGAINST THE FOLLOWING CRITERIA:

1. **THE CHARACTER OF THE AREA;**
2. **THE SENSITIVITY OF NEIGHBOURING USES; AND**
3. **THE LIKELIHOOD OF QUICK TURNOVER OF KERBSIDE PARKING BEING GENERATED BY THE PROPOSAL AND ITS EFFECTS ON THE FREE FLOW OF TRAFFIC, HIGHWAY SAFETY AND ITS POTENTIAL TO CREATE NOISE AND DISTURBANCE.**

ALL APPLICATIONS SHOULD INCLUDE DETAILS OF THE SITING OF ANY FLUE EXTRACTION EQUIPMENT THAT MAY BE CONSIDERED NECESSARY IN ASSOCIATION WITH THE PROPOSED USE, TOGETHER WITH SUPPORTING TECHNICAL INFORMATION DEMONSTRATING HOW THEY CAN BE LOCATED TO MINIMISE VISUAL IMPACT AND PREVENT ODOUR AND NOISE SPREAD TO NEARBY OCCUPIERS.

ALL APPLICANTS WILL BE REQUIRED TO ENTER INTO A LEGAL AGREEMENT WITH THE COUNCIL TO PROVIDE FOR A FINANCIAL PAYMENT TO BE MADE TO MEET THE ADDITIONAL COST OF MAINTAINING A CLEANER STREET ENVIRONMENT.

IN PREDOMINANTLY RESIDENTIAL AREAS, CONDITIONS WILL BE IMPOSED TO LIMIT OPENING TO 11.30PM.

TARGETS

LP Implementation Target	
Policy Area	Town Centres and Retailing
Relevant Policies	TC1, TC2, TC7
Indicator	No. of vacant shops within core commercial area of each town centre
Target	Not more than 5% vacancy in any single year period
Monitoring	Through survey of Prime Shopping Frontages
LP Implementation Target	
Policy Area	Town Centres and Retailing
Relevant Policies	TC2, TC3, TC4, TC5
Indicator	Reduce the leakage of expenditure from Thanet on non-bulky goods
Target	Reduce leakage of expenditure to 25%
Monitoring	In conjunction with KCC Household Expenditure Surveys
LP Implementation Target	
Policy Area	Town Centres and Retailing
Relevant Policies	TC2, TC3, TC4, TC5
Indicator	Increase the share of spend on clothing and footwear items retained within Thanet
Target	Increase share of spend on clothing and footwear items to 75%
Monitoring	In conjunction with KCC Household Expenditure Surveys

1. Extract from Management Horizons 'Ranking of Retail Centres' 2000/01, supplied by Nathaniel Lichfield & Partners, 14 Regent's Wharf, All Saints Street, London.
2. Table supplied by Kent County Council Strategic Planning Intelligence Group, 'Thanet household spend by destination', based on Kent Household Survey 2000.
3. Kent Household Retail Expenditure Survey 2000.
4. Thanet Travel Survey 1998, Thanet District Council.
5. Kent County Council Strategic Planning, 'Unemployment Change in Kent', Travel-to-Work Areas, September 2000, Page 2.
6. Pfizer Ltd, Sandwich, 'Housing Impact Study', February 2000.
7. Kent Structure Plan 1996, page 213, Kent County Council.
8. Lawson Price, 'Retail Study', February 1997.
9. Colliers Conrad Riblat Erdman, 'Kent Household Retail Expenditure Survey', July 2000.
10. Background Paper, 'Town Centres and Retailing', Table 3, Thanet District Council, August 2000.
11. Inspector's Report into the Local Plan Inquiry held between December 1996 and February 1997, para 5.18, page 74.
12. Town and Country Planning Act 1990, Section 78 and Schedule 6 Appeal by Pearce Signs Group, Application OL/TH/97/0563, The Planning Inspectorate Decision Letter Dated 7th July 1998, Appeal Reference No. T/APP/Z2260/A/97/286178/P7.
13. Planning Policy Guidance Note 6 (PPG6), 'Town Centres and Retail Development', Department of the Environment, June 1996.

5. Transportation

5. Transportation

Introduction

5.1 Transport is a critical factor in the District's aspirations for sustainable economic regeneration. Thanet's citizens need to go to work, school, shops and access other services as part of their daily lives. Goods and information need to be moved to support employment and economic growth. Thanet does not at present suffer significant levels of congestion, traffic noise, pollution and delays such as experienced in urban centres elsewhere in Kent. The District has an attractive environment and is a pleasant place to live and work. Its environment is also a potential asset in attracting investment. The intention is to maintain that situation while attracting and accommodating appropriate development in support of regeneration. Accordingly, key actions will be to manage mobility through reducing car-parking provision, improving access to public transport and controlling the location of new development, so as to reduce both the need to travel and reliance on cars for local journeys.

5.2 Thanet's long-standing and deep-seated social and economic deprivation has provided access to a range of external funding assistance. This funding together with the efforts of the District Council and its partners have put in place many of the ingredients needed for the District to reverse these misfortunes. In addition proposals for the development of Kent International Airport as an airport of regional significance together with the opportunity for growth in short shipping routes and cross-Channel access associated with the Port of Ramsgate represent very substantial incentives for further economic growth and investment. However, achieving sustainable regeneration and the rate at which it takes place will require further investment to provide fast and reliable transport links from Thanet to London, the M25 corridor and to the region's arterial transport links in order that Thanet can become a competitive location for investment. In this respect the primary issue is the currently slow and overcrowded rail services between London and Thanet.

5.3 The Channel Tunnel, whilst benefiting the UK as a whole, has had a major economic impact on East Kent through substantial job losses in the cross-channel ferry industry, a position from which East Kent is still recovering. As mitigation, the Government of the time promised that one of the benefits of the Channel Tunnel, and subsequently of the Channel Tunnel Rail Link (CTRL) would be faster, better quality rail services from the towns of the East Kent Coast to London. Fast rail services between Thanet and London using the CTRL are scheduled to commence in 2009. The Council and its partners are continuing to press the Government to deliver these benefits including upgrading the Thanet-Ashford line in terms of speed, signalling and power availability to enable fast service operation.

5.4 Thanet was previously regarded as an isolated and unattractive place for new business. This view is beginning to change following recent improvements to the main road network. The A299 linking with London via the M2 has been improved to dual-carriageway standard, providing a direct fast road link with Manston Business Park and Kent International Airport. The Royal Harbour

Approach Road links the Port of Ramsgate to the A299. However, road links to the south and the Channel Tunnel are inadequate at present. The Council is pressing for improvements to the A299 (formerly A253) between Mount Pleasant, Minster and Lord of the Manor, and for a programme of improvements along the A256 corridor linking Thanet with Pfizer, the Channel Tunnel and Dover Port.

5.5 Securing improved and faster rail services from Thanet to London (through Ashford) and through the Channel Tunnel Rail Link are of paramount importance to reversing perception by investors of Thanet and East Kent as isolated, uncompetitive locations and in generating confidence for further investment by existing local employers. Such rail improvements would also assist Thanet in benefiting from new/improved cross-London public transport services such as the Thameslink 2000 and cross rail proposals. A fast rail service to London is the most important strategic transport issue for Thanet and East Kent Councils. The Council is confident of continuing support from its neighbouring Councils in the sub-region and the County Council in pursuing such improvements and lobbying at national and regional level for these to be put in place as priority. The County Council also supports improvements to provide faster rail links for Thanet via Ashford, and this is expressed in Policy DM6 of the Local Transport Plan 2006-2011.

5.6 The Council considers the potential for expansion and diversification of activities at the Port of Ramsgate is a very important factor for employment generation, tourism and attracting additional investment to the District. Now that a dedicated approach road is in place, and the expanding freight operation supplemented with a car ferry service, the Council is renewing its energies to secure a second operator at the Port.

5.7 In the Council's vision for the future, Thanet remains an attractive place, and quality employment, housing and leisure opportunities are accessible to all. Kent International Airport balances economic success with environmental concerns, and has stimulated development of the Business Parks and a successful ferry service from the Port of Ramsgate. Improved road and rail connections have improved Thanet's accessibility in the region and stimulated new employment opportunities in the Sandwich Corridor. Local journeys are predominantly carried out using reliable, affordable public transport services, walking and cycling.

5.8 In 1998, Government published a White Paper called "A New Deal for Transport – Better For Everyone" which was subsequently incorporated in the Transport Act 2000. This sets out a vision of improved accessibility for all, with freedom from congestion and pollution. Government wants to reduce reliance on cars and to encourage more environmentally friendly means of transport such as walking, cycling and public transport. It requires County Councils to prepare Local Transport Plans to help promote this through wide-ranging proposals and partnerships to achieve integrated transport systems.

5.9 Regional Planning Guidance (RPG) which forms the framework for Strategic Policy focuses on sustainable development principles as a key means

of encouraging economic success and ensuring a high quality environment and opportunity and equity for the region's population. It promotes integration of transport and land use, and greater reliance on walking, cycling and public transport. SEERA's Regional Transport Strategy states that the transport system in the Region will be developed to support delivery of the RPG's Spatial Strategy. This includes developing a framework of strategic transport corridors to assist movement, reduce the present concentration of movement in the London area and assist the regeneration of sub-regional priority areas. Thanet is identified as a Priority Area for Economic Regeneration in the RPG. The District Council is seeking fullest recognition in the Regional Transport Strategy of the growth potential opportunities arising from Kent International Airport and the Port of Ramsgate. The Strategy recognises the need to connect Thanet with programmed and existing fast links to London, the M25/M4 corridors and beyond, in order to redress perceptions of the District as peripheral to the economic powerhouse of the region and UK. In this respect, securing fast and reliable rail access from Thanet to London is a key priority.

Objectives

1. **TO PROMOTE SAFE AND EFFICIENT TRANSPORT SYSTEMS SUPPORTING SUSTAINABLE ECONOMIC REGENERATION AND ENABLING THANET'S CITIZENS TO CONVENIENTLY ACCESS SERVICES AND FACILITIES**

2. **TO INTRODUCE EFFECTIVE TRAFFIC MANAGEMENT TO SAFEGUARD THANET'S ENVIRONMENT AND QUALITY OF LIFE**

3. **TO GUIDE LOCATION OF NEW DEVELOPMENT AND INFRASTRUCTURE IN ORDER TO REDUCE THE NEED TO TRAVEL, PROMOTE USE OF ENVIRONMENT-FRIENDLY MEANS OF TRAVEL AND REDUCE RELIANCE ON PRIVATE CARS ESPECIALLY FOR LOCAL JOURNEYS**

4. **TO SUPPORT DEVELOPMENT PROMOTING SUSTAINABLE TRAVEL**

5. **TO SECURE THE PROVISION OF SATISFACTORY TRANSPORT INFRASTRUCTURE TO MEET EXISTING AND FUTURE PATTERNS OF MOVEMENT**

6. **TO PROMOTE HIGH STANDARDS OF ROAD SAFETY, ACCIDENT REDUCTION AND SAFE, CONVENIENT MOVEMENT OF PEDESTRIANS AND CYCLISTS**

5.10 The level and range of development envisaged in this Local Plan will impact on travel demand and destinations. As an alternative to the private car, buses have the flexibility to cope with the demands generated by such development, particularly where provision of other public transport infrastructure such as new rail links may not be feasible in the short term. Accordingly the Council wishes to promote greater use of buses and development of appropriate service routes. In liaison with bus operators and the County Council, the Council has formulated a Bus Strategy and entered a Quality Bus Partnership to respond to planned new developments as Thanet's economy continues to develop and expand.

5.11 Kent County Council has submitted its second Local Transport Plan (LTP) for the period 2006-2011, setting out a strategy for promoting sustainable patterns of movement and communication in the County. This aims to contribute to improvement of social, economic and environmental considerations in Kent through implementation of effective and sustainable patterns of movement and communication. It recognises, as a priority, the need to provide appropriate transport infrastructure to support the regeneration of East Kent, reflecting regional planning guidance and SEEDA's emerging regional economic plan.

5.12 A 2nd District Transport Plan (2005-2011) has also been prepared to inform the LTP. This amplifies the LTP and sets a local strategy for Thanet and specific measures supporting efficient movement to facilitate sustainable economic regeneration, convenient and safe access to services for Thanet's citizens, reliable, convenient and affordable alternatives to car-based travel, and safeguarding Thanet's environment.

5.13 Integrated transport policy is key in reducing the need to travel and in supporting more sustainable travel choices. A key task for this Local Plan is to promote integration of land use with appropriate transport networks. Policies in this Local Plan underpin the land-use issues arising from the Local and District Transport Plan Strategies. They aim to safeguard the environment while promoting efficient travel movement for Thanet's citizens and in support of sustainable economic regeneration. These policies also have a key role in promoting the Government's objectives for sustainable development, which include promotion of sustainable economic growth, social progress, effective protection of the environment and prudent use of natural resources.

5.14 The District Transport Plan (DTP) promotes convenient and safe access to services needed by Thanet's citizens in going about their daily lives, efficient movement of goods, information and people in support of sustainable economic regeneration, a reduction in the number of car journeys through provision of affordable and convenient alternative means of travel, especially for local journeys, and safeguarding environmental quality. It aims to progressively develop a network of transport routes conveniently located for development generating travel movements. In support of sustainable economic development, a network of strategic routes is proposed, linking the Central Island area with the primary route network outside Thanet. A local network of routes facilitating movement by public transport, cycling and walking is also proposed in order to

improve accessibility and safeguard Thanet's attractive environment. Policies in this Chapter aim to guide location of development and infrastructure investment in order to facilitate implementation and use of these routes.

Location of Development

5.15 Guiding the location, scale and density of new development is an important way of reducing the need to travel, reducing travel distances, and making it safer for people to use alternatives to the car. Consistent policies directing location of travel generating uses will also guide infrastructure investment, further supporting integration of transport and land use.

5.16 Thanet is a small District, and about 95% of its population reside within the coastal urban area. The urban population is highly concentrated around the three main town centres, which therefore provide a location accessible to a high population catchment. This Plan promotes Westwood and the established coastal town centres as key locations for development generating significant travel demand and mixed-use development including housing. Public transport routes and interchanges in the urban area also provide suitable locations for development generating major travel demand. Day-to-day facilities should be located in local centres where they can be accessed by walking and cycling.

5.17 A special case is made in this Local Plan for location of specific kinds of travel intensive development at key allocated sites in the Central Island Area, including Kent International Airport, the Business Parks and Westwood. These allocations will reduce the current levels of commuting outside Thanet for employment and comparison-shopping and underpin sustainable economic regeneration.

5.18 The following policy applies in all other circumstances and aims to direct development generating significant travel demand to appropriate locations. Other chapters in this plan provide specific guidance on location and density in relation to particular types of development including housing, employment, retail, and development in rural areas. Guidance on working from home, which can reduce the need to travel, is contained in the Economic Development chapter.

POLICY TR1 - LOCATION OF DEVELOPMENT

UNLESS JUSTIFIED BY OTHER POLICIES,

- **PROPOSALS FOR DEVELOPMENT GENERATING TRAVEL DEMAND WILL NOT BE PERMITTED OUTSIDE THANET'S URBAN AREAS AND VILLAGE CONFINES**

- **DEVELOPMENT GENERATING HIGH LEVELS OF TRAVEL DEMAND WILL BE PERMITTED ONLY WITHIN THE URBAN AREA IN LOCATIONS WHICH ARE OR WILL BE MADE HIGHLY ACCESSIBLE ON FOOT, BY BICYCLE OR BY PUBLIC TRANSPORT. PRIORITY WILL BE GIVEN TO LOCATIONS AT WESTWOOD AND IN THE**

ESTABLISHED TOWN CENTRES OF MARGATE, RAMSGATE AND BROADSTAIRS, IN CASES WHERE THE SCALE AND NATURE OF DEVELOPMENT WOULD BE COMPATIBLE WITH THEIR ROLE AS HIGH DENSITY CENTRES OF MIXED-USE ACTIVITY

Operational Note:
Accessibility of locations will be assessed in response to particular proposals and take account of topography and existing and prospective transport route networks. Sites will generally be regarded as highly accessible if:

a. within 800 metres' convenient walking distance of the town centres or local centres providing a range of shops and services,

and/or

b. within both

- 800 metres' convenient walking distance of a railway station and
- 400 metres' convenient walking distance of bus routes with frequent services or public transport interchanges

5.19 Explanation: This policy aims to promote development patterns which will reduce the need to travel and increase use of walking, cycling and public transport as an alternative to car use. In some instances certain travel generating uses may not be capable of a Westwood or town-centre location, for example where incompatible with their function or where sites of sufficient size are not available. In such instances development will be directed to alternative locations within the built-up area where conveniently accessible on foot, by bicycle and public transport. Departures from the provisions of the policy will be monitored in order to assess whether additional or amended criteria are appropriate to the policy objective.

The Road Network

5.20 Roads are classified according to their function. Outside the Thanet towns, transport links are described as primary, secondary or local routes. Within the urban areas, roads are referred to as primary, secondary and local distributors. This classification is shown on the Road Hierarchy Map (see Appendix D). In brief, primary distributors cater for long distance and cross-town traffic. Secondary distributors form the link between the primary road network and residential, industrial and commercial areas. Local distributors cater for traffic within commercial, industrial and residential areas.

POLICY TR2 - APPROPRIATE USE OF ROAD HIERARCHY

THE DISTRICT COUNCIL, IN CONJUNCTION WITH THE HIGHWAY AUTHORITY, WILL INVESTIGATE WAYS IN WHICH TRAFFIC CAN BE CHANNELLED ONTO THE MOST APPROPRIATE ROUTES OF THE ROAD HIERARCHY THROUGH ROAD IMPROVEMENTS, JUNCTION

IMPROVEMENTS AND APPROPRIATE TRAFFIC MANAGEMENT SCHEMES, AND WILL SEEK TO ENSURE THAT SUCH ROUTES ARE MAINTAINED TO AN APPROPRIATE LEVEL.

Development and Transportation

5.21 Changes in land use usually affect travel patterns and flows. Structure Plan Policy is that development likely to generate significant increases in traffic, especially heavy good vehicle movements should be well related to the major transport networks (primary and secondary routes).

5.22 This Plan aims to promote walking, cycling and use of public transport. However, some development proposals will only be allowed to proceed if improvements are carried out to the local highways as part of the development (for example at local bottlenecks used both by cars and public transport vehicles). Where the need for such road improvements arises wholly or largely from the proposed development (which is acceptable in all other respects) the Council will ensure that the developer pays for or contributes towards the required improvement.

5.23 Where the Council considers that development proposals are likely to impact on the adjacent highway network, it will expect the developer to submit a Traffic Assessment to help assess the application and provide a basis for negotiation on scheme details such as level of parking and measures to improve access to the site. Such Assessments will be expected to include consideration of the likely impact of the development on capacity, safety and congestion levels on adjacent highways in terms of traffic generation and public transport facilities. They should illustrate the likely modal split of journeys to and from the site, together with details of measures to improve access by public transport, walking and cycling and reduce the number and impact of motorised journeys.

POLICY TR3 - PROVISION OF TRANSPORT INFRASTRUCTURE

THE DISTRICT AND COUNTY COUNCILS WILL ENSURE, BY MEANS OF A LEGAL AGREEMENT, THAT PROPER PROVISION IS MADE FOR TRANSPORT INFRASTRUCTURE THAT IS NECESSARY AND RELEVANT TO THE DEVELOPMENT TO BE PERMITTED. PROPOSALS FOR TRANSPORT INFRASTRUCTURE WILL BE ASSESSED IN TERMS OF THEIR IMPACT ON CAPACITY AND SAFETY OF THE TRANSPORT NETWORK TOGETHER WITH THEIR SOCIAL AND ECONOMIC IMPACTS.

Highway Improvements in the Plan Period

Major Improvements

5.24 The dualling of the A299 up to Mount Pleasant Roundabout has resulted in significant improvements to Thanet's actual and perceived accessibility. However, Thanet's growing ability to attract new economic activity, the prospect

of significant new employment arising from development of Kent International Airport, the Sandwich Corridor and prospective expansion at Pfizer Ltd, highlight remaining strategic deficiencies in relation to poor road links between Thanet and Dover/Channel Tunnel (A256), and the single carriageway section of the A299 between Mount Pleasant and Lord Of The Manor (former A253). The Council is pressing for development and implementation of a comprehensive strategy to address these deficiencies. The County Council has consulted on schemes for infrastructure improvements to the A256 and A299 as Phases 2 & 3 of the overall plan for East Kent Access. It has since resolved that highway improvements to remedy these remaining road link deficiencies in Thanet will be carried out to dual carriageway standard. The route for these improvements has also been approved and is known as "Phase 2". They will link Mount Pleasant, Lord of the Manor and the A256 near the old Richborough Power Station site. The route alignment is identified and safeguarded under Policy TR4. The District Council strongly supports the proposed improvements to the A256 and A299, and will seek their implementation at the earliest opportunity. The Strategy and East Kent Access are considered below under the heading "Transport Strategy for Key Business Sites".

5.25 The A299 is the main approach road to Ramsgate from the A28 and the motorway network. The section from Mount Pleasant to Lord of the Manor is single carriageway and has forward visibility problems and poor alignment with bends not compatible with its national speed limit (60mph). Following public consultation on alternative route options, an on-line improvement (known as "Section 7b") south of the runway was chosen. However, this route has formally been abandoned, and alternative route improvements (referred to in the previous paragraph) approved as part of the comprehensive programme of improvements as part of the strategy for East Kent Access.

5.26 The County Council has approved a programme of improvements ("Phase 1") to the A256 including dualling between the Pfizer Roundabout and Richborough Power Station. This will include a new roundabout in the vicinity of the Power Station and improvement of the Ebbsfleet Lane junction by introduction of traffic signals. The more recently approved improvements known as Phase 2 extend south of, and effectively bypass, the Ebbsfleet Lane junction, and minor amendments have been approved to Phase 2 to tie in with the approved alignment of Phase 1. Introduction of traffic signals at Ebbsfleet Lane would depend on how soon Phase 2 can be implemented after Phase 1.

5.27 Planning consent has been granted for realignment of the A256 at Haine to accommodate improvements and to provide access to the adjacent EuroKent Business Park. Further improvements affecting the A256 are expected as part of Westwood housing development (see Policy H6).

PROPOSAL TR4 - NEW ROAD AND HIGHWAY IMPROVEMENTS

DURING THE PLAN PERIOD TO 2011 THE DISTRICT COUNCIL WILL SEEK THE IMPLEMENTATION OF THE FOLLOWING HIGHWAY IMPROVEMENTS AND WILL, WHERE APPROPRIATE, SAFEGUARD ANY LAND REQUIRED

FOR THEIR CONSTRUCTION. EACH IMPROVEMENT SHALL BE SENSITIVELY DESIGNED AND LANDSCAPED SO AS TO MINIMISE ENVIRONMENTAL IMPACT.

- **IMPROVEMENTS TO DUAL CARRIAGEWAY STANDARD TO THE A256 AND A299 BETWEEN RICHBOROUGH, LORD OF THE MANOR AND MOUNT PLEASANT, MINSTER (KNOWN AS PHASES 1 & 2 OF EAST KENT ACCESS)**

- **REALIGNMENT OF THE A256 ADJACENT TO EUROKENT BUSINESS PARK**

The A28 Corridor

5.28 The A28, primary route, runs from Thanet through the centre of Canterbury and on to Ashford and the rail route from Thanet to Ashford also generally follows the line of the road. During 2001 a multi-modal study of the route was carried out by Babtie on behalf of Kent County, Ashford Borough, Canterbury City and Thanet District Councils. In respect of the road links, the study did not recommend any major highway improvements to the A28 within Thanet, and recommended that effort should be concentrated on minor on-line safety improvements and on achieving greater use of public transport to reduce reliance on the car. This approach ties in with this Council's view that any improvements should be made selectively. In particular, the section between Sarre and Upstreet is important in reinforcing perception of Thanet as an island. It follows an historic route, pleasantly lined by mature trees, and which would be sensitive to intrusion by modern street lighting, crash barriers, and so on. In relation to the rail corridor, the study acknowledges the great need to speed up and upgrade the quality of the rail service on the Stour Valley line. Thanet Council is committed to achieving a significant improvement to journey times between Thanet and Ashford to enable faster links to London by use of the CTRL from Ashford to London. This improvement in journey time is considered one of the keys to the economic regeneration of the area.

Transport Strategy for Key Business Sites

5.29 There are still major strategic deficiencies to be addressed in relation to poor road links between Thanet, and Dover/Channel Tunnel (A256) and the missing link in the Thanet Way between Mount Pleasant and Lord of the Manor (A299). These deficiencies are highlighted by the major employment potential arising from development of civilian operations at Kent International Airport, the Sandwich Corridor, prospective expansion at Pfizer and other sources. Improved rail services are essential to support Thanet's economic regeneration. Line speeds and rolling stock have been improved on the north Kent line. Nevertheless, the Council sees the Thanet/Canterbury and Ashford route (already designated by the EU as a Trans-European route) as having greatest potential for fast links to London, the rest of the UK and Europe. The Council regards upgrading of infrastructure required to reduce journey times along this route as priority. There is currently minimal use of rail for freight traffic in Thanet. The Council would wish to encourage a greater proportion of freight

transport by rail. However, it is recognised that specific improvements may need to be implemented to promote this objective alongside the priority attached to improvements to passenger service line speeds.

5.30 The Central Island Area, Pfizer, the Sandwich Corridor and business parks in Dover District and their transport connections have been identified as a connected area of major development opportunity for East Kent. This area is known as East Kent Access (EKA). Transport improvements to and between these key locations are recognised as essential to successful and sustainable regeneration in East Kent. The County Council is promoting, as a major scheme, the improvement of transport infrastructure along the EKA's 3 main corridors. This will provide a strategic plan for investment in transport improvements to support sustainable economic development of EKA. It will address the following:

- Improved access to Pfizer, the Sandwich Corridor and the Channel Tunnel via the A256
- Bus priority and cycle facilities on the A256 and from urban Thanet to Kent International Airport and the Central Island Business Parks
- Improved and faster rail connections from Ramsgate to London via Canterbury and Ashford
- Medium and long term proposals for rail access to Kent International Airport
- Other road proposals to facilitate access within and beyond East Kent's key development area
- Green Travel Plans

5.31 The District Council will participate in the formulation and implementation of a comprehensive transport strategy for the East Kent Access area. It will seek to expedite comprehensive transport improvements to support development of the economic potential of the East Kent Access area.

Kent International Airport

5.32 Thanet Council and adjoining District Councils wish to see Kent International develop as a regional airport. The new owner of this former RAF airport has aspirations to develop both freight and passenger services. In addition, land is earmarked for "airside" development at the airport. The scale of development is considered in the Economic Development chapter of this Local Plan. The airport offers very significant economic and employment benefits for Thanet and East Kent. Its development will also have significant transport implications arising from passengers, freight and employees, which will need to be addressed. These issues are considered in the Economic Development Chapter and Policy EC3.

Port of Ramsgate

5.33 The Council wishes to support development of new short passenger and freight routes between the Port of Ramsgate and other European Channel ports. The Royal Harbour Approach Road directly links the Port to the strategic road network and Kent International Airport. This and the Ramsgate Renaissance proposal (see Policy EC8) will significantly improve the Port's potential to develop new freight and passenger ferry services. Provision of a direct rail connection to the Port is unlikely to be feasible within this Plan period due to environmental concerns and cost/benefit considerations. The Council intends to investigate a suitable coach connection route between the Port and Ramsgate Railway Station.

5.34 Now that Ramsgate's Royal Harbour Approach Road has been completed, it will be possible to reconsider the future of Military Road. This may become relatively traffic-free, except when occasionally required while Royal Harbour Approach is being repaired, maintained or when exceptional loads are involved. The Ramsgate Renaissance Strategy envisages re use of the Military Road arches for leisure/tourism, which would benefit from pedestrian freedom. The Council will require a specific study against which to assess development options and an appropriate traffic management plan for Military Road. After a period of operation of the Royal Harbour Approach Road, and following a period of assessment of the implications, the Council will consider the need for traffic management measures in relation to any consequential/residual movements of heavy goods vehicles in the Ramsgate Conservation Area.

Westwood

5.35 This Local Plan promotes development of Westwood as a new town centre, together with provision for 1,000 new homes. Westwood occupies a central location at the intersection of two primary distributor roads and adjoins a quality bus corridor (see section headed "buses" below). A key objective will be to facilitate green travel to and within the centre through provision of a public transport interchange, pedestrian priority routes and other measures to encourage non-car travel to the centre. Such measures are expected to include realignment of the A256 to divert vehicular traffic from the town centre to facilitate non-car movement within the centre and from the allocated housing site.

5.36 Facilities to provide for public transport and encourage walking and cycling have been provided for as part of the town centre development. Reasonable highway improvements including financial contributions necessary to enable the housing and other development to proceed, without adverse impact on the wider transport network, will be provided for as part of those developments. Policies TR3, 14 and H6 apply to such improvements. Car parking provision in new developments at Westwood will be regulated through policy TR18.

5.37 A comprehensive Traffic Assessment for Westwood will be required in order to inform a development Master Plan covering the sites subject of

Policies H6 and TC4 and indicating logical phasing of their development and infrastructure.

Westwood Access Strategy

5.38 An overarching access strategy for Westwood will be needed to plan and coordinate the implementation of appropriate travel routes and infrastructure to accommodate its development. The content of this strategy would reflect the conclusions of the Traffic Assessment referred to above. However, it is already clear that a primary consideration for the Westwood Access Strategy will be to facilitate visits to Westwood without the need for vehicles to pass through its centre, thus relieving the volume of traffic using the Westwood Roundabout. Therefore a key principle of the Access Strategy will be to facilitate vehicular access to and egress from Westwood's four quadrants between the A254, Westwood and Haine Road without the need to enter onto the Westwood Roundabout.

5.39 Housing and other development at Westwood beyond that already committed on site policy TC2 will cumulatively impact on the capacity of the Westwood Roundabout and the local road network. All such development will be required to make appropriate contributions (financial and/or land) towards improvements to relieve the roundabout and local road network. Negotiations in respect of individual proposals will be based on their location, assessment of the traffic they are likely to generate and the achievement of significant improvements in the future situation (policy TR3 refers). Specifically, the relief road and its key roundabout junctions associated with allocated residential development at Westwood (H6 and TC4) will need to be in place before completion of the 300th dwelling (Policy H6 refers). Individual phases of housing development would be expected to make provision pro rata to enable appropriate highway improvements to be made.

Freight and Service Delivery

5.40 Effective delivery of goods and services is essential to the health of Thanet's town centres, local business and economic regeneration. Road freight traffic needs to be directed to routes fit for the purpose. Kent International Airport, Thanet's business parks, industrial estates and the Port of Ramsgate are directly accessible through the primary road network. However, town centre roads are generally unsuited to accommodate large vehicles, and off-street servicing facilities are limited. Proposals for new development in town centres will therefore be expected to include adequate off-street servicing. The Council intends to facilitate town-centre servicing by identifying on-street loading/unloading facilities in all "high street" locations, encouraging appropriate delivery times, and enforcement of no-parking restrictions. Where feasible, off-street loading areas, enabling goods to be delivered to shops in smaller loads will be encouraged in new development.

POLICY TR5 - OFF-STREET SERVICING IN TOWN CENTRES

NEW DEVELOPMENT PROPOSALS IN TOWN CENTRES WILL BE EXPECTED TO DEMONSTRATE ADEQUATE OFF-STREET SERVICING (POLICY TR 16 REFERS)

5.41 The District Transport Plan identifies strategic road freight routes serving focal points within Thanet and town-centre routes. The Plan proposes that heavy lorries be discouraged from using unsuitable routes through introduction and enforcement of traffic regulation orders. Structure Plan policy supports measures to discourage such use of minor roads. Policy TR7 of this Local Plan promotes provision of overnight lorry parking facilities and driver services.

5.42 Road user charging for freight is not considered a viable option in view of the need to support regeneration of Thanet's town centres, and the current absence of attractive alternative means of freight movement. The Council intends to consult freight transport professional bodies in determining how best to serve the area and any future development. In particular the Council will seek to promote the introduction of rail freight facilities serving Kent International Airport and the Central Island Area, support freight movements through the Port of Ramsgate and provision of interchange facilities. There is currently little or no use of rail for freight in Thanet. With recent trends towards use of rail for trunk movements by supermarkets, an opportunity exists to identify a site for a local road/rail freight exchange facility in Thanet. Any proposal would have to be in the light of developments at the Port of Ramsgate and the possible provision of a rail link to Kent International Airport. In the meantime, the Council will resist any development which could affect the remaining goods yard at Ramsgate Station until such time as firm proposals are established.

POLICY TR6 - RAMSGATE STATION GOODS YARD

UNTIL SUCH TIME AS FIRM PROPOSALS ARE ESTABLISHED FOR ANY RAIL/ROAD INTERCHANGE FACILITY SERVING THANET, LAND AT RAMSGATE STATION GOODS YARD WILL BE SAFEGUARDED FROM DEVELOPMENT WHICH WOULD RESULT IN ITS SEVERANCE, FRAGMENTATION OR OTHERWISE PRECLUDE ITS POTENTIAL USE FOR GOODS YARD AND/OR RAIL/ PASSENGER RELATED PURPOSES.

Roadside Services

5.43 Structure Plan policy permits facilities and services for road users on primary routes and motorways where a need is established and where there is no overriding conflict with other planning and environmental considerations. The Council endorses this general approach but considers that this Local Plan is the appropriate place to provide more detailed guidance having regard to the nature of the area.

5.44 Thanet is one of the smaller districts in Kent in terms of area. The distances by road between the edges of the Thanet towns and the District's boundary with Canterbury are short. From the western edge of Margate (Birchington) the distance is 4.1 miles; from the edge of Ramsgate (Nethercourt) it is 8.2 miles to the boundary along the A299. There are petrol stations along both routes. The nearby Thanet towns provide the full range of services for road users.

5.45 There has been pressure to establish a comprehensive roadside service area in Thanet. Local authorities are required to take into account the developer's assessment of demand. This pressure is continuing and brings with it the risk that a proposal may be successful at appeal on a site which may be in a particularly sensitive location.

5.46 Thanet District Council, the County Council and other District Councils in East Kent have produced a Planning Strategy For Roadside Services. This provides an overview on the need for and adequacy of current roadside service provision along primary routes. It acknowledges the importance of 24-hour facilities for long distance and HGV drivers on the approaches to East Kent's ports. The Strategy concludes that there is no shortfall in provision of facilities sufficient to cause serious safety concerns or inconvenience to vehicle drivers/passengers. It notes that additional commitments to improve provision exist. This includes the local plan commitment referred to below (Policy TR7) where consent has been granted for a service area including petrol station, restaurant, travel lodge, lorry, coach and car parking and picnic area. Taking these commitments into account, the Strategy concludes that, in relation to Government guidance on spacing, it would be unnecessary to seek previously undeveloped sites to provide new facilities. The District Council has adopted the Strategy as Supplementary Planning Guidance.

5.47 The District Council accepts justification for a facility with accommodation for lorries along the A299 (former A253) to serve the port, airport and business park. It is appreciated that the provision of such a facility would not be financially viable without those other elements normally found in comprehensive roadside service areas. In order to minimise the impact of any development, and avoid serious conflict with planning policy, the council will refuse any proposals at or near the improved Lord of the Manor junction (A299/A256). In addition, the existing petrol filling station at Mount Pleasant, Minster, could not be satisfactorily expanded.

5.48 The Council has identified a site on the south-east side of the A299 at Mount Pleasant for the development of a range of facilities for motorists and lorry drivers. A lorry park and service station have now been constructed. The site can serve traffic in both directions along the A299. Access will be from Tothill Street. Because the site is in open countryside, it will be seen to some extent from the west against the Laundry Road development, while from the east it will be seen against other developments at the roundabout. Special attention to landscaping will be needed to minimise the impact of the development.

PROPOSAL TR7 - ROADSIDE SERVICES

LAND IS SHOWN ON THE PROPOSALS MAP ON THE SOUTH SIDE OF THE A299 AT MINSTER FOR THE DEVELOPMENT OF A COMPREHENSIVE RANGE OF ROADSIDE FACILITIES FOR MOTORISTS.

Safeguarding Land for Channel Tunnel Rail Link Route Corridor

5.49 The Secretary Of State for Transport has issued directions under the Town and Country Planning (General Development Procedure) Order 1995 to safeguard the route corridor of the Channel Tunnel Rail Link Project. This includes additional land that may be required for associated works/development. (Such direction and works are not proposals of the District Council, and the routes in question will not be determined through the development plan process but through other statutory procedures which will provide appropriate opportunities for any objections by those directly affected by the project.)

POLICY TR8 - RAIL LINK SAFEGUARDING DIRECTION

SAFEGUARDING DIRECTIONS FOR DEVELOPMENT AFFECTING THE ROUTE CORRIDOR FOR THE CHANNEL TUNNEL RAIL LINK PROJECT APPLY TO LAND AT RICHBOROUGH. IN ACCORDANCE WITH THE DIRECTION, THE DISTRICT COUNCIL WILL CONSULT UNION RAILWAYS (SOUTH) LIMITED BEFORE GRANTING PLANNING PERMISSION OR RESOLVING TO CARRY OUT/AUTHORISE DEVELOPMENT WITHIN THE LIMIT OF LAND SUBJECT TO CONSULTATION, FEATURED ON THE PROPOSALS MAP.

Ramsgate Renaissance

5.50 Ramsgate Renaissance (Policy EC8) envisages development of Ramsgate Waterfront as a major visitor destination, within a potential two-hour drive time of 15 million people. A comprehensive transportation study and parking strategy will be required to assess the overall impact of such development and achieve comprehensive solutions to balance successful development while minimising the environmental impact of vehicles on the Waterfront and wider town area. Proposals will be expected to incorporate visitor coach parking facilities and consider rail/bus as an acceptable alternative to car use.

POLICY TR9 - RAMSGATE RENAISSANCE

PROPOSALS FOR DEVELOPMENT OF RAMSGATE WATERFRONT AS A MAJOR VISITOR DESTINATION WILL BE ASSESSED THROUGH A COMPREHENSIVE TRANSPORTATION STUDY AND PARKING STRATEGY DEMONSTRATING MEASURES TO MINIMISE ENVIRONMENTAL IMPACT ARISING FROM VEHICLE MOVEMENT. INDIVIDUAL PROPOSALS WILL BE REQUIRED TO INCLUDE GREEN TRAVEL PLANS (POLICY TR15) AND SPECIFIC MEASURES REFLECTING SOLUTIONS PROPOSED IN THE

COMPREHENSIVE TRANSPORTATION STUDY AND PARKING STRATEGY.

Coach Parking

5.51 The tourist trade in Thanet depends to a large extent on coach business. Secure sites to park coaches are, therefore, required. Coach park sites at Palm Bay and The Rendezvous, Margate, and Vere Road in Broadstairs are currently used for such purposes. The Rendezvous site provides a location convenient for day visitors to Margate, but may be affected by future leisure proposals. The Council will consider the provision of coach parking in Ramsgate as part of the District Transport Plan review. In addition, proposals for development at Ramsgate Waterfront as a major visitor destination will be expected to incorporate coach-parking facilities.

5.52 Coach travel is to be encouraged as an acceptable alternative to car based visitor travel. The Council will seek to identify specific on-street coach "set down/pick up" points near major destinations to promote convenience of coach travel.

POLICY TR10 - COACH PARKING

THE DISTRICT COUNCIL WILL RETAIN SITES SPECIFICALLY FOR COACH PARKING TO SERVE THE TOURIST TRADE AT THE FOLLOWING LOCATIONS:

1. **VERE ROAD, BROADSTAIRS**
2. **PALM BAY CAR PARK**

THE RENDEZVOUS CAR PARK, MARGATE WILL ALSO BE RETAINED FOR THIS PURPOSE UNTIL SUCH TIME AS ALTERNATIVE COACH PARKING PROVISION HAS BEEN ADDRESSED THROUGH MARGATE OLD TOWN ACTION PLAN.

Promoting Sustainable Travel Choices.

5.53 The District Transport Plan and this Local Plan aim to reduce reliance on private cars, especially for local journeys. While the Plans' approaches are not anti-car they aim to reduce the need to travel and promote walking, cycling and public transport as environmentally-friendly alternatives. Reducing reliance on cars in favour of more environment-friendly modes is fundamentally dependent on improvements to their reliability, convenience, and personal security. The following policies promote such improvements and the establishment of a network of suitable routes. Specific guidance on designing for personal security and disabled people is set out in the Design Chapter. Policy CC7 safeguards the historic and landscape interest of certain rural lanes. The identification and protection of such lanes may help promote the health and recreational benefits of walking and cycling.

Walking

5.54 Walking is pollution-free and has no age or income barriers. The Council intends to give priority to walking as a healthy and enjoyable means of travel. The locational policies in this Plan will enable more journeys to be undertaken on foot. However, it is also essential that pedestrians are safely and conveniently able to move between destinations. Thanet contains a reasonable network of statutory public footpaths. Policy SR17 seeks to safeguard statutory rights of way and promote their usage. However, non-pedestrianised areas of the town centres and rural roads without footpaths present a hostile and car-dominated environment for the pedestrian. Special attention is required in improving the safety and convenience along common desire lines, in particular for Thanet's vulnerable citizens including school children, women, parents with perambulators, the elderly and other people with limited mobility.

5.55 The Council will investigate provision and signposting of convenient, attractive pedestrian areas and links along desire lines in and between the town centres, car parks, railway stations, public transport stops, taxi ranks, safe routes to schools and other public buildings. Such improvements will be considered when formulating Conservation Area enhancement schemes referred to in paragraphs 7.38 & 7.39.

5.56 During the Local Plan period it is anticipated that schemes for pedestrian improvements will be prepared and implemented as follows:

Enhancement of pedestrian links between Margate Station, Seafront and Old Town / Town Centre.

Pedestrianisation of:

- Lower High Street, Margate
- Part of Turner Street, Ramsgate to improve link from car park to town centre.

Enhancement of pedestrian facilities and revised traffic management system in Broadstairs town centre.

Widening of footways and enhancement of pedestrian crossing facilities around Station Road, Birchington.

5.57 (See also paragraph relating to Military Road, Ramsgate under above heading "Port of Ramsgate"). The Council will seek to promote development of a network of pedestrian links from housing areas to out of town work locations. These areas and links would include pedestrian priority at road crossing points, incorporate seating and other features to assist pedestrians with limited mobility, and be designed to maximise personal security. New development will be expected to promote walking as a prime means of access.

POLICY TR11 - PEDESTRIAN MOVEMENT

NEW DEVELOPMENT WILL BE EXPECTED TO PROVIDE FOR SAFE, CONVENIENT ACCESS AND MOVEMENT BY PEDESTRIANS. PROPOSALS WILL BE EXPECTEDTO DEMONSTRATE REGARD FOR THE NEEDS OF VULNERABLE GROUPS INCLUDING PEOPLE WITH LIMITED MOBILITY, THE ELDERLY AND PEOPLE WITH YOUNG CHILDREN.

THE DISTRICT AND COUNTY COUNCILS WILL TAKE INTO ACCOUNT THE NEEDS OF PEDESTRIANS, AND VULNERABLE GROUPS IN THE DESIGN OF NEW ROADS, AND JUNCTIONS, ROAD IMPROVEMENTS AND TRAFFIC MANAGEMENT SCHEMES.

THE COUNCIL WILL SEEK TO PERMIT PROPOSALS TO PROVIDE NEW PEDESTRIAN ROUTES/NETWORKS OR IMPROVE THE CONVENIENCE, ACCESSIBILITY AND SAFETY OF EXISTING PEDESTRIAN LINKS/DESIRE LINES INCLUDING BETWEEN PUBLIC TRANSPORT STOPS, TOWN CENTRES, RESIDENTIAL AREAS, SAFE ROUTES TO SCHOOLS AND OTHER PUBLIC BUILDINGS.

Cycling

5.58 Cycling can provide an alternative to the car for short trips and form part of longer journeys by public transport. It is the Council's policy to encourage greater use of cycling as a healthy, enjoyable, efficient, pollution-free and cheap means of transport. Thanet has the highest recorded cycle usage (as a percentage of movements) in the County, and exceeds the national level. Greater use of cycling in Thanet will require safe, continuous, direct and attractive cycleways, together with facilities for secure cycle storage at interchange points and destinations. The Council has published a Thanet Cycling Plan, (developed in association with local cycling groups), and, in conjunction with the County Council, will seek provision of a network of cycle routes using existing routes and where appropriate extensions to the primary route network. This includes part of the "Sustrans" National Cycle Network, which runs through Thanet, together with priority links between residential areas, places of work, schools, stations and town centres. The Council is taking every opportunity to introduce cycle routes in accordance with Thanet Cycling Plan (now incorporated in the District Transport Plan) as and where possible, as funding permits. This may include by direct provision/contributions associated with development proposals (Policy TR 14 refers).

5.59 Other measures to improve cyclist safety, including advance stop lines and controlled crossing facilities, will be promoted. Specific improvements which will be pursued in the local plan period include encouraging access improvements and long term cycle parking at Ramsgate and Margate Stations, introduction of advisory cycle lanes along the A254 Ramsgate Road, Margate to Westwood Industrial Estate.

5.60 Thanet Cycling Plan aims to establish a comprehensive safe network of cycle routes catering for all journey purposes, and features existing and

proposed routes. In order to facilitate provision of an appropriate route network, Policy TR12a of this Plan safeguards proposed cycle routes from development that could prejudice their implementation. The Cycling Plan is updated periodically to reflect the evolving network. It is not therefore practical or helpful to feature proposed cycle routes on the Local Plan proposals map, and for the purposes of Policy TR12a, the Thanet Cycling Plan is the appropriate source of reference.

5.61 New development generating travel demand will be expected to promote cycling by demonstrating that the access needs of cyclists have been taken into account, and through provision of cycle parking and changing facilities. (Secure parking facilities and changing/shower facilities will encourage use of cycling.) The Council will judge cycle parking provision against the standards set out in the Appendices.

POLICY TR12 - CYCLING

IN ORDER TO PROMOTE INCREASED USE OF CYCLING:

a) THE COUNCIL WILL SEEK THE PROVISION AT THE EARLIEST OPPORTUNITY, OF A NETWORK OF CYCLE ROUTES. PLANNING PERMISSION WILL NOT BE GRANTED FOR ANY DEVELOPMENT, WHICH WOULD PREJUDICE THE IMPLEMENTATION OF PROPOSED CYCLE ROUTES.

b) THE COUNCIL WILL SEEK THE INCORPORATION OF FACILITIES FOR CYCLISTS INTO THE DESIGN OF NEW AND IMPROVED ROADS, JUNCTION IMPROVEMENTS AND TRAFFIC MANAGEMENT PROPOSALS.

c) SUBSTANTIAL DEVELOPMENT GENERATING TRAVEL DEMAND WILL BE REQUIRED TO PROVIDE CONVENIENT AND SECURE CYCLE-PARKING AND CHANGING FACILITIES. PROPOSALS TO PROVIDE SUCH FACILITIES AS PART OF DEVELOPMENT PROPOSALS IN TOWN CENTRES AND AT TRANSPORT INTERCHANGES, SCHOOLS AND PLACES OF EMPLOYMENT WILL BE PERMITTED.

AND

d) IN NEW RESIDENTIAL DEVELOPMENT FACILITIES FOR THE SECURE PARKING AND STORAGE OF CYCLES SHOULD BE PROVIDED OR, IN EXCEPTIONAL CIRCUMSTANCES WHERE NOT PROVIDED, THE DESIGN SHOULD FACILITATE THE PROVISION IN FUTURE.

Public Transport

5.62 Public transport has a major part to play in the realisation of a sustainable lifestyle by reducing car usage and thus pollution. Thanet has the lowest car ownership in Kent, which means that public transport is vital for personal

mobility. A good public transport network is therefore important so that both these issues are addressed.

5.63 The District Council has no direct control over the provision of bus and rail services. However, in its planning and other functions the Council will support the continuation and improvement of an effective public transport service for both bus and rail. The Council works in partnership with public transport operators and Kent County Council through a Quality Bus Partnership to establish a network of efficient routes with good interchanges well related to the locational policies of this Local Plan. Developer contributions will be used to facilitate implementation of such improvements. (Policy TR14 refers.) In addition the District Council will expect new developments to take into account the needs of public transport. This could include various measures such as designing in waiting areas or the provision of signposting and bus shelters.

Buses

5.64 The Council recognises that buses have an important role to play in providing a flexible alternative to the private car. The Council's Bus Strategy considers a range of measures, many of which are outside the scope of planning control, intended to facilitate more reliable services, improved service information, easier interchange between rail and local buses, introduction of buses accessible to passengers with limited mobility and provision of community buses for passengers whose needs cannot currently be met by commercially operating services. This Local Plan supports development that will facilitate greater use of and improvement to bus services. New development will be expected to provide or contribute towards appropriate improvements.

5.65 The District together with Kent County Council has entered a Quality Bus Partnership with the major local commercial bus operator in order to promote reliable, attractive and convenient service networks. The District Council has already embarked on a programme of general improvements including shelter renewal/modernisation and installation of "bus boarders". The Councils have identified three "Quality Bus Corridors" (featured in the Appendices) where investment will be targeted in promoting phased improvements to reliability and passenger information, including approach-time information display at passenger stops. In preparing traffic management schemes, the Council will give sympathetic consideration to the needs of buses including the provision of bus priority measures where appropriate.

Rail

5.66 Capacity exists for increased use of rail for local journeys. Thanet has seven railway stations serving the main centres of the District. Not all stations are conveniently located in relation to popular destinations and centres of population gravity. The Council intends to work with the local rail operator to promote greater use of rail in preference to cars for journeys within the District and East Kent. Rail/bus interchange facilities have been implemented at Ramsgate, and are planned for Minster Railway Station within the plan period.

POLICY TR13 - PUBLIC TRANSPORT FACILITIES

THE COUNCIL WILL SEEK TO APPROVE PROPOSALS TO FACILTATE USE OF PUBLIC TRANSPORT, INCLUDING: -

- **PROVISION/IMPROVEMENT OF PASSENGER INFORMATION AND WAITING FACILITIES**
- **DEVELOPMENT REQUIRED TO IMPROVE PERSONAL SECURITY AND ACCESSIBILITY FOR PEOPLE WITH LIMITED MOBILITY**
- **BUS/RAIL INTERCHANGE FACILITIES**
- **SECURE CYCLE STORAGE AT RAIL STATIONS**

ALL NEW DEVELOPMENT SHOULD TAKE INTO ACCOUNT THE NEEDS OF PUBLIC TRANSPORT, AND WHERE OPPORTUNITIES ARISE, IMPROVED FACILITIES FOR WAITING PASSENGERS.

Providing Sustainable Transport Facilities for New Development

5.67 The District Transport Plan sets out a six-year programme of action to develop and improve sustainable transport facilities and networks well related to development patterns envisaged in this Local Plan. Development of certain types and size may bring forward the need for these programmed or additional improvements. For example, housing or other travel generating development located within 400 metres of the cycle network, proposed pedestrian links or/and quality bus corridors (featured in Appendices) would normally be expected to contribute to their provision/improvement (Policy TR14). This Local Plan sets out the nature of any improvements expected to be provided in connection with specific site allocations. However, the Council will assess all development proposals to establish the travel demands they will generate. The emphasis of such assessments will be to promote sustainable travel, and the impact development will have in terms of capacity of networks and facilities in the vicinity of the site. Where assessments indicate a need to bring forward or provide additional transport improvements, the Council will require the developer to provide or contribute to the cost of achieving the appropriate improvements. It will seek to do this by means of a planning obligation. (Policy TR3 refers). In particular, proposals for travel-generating development in the vicinity of Westwood Cross will be required to provide/contribute towards such improvements, including specific improvements along the quality bus corridors that link Westwood to the rest of the plan area. Appendix F identifies some relevant quality bus corridors. Subsequent assessment may identify other quality bus corridors.

POLICY TR14 - PROVISION OF FACILITIES FOR SUSTAINABLE TRANSPORT

PROPOSALS FOR DEVELOPMENT WILL BE ASSESSED IN TERMS OF THE TYPE AND LEVEL OF TRAVEL DEMAND LIKELY TO BE GENERATED. PROPOSALS EXPECTED TO RESULT IN A NEED TO IMPROVE OR BRING FORWARD PROGRAMMED IMPROVEMENTS TO PUBLIC TRANSPORT, WALKING OR CYCLING FACILITIES OR INFRASTRUCTURE WILL BE REQUIRED TO INCORPORATE OR CONTRIBUTE TO THE COST OF THEIR PROVISION.
SUBJECT TO INDIVIDUAL ASSESSMENTS, SCHEMES MAY BE REQUIRED TO PROVIDE OR CONTRIBUTE TO:

- **CAPACITY IMPROVEMENTS/CONNECTIONS TO THE CYCLE NETWORK**
- **PROVISION OF PEDESTRIAN LINKS WITH PUBLIC TRANSPORT ROUTES/INTERCHANGES**
- **IMPROVEMENTS TO PASSENGER WAITING FACILITIES**
- **FACILITIES FOR DISPLAY OF APPROACH TIME INFORMATION AT BUS STOPS ALONG IDENTIFIED QUALITY BUS CORRIDORS**
- **IMPROVEMENT OF PUBLIC TRANSPORT SERVICES**

Green Travel Plans

5.68 The effectiveness of policies promoting sustainable travel fundamentally depends on the preferences and behaviour of individuals, businesses and organisations. The Council intends to use its planning powers to encourage reduction in work place parking in favour of alternatives such as walking, cycling and public transport. The Council is keen to promote the use of Green Travel Plans as a means of influencing travel decisions by individuals and businesses in support of sustainable travel objectives. It will encourage preparation of Green Travel Plans by local businesses and other organisations, and proposes to prepare supplementary advice setting out model provisions which may be helpful. Examples of measures in Green Travel Plans include specific initiatives to travel on foot, by cycle or public transport, make shared use of cars and secure reduced traffic speeds.

5.69 The Council will expect Green Travel Plans to accompany planning applications for development likely to generate significant travel demand in locations where car reduction and non-car travel is promoted in the Local Plan, or where specific transport problems may otherwise arise. In particular, Green Travel Plans will be required in respect of major development including jobs, leisure, and services and for development at allocated business parks, Kent International Airport, the Westwood retail area and Ramsgate Waterfront. The

content of Green Travel Plans will be expected to be drawn up in consultation with the Council and local transport providers, and applications should include or provide any facilities needed to enable their implementation. The Council will aim to secure implementation of Green Travel Plans through use of planning conditions or obligations.

School Travel Plans

5.70 The Council wishes to develop working partnerships with schools and the education authorities to promote safe and environmentally friendly travel to and from schools. Encouraging walking and cycling to schools will also promote health and independence. The objective will be to identify suitable measures for inclusion in School Travel Plans to improve pupil safety, reduce the need to use cars for the daily school run and hence reduce the effects of congestion and vehicle emissions arising.

POLICY TR15 - GREEN TRAVEL PLANS

DEVELOPMENT PROPOSALS LIKELY TO GENERATE SIGNIFICANT TRAVEL DEMAND AND/OR TRAFFIC MOVEMENT WILL BE REQUIRED TO DEMONSTRATE, THROUGH GREEN TRAVEL PLANS, SPECIFIC MEASURES TO ENCOURAGE AND FACILITATE USE OF WALKING, CYCLING AND PUBLIC TRANSPORT IN PREFERENCE TO PRIVATE CAR TRAVEL.

THE COUNCIL WILL SEEK TO APPROVE MEASURES, WHICH WILL ASSIST IMPLEMENTATION OF GREEN TRAVEL PLANS AND SCHOOL TRAVEL PLANS.

Car Parking

5.71 The availability of car parking is a major influence on choice of means of travel. This Plan recognises the need to maintain some car parking provision, for example, to provide choice of travel to urban centres, while restricting provision in new development in order to optimise site development potential, and promote sustainable transport choice. The District Council is preparing a comprehensive parking strategy to inform detailed parking policy. Important objectives will be to encourage greater use of public transport, walking and cycling for local journeys in preference to private cars, and secure effective enforcement to facilitate safe and efficient traffic movement.

5.72 The Council will expect new development to make efficient use of sites and optimise site development potential. Accordingly, it will encourage well-designed schemes that correspondingly minimise the proportion of the site used to accommodate the appropriate level of car parking, for example, incorporating, where feasible, underground or multi-storey car parking.

5.73 In determining proposals for development including residential, the Council intends to apply maximum levels of parking provision to be permitted. These maximum levels are set out in Appendix G. The Council will expect lower or nil

provision to be considered where sites are well located in relation to public transport and a range of services. Significant reductions to maximum standards will also be expected in residential development where conversion is involved and where off-street parking may be difficult to design in, or where the size or nature of the accommodation can be expected to generate lower car parking demand than family housing. Special justification would be needed for residential schemes involving average parking provision exceeding 1.5 spaces per dwelling, in order to promote sustainable residential environments.

5.74 The Regional Transport Strategy points to the need to restrict parking provisions below the levels set in Planning Policy Guidance Note 13 (PPG13) in view of the need to promote non-car travel in the Region. A maximum of 70% of the parking levels contained in PPG13 is considered appropriate to the areas covered by the following policy, and this is reflected in the standards set out in Appendix G. The levels set out in PPG13 do not cover all land uses, for example residential. In such circumstances where particular land uses are not covered in the Appendix then a maximum car parking level will be calculated as 70% of the Kent County Council Vehicle Parking Standards.

5.75 Where appropriate parking provision for service vehicles will also be required in accordance with the County Council's vehicle parking standards.

Town Centres

5.76 In towns centres the objective is to reduce the dominance of the private car in favour of walking, cycling and public transport, and to maximise site development potential. Accordingly the approach is to make better use of parking facilities that already exist, rather than providing more, and to apply charging and enforcement policies designed to encourage use of town centre public car parks for short-term parking, and to prevent displacement of parking pressures beyond the immediate town centre area. Structure Plan policy aims to resist A2/B1 uses in larger town centres where these would lead to additional non-operational parking, in order to reduce long-stay parking provision.

5.77 With the exception of Ramsgate Renaissance (see Policy TR9) the Council does not propose to create any additional off-street public car parks. New development will be expected to rely on existing public car parks and non-car transport to accommodate customer and employee needs and will be discouraged from providing dedicated car parking. In some instances a limited amount of parking provision for disabled people may be appropriate. Adequate off-highway servicing of business uses will continue to be required.

Secondary Shopping Areas

5.78 In Secondary Shopping areas including Birchington, and Northdown Road, non-car transport and optimum use of existing public and on street provision for short stay will be encouraged through appropriate charges and enforcement.

5.79 Outside the areas referred to above, the Council will monitor the situation, and consider appropriate measures and mechanisms to address any problems identified.

POLICY TR16 - CAR PARKING PROVISION

A) PROPOSALS FOR DEVELOPMENT WILL BE REQUIRED TO MAKE SATISFACTORY PROVISION FOR THE PARKING OF VEHICLES (INCLUDING, WHERE APPROPRIATE, SERVICE VEHICLES).

PROPOSALS SEEKING CAR PARKING PROVISION ABOVE THE STANDARDS SET OUT IN APPENDIX G WILL NOT BE PERMITTED.

IN CONSERVATION AREAS WHERE PROVISION OF PARKING IN LINE WITH THIS POLICY WOULD BE DETRIMENTAL TO THE CHARACTER OF THE CONSERVATION AREA OR HAVE AN ADVERSE EFFECT ON THE SETTING OF A LISTED BUILDING OR ANCIENT MONUMENT THEN EXCEPTIONS MAY BE MADE.

B) WITHIN THE TOWN CENTRE AREAS OF RAMSGATE, MARGATE AND BROADSTAIRS (AS DEFINED ON THE PROPOSALS MAP), NEW DEVELOPMENT PROPOSALS WILL NOT BE REQUIRED OR EXPECTED TO PROVIDE ON-SITE CAR PARKING SPACES. ON SITE NON-OPERATIONAL PARKING FOR A2/B1 USE WILL BE RESISTED.

Retention of Existing Car Parking

5.80 The attractiveness of town centres for business, shoppers, residents and tourists depends amongst other things on an adequate level of car parking and effective enforcement of traffic regulations to prevent illegal parking on the highway and on public footpaths and grass verges.

POLICY TR17 RETENTION OF EXISTING CAR PARKING

IN TOWN CENTRES AND IN THE CLIFTONVILLE SHOPPING AREA THE EXISTING LEVEL OF OFF-STREET PUBLIC CAR PARKING WILL BE RETAINED. DEVELOPMENT WILL BE REFUSED WHERE THIS RESULTS IN THE LOSS OF PUBLICLY AVAILABLE OFF-STREET CAR PARKING IN THESE CENTRES UNLESS:

(1) A PROPOSAL MAKES SATISFACTORY REPLACEMENT AS PART OF THE DEVELOPMENT OR ON A SUITABLE SITE

OR

(2) THE LOSS OF PARKING SPACE IS A DIRECT RESULT OF PHYSICAL IMPROVEMENT MEASURES

Westwood and Out-Of-Centre Locations

5.81 At Westwood many individual stores already have large, free car parks, and collectively Westwood is over provided with car parking. This situation also applies at out-of-centre locations, including specifically Asda at Westwood Road, Broadstairs, B&Q and Halfords at Ramsgate Road, Margate, Focus Do-It-All, Pyson's Road, and Tesco at Manston Road, Ramsgate. The Council will seek to encourage non-car travel to Westwood and the above out-of centre locations. It will restrict parking provision, and encourage developers to work with the Council to reduce existing parking provision, develop better access, services and facilities for customers who wish to walk, cycle or arrive by public transport. It will seek to achieve this through cooperation with developers and use of its planning powers in relation to any proposals to extend existing or build new commercial development including retail and leisure.

POLICY TR18 - CAR PARKING AT WESTWOOD AND OUT OF CENTRE LOCATIONS

AT WESTWOOD AND THE OUT-OF CENTRE LOCATIONS SHOWN ON THE PROPOSALS MAP, NEW COMMERCIAL DEVELOPMENT PROPOSALS WILL BE EXPECTED TO DEMONSTRATE SPECIFIC MEASURES TO ENCOURAGE AT LEAST 20% OF CUSTOMERS TO ARRIVE AT THE SITE BY MEANS OTHER THAN CAR.

SUCH MEASURES WILL INCLUDE RESTRICTING TOTAL LEVELS OF CAR PARKING PROVISION AS FOLLOWS AND WILL BE THE SUBJECT OF A LEGAL AGREEMENT.

- **CAR PARKING PROVISION IN NEW DEVELOPMENT SHALL NOT EXCEED THE MAXIMUM LEVELS OF PROVISION SET OUT IN APPENDIX G.**

    - **WHERE NEW DEVELOPMENT IS PROPOSED AT SITES WITH EXISTING CAR PARKING THEN SHARED USE OF CAR PARKING WILL BE EXPECTED AND TOTAL PROVISION, ASSESSED ON THE BASIS OF RESULTANT TOTAL FLOORSPACE OF EXISTING AND NEW DEVELOPMENT, SHALL NOT EXCEED THE MAXIMUM LEVELS OF PROVISION SET OUT IN APPENDIX G.**

WHERE EXTENSIONS TO PREMISES ARE PROPOSED THEN NO NEW CAR PARKING PROVISION WILL BE PERMITTED. REPLACEMENT OF ANY CAR PARKING LOST AS A RESULT OF SUCH DEVELOPMENT WILL NOT BE PERMITTED UNLESS SPECIAL JUSTIFICATION CAN BE DEMONSTRATED.

Traffic Management

5.82 The District Transport Plan contains a package of traffic management proposals. These aim to improve priority for people over traffic in town centres, improve air quality, enhance the street environment and improve road safety in

sensitive locations such as residential areas, rural locations lacking footways, shopping streets and near schools. Specific measures include: -

- Application of zone-based charging for on- and off-street parking and enforcement of parking restrictions.

- Consultation and introduction of traffic calming measures including education, enforcement and physical measures such as narrowings and speed tables/cushions.

- Identification of further locations (for example, in town centres, residential areas and near schools) where 20 mph speed limits, traffic calming and traffic restrictions could be tested.

5.83 Many of these measures are outside the scope of land use planning. Support for introduction of new traffic calming measures in the Thanet Villages is expressed in Policy R6.

POLICY TR19 - TRAFFIC MANAGEMENT MEASURES

DEVELOPMENT REQUIRED TO IMPLEMENT TRAFFIC MANAGEMENT MEASURES DESIGNED TO REALISE THE BEST USE OF THE HIGHWAY NETWORK IN TERMS OF SAFETY, TRAFFIC CAPACITY AND ENVIRONMENTAL CONDITIONS WILL BE APPROVED.

Telecommunications

5.84 The District Council recognises that the development of telecommunications is essential to quality of life and to the economy at all levels, can facilitate local economic growth, and safeguard the environment through reducing the need to travel. Electronic communication links are potentially of great significance for Thanet's growing potential as a competitive business location. In particular, the development of Broadband communication services, enabling rapid electronic interchange, will potentially attract hi-tech business investment as well as benefiting domestic users. Accordingly the Council will aim to facilitate, and benefit from direct connection to, these developing high-speed services.

5.85 The District Council will seek to accommodate development required to facilitate the growth of telecommunications in general and the evolving requirements and growth of telecommunications operators. In recognising the wider benefits of telecommunication facilities the District Council remains committed to safeguarding Thanet's environmental quality. Location of telecommunication facilities may be constrained by technical considerations, and the District Council will seek to accommodate such developments in a way which minimises environmental impact. Mast sharing may be beneficial in reducing visual impact depending on location, and the resultant size and appearance of any structure. Applicants seeking erection of new masts will be expected to show evidence that they have explored the possibility of erecting antennae on an existing building, mast or other structure.

5.86 Telecommunications technology has raised certain concerns. The Independent Expert Group on Mobile Phones (IEGMP), under the chairmanship of Sir William Stewart FRS FRSE, considered concerns regarding possible health effects from electromagnetic fields associated with mobile phone technology. While this found no evidence to suggest that base (transmission) stations put the health of the general population at risk, the Government has adopted the Group's recommendation to adopt a "precautionary approach" (comprising a series of scientific measures) until more robust and detailed information on health effects is available. Specific recommendations accepted by Government include independent audit of base station emissions against approved guidelines, exclusion zones around base stations antennae to prevent public exposure to radio frequency radiation above approved guidelines and a substantial research programme.

5.87 Government has accepted the recommendation that base stations should, as a precautionary measure meet the guidelines of the International Commission on Non-Ionizing Radiation protection (ICNIRP) for limiting public exposure. Government planning guidance (PPG8) states that all new base stations are expected to meet ICNIRP guidelines, and that applications for apparatus should include a statement that, when operational, it will meet the guidelines.

5.88 In seeking to operate within the precautionary principle the District Council will have regard to the Stewart Group's report and relevant Government Planning Policy Guidance. Where the Council is satisfied that development will not exceed ICNIRP guidelines it will, in general, regard such development acceptable in terms of impact on health.

5.89 The County Council as county planning authority proposes to develop a strategy for development of telecommunication facilities of national, regional and countywide importance. This will enable the local plan to consider the optimum siting for any such facilities, which may require to be located in the District. In the absence of any known locational requirements, the following policy sets out the general considerations, which will be applied to telecommunications development.

POLICY TR20 - TELECOMMUNICATIONS

IN EXERCISING ITS PLANNING POWERS, THE DISTRICT COUNCIL WILL SEEK TO ACCOMMODATE THE DEVELOPMENT NEEDS OF TELECOMMUNICATIONS OPERATORS WHILE SAFEGUARDING ENVIRONMENTAL QUALITY IN THE DISTRICT.

PROPOSALS WILL BE REQUIRED TO DEMONSTRATE THAT VISUAL IMPACT HAS BEEN MINIMISED THROUGH CAREFUL SITING, DESIGN, AND, WHERE APPROPRIATE, LANDSCAPING.

5.90 Occupiers of new housing, offices and other development will require to be connected to telecommunications networks. The impact of associated cables

etc can be effectively reduced if adequate underground ducting etc can be designed in, at the outset. The District Council will expect developers to consider the telecommunications needs of the future occupiers in designing new development. A specific policy relating to satellite television dish antennae is set out in the Design Chapter.

TARGETS

LP Implementation Target	
Policy Area	Sustainable Travel (Cycling)
Relevant Policies	TR 12
Indicator	% total trips which are undertaken by cycle
Target	At least 6% of all trips to be made by cycle by end of Local Plan period
Monitoring	Available information on proportion of trips (e.g. Thanet Travel Survey)
LP Implementation Target	
Policy Area	Car Parking Provision
Relevant Policies	TR 16
Indicator	Level of car parking provision compared to the policy
Target	100% new development should not exceed car parking provision set out in the policy
Monitoring	Car parking provision shown in planning approvals
LP Implementation Target	
Policy Area	Car Parking
Relevant Policies	TR 17
Indicator	Development permitted which would result in net loss of existing level of off-street public car parking in coastal town centres
Target	Retention of 100% of existing off-street car parking provision in town centres excluding Westwood
Monitoring	Planning approvals resulting in loss of car parking provision in coastal town centres

ANNEX 1

List of Key Projects to Be Addressed In Local Plan Period

- Public Transport Interchange at Westwood
- Comprehensive network of cycle routes including around coast, schools and other major traffic generators.
- School Travel Plans in place for 50% of Thanet Schools.
- Traffic management/improvements to highways to facilitate development of Kent International Airport and movement of work force by reduced dependence on private cars.
- Improvements to the A256 and A299 to facilitate area regeneration

6. Design

6. Design

Introduction

6.1 Urban design is one of the fundamental elements for our quality of life and in the realisation of a sustainable lifestyle. Design will effect the way in which we live, the way in which we work and in the way we perceive the District as a whole.

6.2 The Government's promotion of higher density developments on brownfield sites in urban areas means that the achievement of high quality design solutions is even more essential. Good design will also be an essential element in the regeneration of Thanet. To provide real opportunities for people to want to live and work in urban areas, it is crucial that new developments correspond with the principles of good design so that our towns and villages are not only safe and attractive but also provide environments that people will respect and be proud of.

6.3 By 2020 the Council's vision is that the commitment to quality and creativity in the way new buildings are designed will have had a significant beneficial impact on the Thanet's built environment. Following Government Guidance and guidance in Kent Design, better urban design will have been achieved through positive management, meaningful collaboration and the right skills.

6.4 Designs of new buildings will have set new standards not seen in Thanet for many years. Quality is the key word to describe new building over the last twenty years. Whether it is the materials used or the inspiring detailing on the finished building, people will notice and approve of the new developments that, whilst modern, are sympathetic to their surroundings. All new buildings will be more 'sustainable' in both the way they are built and in their designs.

6.5 Diversity and choice will have been promoted in the towns through a mix of compatible developments and uses to create viable places that respond to local needs. The improvement of public squares and areas will also have benefited town life in Broadstairs, Margate and Ramsgate.

6.6 However, grand, modern designs are not the only reason for future civic pride in Thanet. Locally distinctive patterns and the best examples of past styles will have been safeguarded and enhanced. This is especially true in the towns where their old charm will still be evident and just as popular.

6.7 Where possible, new residential developments would have been focused in the urban areas, along main transport routes and are of a higher density than in the last 20 years of the 20th century. However, higher density has not meant a lower quality of life. Designs will have incorporated innovative detailing, open spaces, 'green roofs' and other techniques that have increased the interest of the buildings for everyday life.

6.8 This chapter sets out this Council's policies for achieving and maintaining the principles of good urban and rural design so that the vision can be realised. The main objectives of the Plan are as follows:

OBJECTIVES

1. **TO ENSURE THAT NEW DEVELOPMENT IS OF A HIGH STANDARD OF QUALITY AND DESIGN;**

2. **TO ENHANCE ENVIRONMENTAL QUALITY AND SUSTAINABILITY THROUGH INNOVATIVE DESIGN SOLUTIONS;**

3. **TO ENSURE THAT NEW DEVELOPMENT CREATES PLACES THAT HAVE THEIR OWN IDENTITY AND ARE SAFE AND ATTRACTIVE ;**

4. **TO ENSURE THAT NEW DEVELOPMENTS RESPECT AND ENHANCE THE LOCAL CHARACTER OF EXISTING AREAS AND BUILDINGS, ESPECIALLY CONSERVATION AREAS AND LISTED BUILDINGS;**

5. **TO ENSURE THAT THE NEEDS OF PEDESTRIANS AND CYCLISTS ARE GIVEN PRIORITY OVER VEHICLES IN NEW DEVELOPMENT;**

6. **TO SAFEGUARD AREAS AND FEATURES, INCLUDING OPEN SPACE AND VEGETATION, WHICH CONTRIBUTE TO THE QUALITY OF THE LOCAL ENVIRONMENT;**

7. **TO ENSURE THAT THE NEEDS OF PEOPLE WITH MOBILITY OR SIGHT DIFFICULTIES ARE TAKEN INTO ACCOUNT IN DESIGN.**

The Importance of Design, Environmental Quality and the Architectural and Historic Heritage

6.9 The importance of good design has recently been given greater emphasis in Government Planning Policy Guidance Notes (PPGs) and in the Regional Guidance for the South-East (RPG9). Design is seen as a vital element in the pursuit of sustainability, in maximising the opportunities for renewal and in striving for a greater mix of building types, land uses and tenures, and in seeking to optimise density. The Government also identifies the need to embrace innovation whilst at the same time protecting the best of the Region's cultural and natural heritage.

6.10 Good design is a major element of the final report of the Urban Task Force, chaired by Lord Rogers of Riverside, 'Towards an Urban Renaissance'. This report considers urban regeneration founded on the principles of design excellence, social well-being and environmental responsibility within a viable and legislative framework.

6.11 The Kent and Medway Structure Plan gives recognition at strategic level to the importance of conserving and enhancing the quality of the built and natural

environment both for its effect on the quality of life and for the support it gives in stimulating new investment. The Structure Plan points out the quality of the built environment is of growing importance not only for the concentrations of people who live there but also for the cultural, leisure and retailing functions in such locations, which underpin their economic well-being.

Thanet Context

6.12 There is an extensive and rich variety of building forms and character within the built-up area of Thanet. The urban areas range from the "urban villages", such as Pegwell and St Peter's, to the 1970s town centre and bright lights of Margate, the 'leafy' residential areas and special atmosphere of Broadstairs to the historic harbour, lively marina and cross-Channel port of Ramsgate. There is also a diversity of pleasant character and built form throughout Thanet's villages.

6.13 The District Council is committed to safeguarding and enhancing the quality of the built environment so as to maintain and improve quality of life and the attractiveness of the District to residents, visitors and investors. It will therefore seek to promote the highest standards of design in exercising its development control function.

6.14 There are four broad areas in this chapter. The first considers the general 'Design Principles' that will apply to all new developments in the District. The second considers 'Enhancement & Special Character Areas' such as 'Areas of' High Townscape Value' and 'seafront architecture'. The third and fourth deal with more specific issues of considerations for the elderly and agricultural buildings respectively.

Design Principles

6.15 In amplification of Government guidance and of the relevant Structure Plan policies, the following principles are considered to be important in developing design concepts that will safeguard and enhance environmental quality. The District Council has, as a partner in the process, adopted 'Kent Design', produced by the Kent Association of Local Authorities, as Supplementary Planning Guidance. This guide promotes sustainability and good design through various principles and objectives and is a material consideration in the determination of planning applications. It also complements and expands upon the principles and on Policy D1 set out below and should be referred to during the preparation of any planning application. In 2006 a new 'Kent Design Guide' was published. This replaces 'Kent Design' and will be adopted in due course.

6.16 The District Council has also adopted Supplementary Planning Guidance with regard to 'Shopfront Design', 'Shopfront Security Shutters', 'Conservation Areas' and 'Conversion of Shops to Residential Accommodation'.

6.17 The principles set out below will not be treated as prescriptive requirements but will be applied flexibly and appropriately to safeguard and enhance environmental quality.

The need to create and safeguard attractive and distinctive places

6.18 The design, scale and grouping of existing buildings, the spaces between them, the texture, type and colour of materials, uses, enclosure, vegetation, land contours and views all contribute to the character and identity of a place. Where a satisfactory sense of place exists, new development should respect, complement and preferably enhance it.

6.19 Where development is proposed in an essentially undeveloped location, retention of existing characteristics including land contours, vegetation, footpaths and attractive or open views beyond the site can help to retain or create an attractive sense of place. When these are not present or are not in themselves strong features the design should endeavour to 'create' a sense of place through design reflecting the scale and proportions of local 'place'.

Innovation in Design

6.20 Proposals that incorporate innovative design in the pursuit of sustainability will be encouraged. This can include the way in which the development is constructed, the materials used or the methods used to reduce consumption from non-renewable energy sources. For example the use of 'green roofs' (the use of flora on the roof) will not only add to the visual appeal to a building, but also reduce surface run off, improve insulation and increase biodiversity. Another example of how design can help the environment is that of water conservation. Larger recycling systems, such as those that recycle rainwater, as well as innovative small scale measures, such as water-efficient toilets, can make a significant contribution. Good modern design where sensitive to its surroundings, even in Conservation Areas, should be promoted. It is recommended that the advice given in the Kent Design Guide should be considered.

Mixed Uses

6.21 Mixed-use developments will be encouraged. The diversity of activity provided for by mixed use will not only make an area more attractive through the diversity of activity but will also reduce the need to travel by car as more people could live within walking distance to the main services. Single-use developments can produce areas with little or no social interaction and thus create desolate areas with unfriendly and unsafe environments. Mixed-use developments can apply to towns, neighbourhoods, streets and to large developments with the relevant mix of uses for those areas. Careful planning, design and siting should be used to resolve any conflicting interests.

Density

6.22 Whether for residential or for commercial use, when density levels are increased, the land take for new development reduces. Higher densities can also contribute to social interaction, be more viable for public transport and provide opportunities for energy efficiency. However, designs need to be properly considered so that the development does not fail through, for example, the loss of privacy or increases in noise. Higher density developments, that have carefully considered other aspects of design, will therefore be encouraged by the Council, especially within town centres or areas accessible to good public transport routes.

6.23 The impact of high density development on the surrounding townscape will be an important material consideration, but PPG3 explains that the overriding objective is to ensure the more efficient use of land. In other areas carefully considered variety in design and density can enhance identity and character. PPG3 clearly expects that poor design should be rejected.

6.24 The density of residential developments is not prescribed in this Plan, as, in all instances, the compatibility with the character of the area and the mix of housing to meet local needs or demand will influence design and layout. However, the Council envisages that densities of up to 50 dwellings, or more, per hectare net may be achieved with careful design. A mixture of dwelling type and size can provide variety in a development. Developments of less than 30 dwellings per hectare net on any site will usually require special justification. Policy H1 will also apply.

6.25 In respect of proposals for conversion to flats, Policy H9 will apply. Supplementary guidance is provided in the adopted Conversion to Flats Guidelines, which sets out comprehensive standards relating to design and layout of accommodation, amenities, and parking requirements, which the District Council would expect to be achieved. It is important to note that buildings that have an overall floor area of less than 110 square metres (1184 square feet) are considered unsuitable for conversion to smaller units. These guidelines are taken into account when determining applications for conversion of buildings to flats. The guidance relating to refuse storage/collection and clothes drying is also applicable in respect of new build flat developments.

Natural Light

6.26 Sufficiency of natural light is an important factor to amenity, health and energy efficiency, and has significant design implications. The District Council generally commends the guidance contained in the Building Research Establishment Report "Site Layout Planning For Daylight And Sunlight - A Guide To Good Practice" in relation to sufficiency of daylight and sunlight to buildings, gardens and amenity areas etc.

Form

6.27 The function of a building is a major determinant of its built form. However, a principal aim in designing new development should be to respect and complement the merits of existing built and natural features including landscape, while still expressing and accommodating the function of the building through design.

6.28 Shopfronts have an impact on the form of a building. They are a dominant visual feature in shopping locations and, if designed poorly, will have a detrimental affect on the perceptions on the area. The District Council intends to use its planning powers to safeguard well-designed and traditional existing shopfronts in sensitive locations and to promote new shopfront design that is appropriate to its location. The District Council have adopted Supplementary Planning Guidance Notes (No.1 Shopfront Design & No.2 Shopfront Shutters) amplifying the design principles it seeks to promote. Another Supplementary Planning Guidance leaflet is also available with regard to the 'Conversion of Shops to Residential Accommodation, external design alterations' (leaflet No.4). Policy H9 will also apply.

Scale

6.29 Some buildings (e.g. public buildings) need to be of larger scale than others. However, the scale and proportion of existing development should generally be respected. It may be possible to break down the bulk of a large building (e.g. by insertion of horizontal design features) to present a satisfactory appearance in relation to adjoining plot widths and proportions and to break bland expanses down to a scale sympathetic to that of existing buildings.

Detail

6.30 Materials should normally be of a local type and harmonise with those of adjoining development (where these present a satisfactory appearance). Architectural style should respect, but not copy or mimic, that of other development in the locality. Innovation in decoration can, if sensitively considered, enhance the identity and character of a building and place.

6.31 While listed buildings, and, to some extent, buildings in conservation areas represent the most important assets in the District's built-environment heritage, the wider townscape and built environment of the urban areas and villages have an important role to play as far as perception of the District is concerned. The District Council is anxious to avoid cumulative erosion of pleasant and unspoilt character that can be caused by certain alterations. Property owners should be also made aware that insensitive home "improvements" could actually reduce property values both on an individual and area basis.

6.32 A guidance leaflet in respect of repairs and alterations to buildings has been prepared by the District Council. Another Guidance leaflet, No.3, is also available for advice on repairs to dwellings in Conservation Areas. In exercising its planning powers, the District Council will aim to ensure that extensions to

dwellings do not adversely affect the amenity enjoyed by neighbouring property occupiers nor have an adverse visual impact on the wider environment.

Functional Requirements

6.33 The functional requirements (e.g. car parking, service areas and access) of a development should form an integral part of the initial design concept. In line with government guidance, the needs of the pedestrian and cyclist should be given priority over the car. This will not only encourage the use of cycling and walking, but also reduce the potential for accidents and promote social interaction between neighbours. The report, Towards an Urban Renaissance encourages the use of 'Home Zones' where "…pedestrians have absolute priority over cars…" and the Council will seek to implement such schemes where viable, and in agreement with the local community.

6.34 New developments will be required to provide adequate provision for dustbin storage and refuse collection. The Council will require that a carry distance for refuse collection should not exceed 25 metres. Residential developments should also make appropriate provision for adequate clothes drying facilities.

6.35 Increases in car ownership and intensification of use of buildings are two factors that can result in the use of front garden areas for parking. This often gives rise to a run-down and sterile appearance resulting from partial demolition of walls, large expanses of bland hard surface, removal of vegetation, and the presence of parked vehicles themselves. Where several front gardens in close proximity are used for parking, the effect can be even more detrimental, even having a negative effect on property values as well as environmental quality. Guidance on softening the impact of front-area parking (including use of planting and surface materials) is contained in the Conversion to Flats Guidelines (supplementary guidance available from the District Council). With regard to 'tandem development' (see above) extra consideration should be given to a satisfactory separate means of pedestrian and vehicle access.

Safety & Security

6.36 Safety and security are also important considerations that will have design (including landscaping) and spatial implications and should be taken into account in the design process. The District Council has a duty under Section 17 of the Crime and Disorder Act to exercise its various functions with regard to the likely effect of those functions on crime and disorder in its area. Such functions include planning decisions as these can have significant implications for crime and disorder. Crime can be reduced through careful design; for example, footpaths can be improved through good lines of visibility or good lighting. The careful combination of security fences and appropriate landscaping cannot only enhance security but do so in ways that are not visually damaging.

Accessibility

6.37 The Council commissioned David Couttie Associates to examine housing needs in Thanet. They produced a document, 'Thanet Housing Needs and Empty Property Survey', which suggested that 18.6% of households contained a disabled person. Therefore, the District Council wishes to ensure that as far as possible, disabled or mobility limited people have the same opportunities as other members of the public.

6.38 An important consideration for access that will effect the planning process is the Disability Discrimination Act 1995. This Act is the first legislation in the UK to address discrimination against disabled people and has implications for the design of access to and within buildings. The Act is being brought into force in stages. Employers are now already responsible for access in the workplace for their employees and service providers are responsible for making the service accessible by '…other means...'. However, from 2004 service providers are responsible for making physical, and therefore permanent, changes to their premises to make their services more accessible. The Code of Practice on Access to Goods, Services and Facilities is available from HMSO.

6.39 The 1995 Act also affects access provision into and within Listed Buildings that are open for public use. The Council would advise consultation with the Conservation Department at the earliest possible time in the proceedings to give the best possible consideration on this matter.

6.40 Developers also have a responsibility to comply with the regulations set out in Part M (1999 edition) of the Building Regulations 1991. These Regulations now cover access considerations for dwellings as well as for other buildings. In addition, developers have an obligation under the Chronically Sick and Disabled Act 1970 to make provision for the needs of disabled people in respect of premises to which the public are to be admitted.

6.41 The District Council is required to draw to the attention of developers the relevant provisions of the above Act and to the British Standards Institution Code Of Practice for Access for the Disabled to Buildings (BS 5810: 1979) and, in respect of educational buildings, to the Department of Education and Science Design Note 18 "Access for the Physically Disabled to Educational Buildings".

6.42 Clearly access arrangements can have amenity implications relevant to determination of planning applications. The District Council wishes to ensure that where buildings and areas are proposed to be accessible to the general public, full account is taken of the needs of people with mobility or sight difficulties at the design stage.

6.43 Whilst the Acts are generally non-prescriptive in methods of access, it would be preferable to aim for 'Inclusive Design'. This is an approach to design that sets out to include as many people as possible rather than to look for the lowest common denominator or to reconcile all the needs of every possible minority group in society. By considering inclusive design for access, perceived barriers and exclusion can be broken down.

6.44 Even where there may be no statutory obligation to provide for the needs of disabled people, the District Council may consider the desirability in planning terms of attaching conditions requiring such provision to be made, e.g. before a change of use is implemented. In such circumstances, impact upon listed buildings and conservation areas will be an important consideration in determining whether to attach such conditions.

Public Art

6.45 Public art can enrich our lives by enhancing our awareness and enjoyment of our built and natural environment. It can bring interest and a sense of place to new and old developments by creating a local distinctiveness that in turn can engender civic pride and enhance tourism. Commissions can also provide opportunities for local artists in the flourishing artistic community in the Thanet District.

6.46 The Council will encourage the inclusion of public art in new developments and/or improvement projects. Public art commissioned should be of a high quality and specific to their site. It can encompass a wide variety of elements including individual artworks, street furniture, signing, lighting, entrance features and working with developers on the design of the actual buildings. Different media may also be considered such as sound, projection and lighting, though this will depend upon surrounding uses.

6.47 The commissioning of public art is best integrated by involving artists as early as possible within the design and development process. Thanet District Council has an agreed methodology of selecting, appointing and commissioning artists and public art. The Council itself has produced 'A Public Art Strategy for Thanet' and will pursue a programme of public art linked to regeneration initiatives.

Landscaping & Trees

6.48 Landscaping can soften the impact of new buildings, lend a sense of maturity to new development, and help to establish a sense of place. It also has a crucial role in terms of wildlife habitat creation and improving the biodiversity of urban areas. However, landscaping should always form an integral part of the design. It should not consist of 'offcuts' of leftover land, or be used simply to camouflage poor design. The future maintenance of landscaping is also an important issue. Landscaping designs should, in the first instance, be related to each plot of land so that each future owner would be responsible for its upkeep, thus reducing the burden on the Council resources. If this is not possible or desirable, commuted payments through legal agreements may be negotiated in appropriate circumstances. Accordingly, landscaping matters should be considered at the earliest stages of the design process. It is, however, accepted that buildings of particular merit deserve an uninterrupted view.

6.49 The District has relatively few trees. The Council will therefore seek to retain existing trees as part of any proposed developments through the making of Tree Preservation Orders and through use of planning conditions where appropriate. British Standard BS5837: 2005 (Guide for Trees in Relation to Construction) gives guidance regarding the best approach to new site development in relation to existing trees. The Council will also seek to retain hedges and other semi-natural habitat, such as ponds and species-rich grassland, together with new planting, as they lend maturity to a development and can safeguard/enhance habitat.

6.50 The District Council, when considering new developments, especially for residential, will seek to resist the loss of trees and hedges, and will encourage new planting. New landscaping proposals in new developments will also be judged in relation to Policy D2 below.

6.51 Further requirements for landscaping are required on sites adjoining farmland. Agricultural land is farmed right up to the edges of Thanet's urban areas. The intensive nature of agricultural production has precluded the introduction of buffer zones to prevent casual access onto farmland. This has resulted in a measure of trespass and vandalism to crops. New landscaping, to prevent such access and to soften the edge of the urban area, would form an integral part of this requirement.

Habitat Creation

6.52 The District Council considers that any potential advantages to nature conservation, which may arise in connection with development proposals, should be explored fully when dealing with such applications. The Council will therefore, support initiatives or development designs that incorporate the creation of suitably sited new habitats and/or corridors. However, relocation or re-creation of existing habitats will not normally validate a proposal, which would result in a loss of habitat where that loss itself constitutes an objection to the development.

6.53 Long-term management is a consideration, but this may actually mean less maintenance or management than if, for example, land was given over to open space. The District Council may seek the advice of Kent Wildlife Trust in respect of particular proposals or opportunities.

6.54 The District Council will therefore encourage the use of legal agreements, such as Section 106 of the Town and Country planning Act, or Section 39 of the Wildlife and Countryside Act, to safeguard habitats and wildlife, and improve the management of landholdings for nature conservation purposes.

6.55 In its pursuit of good design in all new developments, the Council will not grant permission to proposals deemed to be of a poor standard, based on the provisions above or in ‘Kent Design’ and on the following policies.

POLICY D1 - DESIGN PRINCIPLES

(1) ALL NEW DEVELOPMENT IS REQUIRED TO PROVIDE HIGH QUALITY AND INCLUSIVE DESIGN, SUSTAINABILITY, LAYOUT AND MATERIALS.

(2) A NEW DEVELOPMENT PROPOSAL WILL ONLY BE PERMITTED IF IT:

A) RESPECTS OR ENHANCES THE CHARACTER OR APPEARANCE OF THE SURROUNDING AREA, PARTICULARLY IN SCALE, MASSING, RHYTHM, AND USE OF MATERIALS APPROPRIATE TO THE LOCALITY;

B) IS COMPATIBLE WITH NEIGHBOURING BUILDINGS AND SPACES AND DOES NOT LEAD TO UNACCEPTABLE LOSS OF AMENITY THROUGH OVERLOOKING, NOISE OR VIBRATION, LIGHT POLLUTION, OVERSHADOWING, LOSS OF NATURAL LIGHT, OR SENSE OF ENCLOSURE;

C) INCORPORATES WHERE PRACTICABLE A HIGH DEGREE OF PERMEABILITY FOR PEDESTRIANS AND CYCLISTS AND ALSO CONSIDERS ACCESS FOR PUBLIC TRANSPORT;

D) INCORPORATES PROVISION FOR DISABLED ACCESS;

E) RETAINS OPEN SPACES, GAPS IN DEVELOPMENT, MATURE TREES, OTHER VEGETATION AND ANY OTHER FEATURES THAT CONTRIBUTE TO BIODIVERSITY AND THE QUALITY OF THE LOCAL ENVIRONMENT;

F) INCORPORATES NEW LANDSCAPING AS AN INTEGRAL PART (AS SET OUT IN POLICY D2);

G) INCORPORATES, WHERE APPROPRIATE, WILDLIFE HABITATS, WILDLIFE CORRIDORS AND INITIATIVES FOR THEIR LONG TERM MANAGEMENT;

H) INCORPORATES MEASURES TO PREVENT CRIME AND DISORDER, PROMOTES PUBLIC SAFETY AND SECURITY AND THE PERCEPTION OF PUBLIC SAFETY AND SECURITY;

I) INCORPORATES, WHERE PRACTICAL AND APPROPRIATE, HIGH QUALITY INTEGRATED PUBLIC ART WHICH IS RELEVANT TO THE SITE AND LOCALITY;

J) PROVIDES SAFE AND SATISFACTORY MEANS OF PEDESTRIAN AND, WHERE PROVIDED, VEHICLE ACCESS;

K) PROVIDES FOR CLOTHES DRYING FACILITIES AND REFUSE DISPOSAL[1] OR DUSTBIN STORAGE; AND

L) INCORPORATES SUSTAINABLE DRAINAGE SYSTEMS.

[1] Satisfactory provision for refuse disposal means a carry distance for refuse not to exceed 25 metres.

POLICY D2 - LANDSCAPING

THE FOLLOWING ELEMENTS WILL BE REQUIRED AS PART OF LANDSCAPING PROPOSALS FOR ANY NEW DEVELOPMENT:

(1) THE ENHANCEMENT OF THE DEVELOPMENT SITE IN ITS SETTING;

(2) THE RETENTION (AND PROTECTION DURING SITE WORKS) OF AS MANY OF THE EXISTING TREES, HEDGES AND OTHER HABITAT FEATURES ON SITE AS POSSIBLE;

(3) ON SITES OF ONE HECTARE OR MORE, THE SETTING ASIDE OF 10% OF THE DEVELOPMENT SITE FOR THE PLANTING OF NATIVE TREE SPECIES, EITHER WITHIN OR AT THE BOUNDARY OF THE DEVELOPMENT SITE;

(4) THE MAXIMISING OF NATURE CONSERVATION OPPORTUNITIES WHERE DEVELOPMENT IS PROPOSED IN PROXIMITY TO EXISTING OPEN SPACE OR WILDLIFE HABITATS, AND

(5) WHERE BOTH APPROPRIATE AND POSSIBLE, THE PROVISION OF LANDSCAPING IN ADVANCE OF NEW DEVELOPMENT TO FACILITATE THE ASSIMILATION OF NEW DEVELOPMENT INTO THE LANDSCAPE.

THE DISTRICT COUNCIL WILL REQUIRE TO BE SATISFIED THAT THE DEVELOPER HAS MADE ADEQUATE ARRANGEMENTS TO ENSURE CONTINUED MAINTENANCE OF LANDSCAPING, AND MAY SEEK TO SECURE ARRANGEMENTS FOR THIS PURPOSE BY ENTERING INTO A PLANNING AGREEMENT.

Explanations:
6.56 The District Council will make Tree Preservation Orders to protect trees which have amenity value, or which the Council considers to be under threat.

6.57 The District Council also wishes to persuade landowners (primarily farmers, but also commercial and private landowners) not only to conserve as many existing trees as possible, but also to include new tree planting as part of the management of their land.

6.58 In considering new development, the District Council will wish as many trees as possible to be retained on the site, as part of the Council's wider strategy to restore trees in large numbers to the Thanet landscape. Thus proposals which include the retention of existing trees and the planting of additional landscaping will be given more favourable consideration. British

Standard BS5837: 2005 (Guide for Trees in Relation to Construction) gives guidance regarding the best approach to new site development in relation to existing trees.

6.59 As a result of their size at maturity, the planting of additional native trees within the developed part of the site could have undesirable consequences. There is likely to be pressure for their removal in the medium term for a number of reasons: physical presence, loss of light to residential properties, and possible damage to building services and infrastructure. The District Council therefore believes that, in the interests of the long-term survival of landscaping, a different approach is required. Thus, on development sites of 1ha or more, the District Council will usually require the setting aside of one-tenth of the site solely for native-tree planting. This may be at the boundary of the site (as at the urban fringe) or elsewhere within the site.

6.60 The retention of trees referred to in the Policy not only relates to short-term retention during construction work, but also to longer-term protection from pressure for removal of trees once buildings are occupied.

Extensions to Dwelling Houses

6.61 In exercising its planning powers, the District Council will aim to ensure that extensions to dwellings neither adversely affect the amenity enjoyed by neighbouring property occupiers nor have an adverse visual impact on the wider environment. Supplementary guidance 'A Guide to Extending your Home' is available separately from the District Council. This contains the relevant considerations to which the Council will have regard in assessing the impact of individual proposals.

POLICY D3 - EXTENSIONS TO DWELLING HOUSES

IN CONSIDERING PLANNING APPLICATIONS FOR EXTENSIONS TO DWELLING HOUSES, THE DISTRICT COUNCIL WILL:

(1) AIM TO ENSURE THE PROPOSALS WOULD NOT ADVERSELY AFFECT THE AMENITY ENJOYED BY NEIGHBOURING PROPERTY OCCUPIERS; AND

(2) HAVE REGARD TO THE DESIGN OF THE EXTENSION IN RELATION TO THAT OF THE MAIN PROPERTY, AND ITS WIDER VISUAL IMPACT

Design Statements

6.62 For large, complex or sensitive sites (such as in Conservation Areas) the Council will expect a design statement to be submitted with any planning application. A design statement will help the District Council in the assessment of the application and to ensure that the applicant has fully considered the submitted design solution, reflecting the specific features, which control the development of the site in an analytical and positive way. For further advice please see the DTLR document, 'By Design' as well as PPS1.

POLICY D4 - DESIGN STATEMENTS

FOR LARGE, COMPLEX OR SENSITIVE SITES, A WRITTEN DESIGN STATEMENT, INCLUDING ILLUSTRATIVE MATERIAL, WILL BE REQUIRED PRIOR TO DETERMINATION OF THE APPLICATION. THE STATEMENT SHOULD SHOW THE APPROACH OF HOW, WHAT AND WHY THE DEVELOPMENT HAS BEEN DESIGNED IN RELATION TO ALL ISSUES AFFECTING THE SITE. THIS SHOULD ENCOMPASS:

1) **AN APPRAISAL OF THE NATURAL AND BUILT FORM OF THE SITE AND ITS CONTEXT;**
2) **IDENTIFICATION OF CONSTRAINTS AND OPPORTUNITIES OF THE SITE;**
3) **IDENTIFICATION OF THE DESIGN FACTORS THAT HAVE BEEN TAKEN INTO CONSIDERATION, INCLUDING JUSTIFICATION;**
4) **DESIGN OBJECTIVES;**
5) **CONSIDERATION OF DESIGN OPTIONS THAT REFLECT LOCAL CHARACTER;**
6) **THE RATIONALE BEHIND SITING AND MASSING;**
7) **AN EXPLANATION OF PROPOSED ELEVATIONAL AND SPATIAL TREATMENTS.**

Advertisements

6.63 Local planning authorities' regulatory powers to control advertisements can be exercised only in the interests of amenity and public safety. These two interests, and the extent, to which they necessitate restraints upon advertising, are difficult to define in general terms because so much depends on particular circumstances. In some surroundings, advertisements form an integral part of the street scene to which they lend gaiety and colour, in other situations advertisements can be alien, obtrusive and discordant.

6.64 It is not possible to lay down specific rules in the form of a policy statement about what sort of advertisements may receive consent. Individual circumstances will be the deciding factor. However, the District Council has adopted a set of Advertisement Control Guidelines that it will seek to implement through development control and Listed Building Consent procedures. These guidelines, which are intended as supplementary planning guidance, are available separately from the District Council. In exercising its powers to control advertisements, the District Council will be guided by the general principles set out in these adopted Advertisement Control Guidelines.

6.65 Certain advertisements can ordinarily be displayed without the need for express consent but which, in some circumstances, may prove harmful to amenity or public safety. The District Council has powers to seek discontinuance of the display of certain advertisements not normally subject to planning control. It will use these powers to seek discontinuance of display of advertisements where considered expedient to safeguard the amenity of a locality or to remove a public danger.

6.66 The District Council also has a duty to consider whether to seek designation of Areas of Special Control For Advertisements (ASCAs) in the district. Such designation increases the level of control that can be exercised over certain types of advertisements. The District Council will consider designation of ASCAs in any part of the district where such special control is considered expedient in the interests of amenity.

POLICY D5 - ADVERTISEMENTS

APPLICATIONS FOR ADVERTISEMENTS WILL BE CONSIDERED IN RELATION TO THEIR EFFECTS UPON AMENITY AND PUBLIC SAFETY. REGARD WILL BE PAID TO THE SURROUNDING LOCATION, MANNER OF ILLUMINATION (IF PROPOSED), MATERIAL COMPOSITION, DESIGN AND RELATIONSHIP TO THE LAND, BUILDING OR STRUCTURE TO WHICH THEY ARE TO BE AFFIXED. ADVERTISEMENTS SHOULD NOT DOMINATE BUT SHOULD BE IN BALANCE WITH THE CHARACTER, TOWNSCAPE AND ARCHITECTURE OF THE BUILDINGS ON WHICH THEY ARE SITUATED.

IN AND ADJOINING CONSERVATION AREAS THE DISTRICT COUNCIL WILL REQUIRE THAT THE DESIGN AND SITING OF ADVERTISEMENTS DOES NOT DETRACT FROM, AND PREFERABLY MAKES A POSITIVE CONTRIBUTION TO, THE CHARACTER AND/OR APPEARANCE OF THE AREA.

Satellite Antennae (Dishes)

6.67 There are certain technical requirements regarding the siting and orientation of satellite antennae (dishes). However, insensitive and prominent siting can result in the antenna actually dominating the building and presenting an obtrusive appearance in the street scene. Such impact can be compounded so as to adversely transform and dominate the character of an area particularly where a number of antennae are installed in close proximity. The degree of harm will depend upon the visual sensitivity of the area.

6.68 With the exception of Listed Buildings (where control exists through the need for Listed Building Consent), the erection of a satellite antenna can in some instances be carried out without the need for planning consent. However, this is still conditional upon the antenna being sited in a way which minimises its impact upon the external appearance of the building, and upon the antenna being removed when no longer needed. Most commonly, visual impact can be minimised by siting behind the existing building where an antenna may be totally obscured from general view. However, optimum siting will vary according to individual circumstances.

6.69 The General Permitted Development Order for development within the curtilage of a dwelling house (Class H Part 2 (a)) permits the installation of antennae. However, this is subject to the siting which should "...minimise its effect on the external appearance of the building…". Therefore, where the

District Council considers that a dish, for which planning consent is not needed, has been poorly sited, it may ask the owner to resite it at their own expense.

6.70 The need for consent should always be ascertained with the District Council before any commitment is made to rental, purchase or installation. It is also strongly advisable to discuss selection of type of dish and its siting and appearance with the District Council, whether or not planning and/or listed building consent is needed. The District Council also commends the (free) planning guide "A Householder's Planning Guide For The Installation Of Satellite Television Dishes" to anyone contemplating installation of a satellite dish.

6.71 The District Council will use its planning powers to resist installations that would be harmful to visual amenity. In instances where consent is not necessary for erection of satellite antennae, the District Council may consider the use of Article 4 Directions, where for example the presence or proliferation of antennae could threaten the character or appearance of a Conservation Area.

POLICY D6 - SATELLITE ANTENNAE (DISHES)

PROPOSALS FOR SATELLITE DISHES AND SUPPORTING STRUCTURES THAT REQUIRE PLANNING PERMISSION WILL ONLY BE PERMITTED WHERE THE SITING, DESIGN, SIZE AND COLOUR DO NOT RESULT IN AN INTRUSIVE OR DISCORDANT IMPACT ON THE APPEARANCE OR CHARACTER OF THE AREA.

Enhancement & Special Character Areas

Enhancement

6.72 Enhancement of environmental quality is now widely recognised as an equal partner to other initiatives that aim to stimulate investment and foster economic health. Most of Thanet's built environment heritage, although often "tarnished", remains largely intact and is capable of restoration and reinstatement. However, this can only be effectively achieved through positive schemes of enhancement.

6.73 The District Council has a duty to formulate and publish proposals for the preservation and enhancement of its conservation areas and is keen to embrace this duty. However, in the case of many areas, effective enhancement and positive action to bring about improvement of environmental quality will not be realised without a significant input of resources as a catalyst for further investment from other sources. The IMPACT initiative (formerly operating in Ramsgate), and Thanet 2000 have illustrated effective targeting of resources to direct improvement action to upgrade the local environment and stimulate further investment from other sources.

6.74 The District Council has carried out and intends to carry out further enhancement schemes and initiatives. Examples are the award winning

gardens at Marine Gardens Margate, the Ramsgate seafront improvements and the construction of a new seafront lift in Broadstairs. Future schemes are planned in Margate's Old Town and at Ramsgate Harbour/Seafront as part of the Ramsgate Renaissance initiative. Future schemes will be considered in partnership with the Ramsgate Town and Margate Image Partnerships, the Council's Regeneration and Development Operation as well as the private sector and with the local community

Areas and Sites of High Townscape Value

6.75 There are parts of Thanet which are considered to possess certain characteristics meriting special recognition. These Areas of High Townscape Value are defined on the Proposals Map. The character and features of these areas vary, but the separation between buildings, the open form of development and the contribution made by landscaping, will often be the essential characteristics. It is planning policy to ensure that any development respects and enhances the special local character in such areas.

6.76 The areas identified in Policy D7 may be seen as areas conferring a high degree of amenity. This protection is in accord with the plan's aim to safeguard the built-up areas from "town cramming" and loss of established character. However, other parts of the district, not strictly applicable to this policy, may also possess sensitive, established or otherwise valuable character, (e.g. areas of attractive unspoilt Victorian housing), or provide stability or breathing space which it is desirable to protect from harmful development in the interests of the functioning and amenity of the area.

6.77 The existence of Policy D7 should not be taken to imply any weakening of the importance of environmental considerations in other locations including the provisions of Policy D1. The District Council will also seek to protect any other areas of valuable character and amenity from harmful development through its planning powers, even though they may not fall within the criteria for Policy D7.

POLICY D7 - AREAS OF HIGH TOWNSCAPE VALUE

THE FOLLOWING AREAS AS DEFINED ON THE PROPOSALS MAP ARE DESIGNATED AS AREAS OF HIGH TOWNSCAPE VALUE:

(1) CALLIS COURT ROAD, BROADSTAIRS;
(2) HOLLY LANE, NORTHDOWN;
(3) CANTERBURY ROAD, WESTGATE;
(4) PALM BAY AVENUE, CLIFTONVILLE;
(5) NORTH FORELAND, BROADSTAIRS;
(6) ROYAL ESPLANADE/PRINCE EDWARD'S PROMENADE, RAMSGATE;
(7) SOUTH CLIFF PARADE AND WESTERN ESPLANADE, BROADSTAIRS;
(8) KINGSGATE AVENUE, BROADSTAIRS;
(9) PARK AVENUE, BROADSTAIRS ;
(10) SEA ROAD, WESTGATE;

(11) AREA INCLUDING SHAKESPEARE ROAD, CONSTABLE ROAD, WILKIE ROAD, NASMYTH ROAD, COLMAN'S STAIRS ROAD & SPENCER ROAD, BIRCHINGTON; AND
(12) CLIFF ROAD & THE PARADE (PART), BIRCHINGTON.

WITHIN SUCH AREAS, AND SITES IMMEDIATELY ADJOINING, THE CONSERVATION OR ENHANCEMENT OF THE LOCAL CHARACTER WILL BE THE PRIMARY PLANNING AIM. IN FURTHERANCE OF THIS AIM, DEVELOPMENT WILL BE ALLOWED ONLY WHERE THE DESIGN, SCALE OF DEVELOPMENT, SEPARATION BETWEEN BUILDINGS, USE OF MATERIALS AND LANDSCAPING ARE COMPLEMENTARY TO THE SPECIAL CHARACTER OF THE AREA.

Seafront Architecture

6.78 The historical development of the Thanet towns as seaside holiday resorts is reflected in much of the District's architectural heritage. While that traditional style holiday industry has contracted markedly, "purpose-built" seaside architecture is increasingly appreciated. A well-preserved resort with its own historical identity can attract visitors and enhance regeneration on a wider economic base. In addition to purpose-built seaside architecture, many of the established dwellings and hotel buildings that occupy clifftop/promenade locations also have design characteristics reflecting Thanet's seaside location and resort role. For example, such buildings are typically of substantial proportions and often possess ornate detail, belvederes, balconies and other window arrangements designed to maximise sea views. The District Council wishes to ensure that the "lively" and evocative seaside image projected by such design characteristics is respected, and where possible reinforced.

POLICY D8 - SEAFRONT ARCHITECTURE

IN EXERCISING ITS PLANNING POWERS, THE DISTRICT COUNCIL WILL SEEK TO SAFEGUARD, REINSTATE AND ENHANCE SEAFRONT ARCHITECTURE REFLECTING THE INDIVIDUALITY AND HISTORIC DEVELOPMENT OF THE THANET TOWNS AS SEASIDE HOLIDAY RESORTS. THE COUNCIL WILL EXPECT PROPOSALS FOR NEW DEVELOPMENT TO RESPECT AND PREFERABLY ENHANCE SUCH ARCHITECTURE.

IN AREAS CHARACTERISED BY DOMESTIC/HOTEL BUILDINGS OF A SCALE/DESIGN REFLECTING THANET'S SEASIDE LOCATION/RESORT FUNCTION, NEW DEVELOPMENT WILL BE EXPECTED TO BE DESIGNED SO AS TO RESPECT SUCH CHARACTERISTICS. DESIGNS THAT INCLUDE DETAILING AND USE OF MATERIALS THAT WOULD REINFORCE THESE QUALITIES WILL BE PERMITTED.

Accommodation for Elderly Relatives

6.79 Where it is intended that an elderly relative is to reside with the family household, self-contained/part-self contained accommodation may be proposed through internal rearrangement or extension to the dwelling. Normal planning considerations will apply in relation to such proposals*. Such arrangements are, however, rarely suited for occupation as separate living accommodation unrelated to the household occupying the main dwelling unit for a variety of reasons, including lack of self-containment, inadequate separate access and amenity space, and lack of privacy.

6.80 Therefore, where the alteration/extension or other works are permitted to enable accommodation for an elderly relative to be provided, planning permission will normally be subject to a condition that the host property remains as a single dwelling notwithstanding that the accommodation provided may, in effect, be occupied as separate accommodation by that relative. The District Council will normally expect such proposals to demonstrate that the accommodation proposed for independent occupation is easily capable of assimilation into the dwelling (e.g. lockable door) when no longer needed. In order to safeguard such use as a single dwelling, occupation of the accommodation independent from the host dwelling will usually be limited by condition to a named person.

6.81 Provision of such accommodation in freestanding buildings within the curtilage of a dwelling will almost inevitably cause problems of loss of privacy and open character. When no longer required for that purpose, additional planning objections relating to access and amenity space arrangements would arise if proposed for use as separate residential accommodation. Such accommodation would not lend itself to use as living accommodation as part of the host dwelling by reason of physical separation. Such freestanding accommodation will not normally, therefore, be acceptable. The conversion of existing outbuildings, able to revert to their original purpose when no longer required may, however, be acceptable in some instances.

POLICY D9 – ACCOMMODATION FOR ELDERLY RELATIVES

PROPOSALS TO PROVIDE ACCOMMODATION FOR AN ELDERLY RELATIVE AT AN EXISTING DWELLING WILL ONLY BE PERMITTED WHERE SUCH ACCOMMODATION IS PHYSICALLY LINKED TO THE EXISTING DWELLING UNIT AND WHERE THERE IS NO CONFLICT WITH OTHER LOCAL PLAN POLICIES.

Operational Note:
6.82 * Policy D3 applies in respect of extensions to dwellings. Supplementary advice in respect of design of extensions to dwellings is contained in the House Extension Guide, which will be available shortly from the District Council.

Agricultural Buildings

6.83 New agricultural buildings are now subject to a prior notification procedure, which requires the farmer to notify the District Council of the intention to erect new agricultural buildings. The District Council then needs to respond to that notification within 28 days if it wishes to comment on the siting, design or external appearance of the proposed building.

6.84 The General Development Order establishes the principle of generally allowing such development. However, as stated in the Countryside and Coast Chapter, local landscape character issues also need to be given full weight in the consideration of development proposals. It is often the details of a proposal, location and siting, materials, colours and so on, that can make a proposal acceptable or not.

POLICY D10 - AGRICULTURAL BUILDINGS

PROPOSALS FOR NEW AGRICULTURAL BUILDINGS WILL BE CONSIDERED AGAINST THE FOLLOWING CRITERIA:

(1) THE SITING, SCALE, MATERIALS, AND COLOUR OF NEW BUILDINGS SHOULD BE DESIGNED SO AS TO MINIMISE THEIR VISUAL IMPACT IN THE LANDSCAPE, AND, WHERE POSSIBLE, THE NEW BUILDING SHOULD BE LOCATED SO AS TO TAKE ADVANTAGE OF NATURAL SCREENING OR LOCAL TOPOGRAPHY;

(2) WHERE NECESSARY NEW LANDSCAPING SHOULD BE PROVIDED TO FURTHER REDUCE THE VISUAL IMPACT OF THE NEW BUILDING; AND

(3) WHERE MORE THAN ONE PREFABRICATED BUILDING IS INVOLVED, THE RESULTING GROUP OF BUILDINGS SHOULD POSSESS A COMPLEMENTARY APPEARANCE AND CHARACTER IN KEEPING WITH THEIR SURROUNDINGS AND THE LANDSCAPE.

Explanation:
6.85 The Thanet landscape is gently undulating, with relatively little natural vegetation cover. New large farm buildings are therefore likely to have a significant impact on the rural landscape.

6.86 The District Council believes it is necessary to exercise careful control over the scale, location, materials, colour, relationship to other buildings, landscaping and other aspects of the development, to reduce its impact in the rural landscape. However, the size of a proposal will not in itself prevent sympathetic consideration of it.

6.87 The Council considers that this is in the interests of both the farm environment itself, and the wider landscape considerations of this Plan.

7. Heritage

7. Heritage

Introduction

7.1 This Chapter emphasises the importance and attractiveness of our heritage, both the visible built environment which surrounds us and the hidden archaeology beneath us. All that we see and find around us today has developed from the past heritage of Thanet residents and it is this abundant historical past that creates the perceptions of the District as a place to live, visit, work and invest in today. The preservation of our heritage is considered to be an economic asset to the District, and its maintenance and protection plays an important role in the District's economy.

7.2 This Chapter sets out the Council's policies and proposals for maintaining and improving the environmental quality and attractiveness of our heritage through:

(1) use of its development control powers;
(2) safeguarding and enhancing certain buildings and areas which contribute significantly to the character and identity of the District;
(3) promoting, funding and undertaking enhancement initiatives, and
(4) taking a positive role, where appropriate, in ensuring important buildings and structures are maintained to avoid dereliction. The Council may action some sites, encourage property owners to carry out works to other properties in poor condition, or issue compulsory purchase orders where necessary.

OBJECTIVES

(1) TO SAFEGUARD LISTED BUILDINGS FROM DEVELOPMENT LIKELY TO ADVERSELY AFFECT THEIR SPECIAL CHARACTER OR SETTING

(2) TO SAFEGUARD AND ENHANCE THE CHARACTER AND APPEARANCE OF DESIGNATED CONSERVATION AREAS AND TO PROMOTE THE IMPROVEMENT OF THEIR ENVIRONMENTAL QUALITY THROUGH A PROGRAMME OF ENHANCEMENT SCHEMES

(3) TO SAFEGUARD SITES OF ARCHAEOLOGICAL IMPORTANCE FROM DAMAGE OR DESTRUCTION

(4) TO SAFEGUARD AND ENHANCE THE CHARACTER AND APPEARANCE OF EXISTING SEAFRONT ARCHITECTURE, MARGATE OLD TOWN AND OTHER QUALITIES WHICH CONTRIBUTE TO THE CHARACTER OF THE DISTRICT

(5) TO ENSURE SATISFACTORY INVESTIGATION AND RECORDING OF ARCHAEOLOGICAL REMAINS IN CASES WHERE PERMANENT PRESERVATION OF ARCHAEOLOGICAL INTEREST IS NOT WARRANTED

(6) TO EXPRESS THE DISTRICT COUNCIL'S COMMITMENT TO PROMOTING THE EDUCATIONAL AND RECREATIONAL POTENTIAL OF THANET'S HERITAGE AND ARCHAEOLOGICAL RESOURCE

(7) TO SAFEGUARD AREAS AND FEATURES, INCLUDING OPEN SPACE AND VEGETATION, WHICH CONTRIBUTE TO THE QUALITY OF THE LOCAL ENVIRONMENT AND

(8) TO PROVIDE EDUCATION IN THANET'S HERITAGE

The Importance of Environmental Quality and the Architectural and Historic Heritage

7.3 The Structure Plan gives recognition at the strategic level to the importance of conserving and enhancing the quality of the built and natural environment both for its effect on the quality of life and for the support it gives in stimulating new investment.

7.4 The Structure Plan points out the quality of the built environment is of growing importance not only for the concentrations of people who live there but also for the cultural, leisure and retailing functions in such locations, which underpin their economic well-being.

7.5 Structure Plan policy indicates that the character, quality and functioning of Kent's built environment will be conserved and enhanced, and that development should be well designed and respect its setting.

7.6 It is also national and strategic policy to protect and enhance Kent's rich heritage of buildings of special architectural and historic interest. The Structure Plan states that the primary planning policy towards conservation areas is to preserve or enhance their special character and appearance.

Thanet Context

7.7 There is an extensive and rich variety of building forms, character and heritage within the built-up area of Thanet. The urban areas range from the "urban village", such as Pegwell and St Peter's, to the modern shopping centre and bright lights of Margate, the wooded areas and special atmosphere of Broadstairs to the historic harbour, lively marina and cross-Channel port of Ramsgate. There is also a diversity of heritage throughout Thanet's villages.

7.8 Thanet has the highest concentration of listed buildings in Kent. However, due to lack of investment, many of these important buildings are becoming

derelict and falling into disrepair. The Council is committed to tackling this problem using all the powers at its disposal, e.g., grant aid, legal action, compulsory purchase, Section 215 of the Town and Country Planning Act 1990 or any other method considered appropriate.

7.9 The District Council is committed to safeguarding and enhancing the quality of both the visible and hidden built environment within Thanet, so as to maintain and improve quality of life, and the attractiveness of the District to visitors and investors.

Heritage Policies Relating To Listed Buildings

Listed Building Consent

7.10 Anyone who wishes to demolish a listed building, either in whole or in part, or to make alterations to the exterior or interior in any way that would affect its character as a building of special architectural or historic interest, must first obtain listed building consent from the District Council. Applications for listed building consent must be accompanied by full details showing the building as existing and as it is proposed to be altered, including materials to be used.

POLICY HE1 - LISTED BUILDINGS OF SPECIAL ARCHITECTURAL OR HISTORIC INTEREST

(A) PROPOSALS AFFECTING A LISTED BUILDING OR ITS SETTING.

THERE WILL BE A PRESUMPTION IN FAVOUR OF PRESERVATION OF LISTED BUILDINGS. DEMOLITION/PARTIAL DEMOLITION WILL NOT BE PERMITTED UNLESS THERE IS A SPECIAL OVERRIDING JUSTIFICATION. ALTERATIONS AND ADDITIONS TO LISTED BUILDINGS WILL BE PERMITTED ONLY IF IT CAN BE SHOWN THAT THE PROPOSAL WOULD DETRACT NEITHER FROM THE CHARACTER OF THE BUILDING ITSELF NOR FROM ITS SETTING.

IN CONSIDERING APPLICATIONS FOR LISTED BUILDING CONSENT AND OR PLANNING PERMISSION FOR DEVELOPMENT AFFECTING A LISTED BUILDING OR ITS SETTING, THE DISTRICT COUNCIL WILL HAVE SPECIAL REGARD TO THE DESIRABILITY OF PRESERVING THE BUILDING, ITS SETTING AND ANY FEATURES OF SPECIAL ARCHITECTURAL OR HISTORIC INTEREST WHICH IT POSSESSES.

THE DISTRICT COUNCIL WILL SEEK TO ENSURE THAT THE MATERIALS, FEATURES AND DETAILS WHICH CONTRIBUTE TO THE ARCHITECTURAL AND/OR HISTORIC INTEREST OF A LISTED BUILDING ARE RETAINED AND WHERE APPROPRIATE REINSTATED.

(B) CONTROL OF ADVERTISEMENTS AFFECTING A LISTED BUILDING OR CONSERVATION AREA

THE DISTRICT COUNCIL WILL REQUIRE THAT THE DESIGN AND SITING OF ADVERTISEMENTS DOES NOT DETRACT FROM, AND PREFERABLY MAKES A POSITIVE CONTRIBUTION TO, THE CHARACTER AND/OR APPEARANCE OF A LISTED BUILDING AND WHERE LOCATED IN OR ADJOINING A CONSERVATION AREA, EITHER PRESERVES OR PREFERABLY ENHANCES THE AREA'S CHARACTER OR APPEARANCE*.

*** Operational Note:**
Supplementary guidance relating to display of advertisements is available separately from the District Council. In exercising its powers to control advertisements, the District Council will be guided by the general principles set out in these adopted Advertisement Control Guidelines.

Explanation:
7.11 The Council intends to give strong protection to, and where appropriate, encourage enhancement of, listed buildings as an important element of its built environment heritage.

Change of Use of Listed Buildings

7.12 The best use of a historic building is the purpose for which it was designed. However, it is recognised that the preservation and maintenance of listed buildings are usually dependent upon their capability of viable economic use. Proposals for change of use which represent the best reasonable means of conserving the character, appearance, fabric, integrity and setting of a building of special architectural/ historic interest are favoured in Structure Plan policy and will be dealt with as sympathetically as possible. Policy HE2 applies.

7.13 When considering applications for planning permission to change the use of a listed building, the District Council will require, in the form of a separate application for listed building consent, details of any alterations that may be necessary to implement the proposed change of use.

Listed Building Controls and Other Standards

7.14 In certain circumstances, there may be a conflict between the aims of listed building policy and standards/requirements under the Building Regulations or Health and Housing legislation. In such cases the local planning authority will use its powers to seek the relaxation of standards, compliance with which would otherwise necessitate alterations detrimental to the character of the building. Listed building consent may be refused where acceptable relaxation cannot be achieved.

POLICY HE2 - CHANGE OF USE OF LISTED BUILDINGS

CHANGE OF USE OF LISTED BUILDINGS WILL BE PERMITTED ONLY WHERE:

(1) THE CHANGE OF USE WOULD REPRESENT THE BEST REASONABLE

MEANS OF PRESERVING THE CHARACTER, APPEARANCE, FABRIC, INTEGRITY AND SETTING OF THE BUILDING; OR

(2) THE CHANGE WOULD NOT NECESSITATE INTERNAL OR EXTERNAL ALTERATIONS JUDGED TO BE DETRIMENTAL TO ITS CHARACTER AS A BUILDING OF SPECIAL ARCHITECTURAL OR HISTORIC INTEREST.

Conversion of Listed Rural Buildings

7.15 English Heritage have published a report showing how listed rural buildings which have been converted to other uses have later been de-listed because of the effect of the new development on the character of these buildings. This tends mainly to occur with residential conversions, though not exclusively so.

7.16 One of the report's recommendations is that if proposals are likely to lead to the loss of essential features of the building, then conversion should not be permitted. In this respect, it also advises that residential conversions should only be considered as a last resort. Consideration should first be given to other uses, for example, commercial workshop or community uses, especially where Grade I or II* (star) buildings are involved.

7.17 The District Council will therefore seek to encourage the implementation of uses which provide the best possible chance of preserving the essential features of a building.

7.18 The Kent Conservation Officers' Group (KCOG) have drawn up a series of guidelines against which conversions should be judged, including the maintenance of essential features, extensions and other new features and so on. The Policy incorporates both the KCOG and English Heritage advice. In this respect, the Council will normally expect a detailed structural survey to be submitted with the application, to permit the full consideration of the proposals, particularly in relation to part (1) of the Policy.

POLICY HE3 - LISTED RURAL BUILDINGS

IN ADDITION TO THE REQUIREMENTS OF POLICY R5, PROPOSALS FOR THE CONVERSION AND RE-USE OF LISTED RURAL BUILDINGS SHOULD CONSTITUTE THE BEST REASONABLE MEANS OF GIVING LONG TERM PROTECTION TO THE BUILDINGS' ESSENTIAL FEATURES AND ARCHITECTURAL INTEGRITY.

PROPOSALS WHICH WOULD NOT DETRACT FROM THE CHARACTER OF A LISTED BUILDING WILL BE PERMITTED; THUS:

(1) PROPOSALS WHICH WOULD REQUIRE MAJOR STRUCTURAL ALTERATIONS, OR DISMANTLING AND RECONSTRUCTION WILL NOT BE PERMITTED;

(2) PROPOSALS WHICH INCLUDE NEW BUILD ELEMENTS TO THE DETRIMENT OF THE CHARACTER OF THE BUILDING OR ITS SETTING WILL NOT BE PERMITTED;

(3) PROPOSALS WHICH INVOLVE THE CREATION OF INTRUSIVE SUBURBAN FEATURES SUCH AS FENCING, INAPPROPRIATE PAVING, NON-NATIVE TREES OR SHRUBS, KERBING, COLUMN LIGHTING, ETC, WILL NOT BE PERMITTED;

(4) IF THE PROPERTY IS TO BE SEVERED FROM AN AGRICULTURAL UNIT, THE LOCAL PLANNING AUTHORITY WILL REQUIRE THAT ONLY THE MINIMUM NECESSARY CURTILAGE IS SEVERED WITH THE BUILDING; AND

(5) THE LOCAL PLANNING AUTHORITY WILL CONSIDER THE REMOVAL OF PERMITTED DEVELOPMENT RIGHTS AT THE TIME OF GRANTING PLANNING PERMISSION, EITHER BY CONDITION OR LEGAL AGREEMENT.

WHERE THE BUILDING CURRENTLY HOLDS PROTECTED SPECIES, THE CONVERSION SHOULD ENSURE THE CONTINUED USE OF THE BUILDING FOR THAT PURPOSE, OR A SUITABLE ALTERNATIVE SITE SHOULD BE PROVIDED IN THE IMMEDIATE LOCALITY.

Explanation:
7.19 The District Council believes that the future use of listed rural buildings is a different case to that of non-listed buildings. This is recognised in PPS7 and PPS1, where it is acknowledged that the form, bulk and general design of such proposals should be in keeping with their surroundings. As well as the agricultural, landscape and other planning factors, the architectural and historic aspects of listed farm buildings must also be taken into account.

7.20 Where planning permission is granted for a conversion or change of use, the District Council will consider the removal of permitted development rights to preserve converted farm buildings and their surroundings from alterations, extensions and other development which might adversely affect the character and setting of the listed building, and the immediate rural landscape.

7.21 Disused rural buildings may hold species protected by the Wildlife and Conservation Act 1981 and other legislation, for example, bats or barn owls. The conversion of such buildings should make provision for their continued use by protected species which are present. If this is not possible, an alternative roosting site should be provided nearby.

Heritage Policies Relating To Conservation Areas

Conservation Areas

7.22 In addition to individual listed buildings, there are areas which the District Council considers should be conserved and enhanced due to their special

architectural or historic interest. The Council has identified sixteen such areas, and has designated them Conservation Areas. These are:-

Conservation Area	Designated	Extended
Broadstairs	05.06.70	21.10.86
Sarre	26.11.71	
Minster	28.01.72	23.08.00
St Nicholas-at-Wade	28.01.72	
Kingsgate	13.04.73	
Reading Street	13.04.73	
St. Peters	13.04.73	
Birchington	02.02.76	
Pegwell	29.06.76	27.09.89
Margate	07.02.78	07.07.94
Monkton	22.08.78	
Ramsgate	16.01.70	23.01.80; 27.01.88; 22.08.90; 12.07.00
Northdown	20.08.85	
Acol	27.01.88	
Margate Seafront	29.01.97	
Westgate on Sea	11.03.98	
Ramsgate Esplanade	11.05.06	

7.23 Each of the above areas has its own individual and special character. The District Council proposes to prepare appraisals of each Conservation Area identifying the individual special interest and character in each case. It will seek to preserve and enhance these qualities through use of its planning powers. Periodic reports will be made on the progress of improvement and enhancement schemes in designated Conservation Areas.

7.24 The District Council has a statutory duty to periodically consider the designation of further Conservation Areas. In considering designation of new, or review of existing, conservation areas, overall quality (as opposed to that of individual buildings) will be the primary consideration. The District Council does not consider it desirable or practical to attempt to list definitive criteria for designating Conservation Areas. However, factors such as distinctive street pattern, the scale and grouping of buildings, materials and architectural detailing, particular mixes of uses and attractive vistas are qualities which may be considered to merit recognition, preservation and enhancement through designation as a Conservation Area.

Planning Controls in Conservation Areas

7.25 Additional planning controls exist in these designated Conservation Areas. These are summarised below. The need for approval in specific circumstances should be ascertained from the District Council's Planning Department.

7.26 The following is a summary of additional planning controls applying in Conservation Areas:

- With very few exceptions, buildings cannot be demolished in whole or in part without first obtaining Conservation Area Consent (referred to below).

- Certain types of development, not requiring planning consent outside conservation areas, are subject to planning control.

- Six weeks' notice in writing is almost always required before any work can be carried out to trees.

- The repair of unoccupied buildings can be enforced if they are neglected.

7.27 In exercising its planning functions, the District Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of these Conservation Areas. Accordingly, in determining applications under planning powers, a primary consideration will be whether the proposal would either preserve or, preferably, where scope exists, enhance the character or appearance of the Conservation Area.

7.28 Generally, in Conservation Areas, the emphasis will be on control rather than prohibition, to allow the area to remain alive and prosperous while ensuring that any new development accords with its special architectural and/or historic merit. New development, where permitted, should be sympathetic with its surroundings but should not be an unimaginative imitation of the architectural styles of neighbouring buildings, particularly where this would limit its ability to enhance the character and appearance of the Conservation Area. Certain works are regarded as wholly inappropriate to Conservation Areas: for example; stone cladding, brightly coloured non-native roof coverings and bogus historical features. Supplementary Planning Guidance leaflets (Leaflet No. 3: Conservation Areas and Leaflet No. 4: Conversion of Shops to Residential Accommodation) contain additional advice relating to Conservation Areas and buildings within Conservation Areas and are available from the District Council.

7.29 Structure Plan Policy relating to Conservation Areas is reaffirmed and amplified in Local Plan Policies HE4. The Conservation Areas are defined on the Proposals Map.

POLICY HE4 - PLANNING CONTROLS INCONSERVATION AREAS

IN AND ADJOINING CONSERVATION AREAS, ALL PLANNING PROPOSALS, INCLUDING ALTERATIONS AND EXTENSIONS WILL BE ASSESSED IN RELATION TO THEIR EFFECTS ON THE CHARACTER AND APPEARANCE OF THE AREA AS A WHOLE. ALL WORKS WILL BE REQUIRED TO PRESERVE OR ENHANCE ITS SPECIAL CHARACTER OR APPEARANCE (INCLUDING BUILDINGS, RELATED SPACES, TOPOGRAPHY AND VEGETATION).

DEVELOPMENT THAT WOULD HARM THAT SPECIAL CHARACTER OR APPEARANCE WILL NOT BE PERMITTED.

Explanation Policy HE4:
7.30 The District Council regards Thanet's conservation areas as important assets in its architectural and historic heritage, and intends to safeguard their merit as such. Accordingly, the Council intends only to permit development which would at least preserve, and preferably enhance, their character and appearance.

Planning Applications in Conservation Areas

7.31 In or adjoining conservation areas it is usually essential that full design details of new development proposals are considered at the outset so that proposals may be properly judged in relation to the fundamental aims of preservation and enhancement. Accordingly, the District Council will normally seek detailed plans and drawings showing the proposed development in its setting, as opposed to dealing with applications on an outline basis.

Conservation Area Consent

7.32 Overall character is the primary characteristic when considering designation of Conservation Areas. The character of any such area is made up of a unique blend of elements (for example, a historic street pattern or plot layout, a particular grouping of trees, pleasant vistas between buildings etc). In seeking to preserve and enhance Conservation Areas, retention of individual elements which contribute to their special architectural/historic qualities is therefore important.

7.33 Anyone wishing to demolish or partly demolish a building situated within a conservation area must usually first seek Conservation Area Consent from the District Council as local planning authority. Such proposals will be considered in the light of the objectives of preservation and enhancement of special character and appearance.

POLICY HE5 - CONSERVATION AREA CONSENT

IN DETERMINING APPLICATIONS FOR CONSERVATION AREA CONSENT, SPECIAL ATTENTION SHALL BE PAID TO THE DESIRABILITY OF PRESERVING OR ENHANCING THE CHARACTER OR APPEARANCE OF THE CONSERVATION AREA.

POLICY HE6 - DEMOLITION IN CONSERVATION AREAS

THE PRIME CONSIDERATION IN DETERMINING APPLICATIONS FOR DEMOLITION IN A CONSERVATION AREA WILL BE THE WIDER EFFECT ON THE CHARACTER AND APPEARANCE OF THE SURROUNDINGS AND THE CONSERVATION AREA AS A WHOLE.

CONSERVATION AREA CONSENT WILL NOT BE GRANTED FOR DEMOLITION UNLESS DETAILED AND ACCEPTABLE PLANS HAVE BEEN SUBMITTED FOR ANY SUBSEQUENT REDEVELOPMENT.

PLANNING CONDITIONS WILL BE IMPOSED, OR A LEGAL AGREEMENT WILL BE NEGOTIATED, TO ENSURE DEMOLITION DOES NOT TAKE PLACE UNTIL A CONTRACT HAS BEEN MADE TO CARRY OUT IMMEDIATELY THE SUBSEQUENT WORKS WHICH WILL PRESERVE OR ENHANCE THE SITE.

Explanation HE6:
7.34 The District Council intends to resist premature demolition in respect of redevelopment in Conservation Areas in order to minimise the possibility of long-standing, unsightly gaps.

Non-Listed Buildings in Conservation Areas

7.35 The District Council recognises that some buildings, although not listed on the basis of their individual merits, may make a positive contribution to the character or appearance of a conservation area. The District Council is fully committed to preservation and enhancement of its conservation areas. However, the scope of permitted development still allows many changes to buildings which individually or cumulatively can have a disastrous effect upon the character and appearance of the conservation area, as well as adversely affecting property value. For example, Thanet's Victorian and Edwardian buildings are particularly vulnerable in this respect. The excellent detail and use of materials typical of such property is easily damaged by modern alterations. Supplementary Planning Guidance leaflets (Leaflet No. 3: Conservation Areas and Leaflet No. 4: Conversion of Shops to Residential Accommodation) contain additional advice relating to Conservation Areas and buildings within Conservation Areas and are available from the District Council. In cases where such development threatens to detract from the character or appearance of a conservation area, the District Council may seek to bring such development within the scope of planning control by means of a Direction restricting permitted development.

POLICY HE7 - NON-LISTED BUILDINGS IN CONSERVATION AREAS

THE DISTRICT COUNCIL WILL USE ITS POWERS TO PREVENT UNSYMPATHETIC ALTERATIONS TO NON-LISTED BUILDINGS WHICH IT CONSIDERS CONTRIBUTE TO THE CHARACTER OF A CONSERVATION AREA, AND WILL SEEK TO RETAIN THOSE MATERIALS, FEATURES AND DETAILS OF SUCH BUILDINGS WHICH ARE OF INTEREST.

TRADITIONAL MATERIALS AND DETAILS TO BUILDINGS SHOULD BE RESTORED AND REINSTATED IN CONSERVATION AREAS.

Alterations and Repairs to Other Buildings

7.36 While listed buildings, and, to some extent, buildings in conservation areas represent the most important assets in the District's built environment heritage, the wider townscape and built environment of the urban areas and villages have an important role to play as far as perception of the District is concerned. The District Council is anxious to avoid cumulative erosion of pleasant and

unspoilt character which can be caused by certain alterations. Property owners should be also made aware that insensitive home "improvements" can actually reduce property values both on an individual and area basis.

Enhancement

7.37 Enhancement of environmental quality is now widely recognised as an equal partner to other initiatives which aim to stimulate investment and foster economic health. Most of Thanet's built environment heritage, although often "tarnished", remains largely intact and is capable of restoration and reinstatement. However, this can only be effectively achieved through positive schemes of enhancement.

7.38 The District Council has a duty to formulate and publish proposals for the preservation and enhancement of its conservation areas and is keen to embrace this duty. However, in the case of many areas, effective enhancement and positive action to bring about improvement of environmental quality will not be realised without a significant input of resources as a catalyst for further investment from other sources. The IMPACT initiative, formerly operating in Ramsgate, has illustrated effective targeting of resources to direct improvement action to upgrade the local environment and stimulate further investment from other sources**.**

7.39 The District Council intends to carry out further enhancement schemes and initiatives. It proposes to actively invite local residents, amenity societies and other local groups in preparing conservation area enhancement schemes. A District Council, County Council and private sector partnership (formerly known as "Thanet 2000") was set up to prepare and implement major enhancement strategies for Margate and Ramsgate. The Ramsgate Town Partnership, set up and sponsored by Thanet 2000, is working in partnership with the local community to build on the impetus of the former Impact initiative in Ramsgate. In addition, other conservation area enhancement schemes will be co-ordinated in association with the Regeneration Project Delivery Team. The District Council will undertake a series of studies of the Conservation Areas and will prepare enhancement schemes in association with its Regeneration Project Delivery Team and the community.

Street Furniture

7.40 Old street furniture such as coal plates, railings and boundary markers is sometimes removed because it is redundant or affected by site development. Such items may have value in their rarity, historical interest and detail**.**

7.41 Retention/reinstatement can help retain character, interest and identity in the street scene. It is particularly important in sensitive locations like conservation areas where modern replacements of more functional design can erode character.

7.42 Some items of street furniture, eg, public postboxes and traditional style telephone kiosks, are a highly characteristic, often prominent and cherished

part of the British street scene. Certain of the traditional style telephone kiosks remaining in the District are listed buildings.

7.43 Increases in the volume of mail have lead to the introduction of on-street containers to hold second delivery pouches. These "pouch boxes" which can be either attached to an existing postbox or installed free-standing, are subject to planning control.

7.44 Inappropriately sited street furniture and surface treatments can present a hazard for the physically challenged.

POLICY HE8 - STREET FURNITURE

THE DISTRICT COUNCIL WILL SEEK TO SAFEGUARD AND REINSTATE TRADITIONAL STREET FURNITURE IN CONSERVATION AREAS. ELSEWHERE, RETENTION/REINSTATEMENT AND SAFEGUARDING OF STREET FURNITURE OF LOCAL OR HISTORICAL INTEREST WILL BE ENCOURAGED.

ATTACHMENT/ERECTION OF POUCH BOXES WILL ONLY BE PERMITTED WHERE THIS WOULD NOT ADVERSELY AFFECT THE CHARACTER OR APPEARANCE OF A LISTED BUILDING OR ITS SETTING, A CONSERVATION AREA OR OTHER SENSITIVE OR FOCAL LOCATION, OR A POSTBOX OF LOCAL/NATIONAL RARITY OR INTEREST.

7.45 This Chapter also describes the importance of Thanet's archaeological heritage and expresses the District Council's commitment to its protection and promotion as a significant resource in improving perceptions of Thanet as a place to live, visit and invest in. It also sets out the policy approach in dealing with development applications affecting sites of known or suspected archaeological interest.

Thanet's Archaeological Heritage

7.46 This part of England, and Thanet in particular, has been the traditional point of entry into the country for centuries. It is consequently replete with remains left by migrating prehistoric peoples and our Roman, Saxon and Medieval ancestors. Thanet is very rich in archaeological sites of all periods from the Mesolithic to the late Medieval. These sites, surviving both below and above ground level as earthworks, structures and other remains serve as important records of Thanet's history and heritage.

7.47 However, archaeological remains tend generally to be perceived as little more than of minority interest and as an obstacle to development. Also, because much of Thanet's archaeological resource lies below ground level and is not visually prominent, it might mistakenly be regarded as insignificant and only worthy of limited attention in the Local Plan. Its invisible nature, however, belies its importance in the national context. The District Council is committed to its protection and promotion as an important resource.

"Beneath Thanet's fields and streets are some of the Nation's most scientifically important remains. It is doubtful whether such a concentration can be found elsewhere in the country."

("The Gateway Island - Archaeological Discovery in the Island of Thanet 1630-1979" D Birch, P Boakes, S Elworthy, C Hollins and D Perkins)

Government Policy Guidance

7.48 Planning Policy Guidance Note 16 (PPG 16), which sets out current government guidance on archaeology and planning, states that archaeological remains are "part of our sense of national identity and are valuable both for their own sake and for their role in education, leisure and tourism."

7.49 PPG 16 recognises archaeological remains as a finite, non-renewable and often highly fragile resource. It advocates appropriate management to ensure their survival in good condition and care to ensure that they are not needlessly or thoughtlessly destroyed.

Kent Structure Plan

7.50 The Kent Structure Plan points out that the rich heritage of archaeological sites and ancient monuments in the county contribute greatly to the character of the county and are an important education and tourism resource. It is strategic policy to preserve such resources. Structure Plan policy states that in control of development and through policies and proposals in local plans, important archaeological sites and scheduled ancient monuments and their settings will be protected.

Sites and Monuments Records

7.51 The main source of information regarding Kent's archaeological resource is the Kent Sites and Monuments Record. This consists of a computerised database, together with map-based information covering all known sites. It also includes definition of areas of archaeological potential.

7.52 The local Thanet Sites and Monuments Record provides detailed information relating to such sites. The number of records contained in these documents confirms the abundance of Thanet's archaeological resource.

The Importance Of Thanet's Archaeological Resource

7.53 Thanet's significant archaeological resource has so far gone generally unrecognised. The Trust for Thanet Archaeology has done much to promote public awareness and stimulate interest in the local archaeological heritage. However, its efforts have been offset by the lack of any single facility to exhibit all local finds and information. The extent and importance of the remains within Thanet need to be brought to the public's notice. This will help to generate a sense of responsibility and foster good custodianship of a resource which could significantly enhance perceptions of the District as a place to live, visit, work

and invest in. A local exhibition facility would help to realise the recreational and educational value of Thanet's archaeological heritage and to animate its exploitation as a resource.

7.54 The District Council will seek to achieve wider recognition of the importance of Thanet's archaeological heritage in national terms. The Council intends to investigate how additional funding for rescue archaeology, maintenance and management can be obtained, and how it could facilitate the establishment of an adequate local exhibition facility.

7.55 The District Council is very anxious that the current lack of public awareness should not result in a lack of commitment to the protection of this important element of Thanet's heritage. Its policy approach is therefore to preserve all important archaeological sites, and to seek to protect, wherever possible, other archaeological sites. In cases where preservation in situ is not warranted, the District Council intends to ensure that adequate arrangements will be made for investigation and recording.

POLICY HE9 - IMPORTANCE OF ARCHAEOLOGICAL RESOURCE

THE DISTRICT COUNCIL WILL PROMOTE THE IDENTIFICATION, RECORDING, PROTECTION AND ENHANCEMENT OF ARCHAEOLOGICAL SITES, ANCIENT MONUMENTS AND HISTORIC LANDSCAPE FEATURES, AND WILL SEEK TO ENCOURAGE AND DEVELOP THEIR EDUCATIONAL, RECREATIONAL AND TOURIST POTENTIAL THROUGH MANAGEMENT AND INTERPRETATION.

Scheduled Ancient Monuments and the Need for Scheduled Monument Consent

7.56 Scheduled Ancient Monuments are, by definition, sites of national importance, and are included on a schedule compiled by the Secretary of State for the Department of National Heritage. The Secretary of State has a responsibility to maintain a schedule of sites and monuments of national importance, and to ensure that the management and maintenance of Scheduled Ancient Monuments are compatible with their preservation.

7.57 Anyone wishing to undertake works, including farming operations, which would have the effect of demolishing, destroying, damaging, removing, repairing, altering, or adding to a Scheduled Ancient Monument or for flooding or tipping operations on land where there is a scheduled monument, must first obtain Scheduled Monument Consent from the Secretary of State. It is an offence to carry out or cause such works to be carried out unless consent has first been obtained, and there are penalties on summary conviction and on indictment. Planting and landscaping works can damage or destroy a Scheduled Ancient Monument. This will be taken into account in applying the following Policy.

POLICY HE10 - PROTECTION OF SCHEDULED ANCIENT MONUMENTS

DEVELOPMENT WILL NOT BE PERMITTED ON THE SITE OF A SCHEDULED ANCIENT MONUMENT AND/OR WHICH WOULD DAMAGE OR DESTROY THE SETTING OF A SCHEDULED ANCIENT MONUMENT.

Explanation:
7.58 The District Council considers that Thanet's rich archaeological and historic heritage is worthy of the strongest protection both for its own sake, and for its potential significance to tourism, leisure and education. Therefore, in line with Government advice and strategic policy, the District Council intends to resist loss of, or damage to, important archaeological sites.

7.59 Only Scheduled Ancient Monuments are shown on the Proposals Map. These are also specified in the Appendices. English Heritage has recently embarked on a survey expected to result in significant additional numbers of sites being given statutory protection as Scheduled Ancient Monuments. Many of the District's known archaeological sites are considered to be of national importance, and there is every reason to believe that many more sites may exist which could also prove to be of similar importance. The District Council will actively seek designation of such sites as Scheduled Ancient Monuments to reflect the abundance of nationally important remains in Thanet. Therefore Scheduled Monument status and protection may be afforded to additional sites within the Local Plan period.

Other Important Archaeological Sites

7.60 Current Government advice states:

> "Where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development, there should be a presumption in favour of their physical preservation."

7.61 In line with Government advice, strategic policy, and the need to protect this important element of the District's heritage, the District Council wishes to conserve and safeguard all important archaeological sites whether scheduled or not, and whether of national, regional or local importance. Preservation of archaeological remains in situ is always desirable, not least because developing archaeological science will reveal more than current techniques.

7.62 Most of Thanet's many important sites do not have the statutory protection enjoyed by Scheduled Ancient Monuments. The District Council will use its planning powers to protect important remains whether scheduled or not.

7.63 The District Council considers that Thanet's rich archaeological and historic heritage is worthy of the strongest protection both for its own sake, and for its potential significance to tourism, leisure and education. Therefore, in line with Government advice and strategic policy, the Council intends to resist loss of, or damage to, all important archaeological sites.

Development Proposals Affecting Archaeological Sites

7.64 It may be possible for some development proposals to take place on archaeological sites whilst still preserving the remains undisturbed in situ. Designs that secure preservation in situ and minimise archaeological disturbance will usually be encouraged. In some instances, site evaluation/investigation may reveal that there is an insufficient case for resisting development that would damage or destroy the archaeological remains. Where physical preservation in situ is not justified, excavation for "preservation by record" may be appropriate. In some cases it may be necessary to refuse planning permission, where development would adversely affect important remains.

7.65 The District Council is anxious to ensure that the archaeological aspects of all sites affected by development proposals are considered at the earliest possible stage in the planning process. The density of archaeological remains in the District is such that developers would be well advised to include in their research into site development potential, before the submission of a planning application, an initial assessment of whether it is known or likely to contain archaeological remains. It is also in the developer's interest to consider fully the needs of archaeology, because early discussion can help avoid unnecessary expense, eg: abortive design work. Allocation of sites for particular purposes in this Local Plan should not be taken to imply that no archaeological remains are present. In such cases the procedures of consultation, desktop assessment and field evaluation described below should still be followed in the earliest stages of preparing development proposals.

7.66 Because developers may be required to arrange field evaluation, excavation and or archaeological investigation and recording, they would be well advised to bear in mind the relative importance attached to particular types of archaeological sites and the relative strength in presumption against their damage or destruction (expressed in Policies HE10, HE11 & HE12) when considering development potential.

7.67 Early consultation with the District Council and the County Archaeologist is essential. The Kent and Thanet Sites and Monuments Records and maps of Areas of Archaeological Potential should always be consulted as a prime source of reference at the outset. Where the proposed development impinges on any such archaeological hazard area, the developer is strongly advised to consult the County Archaeologist.

7.68 Because Areas of Archaeological Potential are based on existing knowledge, there are clearly other sites waiting to be discovered. Accordingly where major land disturbance is proposed, provision should normally be made at least for a watching brief, and, dependent on the circumstances of the case, more formal investigation may be appropriate. The District Council will normally refer all applications affecting sites falling within areas of archaeological potential or elsewhere, where an area of one acre or more is involved, to the County Archaeologist for comment.

7.69 Where remains are suspected to exist, developers may wish to have as much advance warning of the archaeological sensitivity of the site by commissioning a qualified archaeological organisation/consultant to carry out an initial site assessment. This need not involve fieldwork, but should involve desk-based evaluation in the light of information already available.

Archaeological Field Evaluation

7.70 Where assessment or discussion with the District Council indicates that important archaeological remains do or may exist, the Council will usually require the developer to arrange for an archaeological field evaluation to a standard and specification approved by the Council, and by a professionally qualified archaeologist, to take place before determining a planning application. Such evaluation is quite distinct from a full archaeological excavation, and may include a ground survey or small-scale trenching.

7.71 The evaluation will help to define the true importance of the site, and how development might best be carried out so as to protect the remains in situ or least affect them. It will also allow an informed and reasonable planning decision to be reached.

7.72 In some cases, the District Council may consider that sufficient information already exists to determine the application without the need for an evaluation. It will otherwise normally expect such evaluation to accompany any planning application where there is reason to suspect that the development might affect a site of archaeological importance. Where the developer is not voluntarily prepared to arrange for this to be carried out, the District Council will consider use of its powers to direct that such information be provided, and exceptionally will consider refusing the application where such information is not subsequently supplied.

7.73 In considering all applications affecting sites of archaeological importance, the District Council will seek the views of the County Archaeologist and the Trust for Thanet Archaeology. It will consult English Heritage in respect of applications affecting Scheduled Ancient Monuments and may do so in respect of other non-scheduled sites given the potential in Thanet to add to the number of Scheduled Sites.

POLICY HE11 - ARCHAEOLOGICAL ASSESSMENT

IN ORDER TO DETERMINE PLANNING APPLICATIONS, THE DISTRICT COUNCIL MAY REQUIRE THE DEVELOPER/APPLICANT TO PROVIDE ADDITIONAL INFORMATION, IN THE FORM OF AN ASSESSMENT OF THE ARCHAEOLOGICAL OR HISTORIC IMPORTANCE OF THE SITE IN QUESTION AND THE LIKELY IMPACT OF DEVELOPMENT. IN CERTAIN CASES SUCH ASSESSMENT MAY INVOLVE FIELDWORK OR AN EVALUATION EXCAVATION.

WHERE THE DEVELOPER/APPLICANT IS NOT PREPARED TO ARRANGE SUCH AN ASSESSMENT VOLUNTARILY, THE DISTRICT COUNCIL WILL

USE ITS POWERS TO DIRECT THAT SUCH INFORMATION BE SUPPLIED. PLANNING PERMISSION WILL BE REFUSED WITHOUT ADEQUATE ASSESSMENT OF THE ARCHAEOLOGICAL IMPLICATIONS.

Explanation:
7.74 The District Council wishes to ensure it is fully informed about the archaeological implications of all proposals before determining any planning application for development likely to result in damage or destruction of archaeological remains.

Excavation and Recording

7.75 In accordance with paragraph 12 of PPG16, the District Council does and will continue to make every effort to preserve archaeological remains in situ where appropriate. In cases where the need for development which is likely to destroy or damage an archaeological site is judged by the District Council to be overriding, or where the importance of the site is not sufficient to warrant continued preservation, or the destruction of the site cannot be avoided, the Council intends to ensure adequate provision is made for proper investigation and recording.

7.76 Where the District Council proposes to grant planning consent for a development likely to destroy or damage remains of archaeological importance, it will usually require to be satisfied that the developer has made appropriate and satisfactory provision for prior excavation and recording of the archaeological remains, and publication of the results. Such excavation will normally be expected to take place prior to development commencing and in accordance with a brief prepared by the Council and in the light of advice from the County Archaeologist. Any planning consent will normally therefore be subject to conditions that no works may commence until the applicant has secured implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted to and approved by the District Council as local planning authority. Alternatively, these matters may be the subject of a voluntary agreement (eg: section 106 Agreement) with the developer and archaeologist concerned.

7.77 Where the District Council is of the opinion that consent can be granted without the need for excavation and recording, it may impose a condition requiring that reasonable access be given to a nominated archaeologist to enter the land to keep a watching brief during construction or to carry out archaeological investigation and recording during the course of construction works.

POLICY HE12 - ARCHAEOLOGICAL SITES AND PRESERVATION

ARCHAEOLOGICAL SITES WILL BE PRESERVED AND PROTECTED. ON THOSE ARCHAEOLOGICAL SITES WHERE PERMANENT PRESERVATION IS NOT WARRANTED, PLANNING PERMISSION WILL ONLY BE GRANTED IF ARRANGEMENTS HAVE BEEN MADE BY THE DEVELOPER TO ENSURE THAT TIME AND RESOURCES ARE AVAILABLE TO ALLOW

SATISFACTORY ARCHAEOLOGICAL INVESTIGATION AND RECORDING BY AN APPROVED ARCHAEOLOGICAL BODY TO TAKE PLACE, IN ADVANCE OF AND DURING DEVELOPMENT. NO WORK SHALL TAKE PLACE UNTIL THE SPECIFICATION AND PROGRAMME OF WORK FOR ARCHAEOLOGICAL INVESTIGATION, INCLUDING ITS RELATIONSHIP TO THE PROGRAMME OF DEVELOPMENT, HAS BEEN SUBMITTED AND APPROVED.

Explanation:
7.78 Other archaeological sites will normally be protected from damage and destruction as they contribute to the integrity and diversity of the archaeological heritage. Where refusal of planning consent is not warranted, the District Council intends to ensure "preservation by record".

Remains Encountered Unexpectedly

7.79 It is hoped that the above procedures will avoid the situation where archaeological remains are unexpectedly encountered during construction. Developers may be able to insure particular projects against this eventuality. However, should this situation occur, the District Council hopes that it can be resolved through discussion.

7.80 The District Council is empowered to, and may exceptionally, revoke planning consent. Similarly, English Heritage is empowered to schedule a site even after planning consent has been granted, if it is considered sufficiently important. While such circumstances may never occur, this serves to emphasise the importance of early discussion.

Public Utilities/Contractor's Works

7.81 Chance finds often occur during the course of contractors' works relating, for example, to public utilities, over which there may be no planning control (eg, pipe laying, farming practices). In view of the importance attached to the Thanet archaeological heritage it is essential that all such finds are reported to the District Council so that they can be adequately recorded.

Site Specific Policies

Royal Sea Bathing Hospital

7.82 Founded in 1791, this was the first hospital in England to treat patients with sea air. The principal feature of this listed building is the impressive Doric portico overlooking Canterbury Road. There have been many unfortunate additions and alterations carried out over the years. The decision to centralise hospital services on the Queen Elizabeth Queen Mother Hospital (QEQM) site at St. Peter's Road has meant that the Royal Sea Bathing Hospital site became surplus to requirements. The site is approximately 6.80 acres in extent and includes undeveloped land with a large frontage to the sea. The open space to the north-west part of the site is a high-tide roost associated with the Thanet Coast SPA-Ramsar Site.

7.83 The main issues in the future use of this site relate to the need to protect the setting of the listed building and to ensure, as far as possible, that the more easily developed parts of the site are not undertaken, leaving the listed building to deteriorate and remain unused. The District Council will therefore expect reuse and restoration of the listed building to form part of an overall scheme for development of the site, and will prepare a specific brief amplifying such considerations.

POLICY HE13 - ROYAL SEA BATHING HOSPITAL

THE DISTRICT COUNCIL WILL PERMIT PROPOSALS FOR THE REUSE OF THE ROYAL SEA BATHING HOSPITAL AND THE REDEVELOPMENT OF THE UNDEVELOPED PARTS OF THE SITE PROVIDED THAT:

(1) NEW BUILD DEVELOPMENT ON THE SITE PROTECTS OR ENHANCES THE SETTING OF THE LISTED BUILDING AND IS ITSELF INTRINSICALLY WELL DESIGNED.

(2) PROPOSALS FOR THE REUSE OF THE LISTED BUILDING CONSERVE ITS CHARACTER, APPEARANCE, FABRIC AND INTEGRITY.

THE IMPACT OF ANY DEVELOPMENT ON THE HIGH-TIDE ROOST ASSOCIATED WITH THE THANET COAST SPA RAMSAR SITE AND THE ROYAL SEA BATHING HOSPITAL WILL BE EVALUATED AND THE RESULTS TAKEN INTO ACCOUNT IN THE PROPOSALS FOR THE DEVELOPMENT OF THE HOSPITAL SITE.

The Montefiore Site

7.84 This site (as shown on the Proposals Map) on the north-west side of Dumpton Park Drive provides an open break within an otherwise built-up area, contains a synagogue and mausoleum and also possesses a number of mature trees, which add an attractive natural feature within the urban environment. In considering any future use of the site, the District Council would expect to secure the enhancement and continued maintenance of the amenity value provided by the essentially undeveloped character of the site, the tree cover and the attractive flint wall fronting Dumpton Park Drive. The District Council is acquiring part of the site (land east of the synagogue and mausoleum), and will continue to protect the undeveloped site with a view to its potential creation as public open space.

7.85 Sir Moses Montefiore was a renowned philanthropist as well as a prominent and well-loved member of the 19th century Anglo-Jewish community. The site includes the Grade II* listed synagogue, built by Sir Moses Montefiore, and the Grade II* listed mausoleum containing his remains and those of his wife Lady Judith, together with part of the former Montefiore College site. The site allocated on the Proposals Map is seen as an ideal opportunity to provide and maintain a publicly accessible garden in memory of Sir Moses Montefiore.

7.86 The Council supports the retention of the synagogue and mausoleum as the centrepiece of a tranquil garden, respectful of the whole site as an area of great significance to the Jewish community and of interest to the wider community. The intention would be that the garden would contain a gatekeeper's/caretaker's residence and a focal feature of some kind that would commemorate the life and history of Sir Moses and inform visitors of his importance to international Jewish and local communities.

POLICY HE14 - MONTEFIORE SITE

LAND, AS DEFINED ON THE PROPOSALS MAP, IS ALLOCATED AS A PEACEFUL PUBLIC GARDEN DEDICATED TO THE MEMORY OF SIR MOSES MONTEFIORE.

ANY DEVELOPMENT THAT MAY BE PERMITTED WILL BE EXPECTED TO FORM PART OF A COMPREHENSIVE SCHEME WHICH WOULD ENABLE LONG-TERM MAINTENANCE OF THE SITE'S QUALITIES AND CONSIDERATION OF PUBLIC ACCESS TO THE SITE.

TARGETS

LP Implementation Target	
Policy Area	Heritage
Relevant Policies	HE1, HE2, HE4, HE5, HE6, HE7
Indicator	No. of Listed Building/Conservation Area applications lost on appeal
Target	Win 90% of appeals
Monitoring	Appeal decisions
LP Implementation Target	
Policy Area	Heritage
Relevant Policies	HE10
Indicator	Protect all Scheduled Ancient Monuments from development
Target	Protect 100% of Scheduled Ancient Monuments in Thanet
Monitoring	Development Control application decisions

8. Tourism

8. Tourism

Introduction

8.1. Thanet has been a traditional tourist destination for over 200 years. Whilst the popularity of seaside tourism may have declined since the heyday at the turn of last century, it still remains the single largest component of the domestic holiday market. Tourism expenditure directly supports 4860 jobs, whilst a further 1078 are supported through indirect expenditure.

8.2. A good tourist industry can also provide additional benefits to the District. Facilities providing a service for tourists can also provide further recreational opportunities for residents. A well-received tourist 'experience' can improve the image of Thanet, which may encourage business to locate or families to move into the area.

8.3. The Council's vision is that facilities and attractions would have adapted to the tourist market by 2020 and these would provide new leisure experiences compared to those that were provided twenty years earlier. Projects such as Margate Old Town, including the Turner Centre, and Ramsgate Renaissance would add to existing facilities and events, such as Folk Week at Broadstairs.

8.4. The coast is also seen as a major asset, catering for all recreational requirements from bird watching to jet skiing. It is hoped that the integration of these diverse activities will be achieved through the promotion of the Coastal Park initiative. Many of these attractions should also help to lengthen the holiday period in Thanet and give the area an image boost.

OBJECTIVES

1. **TO PROMOTE AND PROVIDE OPPORTUNITIES FOR NEW TOURISM FACILITIES**

2. **TO PROTECT AND ENHANCE THE LOCAL ECONOMY IN THANET**

8.5. Tourism will continue to be significant in the local area so it is appropriate that planning policies encourage tourism-related development and seek to improve the seaside architecture and overall environment to assist the revitalisation of the industry and improve Thanet's image and appearance. There is potential for tourism to form part of agricultural diversification schemes to the benefit of both industries. Proposals which will expand the length of the holiday season will be supported, for example, promotion of the area as a centre in East Kent for education-related tourism (language schools and school and college field trips relating to geology and archaeology, etc).

8.6. Figures from the South-East England Tourist Board indicate that in 2000, in the region of 518,000 staying trips (10% of the county) were undertaken by tourists in Thanet and that these visitors generated in the region of £85.56

million of direct tourist expenditure into the District economy. In addition to staying visitors, it is estimated that the District received 2.60 million day visitors who contributed a further £43.1 million to the local economy.

8.7 Thanet, Canterbury and Shepway are working together on an East Kent Tourism Strategy. It is expected that the local authorities in the East Kent area will continue to work together to achieve a mutual benefit on a number of issues and make the best use of resources. Thanet also supported Canterbury's bid for the European Capital of Culture 2008.

POLICY T1 - TOURIST FACILITIES

PLANNING PERMISSION WILL BE GRANTED FOR DEVELOPMENT WHICH WOULD EXTEND OR UPGRADE THE RANGE OF TOURIST FACILITIES, INCREASE THE ATTRACTION OF TOURISTS TO THE AREA OR EXTEND THE SEASON.

Serviced Accommodation

8.8 There is scope for further quality hotels in the area to improve the product base. The Council will encourage new provision, or additional provision of such facilities. Policy EC11 considers another aspect of the accommodation market, Business Hotels, in the Economic Development Chapter.

POLICY T2 – SERVICED ACCOMMODATION

IN THE THANET TOWNS AND VILLAGES, PROPOSALS FOR DEVELOPMENT OF SERVICED TOURIST ACCOMMODATION, INCLUDING EXTENSIONS TO AND CONVERSIONS OF EXISTING BUILDINGS, WILL BE APPROVED. SUCH PROPOSALS WILL BE JUDGED ON THEIR INDIVIDUAL MERITS IN RELATION TO SCALE, DESIGN, IMPACT ON THE LOCALITY AND NORMAL DEVELOPMENT CONTROL CRITERIA.

Self-Catering Accommodation

8.9. The range of self-catering tourist accommodation is wide, including holiday homes and flats, touring and static caravan sites and chalets. Such facilities provide choice for the tourist and are to be supported.

8.10 The Council also recognises that tourist facilities need to adapt to an ever-changing market. The upgrading of self-catering accommodation facilities to provide an improved product for the tourist market will therefore be supported by the Council.

8.11 However, in recent years, many facilities have come under pressure for change of use to higher value uses, such as housing. The Council would therefore seek to retain facilities where such a change of use would reduce the choice of tourist accommodation in Thanet.

POLICY T3 – SELF-CATERING ACCOMMODATION

1. **EXCEPT AT OR NEAR THE COAST AND TAKING ACCOUNT OF THE CRITERIA PROVIDED IN POLICY CC2, IN RELATION TO LANDSCAPE, PROPOSALS FOR THE DEVELOPMENT OF NEW TOURING AND STATIC CARAVAN SITES, AND SUITABLE EXTENSIONS TO EXISTING SITES, WILL BE PERMITTED, SUBJECT TO SITING, DESIGN AND ACCESS CONSIDERATIONS, AND PROVIDING THERE IS NO OVERRIDING CONFLICT WITH OTHER PLANNING POLICIES. ALL NEW SITES AND SUITABLE EXTENSIONS MUST BE WELL RELATED TO THE PRIMARY OR SECONDARY ROAD NETWORK. IN ALL NEW CASES, THE CARAVAN SITE MUST BE CAPABLE OF BEING EXTENSIVELY LANDSCAPED SUCH THAT ITS IMPACT ON THE CHARACTER OF THE AREA IS MINIMISED.**

2. **PROPOSALS TO DIVERSIFY, UPGRADE OR IMPROVE FACILITIES RELATING TO SELF-CATERING ACCOMMODATION WILL BE PERMITTED SUBJECT TO SCALE, SITING, DESIGN, ACCESS AND LANDSCAPING CONSIDERATIONS.**

3. **PROPOSALS TO REDEVELOP SELF-CATERING FACILITIES FOR OTHER USES, WILL NOT BE PERMITTED WHERE IT IS CONSIDERED THAT SUCH PROPOSALS WOULD SERIOUSLY AFFECT THE MAINTENANCE OF A REASONABLE CHOICE OF TOURIST ACCOMMODATION IN THANET.**

Coastal Park

8.12 The idea for a Coastal Park developed out of the preparation of the Management Scheme for the Thanet Coast Marine Special Area of Conservation (SAC). Many issues were discussed in that process which did not fall solely within the scope of the Management Scheme, which is a statutory document. These issues included regeneration projects, tourism and leisure (such as 'green tourism') new development, nature conservation and related issues.

8.13 The Coastal Park will also encompass green tourism issues such as the development of walking and cycling routes, particularly the Viking Coastal Trail. TDC are also working up a Coastal Information and Interpretation Strategy alongside the Coastal Park proposal, which will inform and direct future provision of information boards and interpretation panels along the coast.

8.14 The concept of the 'Coastal Park' is to draw together all these policies, proposals and projects at the coast under a single, integrated action plan, to give these initiatives a common identity and to set a framework to carry them forward and develop new ideas**.** As there are many issues covered by this initiative, various policies covering the coastal area will apply. However, the primary policy relating to the Coastal Park is CC13.

Former Hoverport, Pegwell Bay

8.15 The former Hoverport site at Pegwell Bay is located at Cliffs End, adjacent to the coast, and consists of an extensive area of hardstanding (over 8 hectares).

8.16 Any proposed development will, however, have to have due regard to the surrounding environmental concerns. Pegwell Bay is not only part of the Sandwich Bay/Hacklinge Marshes Site of Special Scientific Interest but is also of major international environmental importance under the European Community Wild Birds Directive (as a Special Protection Area) and Ramsar Convention. Part of Pegwell Bay has also been designated within the Sandwich Bay Special Area of Conservation (SAC) and the Thanet Coast Marine SAC. The importance of the surrounding Pegwell Bay area has also been reflected in its designation as a National Nature Reserve under Section 35 of the Wildlife and Countryside Act 1981.

8.17. The cliffs at and near the Hoverport site are also of Special Scientific Interest because of their geology and are a landscape feature of great importance particularly when viewed along the A256.

8.18 The Council as owner of the site has been advised that removal of the hardstanding to return the site back to nature is not a practical or an economic proposition. The Council is therefore seeking a development that will utilise the site to its best economic advantage, without damage to the short and long term future of the SSSI and other aspects of nature conservation interest.

8.19 The Council therefore commits itself to finding a practical and economic form of development, subject to the Habitats Regulations, which will provide employment opportunities on the site without damage to the SSSI, SPA, Ramsar Site or the two SACs.

8.20 The Hoverport site is suitable to form part of the Regional Conservation Park located around the Stour and Wantsum Channel. The Area Investment Framework Action Plan (involving Thanet, Canterbury and Dover Councils) includes the Regional Park Initiative and, as part of the development of a green heart for East Kent, identifies the Hoverport site as a visitor centre for green tourism. The Regional Conservation Park will work in conjunction with Thanet's Coastal Park Initiative which draws together policies, proposals and projects at the coast, developed from the preparation of the Management Scheme for the Thanet Coast Marine Special Area of Conservation (SAC)

POLICY T4 – HOVERPORT SITE PEGWELL BAY

PLANNING PERMISSION WILL BE GRANTED TO PROPOSALS FOR THE DEVELOPMENT OF THE HOVERPORT WITHIN ITS EXISTING BOUNDARIES, PROVIDED:

(1) THERE IS NO MATERIAL HARM TO THE SSSI-SPA-RAMSAR SITE AND THERE IS NO SIGNIFICANT EFFECT ON THE NATURE CONSERVATION INTERESTS OF THE SSSI, SPA, RAMSAR SITE OR SACS.

(2) ANY PROPOSED BUILT DEVELOPMENT WOULD NOT RESULT IN UNACCEPTABLE HARM TO THE SPECIAL LANDSCAPE AREA;

(3) THE MAXIMUM HEIGHT OF BUILT DEVELOPMENT DOES NOT EXCEED THE HEIGHT OF THE CLIFF FACE

(4) PUBLIC VIEWS FROM THE A256 OF THE CHALK CLIFF LINE TO THE EAST OF THE HOVERPORT ARE RETAINED; AND

(5) PUBLIC ACCESS IS RETAINED TO THE REAR OF THE SITE TO FACILITATE INSPECTION OF THE IMPORTANT CLIFF GEOLOGY AND TO THE HUGIN BEACH TO THE EAST.

The Lido, Cliftonville

8.21 The outdated and rundown Lido leisure complex lies on the seaward side of Ethelbert Terrace, on the cliff face close to the Winter Gardens and proposed Turner Centre. This location provides an ideal opportunity for a mixed-use development with uninterrupted sea views. However, any development must be sympathetic to the character of the area and retain a high proportion of sea views from Ethelbert Terrace. The latter requirement should be reflected in the design of any proposed buildings, which should consider varying heights, above the cliff top, to obtain the most advantageous views from Ethelbert Terrace, Ethelbert Crescent and Cliff Terrace. The following policy will therefore apply.

POLICY T5 - THE LIDO SITE

THE DEVELOPMENT OF THE LIDO COMPLEX FOR AN APPROPRIATE MIX OF TOURISM, LEISURE AND HOUSING USES, WILL BE PERMITTED SUBJECT TO CONSIDERATION BEING GIVEN TO THE POTENTIAL LOSS OF SEA VIEWS FROM ETHELBERT TERRACE AND BEING SYMPATHETIC TO THE CHARACTER OF THE AREA.

Language Schools

8.22 The Thanet towns have a considerable number of language schools. Attendance tends to peak during the Easter period and the summer holiday. A high percentage of students using these services stay with Thanet families or as paying guests. The South-East England Tourist Board's document 'The

Economic Impact of Tourism – Thanet 1998' estimated that the total visitor expenditure, by such visitors, was £27.15 million in 1998.

8.23 English language schools in Thanet are therefore a major contributor to the local economy, and offer potential for encouraging the next generation of visitors to this part of Kent. The Council wishes to encourage this sector of the local economy to grow**.**

POLICY T6 - LANGUAGE SCHOOLS

LANGUAGE SCHOOLS WILL NORMALLY BE PERMITTED SUBJECT TO:

1) THE NUMBER OF STUDENTS TO BE ACCOMMODATED, THE HOURS OF OPERATION, THE RANGE OF FACILITIES PROVIDED AND THE RELATIONSHIP WITH ADJOINING PROPERTIES NOT RESULTING IN AN UNACCEPTABLE IMPACT ON THE AMENITIES OF ADJACENT OCCUPIERS OR ON THE CHARACTER OF AN AREA AS A WHOLE THROUGH NOISE OR GENERAL DISTURBANCE;

2) THE USE OF THE PROPERTY AS A LANGUAGE SCHOOL NOT RESULTING IN AN OVER-CONCENTRATION OF SUCH USES IN A PARTICULAR LOCALITY TO A LEVEL WHERE THE CHARACTER OF THAT AREA IS MATERIALLY ALTERED.

Amusement Uses

8.24. Due to its long history as a major holiday centre, Thanet is well served by a great variety of amusement uses. In deciding whether a particular location is suitable for a new amusement use, a relevant factor will always be the kind of amusement intended. There are two distinct types of amusement uses, 'amusement arcades' and 'amusement centres'.

8.25. 'Amusement arcades' offer a mix of amusements with prizes as well as entertainment-only machines (ranging from traditional pin-tables to video games and 'virtual reality'). Arcades are usually open to all ages and offer a bright, noisy, holiday atmosphere. Other more traditional amusements, such as shooting galleries and fairground rides, are also found in Thanet in locations very close to the sea.

8.26 An 'amusement centre' is usually limited to amusements with prizes, although ancillary retail or refreshment facilities may also be provided, subject to planning conditions. The concept was developed from that of 'arcades' but they exclusively use modern electronic machinery. Prize bingo, normally played on console machines, is sometimes included. Centres tend to be far more discreet in appearance than 'arcades' and are 'closed', suppressing noise within the property often via automatic doors. Operators tend to seek to locate 'centres' in traditional street locations to attract a particular clientele and many, therefore, maintain a 'shopfront' appearance with priced goods for sale. Access is usually denied to people under the age of sixteen or eighteen.

8.27 The main issues in determining appropriate locations for such uses will be the character of the area, noise and disturbance, the kind of amusements involved, appearance, traffic and road safety. To some extent noise and general disturbance are likely to depend on the kind of amusement intended and the expected clientele. Therefore, arcades would not be permitted in a town centre, whereas an amusement centre may be. Amusement centres will, however, be required to have a high quality shopfront design that displays prizes or priced goods for sale, thus maintaining a traditional town environment.

8.28 Where proposals for amusement uses are to be located in Listed Buildings the relevant consent will be required. In Conservation Areas, careful design of shop fronts will be also be a requirement.

8.29 Annex D to PPG6 suggests that the Local Plan should give guidance with regard to preferred locations in resort towns. In view of the high level of provision that currently exists in the Thanet towns and the ease of access to existing arcades and centres, it is considered appropriate to operate a policy of restraint in respect of the further expansion of these amusement facilities. In addition to this general approach, the reasons for the application of such a policy are substantiated by the characteristics of the different parts of the District.

Margate

8.30 The major area for amusement arcades is Marine Terrace along Margate seafront and within Dreamland. This area has developed a bright holiday atmosphere, where numerous individual arcades and associated uses compete for business and where a wide range of choice is given to the customer. This area has been defined on the Proposals Map for such uses. An extension to this allocated area will be resisted for two reasons. The first is the unacceptable impact upon the residential apartments, Arlington House, to the west. The second is the importance of Marine Gardens, to the east, as a buffer zone between the main retail area of Margate and the amusements along Marine Terrace. Amusement centres are, however, considered to be acceptable in the designated town centre area, subject to Policy T7 below.

Ramsgate

8.31 Although there are amusement arcades along Harbour Parade, the previous Local Plan had designated an area based on a large amusement centre along Marina Esplanade, close to the main beach. This, however, has since been demolished after a fire and an alternative development has since been approved. The approved development forms part of the Ramsgate Renaissance Initiative that seeks to rejuvenate the waterfront of the town. It is considered that the aims of this initiative would be compromised by any further development of amusement arcades in this area. Therefore, future proposals for amusement arcades will be limited to the defined area in Harbour Parade (as shown on the Proposals Map). Amusement centres are considered to be acceptable in the designated town centre area, subject to Policy T7 below.

Broadstairs

8.32. Broadstairs has a single but significant amusement arcade that lies between the town centre, the harbour and the beach. As a resort, Broadstairs is complementary to Margate and Ramsgate. The visitors that are attracted to Broadstairs are drawn there by its charm and the quiet "Victorian" elegance of the town. The existing amusement arcade is in a central location and it is considered that this meets the needs of visitors and residents. Given the special character and small scale of Broadstairs, there is no need or justification for further expansion of arcades or centres that would be likely to detract from the character of the town. Amusement centres are considered to be acceptable in the designated town centre area of Broadstairs, subject to Policy T7 below.

Westwood

8.33. Amusement arcades will not be permitted within the proposed town centre of Westwood, as defined in Policy TC2. Such an activity would be at odds, and therefore detrimental to, the proposed uses of this new town centre. However, amusement centres are considered to be acceptable in this proposed town centre area, subject to the criteria set out in Policy T7 below.

Other Centres

8.34 Cliftonville was traditionally the "dormitory" area of Margate with a major concentration of hotels and guesthouses. As such, it was entirely appropriate that a certain scale of amusement provision was made in the area. However, the long-stay holiday market has declined and with it the number of hotels. These have generally been replaced with more permanent residential uses and there is therefore a greater potential for conflict if further amusement arcades were to be permitted.

8.35 Two amusement arcades exist and these are relatively divorced from private residential accommodation. It is therefore considered that adequate provision exists, particularly bearing in mind the proximity to Margate. Introducing further arcades would detract from the character of the area and result in conflict with other uses.

8.36 Outside the centres referred to above, there are a number of District local centres and village centres in Thanet, which serve the needs of immediate residents. Given the small scale of these local centres, it is considered that the introduction of amusement arcades into these areas would be detrimental to the character and residential amenities of these areas and should not therefore be permitted. Access to the main town centres is relatively easy and adequate provision is made there.

8.37 Outside the town centres, the acceptability of amusement centres will be judged against the scale of the centre in which they are to be located, the compatibility with adjacent uses and the criteria set out in Policy T7 below.

POLICY T7 - AMUSEMENT USES

1. AMUSEMENT 'CENTRES', WILL BE PERMITTED IN THE TOWN CENTRES AND AT WESTWOOD, AS DEFINED ON THE PROPOSALS MAP, SUBJECT TO;

- **THE LIMITATION OF USE TO AMUSEMENTS WITH PRIZES;**
- **THE PROVISION OF EFFECTIVE SOUNDPROOFING INCLUDING DOOR DESIGN,**
- **A HIGH STANDARD OF SHOPFRONT DESIGN, WITH WINDOW DISPLAY, ESPECIALLY IN CONSERVATION AREAS.**

2. AMUSEMENT ARCADES WILL BE PERMITTED IN MARGATE AND RAMSGATE ONLY, WITHIN THE AREA SHOWN ON THE PROPOSALS MAP. PROPOSALS FOR AMUSEMENT USES WILL BE EXPECTED TO RETAIN EXISTING SIGNIFICANT ELEMENTS OF SEASIDE ARCHITECTURE.

3. OUTSIDE THE DEFINED AREAS PROPOSALS FOR NEW AMUSEMENT ARCADES OR THE EXTENSION OF SUCH USES WILL BE REFUSED.

4. **OUTSIDE TOWN CENTRES THE ACCEPTABILITY OF AMUSEMENT CENTRES WILL BE JUDGED AGAINST THE SCALE OF THE CENTRE IN WHICH THEY ARE LOCATED AND COMPATIBILITY WITH ADJACENT USES.**

Dreamland

8.38 The long-established amusement park known as Dreamland has been synonymous with Margate's function and image as a traditional seaside resort. However, in recent years there has been no substantial investment in the park to add to or maintain its attractiveness, with the result that the park has taken on an increasingly rundown and depressing appearance, with a dwindling number of rides occupying the site. Policy supports investment in the site as an amusement park and continuation of such use if viable and sustainable.

8.39 The Council is promoting the rejuvenation and diversification of Margate for local people and visitors alike through an evolving programme capitalising on its seaside location and character, the historic old town and harbour, and cultural associations including the legacy of the artist JMW Turner. An emerging Master Plan will set out principles and comprehensive opportunities for a number of key seafront sites.

8.40 The Dreamland site, as a result of its size (6.5 hectares) and location, is a key opportunity within the big picture for Margate's future. The Council wishes to realise a comprehensive scheme for the site, maximising its potential to contribute to the economic well-being and attractiveness of Margate as a visitor destination and area in which to live and invest.

8.41 Any development of the Dreamland site will be expected to reflect the context and vision of the wider regeneration programme for Margate, and to integrate with proposals for adjoining key sites. Proposals should not therefore be limited in concept to the immediate Dreamland site, and schemes will be expected to anticipate and integrate with opportunities for redevelopment/refurbishment of adjacent sites (for example potential improvements to Arlington Square/House/car park). In particular, the site is key to securing the diversion of Marine Terrace around the back of the Dreamland site in order to enable much improved pedestrian movement between the site and the beach and enable significant environmental improvements along Marine Terrace. Proposals should therefore demonstrate how this could be achieved and phased in as appropriate.

8.42 The main Dreamland building and scenic railway are listed buildings. Proposals would need to retain these features in situ and to provide an appropriate setting for them in line with other relevant policies in this plan and guidance in PPG15.

8.43 The predominant use of the Dreamland site should be for leisure purposes providing a year-round destination, attractive to visitors and locals alike. This leisure use could take the form of an amusement park on the whole or part of the site. However, if an amusement park is found not to be viable and sustainable then alternative leisure uses will be explored. Any leisure use will be expected to integrate with properties and land fronting Marine Terrace and adjacent at Arlington Square. A residential element may also be appropriate on the site, but only at a scale necessary to enable the leisure proposals to proceed, contribute to the new access road and enable other aspects of the site's development and supporting infrastructure to take place including providing an appropriate parkland setting to the scenic railway. A green park around the scenic railway as a central feature would be required in order to provide an appropriate setting and high quality amenity space with pedestrian links within and beyond the site. A limited amount of retail use, restricted to the sale of goods in connection with the leisure and tourism elements on the site may be appropriate. A small (below 500sq m) convenience store to serve the immediate residential area and visitors would be acceptable.

POLICY T8 - DREAMLAND

1. PROPOSALS THAT SEEK TO EXTEND, UPGRADE OR IMPROVE THE ATTRACTIVENESS OF DREAMLAND AS AN AMUSEMENT PARK WILL BE PERMITTED. DEVELOPMENT THAT WOULD LEAD TO A REDUCTION IN THE ATTRACTIVENESS, LEISURE OR TOURIST POTENTIAL WILL BE RESISTED.

EXCEPTIONALLY, DEVELOPMENT OF A LIMITED PART OF THE SITE MAY BE ACCEPTED AS A PART OF A COMPREHENSIVE SCHEME FOR THE UPGRADING AND IMPROVEMENT OF THE AMUSEMENT PARK. THE SCHEME WILL BE REQUIRED TO DEMONSTRATE THAT THE FUTURE VIABILITY OF THE AMUSEMENT PARK CAN BE ASSURED AND THE COUNCIL WILL NEGOTIATE A LEGAL AGREEMENT TO ENSURE THAT

THE PROPOSED DEVELOPMENT AND THE AGREED INVESTMENT IN THE AMUSEMENT PARK ARE CARRIED OUT IN PARALLEL.

2. IN THE EVENT THAT EVIDENCE, IN THE FORM OF AN INDEPENDENT PROFESSIONAL ASSESSMENT, IS SUBMITTED (AND ACCEPTED BY THE COUNCIL) AS DEMONSTRATING THAT IT IS NOT ECONOMICALLY VIABLE TO OPERATE AN AMUSEMENT PARK ON THE WHOLE OR MAJORITY OF THE SITE IN THE FORESEEABLE FUTURE, THEN PROPOSALS FOR REDEVELOPMENT MAY BE ACCEPTED SUBJECT TO:

(i) PROPOSALS DEMONSTRATING THAT SUCH REDEVELOPMENT WOULD SUSTAINABLY CONTRIBUTE TO THE ECONOMIC WELL-BEING AND REJUVENATION OF MARGATE, AND BEING SUPPORTED BY A BUSINESS PLAN DEMONSTRATING THAT SUCH PROPOSALS ARE ECONOMICALLY VIABLE;

(ii) THE PREDOMINANT USE OF THE SITE BEING FOR LEISURE PURPOSES. (AN ELEMENT OF MIXED RESIDENTIAL WOULD BE APPROPRIATE BUT ONLY OF SUCH A SCALE NEEDED TO SUPPORT DELIVERY OF THE COMPREHENSIVE VISION FOR THE SITE);

(iii) COMPATIBILITY WITH THE CONTEXT AND PROPOSALS OF THE STRATEGIC URBAN DESIGN FRAMEWORK, AND INTEGRATION WITH APPROPRIATE PROPOSALS FOR REDEVELOPMENT /REFURBISHMENT OF NEIGHBOURING SITES;

(iv) PROPOSALS DELIVERING A NEW ROAD ALONG THE SOUTHERN SITE BOUNDARY TO ENABLE THE DIVERSION OF VEHICULAR TRAFFIC FROM MARINE TERRACE. (A LEGAL AGREEMENT WILL BE REQUIRED TO ENSURE THAT A PROPORTIONATE CONTRIBUTION WILL BE MADE TOWARDS THE COST OF PROVIDING THE NEW ROAD AND TO APPROPRIATE IMPROVEMENTS TO CREATE A PEDESTRIAN PRIORITY ENVIRONMENT ALONG MARINE TERRACE);

(v) RETENTION OF THE SCENIC RAILWAY IN SITU AS AN OPERATING FEATURE WITHIN A GREEN PARK SETTING APPROPRIATE TO ITS CHARACTER AS A LISTED BUILDING;
AND

(vi) PROPOSALS BEING ACCOMPANIED BY A TRAFFIC IMPACT ASSESSMENT.

Rural Tourism

8.44 It is considered essential, in the interests of the wider tourism strategy of the District and the county, that appropriate rural tourist facilities should be provided in rural settlements as well as in the urban areas. Minster Abbey and the Rural Life Museum, Sarre Mill, the Norman Church at St. Nicholas, and Foxhunter Park at Monkton are existing examples.

8.45 In planning terms, new facilities could include the reuse of rural buildings, particularly those that are listed, or possibly the conversion or part use of large

existing residential properties. The following Policy will apply to such proposals.

POLICY T9 - RURAL TOURISM

PROPOSALS FOR THE CONVERSION OF BUILDINGS IN RURAL SETTLEMENTS TO TOURISM-RELATED USES WILL BE PERMITTED, SUBJECT TO ENVIRONMENTAL AND TRAFFIC CONSIDERATIONS. THE CONVERSION OF FARM BUILDINGS WILL ALSO BE SUBJECT TO POLICIES R5 AND HE3.

PICNIC AREAS, NATURE WALKS AND OTHER MODEST FACILITIES PROMOTING GREEN TOURISM IN THESE AREAS ARE CONSIDERED DESIRABLE AND WILL BE ENCOURAGED.

TARGETS

LP Implementation Target	
Policy Area	Amusement Uses
Relevant Policies	T7
Indicator	Number of amusement arcades permitted outside designated areas.
Target	Nil.
Monitoring	Monitoring of planning applications

References:

'The Economic Impact of Tourism'. Thanet 1998. South-East England Tourist Board. April 2000
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Document. TDC & Kent Architecture Centre. 2000.
'Ramsgate Renaissance'. A Vision for Ramsgate Waterfront. TDC. ARUP October 1998.
'Amusement Centres'. Development Control Practice Notes. Issue 23-02/94. G Holt.
'Sir Moses Montefiore and Ramsgate', by Gill Wyatt. Kent County Council. 1984.

9. Sport & Recreation

9. Sport & Recreation

Introduction

9.1. The important contribution that sport and recreation, as well as community facilities, can make in improving people's quality of life is now widely accepted. Participation in sport and recreation can improve the health and well-being of an individual, whilst sports clubs and community facilities can improve social interaction and provide a sense of community pride.

9.2. The provision of a wide choice of good facilities is also important for the economy. An attractive area with a choice of recreational facilities is appealing for prospective employers and their employees.

9.3. It is the Council's vision that, by 2020, Thanet will have a wide selection of facilities for sport and recreation. This would be achieved by working together in partnership with the private sector together with funding from the Lottery Commission.

9.4. The Council's commitment to improving facilities in the area has already started with the identification of current deficiencies in sport facilities through the Sports Strategy. This strategy will be assisted by the private sector. With the increase in employment (with more disposable income in the District) the private sector would have the confidence to invest in additional facilities.

9.5. The provision of new facilities may also bring a diverse range of sports and recreation into the area, making Thanet even more attractive as a location to live for new residents. This diversity would be complemented by the Coastal Park concept that which would manage the use of Thanet's coast and successfully accommodate the many opportunities for 'watersports' in this District.

9.6. Other forms of recreation, such as restaurants and cafes, would also become important with the change of emphasis in the use of the town centres.

9.7. To achieve this vision it is important to provide and safeguard good facilities for a wide range of activities that will provide opportunity and choice. Some sports and recreational activities require extensive areas of land to meet their needs. Such land, especially in urban areas, is particularly at risk from development pressures. The land-use based planning system therefore has a crucial role to play in securing the following objectives.

OBJECTIVES

1. **TO ENCOURAGE THE PROVISION OF A RANGE OF ACCESSIBLE, QUALITY FACILITIES FOR SPORT AND RECREATION TO SERVE THE NEEDS OF RESIDENTS AND VISITORS**
2. **TO SAFEGUARD PUBLIC AND PRIVATE OPEN SPACE AND OTHER LAND OF RECREATIONAL, CONSERVATION, WILDLIFE, AMENITY OR HISTORIC VALUE**
3. **TO SECURE THE PROPER AND TIMELY PROVISION OF OPEN SPACE TO SERVE THE NEEDS GENERATED BY NEW DEVELOPMENT SUCH THAT THERE IS NO PUBLIC EXPENSE**
4. **TO IDENTIFY EXISTING DEFICIENCIES IN PROVISION AND OPPORTUNITIES FOR NEW OPEN SPACE AND TO ESTABLISH A POLICY FRAMEWORK FOR RESOLVING CONFLICT BETWEEN RECREATIONAL USES**

Policy Background

9.8. Government advice in Planning Policy Note 17 (PPG17) encourages the provision of a wider range of opportunities for such activities for both spectators and participants over the entire age spectrum. It also suggests that such opportunities should, wherever possible, be available for everyone, including the elderly and those with disabilities.

9.9 Government advice in PPG17 encourages social inclusion and community cohesion with access to open space, sport and recreation being a major theme throughout.

9.10 Sport England also produced 'Planning policies for sport, a land use planning policy statement on behalf of sport' in 1999, which echoes the objectives in PPG17.

9.11 Thanet District Council produced a Sports Strategy for Thanet, 1999-2002, which has the overall objective "…to meet the sporting and recreational needs of the people of Thanet". The Strategy is in line with National Government commitment to fighting social exclusion and encouraging a healthier lifestyle. This document also identifies the changing role of the local authority, from a primary provider, to a role that acts as a facilitator and co-ordinator.

General Policies

9.12 Car ownership is comparatively low in Thanet but is growing in real terms in line with national trends. Although this increasing mobility produced by widespread car ownership permits and encourages people to travel much further afield for their recreation, demand for facilities should as far as possible be met within Thanet, particularly in its urban areas which contain approximately 95% of the District population.

Adequacy of Existing Provision

9.13 The amount of land thought to be necessary for open-space purposes is six acres per thousand population, a standard first proposed by the National Playing Fields Association in 1925. The population profile of an area is clearly a vital component of any calculation of demand for open space.

9.14 In addition, there have been changes in the type and popularity of sporting activities since the standards were devised. A number of factors have changed the needs of the community of Thanet in sporting terms. These have included an increased emphasis placed on a healthy lifestyle, on provision by the private sector and on the expectation for the quality of provision provided.

9.15 Nevertheless, some general comments can be made about sports facilities in Thanet. The economic and social conditions of the past have been reflected in the standard of sports facilities in Thanet. The Sports Strategy for Thanet indicates that the Thanet community has been left with an outdated range of sporting and recreational facilities. Although some facilities date back to the 1970s, some were updated through the 1980s.

9.16 In July 2000 a new sports centre in Ramsgate opened and this centre will provide core community facilities for Ramsgate. It comprises a sports hall (equivalent in size to six badminton courts), a health suite, aerobic and dance studio, conditioning suite and social facilities. It was jointly funded by Thanet District Council, Kent County Council, SRB and Sports Lottery Fund and is an indication of how the Council will expect schemes to be implemented in the future.

9.17 Sports provision in Thanet's schools does not generally compare well with other areas. Most primary schools have a small gymnasium/hall with limited equipment. Most of the state secondary schools have indoor facilities in the form of old-fashioned gymnasiums and school halls. Outdoor facilities are better, but some schools, for example, Clarendon House Grammar School, have little on-site provision, and pupils are forced to travel. Currently more sports halls are now being provided at Thanet secondary schools through basic needs projects being undertaken by Kent County Council.

9.18 Outdoor pitches for public use are in great demand. The loss of formal active open space is to be resisted through Policy SR 10.

9.19 Mixed usage of grass pitches is not possible in some cases, for example, cricket and football. The condition of such pitches declines with overuse, particularly in bad weather. Standards in most sports would increase with better provision. The Regional Sports Council has highlighted the need for a multi-use pitch in Thanet.

9.20 The Sports Strategy for Thanet identifies key locations for its facilities strategy: the new Ramsgate Sports Centre & old swimming pool, Hartsdown Park Leisure complex in Margate, the Jackey Baker's/EuroKent (Rose Farm) proposals and Minster Sports Hall.

9.21 A high proportion of Thanet's residents are elderly and/or suffer illness-limiting mobility. The District Council is keen to ensure that recreational facilities are accessible and suitable for use by as wide a section of the population as possible.

Provision of New Facilities

POLICY SR1 - NEW FACILITIES

PROPOSALS FOR THE PROVISION OF NEW RECREATION AND SPORTS FACILITIES INCLUDING THOSE PROVIDED BY CLUBS OR SCHOOLS, PARTICULARLY WHERE THESE PROPOSALS ARE AVAILABLE TO THE PUBLIC (INCLUDING PEOPLE WITH LIMITED ENERGY/MOVEMENT), AND WHICH REMEDY IDENTIFIED DEFICIENCIES IN EXISTING FACILITIES WILL BE PERMITTED PROVIDED:

(1) THE LOCATION OF THE PROPOSAL IS WITHIN OR ADJOINING THE URBAN AREAS;

(2) THE INTENDED USE IS COMPATIBLE WITH SURROUNDING LAND USES AND WITH CURRENT PLANNING POLICY;

(3) THE FACILITIES ARE WELL RELATED TO THE MAJOR TRANSPORTATION NETWORK, AND THAT THE USE IS IN CLOSE PROXIMITY TO PUBLIC TRANSPORT;

(4) ANY BUILT DEVELOPMENT IS ANCILLARY TO THE OUTDOOR USE, AND THE SCALE, DESIGN, SITING AND MATERIALS ARE SYMPATHETIC TO THE CHARACTER OF THE AREA;

AND

(5) SATISFACTORY ARRANGEMENTS ARE MADE FOR VEHICULAR ACCESS AND PARKING, AND ACCESS BY PEDESTRIANS AND THE DISABLED.

Jackey Baker's Sports Ground

9.22 The District Council considers that it is in the interests of sport in the District to promote a central site for sport and recreation purposes, which would permit the concentration of resources on one site, and the development of a sporting "centre of excellence". Sports development may in some cases mean built sports facilities (gymnasium, stadia etc). It is acknowledged that such a development could result in the loss of open playing space. The Council considers that such a loss should be balanced against the benefits such a new

facility would bring to the District. Outline planning permission has been granted for a sports facility as part of the EuroKent Business Park proposal.

9.23 Any new sports development may be supported by a limited development of D2 (leisure facilities) or A3 (restaurants) uses to subsidise the sporting use and ensure it is viable. Any such proposal will need to be subject to a full justification being made when any application is submitted and will be judged against the amount of land retained for open sporting purposes.

9.24 The Jackey Baker's Sports Ground provides the best opportunity to both enhance existing facilities, and in the longer term, to increase the level of facilities for which there is adjoining undeveloped land as identified on the proposals map. As part of the existing sports land has been allocated for business uses in connection with the EuroKent Business Park, this identified undeveloped land is especially important to compensate for this loss. The following Policy will therefore apply.

POLICY SR2 - JACKEY BAKER'S

(A) JACKEY BAKERS SPORTS GROUND WILL BE PROMOTED AS THE LONG-TERM PRIMARY SPORTS VENUE FOR THANET. WHERE FULLY JUSTIFIED, THE COUNCIL WILL PERMIT ANCILLARY DEVELOPMENT TO SUBSIDISE THE SPORTS USE.

(B) LAND HAS BEEN IDENTIFIED TO THE NORTH OF THE EXISTING SITE FOR SPORT AND RECREATION PURPOSES.

Maximising Use of Facilities

9.25 Few sports or recreational activities are subjected to maximum use compatible with their nature. The underuse of facilities wastes resources whereas fuller use can reduce the amount of land and buildings required to meet needs. The District Council wishes to encourage the joint use of facilities. The following policy addresses all sports facilities, including private clubs and schools, for use by the community.

POLICY SR3 - MAXIMISING USE OF FACILITIES

PROPOSALS FOR THE MULTIPLE USE OF EXISTING FACILITIES AND NEW DEVELOPMENT WHICH WILL CREATE OPPORTUNITIES FOR RECREATIONAL USE BY THE PUBLIC ADDITIONAL TO THE EXISTING USE OF THE FACILITIES WILL BE PERMITTED.

Recreation Provision in New Housing Development

9.26 New housing developments give rise to new recreation and leisure needs. Without new provision, extra pressures will be put upon existing facilities and this will have a negative impact on the quality of life in the area. The Council believes that it is right and proper that, as a general rule, such needs are met by the development with no cost to the public purse. Government guidance

also recognises that it is legitimate to use planning obligations to secure the provision of public open space and sporting facilities.

9.27 The Council will consider three areas in which the developer will have to consider provision of recreation: outdoor sports facilities, play and amenity areas. The following policies aim to ensure that safe and conveniently located provision will be made to accommodate demand generated by proposals for housing development.

Outdoor Sports Facilities

9.28 Outdoor sports facilities, include pitches, greens, courts, athletics tracks and miscellaneous sites such as croquet lawns and training areas. This includes facilities owned by the local authority, education authorities or facilities within the voluntary, private or commercial sectors that serve the outdoor leisure needs for their members or the public.

9.29 Such outdoor facilities for both youth and adult use are at a premium in the District. However, with the exception of the proposed housing at Westwood, there are limited opportunities in this District for large-scale housing developments that could provide open sports facilities within the actual site.

9.30 It is envisaged, therefore, that for most developments, it will not be practical to provide land for outdoor sports facilities on the site. In such cases the Council will seek commuted payments from developers for the provision of new facilities or the upgrade or renewal of existing facilities. The amount expected will be based on the current costs of provision and maintenance at the time of the application and will follow the guidance set out in the Government's document, Assessing the Needs and Opportunities: A Companion Guide to PPG17. The Council produced the Thanet Sports Strategy 1999 – 2000 (which is currently being reviewed) that identifies deficiencies in sports facilities in the District. The Council will be guided by this publication as to where to direct funds.

9.31 However, the exact type and amount of provision will depend upon the size of the development and facilities provided in the vicinity. Contributions to school facilities, which allow their use outside school times, will also be considered.

POLICY SR4 - PROVISION OF NEW SPORTS FACILITIES

FOR NEW RESIDENTIAL DEVELOPMENT WHICH IN ITS COMPLETED FORM WOULD AMOUNT TO MORE THAN TEN RESIDENTIAL UNITS OR IS CONSIDERED LIKELY TO FORM PART OF A FUTURE DEVELOPMENT CUMULATIVELY TOTALLING MORE THAN TEN RESIDENTIAL UNITS, THE DISTRICT COUNCIL WILL SEEK A FINANCIAL CONTRIBUTION FOR THE PROVISION OF SPORTS LAND AND FACILITIES TOGETHER WITH A COMMUTED PAYMENT FOR CONTINUOUS MAINTENANCE. WHERE RESIDENTIAL DEVELOPMENT TAKES PLACE WITHIN THE VICINITY OF EXISTING SPORTS FACILITIES, A FINANCIAL CONTRIBUTION FOR

THEIR UPGRADE OR RENEWAL AND CONTINUED MAINTENANCE WILL BE SOUGHT.

Play Areas

9.32 The District Council intends to ensure that adequately equipped and casual children's playspace is safely and conveniently available to all new residential developments of a size and type likely to generate demand for it. The location of facilities should, however, take into account the potential impact of noise and other disturbance on neighbouring properties. In conjunction with play space for younger children, facilities for teenagers should also be considered. These facilities are more informal in design and are considered to be a good crime prevention measure. Good facilities will contribute to the quality of life in the District and help social interaction.

9.33 Because the District Council's resources are fully utilised in maintaining existing play areas, the Council will expect the developer to provide, or contribute to, play areas to meet the needs likely to be generated by the development.

9.34 The Council is of the view that the cumulative impact of smaller housing developments can also put pressure upon existing play facilities. With the drive to provide more housing units on brownfield land in urban areas, whether it is new build or conversion, 'smaller' sites are more likely to be developed. This situation will ultimately lead to higher local population and put pressure on existing play facilities. To keep a good quality of life, it is therefore proposed that for residential developments of ten to forty-nine units, a financial contribution for the provision, maintenance and upgrade of existing facilities will be required. The exact contribution will be negotiated, as part of a legal agreement, and will be dependent on the level and standard of provision of play facilities within the immediate locality.

9.35 Where a commuted sum is considered necessary for the provision, upgrade and maintenance of play facilities' it will be determined on the current costs to do this per new family home. On sites of between ten to forty-nine units the Council will require a commuted payment to accommodate the additional costs generated for play area maintenance and upgrading in perpetuity. In considering an appropriate sum, the Council will assume a rate of one child per family home (see note below) and will require a sum to generate a return sufficient to cover the annual cost per child for each family unit, taking into account inflation and increased costs at the appropriate time.

9.36 On sites of more than 50 residential units, it is for the developer to consider how play area provision will be accommodated, but the District Council will have regard to the safety, convenience and security of arrangements proposed, in particular:

(1) accessibility in terms of highway safety and proximity to dwellings served

(2) security of children using play areas (including whether the site and access to it is overlooked by dwellings)

and

(3) convenience of siting in relation to noise sensitive development (e.g. dwelling units designed for, or particularly suited to, occupation by the elderly).

9.37 Provision therefore needs to be carefully considered at the design stage, and indicated clearly on submitted drawings. For clarity it should be noted that it is not the District Council's intention to seek playspace in relation to specialised accommodation for the elderly, particularly sheltered housing, or any element of a development that is related to such specialised accommodation. However, where applicable (Policy SR6), private amenity area provision will still be expected in such developments.

9.38 The District Council considers that adequate "doorstep" playspace should be available for young children. Additionally the Council considers that it is practical and desirable that in developments of fifty or more residential units provision should be made for play areas. Requirements for payment and contributions to play spaces, sports facilities and amenity areas will be negotiated on the basis of local standards based on an audit of need, provision and deficiency.

POLICY SR5 - PLAYSPACE

(A) DOORSTEP PLAYSPACE

NEW FAMILY DWELLINGS WILL BE EXPECTED TO INCORPORATE GARDEN SPACE IN ORDER TO PROVIDE A SAFE "DOORSTEP"* PLAY AREA FOR YOUNG CHILDREN.

(B) LOCAL PLAY SPACE

WHERE A DEVELOPMENT IS PROPOSED, WHICH IN ITS COMPLETED FORM WOULD AMOUNT TO TEN TO FORTY-NINE RESIDENTIAL UNITS OR IS CONSIDERED LIKELY TO FORM PART OF A FUTURE DEVELOPMENT CUMULATIVELY TOTALLING TEN TO FORTY-NINE RESIDENTIAL UNITS, THE DISTRICT COUNCIL WILL EXPECT A COMMUTED PAYMENT TO BE MADE FOR THE PROVISION, MAINTENANCE AND UPGRADE OF PLAY FACILITIES AS SPECIFIED ABOVE.

WHERE DEVELOPMENT IS PROPOSED, WHICH IN ITS COMPLETED FORM WOULD AMOUNT TO FIFTY OR MORE RESIDENTIAL UNITS, OR IS CONSIDERED LIKELY TO FORM PART OF A FUTURE DEVELOPMENT CUMULATIVELY TOTALLING FIFTY OR MORE RESIDENTIAL UNITS, THE DISTRICT COUNCIL WILL REQUIRE THE DEVELOPMENT TO INCORPORATE LOCAL PLAY AREA PROVISION ON THE BASIS OF 0.7

HECTARES PER 1000 POPULATION. SUCH PROVISION WILL BE EXPECTED TO COMPRISE APPROXIMATELY 36% EQUIPPED PLAY AREA AND APPROXIMATELY 64% CASUAL/INFORMAL PLAYSPACE.**

IN CONSIDERING THE SUITABILITY OF PROVISION, THE DISTRICT COUNCIL WILL REQUIRE THAT LOCAL PLAY AREA PROVISION IS AVAILABLE WITHIN A MAXIMUM SAFE WALKING DISTANCE OF 200 METRES FROM ANY DWELLING INCORPORATING ONE OR MORE CHILD BEDSPACE WITHIN THE DEVELOPMENT.

THE DISTRICT COUNCIL WILL REQUIRE LOCAL PLAYSPACE PROVISION TO BE AVAILABLE FOR USE AS SUCH PRIOR TO OCCUPATION OF THE FIRST DWELLING.

RESPONSIBILITY FOR MAINTENANCE AND MANAGEMENT OF LOCAL PLAY AREAS SHALL BE VESTED IN A SPECIFIED INDIVIDUAL OR, SUBJECT TO A COMMUTED PAYMENT TO MEET SUCH COSTS, IN THE DISTRICT COUNCIL. THE DISTRICT COUNCIL WILL USUALLY SEEK TO SECURE SUCH ARRANGEMENTS BY MEANS OF A PLANNING AGREEMENT.

IN EXCEPTIONAL CIRCUMSTANCES WHERE THE DISTRICT COUNCIL AGREES THAT IT WOULD BE IMPRACTICAL TO PROVIDE ADEQUATE AND SUITABLY LOCATED PLAYSPACE AS PART OF THE DEVELOPMENT, THEN COMMUTED PAYMENT MAY INSTEAD BE ACCEPTABLE TO OFFSET THE COSTS RESULTING FROM THE ADDITIONAL USE AND NEED FOR INCREASED MAINTENANCE AND PLAY EQUIPMENT AT SUITABLY LOCATED EXISTING PLAYSPACES.

Operational Notes:
9.39 Doorstep Play Areas:
* Doorstep playspace is defined as playspace for young children which is immediately adjacent to, closely visible and safely accessible from the dwellings served.

9.40 Local Play Areas:
** For the purposes of applying the area standards for local play space provision, the District Council will assume an occupancy rate of 2.5 persons per dwelling, except where the individual circumstances of the application clearly indicate that such assumption would be inappropriate.

9.41 For the purposes of the policy, dwellings having two or more bedrooms will be assumed capable of accommodating at least one adult and one child and will be regarded as family dwellings unless particular circumstances indicate otherwise.

Amenity Areas

9.42 Amenity areas comprise open space within residential areas, which can provide an attractive landscaped feature, act as a resting/sitting area and

informal meeting place, as well as a visual amenity and break in the built environment. If well designed and well managed, these can add to the attractiveness of new housing development (which may be reflected in sale price). Amenity areas may also have value in providing/perpetuating a local wildlife habitat, particularly where existing trees and semi-natural habitats can be retained and incorporated as part of the amenity feature. Accordingly, amenity area provision should be considered at the earliest stage of the design process.

9.43 The District Council considers that in larger residential developments, amenity areas should be provided, and considers it reasonable to expect such provision in developments comprising twenty-five or more units. In smaller developments, the District Council may also expect separate amenity area provision where, for example, garden area layout offers insufficient open space and landscaping to relieve the continuity of built development. Amenity areas should be convenient, well designed and usable, including sitting areas, to meet the needs generated by the development. The size of the development will influence the amount of open space that should be provided, and this should be discussed with the District Council prior to submission of a planning application

POLICY SR6 - AMENITY AREAS

THE DISTRICT COUNCIL WILL REQUIRE TO BE SATISFIED THAT A SUITABLY AND CONVENIENTLY LOCATED AREA OF USABLE AMENITY SPACE, ADEQUATE TO ACCOMMODATE THE DEMANDS FOR PASSIVE RECREATION GENERATED BY THE DEVELOPMENT, IS PROVIDED IN RESPECT OF ANY RESIDENTIAL DEVELOPMENT:

(1) COMPRISING TWENTY-FIVE OR MORE RESIDENTIAL UNITS;

OR

(2) THE LAYOUT OF WHICH, INCLUDING GARDEN SPACE, DOES NOT OFFER SUFFICIENT SPACE TO RELIEVE THE CONTINUITY OF BUILT DEVELOPMENT. THE DISTRICT COUNCIL WILL EXPECT PROPER ARRANGEMENTS FOR MAINTENANCE AND MANAGEMENT, RESPONSIBILITY FOR WHICH SHALL BE VESTED IN A PARTICULAR INDIVIDUAL OR, SUBJECT TO COMMUTED PAYMENT TO MEET SUCH COSTS, IN THE DISTRICT, TOWN OR PARISH COUNCIL. THE DISTRICT COUNCIL WILL SEEK TO SECURE SUCH ARRANGEMENTS BY ENTERING INTO A PLANNING AGREEMENT.

IN EXCEPTIONAL CIRCUMSTANCES WHERE THE DISTRICT COUNCIL AGREES THAT IT IS IMPRACTICAL OR UNREASONABLE TO PROVIDE ADEQUATE AND SUITABLY LOCATED AMENITY SPACE AS PART OF THE DEVELOPMENT, THEN COMMUTED PAYMENT MAY INSTEAD BE ACCEPTABLE TO OFFSET THE COSTS RESULTING FROM ADDITIONAL USE AND MAINTENANCE NEEDS AT EXISTING USABLE AMENITY SPACE SUITABLY LOCATED WITHIN THE VICINITY OF THE SITE. THE

DISTRICT COUNCIL WOULD REQUIRE SUCH PAYMENTS TO BE SECURED BY ENTERING INTO A PLANNING AGREEMENT.

Operational Note:
9.44 Amenity areas are expected to comprise usable amenity space and therefore non-usable features such as highway land and verges, and unusable landscape strips/areas of planting to screen development together with any playspace provision will not be considered for the purposes of this policy as contributing to amenity area provision. In designing amenity area provision, the needs of physically challenged persons should be taken into account.

The Urban Fringe (including green wedges)

9.45 Local Planning Authorities are urged to consider the scope for encouraging recreational facilities and increased public access to open land at the urban fringe. Thanet's open agricultural landscape directly abuts dense housing areas.

9.46 The Kent Countryside Strategy (KCC, 1990) indicates that priority should be given to tree planting on the urban fringes of Thanet, inter alia, to provide for informal recreation.

9.47 Care will need to be exercised in identifying suitable areas for recreational uses to avoid locations where retention of the open landscape is important and agricultural considerations less strong.

POLICY SR7 - URBAN FRINGE

ON SITES ABUTTING THE EDGE OF THE BUILT-UP AREAS OF THE THANET TOWNS, APPROVAL WILL BE GIVEN TO THE ESTABLISHMENT OF OPEN RECREATIONAL USES WHICH IMPROVE THE OPPORTUNITY FOR PUBLIC LEISURE AND ACCESS TO THE COUNTRYSIDE, PROVIDED THAT THE USE AND SITE PROPOSED ARE ACCEPTABLE IN TERMS OF THE FOLLOWING CONSIDERATIONS:

(1) IMPACT ON THE CHARACTER OF THE LANDSCAPE;

(2) THE AGRICULTURAL QUALITY OF THE LAND AND WHETHER THERE IS A SUITABLE ALTERNATIVE SITE ON LOWER QUALITY LAND;

(3) THE FUTURE OPERATIONS AND VIABILITY OF FARMING OPERATIONS;

(4) THE EFFECT ON NEIGHBOURING USES;

(5) ARCHAEOLOGICAL, NATURE CONSERVATION AND ECOLOGICAL INTERESTS;

(6) TRAFFIC GENERATION AND THE CAPACITY OF THE LOCAL ROAD NETWORK; AND

(7) THE SCALE, SITING, DESIGN AND LOCATION OF ANY BUILT DEVELOPMENT, WHICH MUST BE ANCILLARY TO THE DOMINANT OPEN USE AND ACCEPTABLE IN RESPECT OF (1) ABOVE.

Countryside

9.48 The countryside is a popular destination for a large proportion of the population and is capable of meeting a variety of outdoor sporting and recreational needs. Some activities involve very little, if any, change in the character of the countryside, e.g. fishing, bird watching, walking.

9.49 However, when uses become more intensive and highly organised there is often a demand for ancillary buildings, improvements to access arrangements for vehicles, car parking, fencing and advertisements. The ability of a particular area to respond to such demands without damage depends largely on its character. Some activities, such as war games, motor sports and clay pigeon shooting, can create noise and disturbance and these will normally be resisted unless the Council is satisfied that the issues raised above have been carefully considered within the immediate locality.

Formal Countryside Recreation

9.50 The District Council has already focused attention on the urban fringe as the most suitable location for some recreational activities, including golf, which are likely to involve the greatest land take. In the countryside, some organised recreational uses require careful siting as they have the potential to result in significant impacts.

9.51 Such uses include clay pigeon shooting, motorised sports and "executive games". The following Policy applies to formal recreation proposals in the countryside.

POLICY SR8 - FORMAL COUNTRYSIDE RECREATION

PROPOSALS FOR FORMAL RECREATION USES IN THE COUNTRYSIDE WILL BE DETERMINED HAVING REGARD TO:

(1) THE NATURE OF THE ACTIVITY AND ITS LIKELY IMPACT ON RURAL AMENITY THROUGH GENERAL DISTURBANCE, INCLUDING NOISE AND TRAFFIC GENERATION;

(2) THE EFFECT OF THE PROPOSAL ON THE CHARACTER, ENJOYMENT AND APPEARANCE OF THE COUNTRYSIDE AND ITS IMPACT ON LANDSCAPE, AGRICULTURE, NATURE CONSERVATION, NATURAL HISTORY AND OTHER INTERESTS; AND

(3) THE CAPACITY OF THE ROAD NETWORK TO SAFELY ACCOMMODATE THE TRAFFIC GENERATED AND THE ABILITY TO PROVIDE ACCESS TO THE FACILITY BY MEANS OTHER THAN THE CAR.

BUILT OR PRIMARILY INDOOR RECREATION FACILITIES WILL NOT BE PERMITTED IN THE COUNTRYSIDE UNLESS IT IS ANCILLARY TO AN ACCEPTABLE OUTDOOR RECREATION USE AND IS WELL DESIGNED, SMALL IN SCALE, AND UNOBTRUSIVELY SITED.

Informal Countryside Recreation

9.52 Informal countryside recreation is the most popular activity in Britain. Thanet is particularly poorly provided with rural open spaces accessible to the public. In the absence of local provision, pressures for informal recreation can lead to conflict with rural conservation and agriculture. This pressure can be reduced by the provision of areas for recreational uses. Farm diversification (see Chapter 11, Policy CC10) has a role to play in securing new provision. New provision of recreational facilities will first be discussed with DEFRA in respect of agricultural quality and with relevant nature conservation bodies to ensure that detrimental effects to the natural environment are minimised.

POLICY SR9 - INFORMAL COUNTRYSIDE RECREATION

IN RURAL AREAS AND AT THE COAST, FACILITIES FOR INFORMAL RECREATION, INCLUDING THE PROVISION, ENHANCEMENT AND PROMOTION OF COUNTRY PARKS, PICNIC SITES, FARM TRAILS, NATURE TRAILS, BIRDWATCHING FACILITIES AND SMALL PARKING AREAS GIVING ACCESS TO THE RIGHTS OF WAY NETWORK, WILL BE ENCOURAGED IN APPROPRIATE AREAS.

SUCH FACILITIES WILL BE PERMITTED WHERE THERE IS NO OVERRIDING CONFLICT WITH ENVIRONMENTAL, AGRICULTURAL LAND QUALITY (GRADES 1, 2 AND 3A) OR TRANSPORTATION CONSIDERATIONS. THE RIGHT OF WAY AND BRIDLE PATH NETWORKS WILL BE PROTECTED AND ENHANCED, FOR RECREATIONAL AS WELL AS OTHER PURPOSES.

Open Space Policies

Safeguarding Existing Public Open Space

9.53 Open space is a scarce commodity within the urban areas of the District. Once such areas are lost to development, it is very difficult to provide satisfactory replacements within the immediate vicinity. With higher densities expected for new developments in urban areas, open space or amenity areas will be vital for the quality of life. The importance of open space is highlighted in the document 'Towards an Urban Renaissance' that suggests that urban neighbourhoods need "…breathing space…".

9.54 Drawing on the latest Government Guidance, the Council will be carrying out an audit of open space in the District. This would identify both quantity and quality of open space as well as access details. The objective is to provide and maintain a network of open space and compare provision to national and local standards. Such a network of open space would be beneficial to the demands of wildlife as well as humans.

9.55 Open land comprises public and private open space and other open land (not now used for recreation but which has amenity value). Such open spaces provide for a wide variety of activities from organised sport to simple relaxation and opportunities for walking.

9.56 Sport England has indicated that participation in sport is at an all-time high across a diverse range of activities, generating demand for more and better places for sport. The demand for open space is likely to increase further if population forecasts are correct. Expectations for the provision of new facilities have also been raised by the availability of Lottery funding.

9.57 The District Council recognises that development pressures may arise in respect of open spaces within its urban areas, the green wedges that relieve the monotony of an otherwise continuously built-up area, and Thanet's high quality farmland. The Council's policy is to resist such pressure.

POLICY SR10 - PUBLIC OPEN SPACE

DEVELOPMENT WILL ONLY BE PERMITTED ON PUBLIC OPEN SPACE IN VERY EXCEPTIONAL CIRCUMSTANCES AND ONLY IF:

(1) THE PROPOSED USE IS OF A TEMPORARY OR SEASONAL NATURE AND CANNOT BE ACCOMMODATED ELSEWHERE WITHOUT CONFLICT WITH CONSERVATION OR OTHER DEVELOPMENT PLAN POLICIES; AND THE PROPOSED USE IS ACCEPTABLE IN TERMS OF ITS RELATIONSHIP WITH NEIGHBOURING LAND USES AND BUILDINGS; AND HIGHWAY ARRANGEMENTS ARE SATISFACTORY; AND THE LAND IS SUBSEQUENTLY REINSTATED AS PUBLIC OPEN SPACE IMMEDIATELY AFTER THE TEMPORARY OR SEASONAL USE HAS CEASED; OR

(2) THE PROPOSED DEVELOPMENT IS ESSENTIAL IN CONNECTION WITH OUTDOOR RECREATIONAL OR SPORTING ACTIVITIES WHICH REQUIRE CLOSE PROXIMITY TO THE SEA OR BEACH AND ARE THEMSELVES ACCEPTABLE IN TERMS OF PLANNING POLICY FOR THE COAST AND ARE SMALL IN SCALE, SITED AND DESIGNED TO MINIMISE LOCAL IMPACT; OR

(3) THE PROPOSAL REQUIRES ONLY THE DEVELOPMENT OF A SMALL PART OF AN AREA OF PUBLIC OPEN SPACE FOR THE PURPOSE OF IMPROVING PUBLIC SPORTS AND RECREATIONAL FACILITIES AND THE PROPOSED DEVELOPMENT DOES NOT CONFLICT WITH OTHER DEVELOPMENT PLAN POLICIES; OR

(4) PROVISION IS MADE, BEFORE PERMISSION IS GRANTED FOR ANY DEVELOPMENT ON ANY PUBLIC OPEN SPACE, FOR ITS REPLACEMENT IN A SUITABLE LOCATION BY AN ALTERNATIVE PUBLIC OPEN SPACE, OF AT LEAST EQUAL RECREATIONAL, COMMUNITY AND AMENITY VALUE.

Private Open Space

9.58 It is important that private open space is not lost to built uses without good cause. This is particularly true where such green space serves a strategic role as part of the area's Green Wedges and Green Grid, provides active recreational space or makes a significant contribution to the amenity or character of the area because it is undeveloped.

POLICY SR11 - PRIVATE OPEN SPACE

DEVELOPMENT WILL NOT BE PERMITTED ON UNDEVELOPED PRIVATE OPEN SPACE OR A GAP IN THE SETTLEMENT PATTERN, IF THE SITE:

(A) PROVIDES ACTIVE RECREATION OPPORTUNITIES, THE LOSS OF WHICH WOULD PUT ADDITIONAL PRESSURE ON REMAINING RECREATIONAL AREAS; OR

(B) MEETS A DEFICIENCY IN RECREATIONAL FACILITIES; OR

(C) HAS INTRINSICALLY BENEFICIAL QUALITIES AND MAKES A CONTRIBUTION TO THE CHARACTER OF THE AREA EITHER IN ITSELF OR BY VIRTUE OF THE LONGER DISTANCE VIEWS IT AFFORDS;

UNLESS ADEQUATE PROVISION HAS PREVIOUSLY BEEN MADE IN A SUITABLE LOCATION FOR REPLACEMENT OPEN SPACE, OF AT LEAST EQUAL RECREATIONAL, COMMUNITY AND AMENITY VALUE.

Playing Fields

9.59 The Governments concern about the continued loss of playing fields to development has culminated in the publication of 'The Town and Country (Playing Fields) Direction 1998. The Direction applies to any proposal for development of any playing field owned by a local authority or used by an educational institution, as specified in the Direction. The definition of a 'playing field' used by the Direction means "…the whole of a site which encompasses at least one playing pitch…". As a result Sport England is now consulted on all applications for development which involve playing fields that are, or were in the last five years, in use.

9.60 Sport England have set out Planning Policies for Sport in their November 1999 land use planning policy statement, on behalf of sport, (Para 65 of Sport England's document) on this subject.

9.61 The following Policy addresses planning proposals for the development of playing fields. –

POLICY SR12 - PLAYING FIELDS

BUILT DEVELOPMENT WILL NOT BE PERMITTED ON PLAYING FIELDS IF IT WOULDBE DETRIMENTAL TO THE CHARACTER OF THE AREA.

MOREOVER, NO DEVELOPMENT WILL BE PERMITTED ON LAND LAST USED AS A PLAYING FIELD - SUBJECT ONLY TO THE FOLLOWING EXCEPTIONS:

(1) IF IT IS DEMONSTRATED THAT THERE IS AN EXCESS OF PLAYING FIELD PROVISON IN THE AREA, FOR CURRENT AND FUTURE USES OF BOTH THE SCHOOL AND THE COMMUNITY;

(2) IF THE PROPOSED USE IS ANCILLARY TO THE PRIMARY USE AS A PLAYING FIELD AND DOES NOT AFFECT THE QUANTITY OR QUALITY OF PITCHES OR ADVERSELY AFFECT THEIR USE;

(3) IF THE PROPOSED DEVELOPMENT IS ON LAND INCAPABLE OFFORMING A PITCH OR PART OF A PITCH AND DOES NOT RESULT IN THE LOSS OF, OR INABILITY TO MAKE USE OF, A PITCH;

(4) IF THE PLAYING FIELD OR FIELDS THAT WOULD BE LOST AS A CONSEQUENCE OF THE PROPOSED DEVELOPMENT WOULD BE REPLACED, PRIOR TO THE COMMENCEMENT OF THE DEVELOPMENT, BY A PLAYING FIELD OR FIELDS OF A SIMILAR OR BETTER QUALITY IN A SUITABLE LOCATION AND SUBJECT TO EQUIVALENT OR BETTER MANAGEMENT ARRANGEMENTS;

(5) IF THE PROPOSED DEVELOPMENT IS FOR AN INDOOR OR OUTDOOR SPORTS FACILITY, THE PROVISION OF WHICH WOULD BE OF SUFFICIENT BENEFIT TO SPORT AND RECREATION AS TO OUTWEIGH THE DETRIMENT CAUSED BY THE LOSS OF THE PLAYING FIELD OF PLAYING FIELDS.

Allotment Gardens

9.62 Allotment gardening provides both leisure and social activities, a source of fresh food production and contributes to the Green Grid. The District Council is responsible for the management of the majority of allotments. Demand for allotments rises and falls, and is monitored by the District Council but in recent years, this has been low. Sites have also been criticised for poor security and facilities. Whilst measures have been made to curtail vandalism and improve services, these have had only limited effect.

9.63 Some allowance for fluctuations in demand needs to be made. Clearly, once a site is developed, it is extremely difficult to find a replacement site to

serve local needs. However, the Council has agreed to develop part of the Manston Road site and the proceeds from the sale of the land will then be reinvested in upgrading facilities at the remaining sites. However, for the remaining sites, only in cases of a substantial and persistent decline in demand for plots would the Council investigate alternative uses for surplus allotments. The Council will review any need for more allotments.

POLICY SR13 - ALLOTMENTS

THE DEVELOPMENT OF ALLOTMENTS WILL NOT BE PERMITTED. IN CONSIDERING DEVELOPMENT PROPOSALS, THE FOLLOWING CONSIDERATIONS WILL BE TAKEN INTO ACCOUNT:

(1) THE NATURE OF THE PROPOSED USE, ITS LIKELY IMPACT ON THE AREA, AND THE AVAILABILITY OF ALTERNATIVE SITES;

(2) THE DEMAND FOR ALLOTMENTS ON THE PARTICULAR SITE OVER THE PREVIOUS FIVE YEARS; AND

(3) WHETHER THE ALLOTMENT GARDENS AS OPEN LAND SERVE OTHER PLANNING PURPOSES IN THE AREA.

New Community Woodlands

9.64 There is a major deficiency of woodlands that permit informal recreation in the District. With the exception of Quex Park, which is privately owned but partially open to the public at certain times of the year, and Mocketts Wood, no publicly accessible woodlands exist in the district. In response to this deficiency and the priorities expressed in the Kent Countryside Strategy, the District Council is involved in the establishment of two new community woodlands.

9.65 These will assist in the enhancement of the urban fringe landscape, provide informal recreation facilities for the public, and help create new wildlife habitats to replace those lost to agriculture and other development over the years. These community woodlands could also be used for woodland burial schemes.

9.66 The first, and larger, community woodland, is proposed to be located on Council-owned land at Twenties, fronted by Hartsdown Road and Shottendane Road on the southern edge of Margate and Garlinge. The second site, again in Council ownership, is in Dane Valley. It abuts the railway line and has a frontage to Dane Valley Road.

9.67 The long-term management of the woodlands will also need to be secured in order to meet the objectives set out in Paragraph 9.65 above.

POLICY SR14 - COMMUNITY WOODLANDS

SUPPORT WILL BE GIVEN TO THE ESTABLISHMENT OF NEW PUBLICLY ACCESSIBLE WOODLANDS OF AN APPROPRIATE SCALE IN SUITABLE LOCATIONS IN THE DISTRICT, NOTABLY AT THE URBAN FRINGE, FOR RECREATION, LANDSCAPE AND NATURE CONSERVATION PURPOSES.

THE FOLLOWING SITES ARE CURRENTLY PROPOSED FOR COMMUNITY WOODLANDS:

(1) HARTSDOWN-TWENTIES, MARGATE; AND

(2) DANE VALLEY ROAD, MARGATE.

Golf Courses

9.68 The main formal recreation activity requiring an urban fringe location in Thanet is golf. Demand for the sport has risen sharply in recent years due to media coverage, its social status and a greater concern with personal relaxation and health. Standards of provision have risen in consequence.

9.69 There are currently four 18-hole golf courses in Thanet. The Council has allocated a site in the Margate/Broadstairs Green Wedge for use as a country park and golf course. It is therefore considered that there should be no further golf courses.

9.70 The District Council considers that the Green Wedge areas (see Policy CC5, Countryside Coast Chapter), and in particular, the largest of the Wedges which separates Margate, Broadstairs and Ramsgate, provide long-term potential as a recreational resource for the Thanet towns. The District Council therefore wishes to promote recreational uses in the area, which do not conflict with Policy CC5 (Countryside & Coast Chapter).

9.71 The District Council believes that a combined publicly accessible golf course and country park in the Green Wedge would:

(a) provide a much needed recreational resource close to centres of population

(b) assist in the enhancement of the landscape qualities of the Green Wedge; and

(c) maintain the overall objectives of Policy CC5

9.72 The Council believe that built elements could be located at Westwood Lodge without putting Green Wedge Policy objectives at risk, because of its location within the Green Wedge, and the extensive existing tree cover. In this particular situation within the Green Wedge, it is considered that only essential golf-related built development of a modest scale would be appropriate. Additional development (eg, housing or hotel development) would not be

acceptable. The suitability of a particular site will depend upon its location and the impact of the proposed development on the following issues.

9.73 Golf differs from other recreational activity not only in scale (40 – 60 hectares), but also in the extent to which it usually requires physical changes to the land involved, and because it completely displaces agriculture. The use of land for golf courses is not fully reversible. Where substantial earth moving is proposed, the land could probably never be returned to its original grade.

9.74 On the other hand, golf courses have the potential to improve areas of poor or mediocre environment. This may have particular force in Thanet at the urban fringe, where farmland meets the largely unscreened urban edge. However, by their sheer size and nature, golf courses can appear alien in the Thanet landscape, unless well sited and designed with respect for the area's traditional landscape character.

Countryside

9.75 The landscape impact of a proposed golf course is a primary consideration in Thanet, where the traditional landscape is one of large arable fields without demarcation and with little tree or hedgerow cover in gently undulating topography. By their size and character, golf courses are likely to be inappropriate in this landscape. On the urban fringe where there is generally a harsh edge to the built environment, golf courses have the potential to improve the landscape.

9.76 Existing landscape character and features should be protected, and where possible, enhanced. Conservation of landscape will be given particular emphasis in designated areas of landscape importance and regard should be had to the policies of such areas in this Plan. Proposals should also respect and where possible conserve historic landscape features.

Ecology

9.77 Much of Thanet's countryside is, relatively speaking, ecologically poor. Golf courses should therefore safeguard, and where appropriate, enhance sites and areas possessing a nature conservation interest. New habitats can be created in the course of development. Planning applications should include an ecological statement.

9.78 Water is an essential resource and therefore any golf course should be designed in a sustainable manner and this should include securing the best use of and conserving water resources.

Archaeology

9.79 Thanet is rich in archaeology, particularly in below ground remains. Designers of courses aim to provide topographical features to increase the challenge for players. Major ground modelling in gently undulating landscapes like Thanet's can cause the physical destruction of ancient features including

below-ground archaeology. If ground disturbance is not specified over the whole application site, it is difficult to assess the effect of course development on archaeology. It is therefore essential that course layout should not be finalised until these issues have been thoroughly investigated.

Agricultural Land

9.80 The majority of farmland is either Grade 1, 2 or 3a. Substantial earth modelling may result in farmland being incapable of returning to its original grade (irreversible development). Proposals, which involve the irreversible loss of such land, will not be permitted.

9.81 DEFRA will be consulted where best and most versatile land (Grade 1, 2 and 3a) is involved and where it is considered that proposed engineering works may affect reversibility. An approved scheme of operation may be required, together with a detailed record of works undertaken.

Traffic Circulation

9.82 Golf courses tend to generate a steady flow of road traffic through the day. Proposals should ensure that safe and convenient access can be made to the road network without the need to use unsuitable roads. Particular attention needs to be given to the visual impact of parking areas and parked vehicles.

9.83 Applicants may be asked to provide appropriate traffic studies before applications are decided. Proposals should safeguard, and where possible, enhance the amenity, safety and functions of the right of way network. Re-routing rights of way will not normally be allowed, and details of measures to integrate them may be required.

Built Development

9.84 Built development forming part of golf course applications falls into three categories, essential, desirable and beneficial. A clubhouse, maintenance store, car-parking areas and a professional's shop are usually regarded as essential elements. A bar & restaurant, driving range, floodlighting and manager's accommodation may be considered as desirable. The inclusion of a hotel, other sport and leisure facilities or housing may be considered as beneficial, but not necessary. (Please note that floodlighting will be subject to Policy EP9 in the Environmental Protection Chapter). The Council believes that the latter category (considered as beneficial), for ancillary development not directly related to the playing of golf, will not normally be permitted.

POLICY SR15 - GOLF COURSES & COUNTRY PARK

FAVOURABLE CONSIDERATION WILL BE GIVEN TO THE ESTABLISHMENT OF A COMBINED GOLF COURSE AND COUNTRY PARK WITHIN THE MARGATE-BROADSTAIRS GREEN WEDGE, SOUTH-WEST OF THE RAILWAY LINE.

THE GOLF COURSE AND COUNTRY PARK WILL NEED TO COMPLY WITH THE CRITERIA SET DOWN IN POLICY CC5 AND WILL BE SUBJECT TO;

(1) DETAILS OF THE LAYOUT OF THE COURSE, THE SITING AND SIZE OF ITS BUILDINGS, CAR PARKING AND A LANDSCAPING SCHEME FORMING PART OF THE APPLICATION (NOT AS A RESERVED MATTER);

(2) THE SUBMISSION, AS PART OF THE APPLICATION, OF:

(a) A FIELD SURVEY TO IDENTIFY THE EXISTING SITE FEATURES, CHARACTER AND CONDITION;

(b) A DESCRIPTION OF THE SITE'S INTEREST FROM THE HISTORICAL RECORD, NATURE CONSERVATION, ECOLOGY, AND ARCHAEOLOGY ASPECTS;

(c) AN ASSESSMENT OF THE PROPOSAL'S IMPACT ON HISTORICAL AND NATURAL FEATURES AND CHARACTER;

(d) AN ASSESSMENT OF THE OPPORTUNITIES PRESENTED BY THE DEVELOPMENT TO SAFEGUARD OR IMPROVE EXISTING FEATURES OR CREATE NEW FEATURES;

WHERE THERE IS AN ADVERSE IMPACT ON LANDSCAPE, NATURE CONSERVATION, BEST OR MOST VERSATILE AGRICULTURAL LAND, HISTORICAL FEATURES OR ARCHAEOLOGY, DEVELOPMENT WILL NOT BE PERMITTED.

(3) IN THE EVENT OF PERMISSION BEING GRANTED, PLANNING CONDITIONS, OBLIGATIONS OR AGREEMENTS MAY NEED TO BE IMPOSED, OFFERED OR AGREED TO COVER THE PROTECTION OF CERTAIN FEATURES DURING EARTHMOVING AND USE OF HEAVY MACHINERY, LANDSCAPING, HABITAT CREATION AND IMPROVEMENT AND TO GIVE ACCESS BY ARCHAEOLOGISTS.

THE PROVISION OF FURTHER GOLF COURSES WILL NOT BE PERMITTED UNLESS LOCAL DEMAND CAN BE DEMONSTRATED AND COMPLIANCE WITH PARTS 1,2 AND 3 OF THIS POLICY.

Equestrian Uses and Buildings

9.85 The District Council accepts that equestrian activities are most appropriately located in a rural area, in so far as such uses are related to a generally open use of land. However, the uncontrolled proliferation of stables and other associated development has the potential to bring about cumulatively significant changes in the character of the open countryside which is typical in Thanet.

9.86 Moreover, the fragmentation of landholdings may accelerate other changes which would be detrimental to the countryside. For the avoidance of doubt, the Council cannot directly control the fragmentation of farmland provided the subsequent use remains agricultural. However, the change of use of farmland to land for the keeping of horses for non-agricultural purposes normally amounts to development for which planning permission is required. Such proposals will therefore be considered in relation to the following policy.

POLICY SR16 - EQUESTRIAN USES AND BUILDINGS

PROPOSALS FOR THE CHANGE OF USE OF FARMLAND TO LAND FOR THE BREEDING AND/OR KEEPING OF HORSES AND/OR FOR THE ERECTION OF STABLES WILL BE CONSIDERED AGAINST THE FOLLOWING FACTORS:

(1) THE NATURE AND SCALE OF THE EQUESTRIAN USE AND THE IMPACT OF THE BUILT DEVELOPMENT ON THE CHARACTER OF THE COUNTRYSIDE, INCLUDING THE CUMULATIVE EFFECT OF SIMILAR USES IN THE VICINITY;

(2) WHETHER THE SIZE OF THE STABLES ACCORDS WITH THE NUMBER OF HORSES INTENDED TO BE ACCOMMODATED;

(3) THE IMPACT OF ANY BUILT DEVELOPMENT ON THE AMENITY OF NEIGHBOURING RESIDENTIAL USES;

(4) WHETHER SUITABLE ARRANGEMENTS HAVE BEEN MADE FOR THE DISPOSAL OR STORAGE OF SOILED BEDDING MATERIAL AND FOUL DRAINAGE PROVISION MEETS ANY REQUIREMENTS OF THE COUNCIL AND THE WATER AUTHORITIES;

(5) WHETHER A SUITABLE VEHICULAR ACCESS CAN BE PROVIDED IN CONNECTION WITH THE STABLES SUCH AS TO ALLOW THE FREE AND SAFE FLOW OF TRAFFIC ON THE ADJOINING HIGHWAY AND THE IMPACT ON THE CHARACTER OF THE COUNTRYSIDE OF PROVIDING SUCH AN ACCESS;

(6) THE LEVEL OF TRAFFIC LIKELY TO BE GENERATED BY THE PROPOSED USE, AND THE PHYSICAL SUITABILITY OF, THE ROAD LEADING TO THE SITE TO CATER FOR SUCH MOVEMENTS;

(7) THE IMPACT OF TRAFFIC LEVELS ON THE AMENITIES OF THE AREA; AND

(8) APPLICATIONS FOR STABLES OR LOOSE BOXES WILL BE EXPECTED TO:

(A) HAVE SUFFICIENT* LAND AVAILABLE FOR THE EXERCISE OF THE HORSE(S) TO BE KEPT; AND

(B) BE WELL RELATED TO A BRIDLEWAY/PERMISSIVE HORSE ROUTE NETWORK.

***Operational Note:**
9.87 In consideration of any application for stables or loose boxes, the factors to be taken into consideration in determining whether or not sufficient land is available will include

(i) The area of the land;

(ii) The suitability of the land (e.g. topography, the surface material or adjacent land uses); and

(iii) The proximity/accessibility of the land to the stable/loose box.

Statutory Rights of Way.

9.88 The Plan area contains a reasonable network of statutory footpaths, bridleways or other rights of way. Protection will be achieved by presuming against development which would damage the network.

POLICY SR17 - STATUTORY RIGHTS OF WAY

THE COUNCIL WILL SAFEGUARD STATUTORY RIGHTS OF WAY OR SUPPORT THEIR RATIONALISATION TO FORM AN INTEGRATED NETWORK, SUBJECT TO THERE BEING NO NET LOSS, AND PROMOTE THEIR USAGE. DEVELOPMENT PROPOSALS WHICH WOULD PREVENT THE PROPER USE OF A STATUTORY FOOTPATH/BRIDLEWAY OR OTHER RIGHTS OF WAY WILL NOT BE PERMITTED. WHERE DEVELOPMENT IS ACCEPTABLE IN OTHER RESPECTS THE COUNCIL WILL REQUIRE A DIVERSION.

The Coast

9.89 Thanet has over 23 miles of coastline, of which nearly two-thirds is currently built-up. (38% of the total coastline is free from development. This reduces to 18% in the "urban" areas between Minnis and Pegwell Bays.)

9.90 It is a major resource not only for tourism and recreation, but also for its conservation, ecological and landscape value. Most of the Thanet coastline falls under SSSI, SPA and Ramsar designations and so there are obligations to protect these areas (see the Nature Conservation Chapter). Owing to the overall lack of public open space in Thanet's countryside, there is additional pressure on its coastline, which is already important for wildlife because of the impact of agricultural practices in the rest of the district.

9.91 A ‘Coastal Park’ concept has been developed to promote the use of the coast for tourism, leisure, and conservation as well as for regeneration projects. This concept is discussed further in the Coastal Policy chapter of this Plan, but the use of the coast for recreational uses is a vital part of this scheme.

9.92 Traditionally, most recreation associated with the coast was informal - sea bathing, beach games and "strolling the prom". Moreover, recreational activity was once concentrated in relatively small areas, usually near railway stations. However, greater mobility, increased leisure time and longer weekends have produced a very different situation.

9.93 Demand has now spread over the whole coast to wherever access and facilities are available. The variety of recreational activity has become more diverse and demand has increased across a range of activities, both formal and informal, each with differing requirements.

9.94 Because of the diversity of recreational activities on the coast, such as boating, windsurfing or jet-skiing, there are a number of possible conflicts which can arise. These can vary between different activities, but also between activities and nature conservation, ecological or landscape interests. For safety reasons, there are already restrictions on the mix of water uses allowed on particular beach areas.

9.95 Boating activities are important to Thanet. Many boats on passage towards the Thames "put in", traditionally at Ramsgate, to work the tides. The District Council supports and encourages such activity and this is reflected in policies set out in the Tourism Chapter.

9.96 There will be a continuing need to evolve a Beach Strategy which aims to meet recreational demands, while at the same time minimising conflicts and damage to interests of acknowledged importance. Accordingly, the District Council intends to produce, and regularly review, a Strategy for Thanet's beaches which will aim to reconcile conflicts between recreational activities and respect conservation, ecology and landscape constraints.

Beaches - Maintaining Choice

9.97 Thanet possesses a large number of sandy beaches, whose characters range from intensively holiday-oriented beaches (eg: Marine Sands, Margate) to undeveloped beaches with a natural character and appearance (eg: Grenham Bay, Birchington). The different types of beach offer opportunities for different types of recreational activity. In the interests of choice, the Council believes that it is desirable to ensure that the differences of character are maintained, and where appropriate, enhanced. Most beaches along the Thanet coast are internationally important for their wintering bird populations.

9.98 The beaches have been divided into three broad categories. It should be noted that the intermediate category includes beaches which have scope for some further development, as well as those which are fully developed within the terms of the Policy.

9.99 To provide for a variety of tastes and choice in the type of recreational activities, associated service facilities and degree of solitude on Thanet's coastline, the following Policies will apply to beach development.

POLICY SR18 - MAJOR HOLIDAY BEACHES

ON THOSE BEACHES IDENTIFIED AS MAJOR HOLIDAY BEACHES BELOW, THE COUNCIL WILL SUPPORT PROPOSALS FOR THE PROVISION AND UPGRADING OF A WIDE RANGE OF RECREATIONAL FACILITIES AND SERVICES:

(1) MARINE SANDS, MARGATE
(2) RAMSGATE MAIN SANDS
(3) VIKING BAY, BROADSTAIRS

PROPOSALS FOR VIKING BAY COMPATIBLE WITH THIS POLICY MUST ALSO COMPLY WITH THE CONSERVATION AREA POLICIES OF THIS PLAN.

AT MARGATE MARINE SANDS RECREATIONAL FACILITIES WILL BE CONCENTRATED ON THAT PART OF THE BEACH AT THE JUNCTION OF MARINE TERRACE AND MARINE DRIVE AND THE BUILT FORM SHALL NOT PROJECT ABOVE THE LEVEL OF THE SEAFRONT PROMENADE.

REGARD SHOULD BE HAD TO NATURE CONSERVATION POLICIES WHICH MAY AFFECT THESE BEACHES.

POLICY SR19 - INTERMEDIATE BEACHES

ON THOSE BEACHES IDENTIFIED AS INTERMEDIATE BEACHES BELOW, AND WHERE SCOPE EXISTS FOR SUCH DEVELOPMENT, THE COUNCIL WILL SUPPORT PROPOSALS FOR A LIMITED RANGE OF BASIC FACILITIES (EG: KIOSKS SUPPLYING FOOD AND REFRESHMENTS, BEACH HUTS AND BEACH FURNITURE), SUBJECT TO THE SCALE OF PROVISION BEING CONSISTENT WITH THE INTERMEDIATE STATUS OF THE BEACH AND SATISFACTORY DESIGN AND SITING OF DEVELOPMENT:

(1) DUMPTON GAP (PART)
(2) EPPLE BAY
(3) JOSS BAY
(4) LOUISA BAY
(5) MINNIS BAY (PART)
(6) ST MILDRED'S BAY
(7) STONE BAY
(8) WALPOLE BAY
(9) WESTBROOK BAY
(10) WESTERN UNDERCLIFF, RAMSGATE
(11) WESTGATE BAY

REGARD SHOULD BE HAD TO NATURE CONSERVATION POLICIES WHICH AFFECT THESE BEACHES.

POLICY SR20 - UNDEVELOPED BEACHES

ON, OR ADJACENT TO, THOSE BEACHES IDENTIFIED AS UNDEVELOPED BEACHES, PRIORITY WILL BE GIVEN TO THE MAINTENANCE AND ENHANCEMENT OF THEIR NATURAL AND UNDEVELOPED CHARACTER. NEW DEVELOPMENT INCLUDING NEW BUILT FACILITIES, THE PROVISION OF PUBLIC CAR PARKING FACILITIES AND NEW OR IMPROVED VEHICULAR ACCESS TO SERVE SUCH BEACHES WILL NOT BE PERMITTED.

Seafront Esplanades

9.100 In addition to policies which refer to beaches, it is important to note that many of the seafront esplanades flanking the beaches have fine open aspects, and this allows unrestricted views over the beaches to the sea.

9.101 The contribution which this open aspect makes to the character of any particular seafront area will be an important consideration in deciding whether to allow the introduction or spread of holiday/tourist-related uses, such as kiosks, etc.

POLICY SR21 - DEVELOPMENT ON SEAFRONT ESPLANADES

NEW KIOSKS, SMALL BUILDINGS AND STRUCTURES WILL NOT BE PERMITTED IN SEAFRONT AREAS IF THEY HAVE ANY ADVERSE IMPACT ON THE OPENNESS AND CHARACTER OF THE AREA.

TARGETS

LP Implementation Target	
Policy Area	Amenity & Play Areas
Relevant Policies	SR5 & SR6
Indicator	Amenity/Play Space provided or commuted payments received
Target	100%
Monitoring	Monitoring of planning applications.
LP Implementation Target	
Policy Area	Safeguarding Open Space
Relevant Policies	SR10, SR12
Indicator	Hectarage of Public Open Space and playing fields irreversibly lost
Target	Nil
Monitoring	Monitoring of Planning Applications

10. Countryside & Coast

10. Countryside & Coast

Introduction

10.1 This Chapter contains the District Council's planning policies relating to development in the countryside, areas of landscape importance, the protection of agricultural land, new agricultural development, the urban fringe, urban and rural strategic gaps, trees and woodlands, and the coast.

10.2 The Planning & Compensation Act 1991 requires Local Planning Authorities to include policies in development plans which address the conservation of the natural beauty and amenity of the land.

10.3 Central Government advice in relation to the countryside was expressed in Planning Policy Guidance Note 7. This advised that the planning system should help to integrate the development necessary to sustain economic and social activity in rural communities with protection of the countryside for the sake of its beauty, the diversity of its landscape and historic character, the wealth of its natural resources and its ecological, agricultural, recreational and archaeological value.

OBJECTIVES

(1) TO PROTECT AND, WHERE POSSIBLE, ENHANCE THE NATURE CONSERVATION VALUE OF THE THANET COUNTRYSIDE AND COAST FOR ITS OWN SAKE, AND FOR THE ENJOYMENT OF RESIDENTS AND VISITORS;

(2) TO PROTECT AND, WHERE POSSIBLE, ENHANCE THE FULL DIVERSITY OF LOCAL LANDSCAPES AND THE OPEN COUNTRYSIDE AND COAST;

(3) TO PROTECT THE BEST AND MOST VERSATILE AGRICULTURAL LAND FROM IRREVERSIBLE DEVELOPMENT, IN THE INTERESTS OF LONG-TERM AGRICULTURAL PRODUCTION;

(4) TO SUPPORT DEVELOPMENT THAT WOULD MEET THE SOCIAL AND ECONOMIC NEEDS OF RURAL AND COASTAL AREAS;

(5) TO MAKE PROVISION FOR TOURISM-RELATED USES, INFORMAL AND FORMAL RECREATION, AND THE PUBLIC ENJOYMENT OF THE THANET COAST; AND

(6) TO CONSERVE AND ENHANCE STRATEGIC OPEN AREAS AND GAPS IN BOTH URBAN AND RURAL AREAS.

Strategic Background

10.4 The Regional Planning Guidance states that the wider countryside of the South-East is valuable in providing countryside around and between towns, undeveloped coast, extensive open space and river corridors. The countryside should fulfil a range of needs including recreation, farming and the local economy, while safeguarding landscape and biodiversity.

10.5 The Guidance seeks to both protect the best and most versatile farmland in the Region in the long term, and to encourage rural economic diversification. The Guidance also seeks to protect and enhance the landscape, wildlife, natural character and built qualities of the coastline.

10.6 The Structure Plan seeks to restrain new development in the rural areas, to protect the countryside for its intrinsic value, rather than just for the productive utility of the land, but also to allow development that meets the social and economic needs of those areas.

10.7 Agricultural land concerns have been dominant in determining planning policies and decisions in Thanet for many years. Thanet's farmland ranks as some of the best and most versatile productive land in Kent and in the South-East, by virtue of both the high soil quality, and the extensive and continuous nature of the land in production. As a national food resource it therefore merits long term protection from irreversible development.

10.8 Agriculture enjoys very favourable conditions in respect of general climatic conditions, reliability of rainfall, topography and drainage. Furthermore, the farming sector in Thanet has a long track record of good productivity, efficiency, technical innovation and business investment.

10.9 Central Government advice is provided in Planning Policy Guidance Note (PPG) 20 on Coastal Planning. The Guidance strongly advocates the protection of undeveloped coastal areas from new development, unless no other suitable sites exist (see Policy CC14). It also warns of the potentially detrimental impact of inappropriate development to the coastal skyline.

10.10 The advice recognises that coastal and estuary development can have an impact on the environment well beyond the immediate vicinity, and, conversely, that development away from coasts and estuaries can have a similar impact on those areas (See Nature Conservation Chapter).

10.11 The Structure Plan contains policies that relate to the undeveloped coast and nature conservation aspects of coastal policy. The Plan also recognises the importance of co-ordinating coastal planning policy, and contains policies relating to the recreational use of the coastal zone.

10.12 A co-ordinated approach is also the aim of the North Kent Coast, Shoreline Management Plan, a document produced by the relevant Coastal Councils and the Environmental Agency. This is a document which sets out a strategy for coastal defence for a specified length of coast taking account of

natural coastal processes and human and other environmental influences and needs.

10.13 The District Council recognises that the coastline is one of the District's greatest assets. The Council considers that it is important to maintain the diverse character of the Thanet coast for its value for tourism, recreation, landscape and wildlife. It is therefore recognised that these various needs and demands will have to be managed so that the Thanet coastline does not deteriorate. It is for this reason that the Council has commenced on the establishment of a proposal known as the 'Coastal Park Initiative'.

Development in the Open Countryside

10.14 PPS7 states that new development in rural areas should be sensitively related to existing settlement patterns, and to the historic, wildlife and landscape resources of the area in which it is located.

10.15 The Structure Plan acknowledges that Kent's environment is one of its greatest assets, and has a direct influence not only on the quality of life for Kent residents, but also on the prospects for economic development and tourism. An attractive environment contributes to the context for a thriving economy.

10.16 The 1996 Kent Structure Plan Policies ENV1 and RS5 indicated the County Council's commitment to enhancing the character, amenity and functioning of Kent's rural areas, and to protecting the countryside from non-essential development. Thus, in the consideration of development proposals, the District Council will expect new development that is allowed to make a positive contribution to the character and diversity of the Thanet countryside.

10.17 Thanet's open countryside has long been protected from non-essential development by the operation of Structure Plan policies.

10.18 The open countryside in Thanet is particularly vulnerable to landscape damage from development, because of its limited extent, the openness and flatness of the rural landscape, and the proximity of the towns. Isolated rural development therefore has the potential to be much more conspicuous in rural Thanet than in other parts of the County.

10.19 The District Council therefore believes that it is essential to maintain these protective policies in the long term, in view of the vulnerability of the open countryside of Thanet to sporadic forms of development. It is thus general policy to locate all but essentially rural development (as indicated in Structure Plan Policy) in the Thanet towns.

POLICY CC1 - DEVELOPMENT IN THE COUNTRYSIDE

THE THANET COUNTRYSIDE IS DEFINED AS THOSE AREAS OF THE DISTRICT OUTSIDE THE IDENTIFIED URBAN AND VILLAGE CONFINES.

WITHIN THE COUNTRYSIDE, NEW DEVELOPMENT WILL NOT BE PERMITTED UNLESS THERE IS A NEED FOR THE DEVELOPMENT THAT OVERRIDES THE NEED TO PROTECT THE COUNTRYSIDE.

District Landscape Assessment Survey

10.20 During 1991, the District Council carried out a detailed Landscape Assessment Survey, based on Countryside Commission advice published in 1987, as part of the preparation of the Isle of Thanet Local Plan. The Survey confirmed many of the long-held ideas about the Thanet landscape. Thanet is recognised as possessing a gently undulating landscape, with few dominant natural features, shaped largely by arable farming, combined with a historical lack of tree cover.

10.21 However, there are features and areas within the District which provide a high level of landscape value and public amenity. This is especially true of Pegwell Bay and the former Wantsum Channel, where uninterrupted long views of the sea, the marshes and the attractive and undeveloped coastline exist towards Sandwich, the Ash Levels and Reculver.

10.22 The results of the Survey also indicate that views of the sea form a particularly important factor in Thanet's landscape qualities, since the sea often forms the backdrop to other landscape areas or features. It also provides a contrasting edge to the open countryside and the built environment, and an element of wildscape in an otherwise largely "managed" landscape. This is enhanced by the flatness of the landscape, which permits long views of the sea from some elevated or particularly flat inland parts of the district.

10.23 As part of the Local Plan review, the District Landscape Assessment Survey work was fully reviewed in the light of Government guidance in PPG7, and the Countryside Commission guidance published in 1993, relating to the change to a landscape character area approach to landscape assessment. This work has also drawn on the North East Kent Landscape Assessment & Guidelines, published by Kent County Council in 1999.

10.24 This has resulted in the identification of six landscape character areas at the local level, brief descriptions of which are given below to provide the background for the detailed landscape policy for the District:

Pegwell Bay

10.25 Pegwell Bay is an extensive area of mixed coastal habitats, including mudflats, saltmarsh and coastal scrub. These habitats form an open and relatively unspoilt landscape, with a distinctive character. The area possesses a sense of remoteness and wildness despite the relative proximity of development. Among its most important features in the area is the unique sweep of chalk cliffs viewed across Pegwell Bay from the south. This landscape creates large open skies.

10.26 Pegwell Bay is identified in the Kent Structure Plan as a Special Landscape Area. However, because it is a relatively small area, it is less robust than other SLAs, and more vulnerable to development impact. It is therefore necessary to exercise rigorous control over the location, scale and design of new development within and adjacent to the SLA, having regard to the sensitive nature of the area.

The Former Wantsum Channel

10.27 This area includes all the flood plain of the River Stour, and historically represents the former sea channel, the Wantsum Channel, which previously separated the Isle of Thanet from mainland Kent and which silted up over several centuries. The area is characterised by a vast, flat, open landscape defined by the presence of an ancient field system, defined by an extensive ditch and dyke system, the sea walls and isolated groups of trees. These elements provide important visual evidence of the physical evolution of the Wantsum Channel and, like other marsh areas in Kent, produce huge open skies.

10.28 This Landscape Character Area has been identified in consultation with Canterbury City and Dover District Councils. This reflects the wider recognition of the historical, cultural and visual significance of this landscape.

The Former Wantsum North Shore

10.29 This area largely comprises the distinctive and often quite steep hill slopes leading down from the Central Chalk Plateau to the former Wantsum Channel. The landscape is very open with few features and the former shoreline is more distinct in some places than in others, with the variation in the contour pattern. From the upper slopes it affords extensive views across the whole of the former Wantsum Channel to the slopes on the opposite banks and in many places to the sea.

10.30 The former shoreline is more distinct in some places than in others, with the variation in the contour pattern. However, it also provides the unique setting of the former channel-side villages of Minster, Monkton, Sarre and St Nicholas, and the smaller, originally farm-based, settlements of Shuart, Gore Street and Potten Street. These elements provide important visual evidence of the growth of human settlement, agriculture and commerce in the area.

10.31 The openness of this landscape provides wide and long views of the former Wantsum Channel area and Pegwell Bay. The area also possesses a large number of archaeological sites (including scheduled ancient monuments); numerous listed buildings (including Minster Abbey, the churches at Minster, Monkton and St Nicholas, and Sarre Mill); and the historical landing sites of St Augustine and the Saxons, Hengist and Horsa.

The Central Chalk Plateau

10.32 The central part of the District is characterised by a generally flat or gently undulating landscape, with extensive, unenclosed fields under intensive arable cultivation. This open landscape is fragmented by the location of large-scale developments such as the airport, Manston Business Park and a sporadic settlement pattern to the north of the airport. The character of this area is also defined by the proximity of the edges of the urban areas.

Quex Park

10.33 The Park is unique within the Thanet context, comprising a formal and extensive wooded parkland and amenity landscape within an otherwise open intensively farmed landscape. It possesses a formal landscape structure and gardens that act as an effective setting to Quex House. The parkland is intensively cultivated between the tree belts, with limited grazing pasture remaining. Two important historic features of the Park are the Waterloo Tower and a round castellated brick tower to the north of the main House.

The Urban Coast

10.34 The urban areas of Thanet form an almost continuous conurbation along the coast between Pegwell Village and Minnis Bay. With the exception of the Green Wedges, this area is heavily urbanised. The coastal strip is characterised by the presence of traditional seaside architecture, active harbour areas and beaches and some extensive public open clifftop areas. The pattern of bays and headlands provides long sweeping views of the coast.

10.35 The Council recognises that changes between areas of landscape character tend to be gradual, rather than sharply defined. However, for the purposes of applying Policy CC2, it is necessary to provide clear definition of each character area. Each of these areas is defined primarily by its physical characteristics, but social and economic factors have also influenced the character of these areas. Within each of these areas, different principles will guide the nature of development that is considered acceptable within the landscape context.

10.36 In applying Policy CC2 to protect the landscape character of the district, the Council will also seek to take account of the social and economic well-being of the rural areas, in line with PPS7.

10.37 The Local Plan makes specific provision for such forms of development (including local needs housing, the development of commercial/tourism facilities in rural settlements, and the provision of new employment opportunities). However, it is recognised that there may be other development needs that require sympathetic consideration. These will be considered in the light of their landscape impact, the availability of alternative sites and their relationship and proximity to urban service provision. The use of Article 4 Directions will only be considered where the Council believes that there is a real and specific threat to the aims of landscape policy.

10.38 It should be borne in mind that large parts of the Landscape Character Areas identified above and in Policy CC2 are located in the countryside and are therefore subject to general countryside constraint policies, including Policy CC1 of this Plan, and relevant Structure Plan Policies. In many cases, therefore, special justification will be required for development in these areas.

POLICY CC2 - LANDSCAPE CHARACTER AREAS

WITHIN THE LANDSCAPE CHARACTER AREAS IDENTIFIED ON THE PROPOSALS MAP, THE FOLLOWING POLICY PRINCIPLES WILL BE APPLIED:

(1) AT PEGWELL BAY PRIORITY WILL BE GIVEN TO THE CONSERVATION AND ENHANCEMENT OF THE NATURAL BEAUTY OF THE LANDSCAPE OVER OTHER PLANNING CONSIDERATIONS;

(2) IN THE FORMER WANTSUM CHANNEL AREA, NEW DEVELOPMENT WILL NOT NORMALLY BE PERMITTED;

(3) IN THE WANTSUM CHANNEL NORTH SHORE AREA, DEVELOPMENT WILL ONLY BE PERMITTED THAT WOULD NOT DAMAGE THE SETTING OF THE WANTSUM CHANNEL, AND LONG VIEWS OF PEGWELL BAY, THE WANTSUM CHANNEL, THE ADJACENT MARSHES AND THE SEA;

(4) ON THE CENTRAL CHALK PLATEAU, A NUMBER OF SITES ARE IDENTIFIED FOR VARIOUS DEVELOPMENT PURPOSES. WHERE DEVELOPMENT IS PERMITTED BY OTHER POLICIES IN THIS PLAN, PARTICULAR CARE SHOULD BE TAKEN TO AVOID SKYLINE INTRUSION AND THE LOSS OR INTERRUPTION OF LONG VIEWS OF THE COAST AND THE SEA;

(5) AT QUEX PARK, NEW DEVELOPMENT PROPOSALS SHOULD RESPECT THE HISTORIC CHARACTER OF THE PARKLAND; AND

(6) AT THE URBAN COAST, DEVELOPMENT THAT DOES NOT REFLECT THE TRADITIONAL SEAFRONT ARCHITECTURE OF THE AREA, MAINTAIN EXISTING OPEN SPACES AND LONG SWEEPING VIEWS OF THE COASTLINE WILL NOT BE PERMITTED.

DEVELOPMENT PROPOSALS THAT CONFLICT WITH THE ABOVE PRINCIPLES WILL ONLY BE PERMITTED WHERE IT CAN BE DEMONSTRATED THAT THEY ARE ESSENTIAL FOR THE ECONOMIC OR SOCIAL WELL-BEING OF THE AREA.

IN THE EVENT OF A REAL AND SPECIFIC THREAT TO THE LANDSCAPE CHARACTER OF THESE AREAS FROM PERMITTED DEVELOPMENT, THE USE OF ARTICLE 4 DIRECTIONS WILL BE CONSIDERED, AND SECRETARY OF STATE APPROVAL FOR THE DIRECTION SOUGHT.

Local Landscape Features

10.39 Within the context of the Landscape Character Areas identified above, there may be local variations in landscape character or other valuable features and characteristics in the local landscape that the Council wishes to protect. These may be natural and semi-natural features, for example, views of the sea and coastline, and habitat elements, such as wooded areas (particularly critical in the Thanet landscape), or features resulting from human activity, for example, ancient monuments, listed buildings and conservation areas.

10.40 These features, and their settings, need to be taken into consideration wherever they are affected by new development proposals.

POLICY CC3 - LOCAL LANDSCAPE FEATURES

NEW DEVELOPMENT PROPOSALS SHOULD RESPECT LOCAL LANDSCAPE FEATURES AND THEIR SETTINGS, WHETHER NATURAL OR THE RESULT OF HUMAN ACTIVITY. PROPOSALS THAT WOULD LEAD TO THE LOSS OR FRAGMENTATION OF SUCH FEATURES WILL NOT BE PERMITTED.

Island Approach Routes

10.41 Approaches to the District, in particular major roads, play a key role in determining the quality of the environmental perception presented by the Isle of Thanet. This image is important because it influences the perceptions of residents, tourists and potential inward investors. An attractive environment contributes to the context for a thriving economy.

10.42 These approach routes cross the former Wantsum Channel, and this provides the perception of Thanet as an island (recognised in the North East Kent Landscape Assessment Study), and a "sense of arrival" in the Isle of Thanet. The island character of the District is preserved by the manner in which Thanet rises above the nearby marshes to a modest height of just over 50m.

10.43 The visual and environmental quality of these gateways within their wider settings therefore needs to be enhanced. In the case of major roads in particular, there is a need for firm protection from inappropriate and intrusive development, including advertisements, in the open countryside along these routes.

10.44 Approach routes to the Isle of Thanet include the main A28, A253, A256 and A299 roads, and the main rail lines from Chatham, Ashford and Dover. The lengths of the approach routes are defined on the Proposals Map. However, the Policy areas are not laterally defined, as the impact of any new development proposals will need to be judged in relation to their nature and scale and relative proximity to the routes.

POLICY CC4 - ISLAND APPROACH ROUTES

THE PROTECTION OF THE IMPORTANT VISUAL AND ENVIRONMENTAL QUALITY OF MAJOR APPROACHES TO THE THANET TOWNS, AND OTHER MAIN GATEWAYS AND TRANSIT ROUTES IN THE DISTRICT, IS A PRIMARY PLANNING AIM.

THE COUNCIL WILL PROMOTE THE ENHANCEMENT OF EXISTING SITES THROUGH ENVIRONMENTAL IMPROVEMENTS.

CONSENT WILL NOT BE GRANTED FOR NEW DEVELOPMENT OR ADVERTISEMENTS IN THESE LOCATIONS, PARTICULARLY ADJACENT TO ROAD FRONTAGES.

DEVELOPMENT WHICH IS ALLOWED TO FRONT ONTO OR WHICH IS CONSPICUOUS FROM THESE ROUTES WILL BE REQUIRED TO BE SITED, DESIGNED, AND LANDSCAPED SO AS TO MAKE A POSITIVE CONTRIBUTION TO THE ENVIRONMENT OF THE ROUTES.

Settlement Separation Policies

10.45 The Thanet towns, with a population in excess of 125,000, form the largest urban concentration within East Kent but with one of the smallest land areas in Kent. The adopted Isle of Thanet Local Plan (and the previous Urban Local Plan) sought to maintain the individual and separate physical identities of the Thanet towns.

10.46 The retention of a physical separation was to be achieved by resisting all but essential or policy-conforming development in the "wedges" of largely open countryside which adjoin, penetrate or separate the urban areas. These policies also had the additional effect of reinforcing policies for the protection of agricultural land.

10.47 Strong support for this policy approach has consistently been given at Appeal, in terms of both the extent of the areas to which the Policy applied, and the planning aims of the Policy. The Green Wedge boundaries have remained largely unaltered in this Plan.

10.48 The dominant land use in the Green Wedges is agriculture. The Green Wedge Policy is not a policy for the protection of agricultural land (see Policy CC9). However, the strong planning protection afforded to high-quality farmland in Thanet has helped historically to maintain the undeveloped and open character of the Green Wedges. This positive contribution to Green Wedge purposes has depended in part on a system of intensive arable farming, that is, large open fields.

10.49 In respect of the promotion of additional public access to the Green Wedges there is a proposal to create a combined golf course and country park in the south-west part of the Margate-Broadstairs Green Wedge. The

implementation of this proposal will need to take into account the aims of Policy CC5, and is dealt with by Policy SR15 in the Sport & Recreation Chapter.

10.50 The planning approach to the Green Wedges is expressed in one Policy. The Policy has four aims:

(1) To serve as a barrier to the further outward growth and coalescence of Thanet's urban areas, so that the separate physical identities of the towns are retained;

(2) To prevent the consolidation of development on the boundaries between the built-up areas of the towns and the open countryside of the Wedges, and the extension of isolated groups of houses or other development;

(3) To conserve and protect the essentially rural and unspoilt character, and distinctive landscape qualities of the countryside that separates the urban areas, for the enjoyment and amenity of those living in, and visiting, Thanet;

(4) To prohibit all but essential development and other development which does not detract from the character and appearance of the area.

10.51 The Council considers that open sports and recreational uses would be compatible with Green Wedge policy, subject to there being no overriding conflict with the Policy criteria and the wider objectives of the Plan.

10.52 Policy CC5 applies to all forms of development, including new buildings, the change of use of land and buildings and advertisements. It should be noted that Policies CC2 (Landscape Character Areas) and CC9 (Best and Most Versatile Agricultural Land) of this Plan and Policies S6 (b), RS5 and ED6 of the Kent Structure Plan also apply to these areas.

10.53 There are three Green Wedge areas defined on the Proposals Map. They differ not only in size but also in character. The essence of the Green Wedges is the maintenance of a permanent setting of open countryside around and between the Thanet towns. They are all highly significant in the local context, providing visual relief in a highly urbanised area.

10.54 The Green Wedge that separates Margate and Broadstairs is the largest, best known and longest established of the Wedges. Substantial areas of this Wedge consist of high-quality farmland in large open fields without fences or hedgerows. However, other parts have isolated belts of woodland, being the grounds of large houses or institutions or, like the golf course, used for outdoor recreation. The other two Green Wedges (which separate Ramsgate and Broadstairs, and Birchington and Westgate) are considerably smaller than the Margate-Broadstairs Green Wedge.

10.55 The primary purpose of the Green Wedges is to prevent coalescence. Much of the land in the Wedges lacks buildings, has a level landform and generally has sparse vegetation. In turn these factors allow many extensive and uninterrupted views across open countryside. The public perception of

space, openness and separation is largely gained from roads and footpaths that run through or alongside the Wedges in undeveloped frontages.

POLICY CC5 - GREEN WEDGES

WITHIN THE GREEN WEDGES, AS DEFINED ON THE PROPOSALS MAP, NEW DEVELOPMENT (INCLUDING THE CHANGE OF USE OF LAND AND BUILDINGS) WILL NOT BE PERMITTED, UNLESS IT CAN BE DEMONSTRATED THAT THE DEVELOPMENT:

(1) IS NOT DETRIMENTAL OR CONTRARY TO THE STATED AIMS OF THE POLICY; OR

(2) IS ESSENTIAL FOR THE PROPOSED DEVELOPMENT TO BE LOCATED WITHIN THE GREEN WEDGES.

OPEN SPORTS AND RECREATIONAL USES WILL BE PERMITTED SUBJECT TO THERE BEING NO OVERRIDING CONFLICT WITH OTHER POLICIES AND THE WIDER OBJECTIVES OF THE PLAN. ANY RELATED BUILT DEVELOPMENT SHOULD BE KEPT TO THE MINIMUM NECESSARY TO SUPPORT THE OPEN USE, AND BE SENSITIVELY LOCATED.

NEW DEVELOPMENT THAT IS PERMITTED BY VIRTUE OF THIS POLICY SHOULD MAKE A POSITIVE CONTRIBUTION TO THE AREA IN TERMS OF SITING, DESIGN, SCALE AND USE OF MATERIALS.

Village Separation Corridors

10.56 Each of the Thanet villages makes its own contribution to the character and diversity of the Thanet countryside. The District Council believes that it is essential for each village in the District to retain its separate physical identity, in the same way as the towns. This is recognised by Kent Structure Plan Policy S6 (b).

10.57 There are some settlements that, due to their mutual proximity, are potentially vulnerable to coalescence through the development along the road frontages that link them for example, Minster and Monkton.

10.58 The District Council will, therefore, apply this policy in rural areas to maintain the identity of individual settlements, safeguard the character of the open countryside and, in the case of settlements close to Ramsgate, to preserve the distinction between the different characters of the urban and rural areas. It should be noted that there are two such corridors between Ramsgate and Manston.

10.59 The future development of Kent International Airport is clearly a matter of concern for Manston, in terms of its physical relationship to the village. The village is currently separated from the airport by agricultural land, and it is essential that a significant gap is retained so that Manston is not physically absorbed into the growing airport complex.

POLICY CC6 - VILLAGE SEPARATION CORRIDORS

IN THE FOLLOWING VILLAGE SEPARATION CORRIDORS, PRIORITY WILL BE GIVEN TO THE LONG-TERM MAINTENANCE OF THEIR OPEN CHARACTER AND THE PHYSICAL SEPARATION OF THE RURAL SETTLEMENTS OVER OTHER PLANNING CONSIDERATIONS:

(1) MINSTER-MONKTON
(2) ST NICHOLAS-SARRE
(3) MANSTON-WORLDS WONDER
(4) RAMSGATE-CLIFFS END
(5) RAMSGATE-MANSTON
(6) BIRCHINGTON-ACOL
(7) ACOL-CLEVE COURT AND
(8) MONKTON-GORE STREET

Rural Lanes

10.60 The 1996 Kent Structure Plan identified "a rich heritage of ancient lanes" within the County. These lanes not only possess their own character and historical value, but also contribute to wider landscape character. The Structure Plan seeks to protect the character and integrity of these lanes from adverse physical change, particularly as a result of new development.

10.61 This Plan also identifies a number of such lanes in the Thanet area. This was achieved using slightly different criteria to those in the Kent study, which have been devised to reflect the unique historical character of rural lanes in Thanet.

POLICY CC7 - RURAL LANES

DEVELOPMENT THAT WOULD ADVERSELY AFFECT THE LANDSCAPE, AMENITY, NATURE CONSERVATION, HISTORICAL OR ARCHAEOLOGICAL INTEREST OF THE RURAL LANES IDENTIFIED ON THE PROPOSALS MAP WILL NOT BE PERMITTED.

(1) WAY HILL, MINSTER;
(2) WAYBOROUGH HILL, MINSTER;
(3) GRINSELL HILL, MINSTER;
(4) MARSH FARM ROAD, MINSTER;
(5) CHAMBERS WALL, ST. NICHOLAS; AND
(6) SHUART LANE, ST. NICHOLAS.

Overhead Power Lines

10.62 One of the major issues identified by the Thanet Landscape Assessment Survey was the significant visual intrusion and landscape disruption caused by overhead power lines, and other similar structures.

10.63 This disruption is particularly evident in the marsh and coastal areas, around the villages, and the Green Wedge policy areas. The District has an agricultural landscape, with gently undulating slopes, which exacerbate the impact of power lines.

10.64 The Town & Country (Assessment of Environmental Effects) Regulations 1988 include the "transmission of electrical energy by overhead cables" as a Schedule 2 project, which would require a detailed environmental assessment in certain circumstances.

10.65 Furthermore, Schedule 9 of the Electricity Act 1989 requires that electricity generators and suppliers shall have regard to the desirability of preserving natural beauty and do what they reasonably can to mitigate any effect which electricity transmission line proposals would have on the natural beauty of the countryside.

10.66 The District Council will therefore seek early consultation with the National Grid Company and other statutory undertakers on power line proposals to minimise their impact on sensitive landscape areas in the district, notably the Stour Valley and coastal areas. In circumstances where a sensitive landscape might be severely affected, the undergrounding of power lines may be sought.

10.67 The District Council will also pursue the removal of existing power lines from sensitive landscape areas if appropriate opportunities occur in the future.

POLICY CC8 - POWER LINES

IN CONSIDERING PROPOSALS FOR NEW POWER LINES, AND OTHER SIMILAR STRUCTURES, PARTICULAR REGARD WILL BE HAD TO THE POSSIBLE IMPACTS OF SUCH STRUCTURES ON THE CHARACTER AND AMENITY OF DESIGNATED LANDSCAPE AREAS IN THE DISTRICT, AND TO THE USE OF APPROPRIATE MITIGATING MEASURES. THE UNDERGROUNDING OF POWER LINES WILL ONLY BE SOUGHT IN EXCEPTIONAL CIRCUMSTANCES.

THE DISTRICT COUNCIL WILL, IF APPROPRIATE OPPORTUNITIES ARISE, SEEK THE LONG-TERM REMOVAL OR UNDERGROUNDING OF EXISTING STRUCTURES.

Urban Fringe

10.68 PPS7 states that local planning authorities should ensure that planning policies in LDDs address the particular land use issues and opportunities to be found in the countryside around all urban areas, recognising its importance to those who live or work there, and also in providing the nearest and most accessible countryside to urban residents. Planning authorities should aim to secure environmental improvements and maximise a range of beneficial uses of this land, whilst reducing potential conflicts between neighbouring land uses. This should include improvement of public access (e.g. through support for country parks and community forests) and facilitating the provision of appropriate sport and recreation facilities.

10.69 SERPLAN, in "A New Strategy For The South-East", urged local authorities to plan for environmental improvements to the urban fringe, and to devise programmes for the management of change, primarily land-use change, in those areas, together with appropriate development to meet housing, recreational and other needs.

10.70 The urban fringe comprises the boundary between the urban and rural areas of the District. In most parts of Thanet, the high quality of agricultural land has resulted in a well-defined and conspicuous edge between the built-up areas and the open countryside. However, it is also characterised in some areas by fragmented uses.

10.71 However, the urban fringe is also subject to most development pressure for housing, commercial uses and so on, and local planning authorities need to address these pressures as well.

Landscaping, Tree Planting and Woodlands

10.72 One of the characteristics of the Thanet countryside and landscape is the lack of trees. This is a historic feature, which has been intensified by modern farming practices in some places, the impact of new development, and also by the violent storms of 1987 and 1990. The Council wishes to encourage landowners not only to preserve as many existing trees as possible, but also to include new tree planting as part of the management programme for their land.

10.73 However, this is in itself not a sufficient answer to the long-term problem, since there is also a lack of publicly accessible woodlands. With the exception of Quex Park, which is privately owned but partially open to the public at certain times of the year, and Mocketts Wood in St Peters, no publicly accessible woodlands exist in the District.

10.74 The District Council believes that part of the long-term solution lies in the formation of new community woodlands within the District. This is further addressed in the Sport & Recreation Chapter.

10.75 The District Council will seek to conserve and enhance the landscape, habitat, amenity and recreational value provided by trees and woodlands by:

(1) making Tree Preservation Orders to protect trees that are important in the landscape, are good examples of the particular species, or that have significant public amenity value;

(2) encouraging owners and occupiers of land, notably farmers, to take advantage of available grant aid for new planting, and to preserve trees and hedgerows on their land;

(3) ensuring that adequate landscaping is incorporated in new development proposals in line with Policy D2; and

(4) promoting the planting of native tree species in rural areas to create new landscape features and wildlife habitats, compatible with any existing nature conservation interest.

Best and Most Versatile Agricultural Land

10.76 PPS7 states that the presence of best and most versatile agricultural land (1, 2 and 3a) should be taken into account alongside other sustainability considerations (e.g. biodiversity; the quality and character of the landscape; its amenity value or heritage interest; accessibility to infrastructure, workforce and markets; maintaining viable communities; and the protection of natural resources, including soil quality) when determining planning applications. Where significant development of agricultural land is unavoidable, local planning authorities should seek to use areas of poorer quality land (grades 3b, 4 and 5) in preference to that of a higher quality. In Thanet approximately 86% of agricultural land is denoted best and most versatile

10.77 The Structure Plan places a strategic emphasis on the long-term protection of the best and most versatile agricultural land (MAFF Grades 1, 2 and 3a), regardless of its location. It also seeks to protect the long-term potential of other agricultural land.

10.78 This Policy applies to the majority of agricultural land in Thanet. The Policy is intended to protect Thanet's high-quality agricultural land from development indefinitely, and to encourage farmers and other landowners to make the long-term investment required in a changing agricultural environment. This should provide the necessary strong degree of certainty regarding the future use of existing agricultural land.

10.79 Only in very exceptional circumstances, as set out in this Policy, will new development proposals that affect Thanet's high quality agricultural land be considered favourably.

POLICY CC9 - BEST & MOST VERSATILE FARMLAND

PLANNING PERMISSION WILL NOT BE GRANTED FOR DEVELOPMENT WHICH WOULD USE BEST AND MOST VERSATILE LAND UNLESS IT CAN BE CLEARLY DEMONSTRATED THAT THE DEVELOPMENT IS ESSENTIAL AND THERE ARE NO PREFERABLE SITES.

Rural Diversification

10.80 Planning Policy Statement 7 states that it is important to encourage the diversification of the rural economy and to accommodate change, while conserving the full and varied countryside for the benefit and enjoyment of residents and visitors alike. A healthy rural economy helps to protect and improve the countryside. The Guidance recognises that such diversification will often be based around farm businesses.

10.81 The District Council wishes to support proposals for diversification that will strengthen and protect the productive base of the farm unit, that is, allow the farmer to continue to farm. Thus the District Council will expect an outline farm plan to be submitted with any planning application, indicating where new diversification schemes fit into the overall farm programme, as part of that assessment. By granting planning consent for acceptable diversification projects, the District Council is indicating its long-term support for a continuing viable agricultural community in Thanet.

10.82 Farm diversification projects have a number of issues associated with them, for example, traffic and landscape impacts, and the depletion of financial and land resources. Applicants will therefore need to carefully assess the implications of new proposals, both for their own benefit, and to enable the Local Planning Authority to give support to acceptable and viable schemes.

POLICY CC10 - FARM DIVERSIFICATION

A PROPOSAL TO DIVERSIFY THE RANGE OF ECONOMIC ACTIVITIES ON A FARM WILL BE PERMITTED IF ALL THE FOLLOWING CRITERIA ARE MET:

(1) THE PROPOSAL IS COMPLEMENTARY TO THE AGRICULTURAL OPERATIONS ON THE FARM, AND IS OPERATED AS PART OF THE FARM HOLDING;

(2) THE PROPOSAL IS ACCEPTABLE IN TERMS OF ITS IMPACT ON ITS LANDSCAPE SETTING AND ANY KNOWN NATURE CONSERVATION INTEREST;

(3) THERE WOULD BE NO LOSS OF BEST AND MOST VERSATILE AGRICULTURAL LAND;

(4) THE LIKELY TRAFFIC GENERATION COULD BE SAFELY ACCOMMODATED ON THE LOCAL HIGHWAY NETWORK;

(5) THE PROPOSAL SHOULD UTILISE AVAILABLE EXISTING FARM BUILDINGS;

(6) IF A NEW BUILDING CAN BE JUSTIFIED, IT SHOULD MEET ALL THE REQUIREMENTS OF POLICY D10; AND

(7) THE PROPOSAL WOULD BE COMPATIBLE WITH THE PLAN'S POLLUTION CONTROL POLICIES AND WOULD NOT BE DETRIMENTAL TO THE RESIDENTIAL AMENITIES OF THE LOCAL AREA.

(8) THE PROPOSAL IS APPROPRIATE TO THE ECONOMIC, SOCIAL AND ENVIRONMENTAL CHARACTER OF THE SURROUNDING AREA.

Agriculture-Related Development

10.83 The 1996 Structure Plan sought to control the location of agriculture-related businesses that are not part of a farm business, such as produce processing and packaging operations. Such uses are relatively unusual in the Thanet area, the principal exception being the potato pack-house at St Nicholas Court Farm, near the Thanet Way. These value-adding operations would not be inappropriate within the Plan area as a whole, but their scale and location will be closely regulated by the application of the following Policy.

POLICY CC11 - AGRICULTURE-RELATED DEVELOPMENT

DEVELOPMENT RELATED TO THE AGRICULTURAL INDUSTRY MAY BE LOCATED ON SUITABLE SITES ON AGRICULTURAL LAND, SUBJECT TO LANDSCAPE, TRAFFIC AND OTHER PLANNING CONSIDERATIONS, AND THE SCALE OF THE DEVELOPMENT BEING ACCEPTABLE.

Retail Development on Farms

10.84 Many farms now sell products direct to the public in one of three forms:

(1) As a farm shop located within an existing farm building which markets goods produced within the agricultural unit, not requiring planning permission;
(2) As a farm shop located within a purpose built building where planning consent is required for the building; and
(3) As a retail unit associated with that farm, which markets a significant level of a wider range of goods than are produced within the agricultural unit, also requiring planning consent and to which Policy CC12 will apply.

10.85 The acceptability of a proposal to erect a new farm shop in the countryside will be judged on the basis of Kent Structure Plan Policy RS5.

10.86 In order not to conflict with parts 2 and 3 of the Policy, the District Council would normally expect farm shop buildings not to exceed 1500 sq ft gross floor area.

10.87 Policy CC12 addresses the situation where it is intended to sell a wider range of goods than those that are produced on the agricultural unit. Whilst the District Council recognises the desirability for farmers to provide a service throughout the year and the problems associated with seasonality, the District Council has, in formulating the Policy, taken into consideration the unusual circumstances of the area in that, due to its size, no location is far from centres of population with existing shops.

10.88 Retail units on farms which sell a wider range of goods (where more than 25% of goods sold are not produced within the agricultural unit), are considered by the District Council to be general retail units which may have wider environmental implications than farm shops solely marketing goods produced within the agricultural unit, and therefore, the following Policy will apply.

10.89 If planning permission, in suitable locations, is granted the District Council may impose conditions on:

(1) the limit of the type of goods to be sold;
(2) the size of the retail area;
(3) the provision of satisfactory access and loading arrangements off the highway; and
(4) the landscaping arrangements.

POLICY CC12 - FARM RETAIL UNITS

DEVELOPMENT OF A RETAIL UNIT ASSOCIATED WITH A FARM, WHICH INVOLVES THE DISPLAY AND SALE OF GOODS WHICH HAVE NOT BEEN PRODUCED WITHIN THE AGRICULTURAL UNIT, WILL BE PERMITTED BUT ONLY IF THE DISTRICT COUNCIL CAN BE SATISFIED THAT:

(1) THE USE WOULD NOT BE DETRIMENTAL EITHER TO THE EXISTING LOCAL AMENITIES OR THE CONTINUED VIABILITY OF ESTABLISHED SHOPS WITHIN THE IMMEDIATE VICINITY;

(2) THE SCALE OF RETAILING ACTIVITY WOULD NOT EXCEED THAT WHICH WOULD NORMALLY BE ASSOCIATED WITH A LOCAL SMALL SCALE SHOPPING FACILITY AND WOULD NOT BE DETRIMENTAL TO THE RURAL CHARACTER OF THE AREA;

(3) ANY ASSOCIATED BUILDING OR STRUCTURE WOULD NOT BE OBTRUSIVE IN THE LANDSCAPE, OR DETRIMENTAL TO THE RURAL CHARACTER OF THE AREA BY MEANS OF ITS DESIGN, SIZE, SITING OR APPEARANCE; AND

(4) THE TRAFFIC GENERATED BY THE USE WOULD NOT CREATE DANGEROUS CONDITIONS ON ADJACENT HIGHWAYS OR EXCEED THE CAPACITY OF THE LOCAL ROAD NETWORK.

The Coast

10.90 The Isle of Thanet has over 23 miles of coastline, which are characterised by a distinctive and rare combination of chalk cliffs and extensive sandy beaches. The coast forms one of the District's most valuable resources, in terms of tourism, formal and informal recreation, landscaping and nature conservation.

10.91 PPG20 stresses that coastal planning is a strategic issue, and that there is a need for greater co-operation and co-ordination between coastal local authorities.

10.92 The broad range of planning policies that relate to the coastal zone are not confined to this chapter and the Chapters on 'Nature Conservation' and 'Sport & Recreation' should also be considered.

10.93 With the exception of limited areas around Ramsgate and Broadstairs Harbours, the entire Thanet coastline is recognised, both nationally and internationally, for its nature conservation and scientific value, and it therefore requires particularly strong protection in this regard.

10.94 Additionally, the Thanet coastline and beaches historically represent a considerable recreation and tourism resource, which in the future needs to be further explored and developed for the enjoyment of residents and visitors alike (see Sport and Recreation Chapter).

10.95 The Thanet coastline and the sea also considerably enhance the value of the District's landscape, and this enhanced value is recognised by its partial designation as part of the Pegwell Bay Special Landscape Area and the former Wantsum Channel Landscape Character Area.

10.96 The objectives of the Kent Biodiversity Action Plan are also a consideration (see Nature Conservation Chapter). This document identifies species and habitats that are most under threat. The coastal area is one such habitat and is of particular importance and has the following designations: SAC, SPA, Ramsar Site, SSSI and part is also a National Nature Reserve.

Coastal Park Initiative

10.97 The District Council recognises that the coastline is one of the District's greatest assets. The Council considers that it is important to maintain the diverse character of the Thanet coast for its value for tourism, recreation, landscape and wildlife. It is therefore recognised that these various needs and demands will have to be managed so that the Thanet coastline does not deteriorate. It is for this reason that the Council has commenced on the establishment of a proposal known as the 'Coastal Park Initiative'

10.98 The idea for a coastal plan developed out of the preparation of the Management Scheme for the Thanet Coast Marine Special Area of Conservation (SAC). Many issues were discussed in that process which did not fall solely within the scope of the Management Scheme, which is a statutory document. These issues included regeneration projects, tourism and leisure (such as 'green tourism') new development, nature conservation and related issues.

10.99 The concept of the 'Coastal Park' is to draw together all these policies, proposals and projects at the coast under a single, integrated action plan; to give these initiatives a common identity and to set a framework to carry them forward and develop new ideas.

10.100 As there are many issues covered by this initiative, other Policies in the Plan will be relevant. However, Policy CC13 will apply to developments within the coastal area.

POLICY CC13 - COASTAL PARK INITIATIVE

PROPOSED DEVELOPMENTS WITHIN THE AREA IDENTIFIED AS THE 'COASTAL PARK INITIATIVE' WILL BE GRANTED WHERE THEY CONTRIBUTE TO OR ENHANCE THIS INITIATIVE AND ARE NOT CONTRARY TO THE MANAGEMENT SCHEME, SUBJECT TO OTHER POLICIES IN THIS PLAN.

Planning Policies for the Coast

10.101 The Council recognises the importance of balancing the environmental, recreational and development needs of the coastal zone. Policy CC14 therefore outlines the wider considerations within which decisions relating to various forms of development (including developments not related to the Coastal Park Initiative) at the coast must be assessed. These are addressed in more detail in other Chapters of this Plan.

10.102 The Council will also, in considering new development proposals at the coast, take into account the character of the whole Thanet coast, and whether a particular development might be better located elsewhere in the coastal zone. This carries forward the Council's commitment to enhance the differences in the character of the Thanet coast.

10.103 The Thanet coast is a sensitive area for wildlife and for its landscape value. Depending on the location, nature and scale of new development, an Environmental Impact Statement may be required under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (circular 02/99 refers). Thus the following Policy will apply.

POLICY CC14 - DEVELOPMENT ALONG THE COAST

DEVELOPMENT WHICH SPECIFICALLY REQUIRES A COASTAL LOCATION WILL ONLY BE PERMITTED IF IT CAN BE DEMONSTRATED THAT NO ALTERNATIVE SITE EXISTS AND THE DEVELOPMENT IS CONSISTENT WITH OTHER LOCAL PLAN POLICIES.

DEVELOPMENT AT THE COAST WILL BE EXPECTED TO PROTECT AND ENHANCE THE LANDSCAPE, NATURE CONSERVATION AND RECREATIONAL VALUE AND DIVERSE CHARACTER OF THOSE AREAS. PROPOSALS WHICH ARE LIKELY TO RESULT IN THE LOSS OF OR DAMAGE TO COASTAL OR INTER-TIDAL HABITATS MUST BE ACCOMPANIED BY AN ENVIRONMENTAL ASSESSMENT. THE FINDINGS OF SUCH AN ASSESSMENT WILL BE A MATERIAL CONSIDERATION IN DETERMINING AN APPLICATION FOR PLANNING PERMISSION.

Coastal Defence Works

10.104 Thanet's chalk coastline is particularly vulnerable to sea and wind action, being located where the North Sea meets the English Channel. The Shoreline Management Plan advocates to "…hold the existing line…" for most of the coastline. The District Council therefore regards it as very important for these areas to be protected from erosion and subsequent damage.

10.105 However, most of the Thanet coastline is designated as a Site of Special Scientific Interest, as a Special Protection Area and Ramsar Site, and is therefore protected by Policy NC2 of this Plan, and by European legislation.

10.106 The Council acknowledges the potential for conflict between the construction of sea defence works, the scientific and nature conservation interests and the public amenity value of the Thanet coastline. It thus also recognises the necessity to reach agreement with English Nature, as far as possible, concerning the most suitable form of sea defence measures. In this respect, the District Council will seek to encourage the use, where appropriate, of "soft" engineering options for coastal defences.

10.107 Under the Coast Protection Act 1949, an English Nature objection to new defence works automatically results in a Public Inquiry, and this would involve considerable delays in the implementation of new coastal protection works.

10.108 The District Council already consults English Nature as a matter of course when designing new coastal defence works with a view to conserving the known nature conservation and scientific aspects, and intends to continue that practice. The following Policy will therefore apply.

POLICY CC15 - COASTAL DEFENCE WORKS

WHERE NEW COASTAL PROTECTION PROPOSALS WOULD AFFECT A DESIGNATED SSSI, SPECIAL AREA OF CONSERVATION, SPECIAL PROTECTION AREA, OR RAMSAR SITE, OR INCLUDE A SIGNIFICANT LOCAL SCIENTIFIC OR LANDSCAPE FEATURE, NEW PROTECTION MEASURES SHOULD BE DESIGNED IN SUCH A WAY THAT THE SCIENTIFIC OR LANDSCAPE INTEREST IS NOT DETRIMENTALLY AFFECTED OR PUBLIC ACCESS TO THESE FEATURES UNREASONABLY RESTRICTED.

Undeveloped Coast

10.109 The unspoilt scenic quality of much of the undeveloped coast of Kent, and the countryside adjoining the coast, is of County-wide or national significance.

10.110 Although none of the Thanet coastline is designated as "Heritage Coast", there are three lengths of coast which have remained substantially undeveloped. These are recognised by Structure Plan Policy EN2, and are located at Pegwell Bay, North Foreland/Palm Bay and Minnis Bay/Plum Pudding Island. The scenic and scientific value of these areas varies. At Pegwell Bay, for example, the scenic value is affected by the former Hoverport, but the scientific value of this coast in terms of fauna, flora and geology is of international significance.

10.111 The North Foreland/Palm Bay stretch contains one of the most important local landscape areas, known as the Green Wedge, and the chalk cliffs have a measure of botanical interest. Minnis Bay/Plum Pudding Island includes part of the Channel of the former River Wantsum. It is consequently a flat landscape of alluvial deposits, which is mainly in agricultural use. In particular, Plum Pudding Island has considerable ornithological, botanical and entomological (insect-related) interest. These areas, like Pegwell Bay, are of international importance for wildlife and geology.

10.112 The following Policy will therefore apply to those areas that are designated as Undeveloped Coast by Structure Plan Policy EN2.

POLICY CC16 - UNDEVELOPED COAST

IN CONSIDERING DEVELOPMENT PROPOSALS AT OR ADJACENT TO THE UNDEVELOPED COAST, THE DISTRICT COUNCIL WILL TAKE INTO ACCOUNT THE UNSPOILT LANDSCAPE, SCIENTIFIC VALUE AND CHARACTER OF THE COASTLINE, AND PROPOSALS WHICH ARE INAPPROPRIATE TO THE AREA BY REASON OF THE NATURE, SCALE, LOCATION AND LIKELY IMPACT OF THE USE WILL NOT BE PERMITTED.

Development of Clifftop Sites

10.113 Within the built-up areas of Thanet, less than 10% of the coast remains undeveloped. In view of the conflict of interests addressed by Policy CC16, the District Council also considers that it is also important to prevent development on clifftops in urban areas that might damage the landscape and nature conservation interests of the coastline.

10.114 The Department of the Environment has recognised in PPG20 that the development of unprotected clifftops encourages the provision of new coastal protection, and is thus a material consideration in dealing with applications for new development.

10.115 Since almost the entire Thanet Coast is designated as a SSSI/SAC/SPA/Ramsar site (including those sections which abut urban areas) and is of considerable landscape value, it would not be appropriate to permit development which might lead to the degradation of such sites, either in the short or long term.

Thus the following Policy will apply, whether a site is covered by Policy CC16 or not.

POLICY CC17 - UNDEVELOPED CLIFFTOP SITES

ON UNDEVELOPED CLIFFTOP SITES, NEW DEVELOPMENT WILL ONLY BE PERMITTED WHERE IT WOULD NOT:

(1) BE DETRIMENTAL TO THE VIEWS OR SEASCAPE VALUE PROVIDED BY SUCH SITES OR THE NATURAL HABITAT INTERESTS OF IMMEDIATELY ADJOINING AREAS;

(2) UNDERMINE THE STABILITY OF A CLIFF FACE NOT PROTECTED FROM MARINE WEATHERING;

(3) CREATE A DEMAND FOR NEW COASTAL PROTECTION WORKS; OR

(4) CONTRIBUTE TO THE COALESCENCE OF URBAN DEVELOPMENT ALONG THE THANET COASTLINE, OR ADVERSELY AFFECT THE CHARACTER OF THE COASTAL SKYLINE.

TARGETS

LP Implementation Target	
Policy Area	Development in the Countryside
Relevant Policies	CC1
Indicator	Number of hectares of rural area lost to irreversible development during Plan period
Target	No specific target – monitor to establish appropriate targets
Monitoring	Annual monitoring through Development Control (DC) Applications system

LP Implementation Target	
Policy Area	Green Wedge
Relevant Policies	CC5
Indicator	Number of departures to Policy; Number of hectares of Green Wedges lost to irreversible development during Plan period
Target	No specific target – monitor to establish appropriate targets
Monitoring	Through DC Applications system
LP Implementation Target	
Policy Area	Best & Most Versatile Agricultural Land
Relevant Policies	**CC9**
Indicator	Number of hectares of best and most versatile land to irreversible development during Plan period
Target	No specific target – monitor to establish appropriate targets
Monitoring	Through DC Applications system

11. Rural Settlements

11. Rural Settlements

Introduction

11.1 This Chapter contains the District Council's planning policies as they relate to the villages in the District, including general levels of new development, service provision and other issues. Some topics which affect the villages are dealt with in more detail in other Chapters; for example, public open space (Sport & Recreation), employment sites (Economic Development), and Conservation Areas (Heritage).

OBJECTIVES

(1) TO PROTECT THE CHARACTER, QUALITY AND FUNCTIONING OF THANET'S RURAL SETTLEMENTS;

AND

(2) TO MAKE PROVISION, WHERE APPROPRIATE, FOR NECESSARY NEW DEVELOPMENT WHICH WILL CONTRIBUTE TO THE CHARACTER, QUALITY AND FUNCTIONING OF THE VILLAGE.

Policy Background

11.2 Central Government Guidance in PPS7 states that the key principles of sustainable rural development are:

- social inclusion, recognising the needs of everyone;
- effective protection and enhancement of the environment;
- prudent use of natural resources; and
- maintaining high and stable levels of economic growth and employment.

11.3 In their Regional Economic Strategy "Building A World-Class Region" the South-East of England Development Agency says that the countryside of the south-east is one of its major economic assets and its conservation is integral to the region's competitiveness. Resolving the tension between conservation and economic growth must be a priority.

11.4 The 'aim' of the Rural White Paper "Our Countryside: The Future, A Fair Deal For Rural England" is to sustain and enhance the distinctive environment, economy and social fabric of the English Countryside for the benefit of all. Although the White Paper envisions a 'Working Countryside' with a diverse economy and high levels of employment, it seeks to protect the countryside, looking after, restoring and conserving the landscape, wildlife, architecture and traditions that make our countryside special, as well as creating a 'Living' and 'Vibrant' countryside. Some of the main ways to make a difference are supporting and modernising village services, delivering local transport

solutions, rejuvenating a thriving economy, setting a new direction for farming, preserving the countryside and making it accessible.

11.5 In line with these aims and objectives the Local Plan will seek to ensure sustainable rural development responsive to local circumstances and the individual character of each settlement.

11.6 One of the aims of the Structure Plan and the Kent Countryside Strategy is to enhance the character, quality and functioning of rural settlements in Kent, with the objective of securing a viable multi-purpose rural economy and balanced rural community, consistent with conserving the attractiveness and character of the countryside.

11.7 The Structure Plan therefore gives flexibility to district planning authorities to formulate policies in respect of rural settlements, and to take account of local needs and circumstances in formulating settlement policies relating to housing provision, employment opportunities, services, recreational facilities, and tourism.

11.8 The District Council considers that new development should help to enhance the rural settlements of Thanet, not only in terms of quality of design, but also meeting the needs of the village, whether housing, employment opportunities, recreational facilities or other amenities.

Thanet Context

11.9 One of the factors which has been considered in the development of Local Plan policies is the proximity of the rural settlements to Thanet's urban areas, and the reliance of the rural population on the towns for employment and services. A considerable proportion of rural dwellers both work and use services in the Thanet towns, and Canterbury and Dover. The level of car ownership in the villages also tends to be higher than in the towns.

11.10 The seven villages of Acol, Cliffs End, Manston, Minster, Monkton, St Nicholas and Sarre vary in a number of ways: scale, function, historic character, pattern of development, location relative to the towns, and so on. Each contributes something distinctive to the character of Thanet's rural area, and each has its own problems and future potential.

11.11 The District Council will, therefore, examine opportunities for improving the character, quality and functioning of those settlements.

General Levels of Development

11.12 The 1996 Structure Plan's Rural Settlement policies allowed district planning authorities to designate certain villages for future growth under Policy RS3 (a). Other villages would remain subject to Policy RS2 where restraint considerations apply, or even the strongly conservationist approach advocated by Policy RS3 (b). This principle applied to housing, employment and all other forms of development subject to planning control.

11.13 The Village Appraisals carried out by Parish Councils during late 1989 and early 1990 indicate that modest growth is preferred by residents in most parishes, with an emphasis on meeting locally generated needs. For example, there is general support for the provision of affordable housing and limited employment uses, to allow young people to stay in the village, and to enhance the living and working environment of Thanet's rural settlements.

POLICY R1 - GENERAL LEVELS OF DEVELOPMENT

WITH THE EXCEPTION OF THE SPECIFIC HOUSING ALLOCATION AT MINSTER (POLICY H7) NEW RESIDENTIAL DEVELOPMENT AT RURAL SETTLEMENTS WILL BE LIMITED TO MINOR DEVELOPMENT WITHIN THEIR CONFINES.

Explanation:
11.14 The policy of the District Council is to concentrate new development in the Thanet towns, and to prevent levels of development in its rural settlements which might damage their character, amenity or functioning. What is minor development will be judged in relation to the scale of the development proposed and the size of the settlement.

11.15 This Plan identifies sufficient land to meet expected requirements for housing land. In the short term, this does not necessitate the release of any additional land adjacent to Thanet's existing rural settlements, other than at Minster, where the range of services and the presence of a railway station makes a limited release of land for housing appropriate. The Council wishes to maintain the current pattern of development, in line with Kent County Council's rural settlement and conservation policies.

11.16 The District Council considers that the only Thanet village suitable for more than minor development is Minster.

11.17 The village confines, as defined on the Village Insets accompanying the Proposals Map, therefore indicate the limits to new development in the various settlements. The only exception to this general approach would be where a local housing need is identified in line with Policy H15. (It should be noted that the village confines are designed to perform a purely land use planning function, and are not intended to define parishes, or have any other social implications.)

Village Gaps

11.18 There are a number of road frontage sites in the villages which provide outlook into the open countryside or onto other open spaces, or form an important break in the built environment of those villages.

11.19 The Council considers that such gaps are an important part of the built character of the villages, and should be protected as such. The following Policy will therefore apply in these situations.

POLICY R2 - VILLAGE GAPS

THE FOLLOWING SITES SHOWN ON THE PROPOSALS MAP ARE IMPORTANT GAPS IN THE BUILT AREAS OF VILLAGES WHICH CONTRIBUTE TO THE CHARACTER AND AMENITY OF THOSE VILLAGES, AND WILL NOT BE CONSIDERED SUITABLE FOR DEVELOPMENT:

(1) THE STREET, ACOL;
(2) SPRATLING STREET, MANSTON;
(3) GREENHILL GARDENS, MINSTER;
(4) THE STREET, MONKTON;
(5) A28/A253, SARRE; AND
(6) THE LENGTH, ST NICHOLAS.

Village Services

11.20 Village services are also under threat. This includes shops, schools, pubs, bus and other services. The Council wishes to support the continuation of as many village services as possible. For example, with the continued population growth at Minster, the extension to the existing school is welcomed.

11.21 The proximity of the villages to the urban areas and the high levels of car ownership mean that the continuation of such services is vulnerable to the operation of market forces. It may be that alternative voluntary methods of maintaining village services will need to be considered by the Parish Councils, in conjunction with Kent Rural Community Council.

POLICY R3 - VILLAGE SERVICES

PROPOSALS FOR THE USE OF EXISTING RESIDENTIAL PROPERTIES IN THE VILLAGES TO PROVIDE SHOPS OR OTHER APPROPRIATE COMMERCIAL ACTIVITIES OR SERVICES WILL BE PERMITTED, SUBJECT TO ENVIRONMENTAL AND TRAFFIC CONSIDERATIONS, AND MINIMUM IMPACT ON RESIDENTIAL AMENITY.

PROPOSALS FOR THE USE OF AGRICULTURAL BUILDINGS IN THE VILLAGES FOR SUCH PURPOSES WILL ALSO BE SUBJECT TO POLICIES R5 AND HE3.

Explanation:
11.22 One of the concerns expressed in the Village Appraisals is the continued loss of village services. While the District Council is not in a position to provide such services directly, it believes that it should play a facilitating role as Local Planning Authority for the private and voluntary sectors in terms of a positive planning approach to new retail and commercial opportunities of a suitable scale.

Village Shops

11.23 Village shops can provide a convenient and energy efficient source of shopping, fulfil a valuable social community function and contribute to the rural economy. Their viability will depend on customers continuing to use them. However, their loss can have a severe impact on the communities they serve. While trade protection is not a planning function, the District Council will use its powers to resist proposals which would threaten the viability of retention of a reasonable level of accessible shopping provision in the Thanet villages. In considering a reasonable level of shopping provision in relation to Policy R4, account will be taken of the size of the settlement and the community to be served. In addition to the following Policy, Policy R3 is also relevant.

POLICY R4 - VILLAGE SHOPS

THE COUNCIL WILL SEEK TO USE ITS PLANNING POWERS TO RETAIN A REASONABLE LEVEL OF SHOPPING PROVISION IN THANET'S RURAL SETTLEMENTS.

Recreational Land

11.24 There has been a consistent shortfall of land available for recreational purposes throughout the District. Some of the villages do have sufficient recreation land. However, Minster, Sarre and Cliffs End in particular suffer from a shortfall of such land, and the Local Plan seeks to address this situation.

11.25 Policies relating to village recreation land are contained in the **Sport and Recreation Chapter** of this Plan.

Conservation and Enhancement

11.26 The enhancement of the built environment of the villages is clearly an important aspect of the overall rural economic and environmental strategy. The Policies contained in this Chapter seek to provide a basis on which to protect the built character of the villages.

11.27 In terms of positive enhancement, the Heritage Chapter gives policy and other guidance in respect of the enhancement of Conservation Areas in the District. The Kent Landscape and Nature Guidelines also provide a foundation for landscape and related improvement to key village sites.

11.28 For example, the Manston War Memorial is one of a number of village greens in Kent which have been identified in the Commons Registration Act 1965. Although a relatively small piece of land, it is still common land of unique character, the only such land in Thanet which merits long-term protection.

Conversion of Rural Buildings

11.29 Another aspect of rural diversification is the reuse of rural buildings. In recent years, many farm buildings have become redundant, in most cases

because the buildings are of traditional construction and thus not suitable for modern farm machinery. Redundancy may also occur as a result of operational changes, farm rationalisation, or EU Common Agricultural Policy.

11.30 Central Government advice is to support proposals for the conversion and reuse of such buildings wherever possible, to aid sustainable development objectives. Reuse for economic development purposes will usually be preferable, but residential conversions may be more appropriate in some locations and for some types of building.

11.31 Such conversions might be particularly desirable where buildings are listed, or have other landscape value, and their long-term retention may be sought for these reasons.

11.32 However, it is in the interest of the character of the Thanet landscape not to permit the conversion of buildings which are not sympathetic to their landscape setting by reason of size, design or built form. The District Council will not normally support the conversion or adaption of such buildings.

11.33 Disused rural buildings may hold species protected by the Wildlife and Conservation Act 1981 and other legislation, for example, bats or barn owls. The conversion of such buildings should make provision for their continued use by protected species which are present. If this is not possible, an alternative roosting site should be provided nearby. This applies to Policies R5 and HE3.

POLICY R5 - CONVERSION OF RURAL BUILDINGS

THE CONVERSION OF RURAL BUILDINGS TO OTHER USES WILL BE PERMITTED WHERE:

(1) THEIR FORM, BULK AND GENERAL DESIGN ARE IN KEEPING WITH THE CHARACTER OF THE SURROUNDING COUNTRYSIDE; AND

(2) THE PROPOSED USE IS ACCEPTABLE IN TERMS OF ITS IMPACT ON THE IMMEDIATE LOCALITY AND THE LOCAL HIGHWAY NETWORK.

WHERE THE BUILDING CURRENTLY HOLDS PROTECTED SPECIES, THE CONVERSION SHOULD ENSURE THE CONTINUED USE OF THE BUILDING FOR THAT PURPOSE, OR A SUITABLE ALTERNATIVE SITE SHOULD BE PROVIDED IN THE IMMEDIATE LOCALITY.

Traffic In The Villages

11.34 The Village Appraisals have indicated a high degree of concern in respect of traffic and pedestrian safety in the villages. The recognition of this concern is reflected by the completion of the Sarre Highway Environmental Management Initiative (HEMI) or "traffic-calming" scheme.

POLICY R6 - TRAFFIC IN THE VILLAGES

THE DISTRICT COUNCIL WILL PERMIT NEW TRAFFIC-CALMING MEASURES IN THE THANET VILLAGES. ACOL AND MINSTER ARE CONSIDERED TO BE PRIORITY SETTLEMENTS FOR SUCH MEASURES.

Explanation:
11.35 The District Council believes that traffic calming plays a crucial role in improving the environment of villages, both for residents and to encourage their tourism role.

11.36 The District Council believes that traffic calming should form an integral part of environmental improvements in all the Thanet villages. However, two Thanet villages are particularly subject to considerable traffic pressures.

11.37 Acol and Minster experience high vehicle speeds on the approaches to, and through, their built-up areas, and the Council believes that on both safety and local environmental grounds consideration should be given to the extension of such schemes to these villages. In the meantime, the Council would support traffic schemes that moderate the effects of traffic in the villages.

TARGETS

LP Implementation Target	
Policy Area	Rural Settlements
Relevant Policies	R2
Indicator	Maintain all village gaps free from development
Target	Retain 100% of village gaps
Monitoring	Development Control application decisions/appeals?

12. Nature Conservation

12. Nature Conservation

Introduction

12.1 Natural habitats, wildlife and geology are important aspects for a good quality of life in Thanet. The protection of these natural assets not only encourages wildlife to flourish, but also provides opportunities for recreation and education.

12.2 The importance of nature conservation in this District is reflected in the number of different designations: internationally important Special Areas of Conservation (SAC), a Special Protection Area (SPA) and Ramsar site; nationally important Sites of Special Scientific Interest (SSSIs); Sites of Nature Conservation Importance (SNCI) which are of County Importance; and Regionally Important Geological/Geomorphological Sites (RIGs).

12.3 These are all areas of great value because of their undeveloped condition and nature conservation or geological interest, and have therefore been designated either under Central Government legislation or by County or District Council planning policy. They are, by their nature, environmentally sensitive and deserve long-term protection from non-essential development.

OBJECTIVES:

1. **TO MAINTAIN THE FULL RANGE OF NATURAL HABITATS AND GEOLOGICAL SITES IN THE DISTRICT, INCLUDING THOSE IDENTIFIED IN THE KENT HABITAT SURVEY 2003, AND ANY OTHER KNOWN SCIENTIFIC OR WILDLIFE INTERESTS;**

2. **TO RESIST DEVELOPMENT WHICH WOULD BE LIKELY, EITHER DIRECTLY OR INDIRECTLY, TO DAMAGE OR DESTROY THOSE SITES AND INTERESTS, UNLESS THERE ARE COMPELLING AND OVERRIDING REASONS OF PUBLIC INTEREST WHY THE DEVELOPMENT SHOULD TAKE PLACE ON A PARTICULAR SITE;**

3. **WHEREVER POSSIBLE, TO ENHANCE THE NATURE CONSERVATION AND HABITAT RESOURCE OF THE DISTRICT; AND**

4. **TO ENCOURAGE AND PROMOTE THE EDUCATIONAL VALUE, AND PUBLIC ENJOYMENT, OF THE WILDLIFE HABITATS AND GEOLOGY OF THE DISTRICT THROUGH THE DECLARATION OF LOCAL NATURE RESERVES AND OTHER SIMILAR MEASURES.**

Strategic Background

12.4 The Bio-Diversity Convention signed by the United Kingdom at the UN Earth Summit emphasises the value of nature conservation to the protection of the planet's finite resources.

12.5 Within this context, the Office of the Deputy Prime Minister, Planning Policy Statement 9 – Biodiversity and Geological Conservation gives advice in respect of the protection of sites of nature conservation value from local sites of nature conservation interest to important sites designated under the internationally recognised Ramsar Convention, The Habitat Directive and the Birds Directive.

12.6 The best national examples of natural habitat and physical features are notified by English Nature as Sites of Special Scientific Interest (SSSIs). Under the Wildlife and Countryside Act 1981, English Nature must be consulted in respect of any proposal which is likely to damage the interests of those sites. The Countryside and Rights of Way Act 2000 (CROW) provides significant new powers for site protection. English Nature must be given notice of any proposals that would affect an SSSI, even if it would take place outside the SSSI. Under CROW, Thanet District Council has comprehensive new duties with respect to its own activities and activities that it may permit others to undertake on or affecting SSSI. This includes a duty to take reasonable steps, consistent with the proper exercise of its functions, to further the conservation and enhancement of the features for which the site is of special scientific interest.

12.7 The EU Habitats Directive also provides for the designation of Special Areas of Conservation (SACs), as part of a European network of habitats, to be known as "Natura 2000". There are two SACs in Thanet, which cover most of the coastline of the District. SSSIs may also be designated as Special Protection Areas under the EC Wild Birds Directive, and as Wetlands of International Importance under the Ramsar Convention

12.8 However, these statutory designations cannot protect the full diversity of wildlife on their own. If wildlife is to continue to be seen and enjoyed throughout Britain, nature conservation must be an integral part of the processes which are shaping our modern environment - instilled into the planning, management and use of land as a whole.

12.9 The potential effects of a development on habitats or species listed as priorities are capable of being a material consideration in the making of planning decisions. Section 74 of the Countryside and Rights of Way Act 2000 places new duties on the Government in respect of the conservation of biodiversity. The Secretary of State has produced a list of habitat types and species comprising those identified as priorities under the UK Biodiversity Action Plan. Under the remit of PPS9, the Council is required to conserve important natural habitat types that have been identified in the Countryside and Rights of Way Act 2000 section 74 list, as being of principal importance for the

conservation of biodiversity, and identify opportunities to enhance and to add to them.

12.10 To conserve and enhance the biological diversity in Kent is the main goal of the Kent Biodiversity Action Plan (BAP). This plan was endorsed by the District Council in 1997 and is the first step in the County's response to the Governments "Biodiversity; The UK Action Plan". The Kent BAP summarises information that is currently available with regard to the county's biodiversity and considers habitats including the coast and in urban areas. Species and habitats that are most under threat are identified and targets for the future have been set. However, it is not just areas that are most under threat that are considered, but those that are "…commonplace…" as well. The policies that are set out in this chapter have been considered against the objectives of the Kent BAP.

12.11 Ecological conservation and enhancement constitute one of the main aims of the Kent Countryside Strategy. The Strategy, which provides a framework for partnership between the County and District Councils and other bodies, seeks to achieve conservation and enhancement of landscape and ecology through the following objectives:

(1) Countryside management with farmers, landowners, local businesses and voluntary groups;

(2) Compilation of a database of nature conservation and landscape resources as a basis for future decision making and management measures; and

(3) Production of guidelines for the protection and enhancement of landscape and nature conservation sites.

Thanet Context

12.12 It is important to recognise the unusual ecological context of the Isle of Thanet. Most of the Thanet Coast (with the exception of Viking Bay, Broadstairs and some areas around Ramsgate Harbour) is covered by statutory nature conservation designations. These include two Sites of Special Scientific Interest, two candidate Special Areas of Conservation, and the Thanet Coast Special Protection Area, and Ramsar Site.

12.13 The Thanet Coast has also been identified by English Nature as one of the 27 most sensitive marine areas in England. The District Council recognises that these sites require long-term protection from damaging development.

12.14 However, the District Council also recognises that Thanet's coastline is a major tourism and economic asset, in an area suffering from long-term decline in tourism and economic performance. Thus there may be exceptional circumstances in which the economic development interest overrides the ecological interest. This unique situation is acknowledged in each of the relevant policy statements.

12.15 The District Council considers that such situations are likely to be very rare, and the related policy statements should not in any way be regarded as providing justification for development which do not fall into this exceptional category.

12.16 There are very few, if any, other areas in the District which enjoy statutory protection from development likely to adversely affect their nature conservation interest.

12.17 Thanet's agricultural landscape is largely treeless, and generally cultivated right up to the edges of the built-up confines. As a result of strategic policy, the provision of infrastructure and other factors, considerable pressure for new development will be focused within the existing built-up areas. Consequently, those areas of natural habitat which do exist assume particular importance in the local context.

12.18 Accordingly, when considering applications for development likely to affect any site having nature conservation value, the District Council intends to give sensitive consideration to the need for their preservation as such and to safeguard them from harmful development.

Kent Habitats Survey

12.19 A comprehensive survey of Kent's semi-natural habitats was first carried out between 1990 and 1994 using the Phase 1 habitat classification system (Kent Wildlife Habitat Survey County Report, 1995). In 2000, a new partnership was established to re-survey the county, and produced the Kent Habitats Survey 2003.

12.20 The purposes of the survey include supporting environmental education projects for schools and the public; targeting agri-environmental awards and conservation action; informing environmental impact assessments for new projects and developments; guiding strategic planning and development in Kent; monitoring the pattern and scale of changes in land use across the county; and advising wildlife management plans for local farmers, landowners and businesses.

POLICY NC1 – HABITATS

DEVELOPMENT PROPOSALS WHICH WOULD RESULT IN THE LOSS OR DAMAGE TO SEMI-NATURAL HABITATS OR FEATURES, WILL NOT BE PERMITTED.

EXCEPTIONALLY, WHERE A SPECIFIC LOCAL, REGIONAL OR NATIONAL NEED HAS BEEN IDENTIFIED WHICH OVERRIDES THE NECESSITY OF RETAINING THE SITE AND FOR WHICH NO SUITABLE ALTERNATIVE SITE EXISTS, AT LEAST AN EQUIVALENT AREA OF CORRESPONDING HABITAT WILL BE EXPECTED TO BE CREATED, AT THE DEVELOPER'S EXPENSE, AT A SUITABLE LOCATION WITHIN THE DISTRICT, AND WELL RELATED TO OTHER EXISTING HABITATS.

WHERE APPROPRIATE, THE EFFECTIVE LONG-TERM MANAGEMENT OF HABITAT SITES AND FEATURES WILL BE SECURED THROUGH THE USE OF PLANNING CONDITIONS, LEGAL AGREEMENTS OR OTHER SUITABLE MECHANISMS.

Explanation:
12.21 Thanet's habitat resources are limited in comparison to other Kent districts, with the third lowest representation of habitat resources. Thus non-statutory habitat sites and features assume a particularly high level of importance in the Thanet context. They also contribute significantly to the local landscape (see Countryside and Coast Chapter). Policy NC1 will therefore apply to habitat sites and features (including those identified in the Kent Habitats Survey 2003) not covered by the other nature conservation policies in this Plan.

12.22 Thus development proposals which would damage or destroy habitats or sites identified for protection in this Plan will not normally be permitted. This preclusion also relates to off-site development proposals which would damage habitats indirectly, either in the short term or cumulatively in the long term.

12.23 Thanet's agricultural land is generally lacking in trees, hedges and other natural cover. It is for the most part farmed right up to the edges of the built-up confines which will, as a result of strategic policies, be the focus for future development pressures.

12.24 Therefore, where sites of known habitat value do exist, these assume a particular importance and warrant every effort to protect them. However, the Council believes that it is also important to enhance existing habitats and create new habitats for wildlife, and increase their educational value for the wider public.

12.25 The Policy also makes provision for exceptional circumstances where the need for development overrides the desirability of retaining the site, and where no other suitable site can be found. The Council would normally expect development of the site to include mitigating measures to minimise the impact of the development on the habitat value of the site. In such situations, the Council will also expect the developer to provide for the replacement of that habitat in another location which would complement the existing pattern of habitats in the District.

A Nature Conservation Strategy

12.26 The District Council is committed to the protection of an attractive countryside including nature conservation and all its attendant benefits. The development of a nature conservation strategy will be based on the information provided by the Habitat Survey and other relevant sources. It is recognised that the positive aspects of nature conservation aims are largely dependent upon the goodwill of farmers and other landowners.

12.27 The District Council aims to adopt nature conservation friendly practice in its own operations, and also to encourage owners and users of land to adopt such practice.

12.28 The purpose of the Strategy will be to provide a context for positive measures, including management agreements and other initiatives, for protecting and enhancing habitat areas, and creating new and varied habitats within the District.

Sites Of National And International Nature Conservation Significance

12.29 The Thanet Coast and Sandwich Bay-Hacklinge Marshes (which includes Pegwell Bay) SSSIs cover most of the Thanet coastline, with the exception of Viking Bay, Broadstairs and some of the beach areas around Ramsgate, and are ranked Grade 1 in the Nature Conservation Review. This importance is underlined by the existence of a Kent Wildlife Trust Nature Reserve on the site.

12.30 Proposals which might have an impact on the SSSIs, either directly or indirectly, would need to be subject to the most rigorous examination.

Pegwell Bay

12.31 Pegwell Bay is a nature conservation site of exceptional international importance. This is reflected in the designation of the area as a Site of Special Scientific Interest, two candidate Special Areas of Conservation under the Habitats Directivea Special Protection Area under the European Community Wild Birds Directive, and a Ramsar Site. It has also been declared as a National Nature Reserve under Section 35 of the Wildlife and Countryside Act 1981.

12.32 This National Nature Reserve, of 610ha (1500 acres) which extends into Dover District, has been jointly declared by this Council, and Kent County Council. A Reserve Management Committee has been established, including English Nature, the declaring authorities and the other landowners - the Kent Wildlife Trust, RSPB, and the National Trust. A full-time Warden/Manager has been employed to implement a management plan for the site. The post is funded by the declaring authorities, the conservation organisations and commercial sponsors PowerGen and Pfizer.

12.33 The Sandwich Bay-Hacklinge Marshes area (which includes Pegwell Bay) contains the finest sand dune system and sandy coastal grassland in south-east England, and also includes a wide range of other rare and highly valuable habitats such as mudflats, saltmarsh, freshwater marsh, scrub and woodland, and the rare geological features in the Pegwell Bay cliff formations. It is among the richest for plants in the country, renowned for invertebrate fauna.

12.34 The mudflats and saltmarsh provide an important roost site for golden plover and support large wintering populations of waders, particularly grey

plover and sanderling, which regularly reach levels of international importance. It is also important for other wintering, passage and breeding birds and as a landfall for migrant birds.

12.35 It should be noted that Pegwell Bay is an area of considerable landscape value and significance, being designated a Special Landscape Area (in the Structure Plan) and as an area of Undeveloped Coast (See Policy CC16 in the Countryside and Coast Chapter).

POLICY NC2 - NATURE RESERVE AND SSSIs

DEVELOPMENT WHICH WOULD MATERIALLY HARM OR DETRACT FROM THE SCIENTIFIC OR NATURE CONSERVATION INTEREST OF A SSSI OR NATIONAL NATURE RESERVE, EITHER DIRECTLY OR INDIRECTLY, WILL NOT BE PERMITTED.

EXCEPTIONALLY, WHERE IT CAN BE DEMONSTRATED THAT THE NEED FOR THE PROPOSED DEVELOPMENT IS COMPELLING AND OVERRIDES THE NATIONAL IMPORTANCE OF THE SSSIs, AND NO SUITABLE ALTERNATIVE SITE EXISTS, MITIGATING MEASURES SHOULD BE INCORPORATED INTO THE DEVELOPMENT, TO MINIMISE THE IMPACT OF THOSE PROPOSALS OR ENHANCE THE SCIENTIFIC OR NATURE CONSERVATION INTEREST OF THE AREA.

Explanation:
12.36 The Thanet coastal SSSIs are also Special Protection Areas (SPAs) under the European Community Wild Birds Directive. Whilst SPAs must also be SSSI, not all the Thanet SSSIs are included in the SPA.

12.37 Circular DETR 2/99 (Environmental Impact Assessment) and Circular ODPM 06/2005 (Biodiversity and Geological Conservation) advise that the environmental effects of any proposed development either in or close to a declared or potential SPA or Ramsar site should be subject to the most rigorous examination.

12.38 The Wild Birds Directive requires member states to take appropriate steps to avoid the pollution or deterioration of habitats, or any disturbance affecting bird life within an SPA. Current case-law indications are that Special Protection Area status means that only development which is of overriding public interest should be permitted.

12.39 A large proportion of the Thanet coast is identified within two candidate Special Areas of Conservation (cSACs) - the Sandwich Bay SAC and the Thanet Coast Marine SAC. Government guidance in PPG9 states that candidate SACs should be treated for planning purposes in the same way as designated SACs.

12.40 The Thanet Coast Marine SAC extends beyond the mean low-water mark. However, for planning purposes the Policy is only applicable as far as the mean low-water mark. The level of protection to be applied to SACs is

comparable to that applied to SPAs. In Thanet, the primary interests protected by the SACs are chalk reefs and sea caves (Thanet Coast) and mud/sandflats contributing to the formation of rare and valuable dune habitats (Sandwich Bay)

12.41 The marine areas (land covered continuously or intermittently by tidal water) of the SPA and two candidate SACs are now covered by the North-East Kent European marine sites Management Scheme. This management scheme reviews on-going operations and activities in the light of advice from English Nature on the conservation objectives and the operations that may cause deterioration or disturbance. The management scheme sets out an action plan to be implemented by the relevant authorities to ensure the conservation features are maintained in a favourable condition.

12.42 One of the key actions has been to appoint a project officer to take forward interpretation and promotion of the nature conservation importance of the coast, codes of conduct for all recreation and related activities, green tourism and monitoring of site use. The post is funded by some of the relevant authorities and also has Objective 2 funding. The post is based in Thanet District Council.

12.43 PPS9 states that due to the European legislation (detailed below) that covers the SPA, SAC and Ramsar Sites, a separate local plan policy is not required. However, these sites are still shown on the proposals map.

12.44 The UK is bound by the terms of Council Directive 79/409/EEC on the Conservation of Wild Birds (EC Birds Directive); Council Directive 92/43/EEC on the Conservation of Natural Habitats, Wild Fauna and Flora (EC Habitats Directive) which has been transposed into UK law as the Conservation (Natural Habitats,) Regulations 1994 (as amended); and the Convention on Wetlands of International Importance especially as Wildfowl Habitat (the Ramsar Convention). These international statutes apply to the SPA, SAC and Ramsar sites designated along the Thanet Coast (which are also nationally designated as Sites of Special Scientific Interest).

12.45 The Council will require an assessment of any implications of a proposed development which is likely to affect a European Site (SPA or SAC) or a Ramsar site, unless the proposal is directly connected with, or necessary for, the management of the site.

12.46 In order to consider granting such a proposal, the Council would need to be satisfied that there are no alternative solutions, or that there are imperative reasons of overriding public interest for the development.

12.47 If the Council intends to allow a development on a European site, the Secretary of State will be notified in order to consider whether the application falls within the criteria for call-in.

Sites Of County And Local Nature Conservation Significance

12.48 In addition to statutorily protected sites, there are a number of other sites known to have substantial nature conservation interest within the Kent context. These have been identified by the Kent Wildlife Trust as Local Wildlife Sites (formerly known as Sites of Nature Conservation Interest (SNCI)) and are reviewed on a regular basis. The Schedules are attached as an Appendix (still listed as SNCIs).

POLICY NC3 - LOCAL WILDLIFE SITES

DEVELOPMENT WHICH WOULD BE DAMAGING TO THE FOLLOWING SITES OF NATURE CONSERVATION INTEREST AS DEFINED ON THE PROPOSALS MAP, OR ANY SITES SO DESIGNATED IN THE FUTURE, EITHER IN THE LONG TERM OR THE SHORT TERM, WILL NOT BE PERMITTED:

1. **MONKTON CHALK PIT;**
2. **ST. PETER'S CHURCHYARD;**
3. **NORTH FORELAND AND GOLF COURSE ROUGHS;**
4. **MINSTER STATION ENVIRONS;**
5. **ASH LEVELS (part);**
6. **ST. NICOLAS AT WADE CHURCHYARD;**
7. **ST. MARY MAGDALENE CHURCHYARD MONKTON; AND**
8. **RAMSGATE CEMETERY.**

EXCEPTIONALLY, WHERE A STRATEGIC NEED IS IDENTIFIED, AT LEAST AN EQUIVALENT AREA OF CORRESPONDING HABITAT WILL BE EXPECTED TO BE CREATED, AT THE DEVELOPER'S EXPENSE, AT A SUITABLE LOCATION IN THE DISTRICT, AND WELL RELATED TO OTHER EXISTING HABITATS.

Explanation:
12.49 Planning Policy Statement 9, Biodiversity and Geological Conservation, highlights the importance of nature conservation outside statutorily designated sites, and states that development plans should address these areas as well.

12.50. The Council considers that Local Wildlife Sites are crucial elements of the habitat network in Thanet and that they therefore require formal protection if the habitat interest is to be maintained.

12.51. It should be noted that a number of former Local Wildlife Sites now form part of the Thanet coastal SSSIs, and will therefore be given the appropriate level of protection from development proposals by Policy NC2.

12.52 The Policy does make provision for circumstances where development might, in exceptional circumstances, be acceptable on a Local Wildlife Site. However, Local Wildlife Sites are scarce within the District, and take up a very small area of land. Thus the District Council would regard this as being an extremely rare occurrence, for which substantial justification would have to be

put forward. The Council would normally expect development of the site to include mitigating measures to minimise the impact of the development on the habitat value of the site. In such situations, the Council will also expect the developer to provide for the replacement of that habitat in another location which would complement the existing pattern of habitats in the District.

Habitat Management And Creation

12.53. Development proposals may sometimes create or incorporate open areas of land which provide an opportunity to protect and enhance the network of wildlife habitats outside designated sites and contribute to the maintenance of the current range and diversity of flora and fauna. New wildlife habitats which are managed appropriately may function as stepping stones or linear features which enhance the level of connectivity between sites and help with the migration, dispersal and genetic exchange of species as consistent with Planning Policy Statement 9 (PPS9). Further advice is also available in the DEFRA publication 'Working with the Grain of Nature'.

POLICY NC4 - HABITAT MANAGEMENT AND CREATION

DEVELOPMENT SHOULD, WHEREVER PRACTICAL, MAKE POSITIVE CONTRIBUTIONS TO THE RETENTION, CREATION AND MANAGEMENT OF WILDLIFE HABITATS WHICH COULD CONTRIBUTE TO A NETWORK OF WILDLIFE CORRIDORS AND STEPPING STONES.

Explanation:
12.54 The Nature Conservation objectives of this Plan seek to prevent development which would be harmful to habitats or features of nature conservation importance. However, the District Council recognises that in certain instances development may satisfactorily co-exist without any loss of the nature conservation interest, and may actually perpetuate its protection or bring about more satisfactory management.

Lower Stour Valley

12.55 One of the potential areas for habitat enhancement is the Lower Stour Valley, and this was recognised in the Stour Valley Countryside Plan in 1982. The low-lying ground either side of the River Stour between Sarre and Pegwell Bay forms a natural topographical and ecological unit related to the river. It constitutes a linear zone of high habitat interest linked to the Stour estuary and hinterland to Pegwell Bay and Sandwich Bay, discussed above.

12.56 The interest of the Lower Stour Valley is principally a consequence of the high - water table in the proximity of the Stour, giving rise to damp pastures drained by open dyke systems. This has created an area remarkably valuable for plants, birds and insects, containing species which are significant in national and regional terms. The habitat types represented here are, in County terms, rare and sensitive to change.

POLICY NC5 - LOWER STOUR VALLEY

WITHIN THE LOWER STOUR VALLEY, THE PRIMARY PLANNING AIMS ARE THE CONSERVATION AND ENHANCEMENT OF THE RIVER CORRIDOR ENVIRONMENT, INCLUDING THE LANDSCAPE, WATER ENVIRONMENT AND WILDLIFE HABITATS.

DEVELOPMENT WHICH WOULD CONFLICT WITH THESE AIMS WILL NOT BE PERMITTED. EXCEPTIONALLY, WHERE DEVELOPMENT IS PERMITTED, THE DISTRICT COUNCIL WILL IMPOSE CONDITIONS OR SEEK TO ENTER INTO PLANNING OBLIGATIONS WHERE NECESSARY TO SAFEGUARD THE OPEN CHARACTER, NATURE CONSERVATION AND RECREATIONAL VALUE OF THE AREA

Explanation:
12.57 The area is one of considerable potential for habitat creation and enhancement, particularly land currently in arable production. The District Council supports a partnership approach for the management and enhancement of the habitat base of the Lower Stour Valley. The Kentish Stour Countryside Project has been running for over six years and now includes the Lower Stour Valley.

12.58 The area covered by this policy has been extended beyond that in the 1982 Countryside Plan to include two stretches which link into the three existing SNCIs at Ash Levels, Minster Station Environs and the Chislet Marshes & Sarre Peninsula.

Species Protected by Other Legislation

12.59 It is possible that, although a site may not be a designated nature conservation site, some of the many species which are protected by the Wildlife & Countryside Act or the Badgers Act or the Habitats Regulations may be present. The presence of such species is a material consideration in the assessment of development proposals. It will therefore be important to carry out survey work where appropriate to establish the presence of protected species, including the effect of seasonal factors on their presence. In this respect, the District Council would advise developers to take account of the statutory obligations explained in ODPM Circular 06/2005, exercise caution in the preparation of development proposals, and also in their implementation, if planning permission is granted.

12.60 Of particular interest in the Thanet context are the numerous high-tide roost areas which are associated with the Thanet coastal SPA-Ramsar Sites, but not located within them. These sites obviously do not benefit from protection as SPA-Ramsar Sites or under the Wildlife & Countryside Act.

District Council Initiatives

12.61 To demonstrate its commitment to, and to further the aims of, nature conservation and the Biodiversity Action Plan, the District Council intends to

have particular regard to land within its own ownership or control, and will consider whether pilot management schemes or other initiatives are appropriate in stimulating interest, developing educational awareness and commitment to nature conservation.

12.62 It intends to consider initiatives aimed at furthering the aims of nature conservation including community woodlands (See Sport & Recreation Chapter), land management schemes, designation of local nature reserves and securing habitat creation through the use of planning agreements and design briefs. The Victoria Road cemetery in Margate will be managed by the District Council as an urban habitat resource.

Nature Conservation and Farming

12.63 Natural elements which are often regarded as obstacles to efficient farming are actually important in perpetuating the viability of the land for cultivation. For example, trees and hedgerows can maintain soil quality by preventing erosion, retaining water and sheltering crops from wind damage and subsequent rot, and can provide a habitat for wildlife which prey on pests which attack crops. It is actually in the farmer's interests to nurture the appropriate natural conditions which will assist his type of farming.

12.64 With the exception of those sites having statutory protection, nature conservation in the countryside is largely dependent on the benevolence of the farming community. The diversification of the rural economy and uncertainty over future farming methods and land requirements mean that the impact on, or potential for, nature conservation is imponderable.

12.65 While it is often attractive to work all available land as intensely as possible, it will often be possible to attain significant conservation benefits with little or no loss of potential return.

12.66 Grants may be available from a number of sources including the Countryside Agency, the Forestry Authority, English Nature, Ministry of Agriculture Fisheries and Food, Kent County Council. Projects eligible for grant aid and which may have nature conservation benefits include:

(1) planting for shelter, shade, amenity, woodland planting, hedgerow planting; and

(2) maintenance and management of sites and species of nature conservation importance.

12.67 The District Council is committed to habitat and wildlife conservation. While its statutory powers may be limited in respect of agricultural practice and operations in the countryside, the District Council wishes to encourage nature-friendly use of the countryside through any practical means available. In this regard it also wishes to bring to the attention of farmers and landowners the range of advice and grants available and also in the DEFRA publication ‘Working with the Grain of Nature’.

Sites of Geological Importance

12.68 The Isle of Thanet possesses a wealth of areas of geological and geomorphological interest which are of importance for study and research purposes. Many of these areas are protected by virtue of their location within the Thanet SSSIs, which are geological as well as biological.

12.69 However, there are other areas which do not benefit from statutory protection, but which can be designated as Regionally Important Geomorphological/Geological Sites (RIG Sites). RIG Sites are regarded as being broadly analogous to Local Wildlife Sites (Policy NC3) in terms of their status within the planning context.

12.70 Thus far, three sites in Thanet have been formally proposed by the Kent RIGS Group; the Monkton Chalkpit Nature Reserve; St Peter's Quarry and Pegwell Bay infilled dry valley. At RIG Sites, the following Policy will apply.

POLICY NC6 - RIG SITES

AT RIGS SITES, DEVELOPMENT WHICH WOULD RESULT IN THE LOSS OR OBSTRUCTION OF GEOLOGICAL FEATURES OF IMPORTANCE FOR STUDY AND RESEARCH PURPOSES WILL NOT BE PERMITTED.

TARGETS

LP Implementation Target	
Policy Area	Protection of the Natural Environment
Relevant Policies	NC1
Indicator	Hectarage of Semi-Natural Habitat lost or fragmented
Target	Nil
Monitoring	Monitoring of Planning Applications
LP Implementation Target	
Policy Area	Protection of sites of Geological Importance
Relevant Policies	NC6
Indicator	Hectarage of RIG sites lost or obstructed
Target	Nil
Monitoring	Monitoring of Planning Applications

13. Environmental Protection

13. Environmental Protection

Introduction

13.1 In recent years, the issues of environmental pollution and human health have come increasingly to the fore, and Government guidance and planning policies are developing to address these issues. In setting a strong regeneration agenda for the area to meet the economic and social needs of local people, the Council is also keen to ensure that the environmental quality of the area is maintained and enhanced, both for local residents and visitors, and to encourage inward investment.

13.2 The allocation of sites in this Local Plan for particular purposes should not be taken as an indication that they are free of the physical/hazard constraints addressed in this Chapter, or that they are not in the vicinity of gas transmission pipelines/other installations handling hazardous substances.

13.3 Information regarding sites known or suspected to have problems of ground instability is included on the basis of the best information available to the District Council. It is not necessarily exhaustive, and responsibility for determining the extent and effect of such constraints remains that of the developer.

OBJECTIVES

(1) TO MAINTAIN THE OVERALL ENVIRONMENTAL QUALITY OF THE DISTRICT;

(2) TO ENSURE THAT DEVELOPMENT IS ONLY PERMITTED WHERE THE DISTRICT COUNCIL IS SATISFIED THAT ADVERSE PHYSICAL AND OTHER CONDITIONS LIKELY TO AFFECT HUMAN HEALTH AND SAFETY, OR THE ENVIRONMENT ARE NOT PRESENT OR CAN BE SATISFACTORILY OVERCOME;

(3) TO SAFEGUARD NOISE-SENSITIVE DEVELOPMENT FROM THE EFFECT OF AIRCRAFT NOISE; AND

(4) TO PREVENT DEVELOPMENT THAT WOULD BE AT RISK OF FLOODING OR THAT WOULD REPRESENT AN UNACCEPTABLE RISK TO GROUNDWATER SOURCES.

Strategic Policy Background

13.4 PPS23 states that the planning system and the pollution control systems are separate, but complementary, in their operation. The planning system should not therefore operate so as to duplicate controls that are the statutory responsibility of other bodies. The complementary role of the planning system is to:

(1) determine the location of development which may give rise to pollution, either directly or from traffic generated, and in ensuring that other developments are, as far as possible, not affected by major existing, or potential sources of pollution; and

(2) focus on whether a development is an acceptable use of the land and the impact of those uses.

13.5 Regional Planning Guidance recognises that the quality of the Region's environment is underpinned by the key elements of land, air and water.

13.6 The Kent and Medway Structure Plan also seeks to avoid or minimise the pollution impacts of new development requiring a pollution impact assessment for proposals likely to have adverse implications for pollution, and opposing development which would be sensitive to adverse levels of pollution where mitigation measures would not afford satisfactory protection (NR4 and NR5).

Potentially Polluting Development

13.7 The detailed characteristics of activities with potential to pollute are controlled by wide-ranging powers under pollution-control legislation. However, the effect of potentially polluting development on use of land can be a material planning consideration in exercising planning controls. The District Council as local planning authority will require any application to contain sufficient information to enable the risk of pollution to be assessed. In considering applications for development with potential to pollute or for housing/other development sensitive to pollution from existing sources, the District Council will consult the relevant pollution control authorities, in particular the Environment Agency who have a specific responsibility in a number of areas. These include flooding (warning people about flooding and building flood defences), waste (regulating waste management through a system of licences), water quality (maintaining the quality of water and preventing/reducing the risk of water pollution) and securing the proper use of water resources (monitoring and issuing ‘abstraction licences’ to regulate who can take water).

13.8 The following Policy does not apply to land-use planning matters relating to waste management, for which relevant policies and proposals are set out in the Waste Local Plan prepared by the County Council. With the exception of possible waste management proposals, the District Council is not aware of a need to identify sites to meet specific requirements for potentially polluting development within the Local Plan period. Accordingly, the following criteria-based Policy will apply in respect of any such proposals that may arise.

POLICY EP1 - POTENTIALLY POLLUTING DEVELOPMENT

DEVELOPMENT WITH POTENTIAL TO POLLUTE WILL BE PERMITTED ONLY WHERE:

(1) APPLICABLE STATUTORY POLLUTION CONTROLS AND SITING WILL EFFECTIVELY AND ADEQUATELY MINIMISE IMPACT UPON LAND USE AND ENVIRONMENT INCLUDING THE EFFECTS ON HEALTH, THE NATURAL ENVIRONMENT OR GENERAL AMENITY RESULTING FROM RELEASE OF POLLUTANTS TO WATER, LAND OR AIR, OR FROM NOISE, DUST, VIBRATION, LIGHT OR HEAT; AND

(2) ACCEPTABLE AND ADEQUATE RESTORATION PROPOSALS WILL BE SECURED SO THAT LAND IS CAPABLE OF AN APPROPRIATE AFTER-USE.

IN DETERMINING INDIVIDUAL PROPOSALS, REGARD WILL BE PAID TO:

(3) THE ECONOMIC AND WIDER SOCIAL NEED FOR THE DEVELOPMENT; AND

(4) THE VISUAL IMPACT OF MEASURES NEEDED TO COMPLY WITH ANY STATUTORY ENVIRONMENTAL QUALITY STANDARDS OR OBJECTIVES.

PERMISSION FOR DEVELOPMENT WHICH IS SENSITIVE TO POLLUTION WILL BE PERMITTED ONLY IF IT IS SUFFICIENTLY WELL SEPARATED FROM ANY EXISTING OR POTENTIAL SOURCE OF POLLUTION AS TO REDUCE POLLUTION IMPACT UPON HEALTH, THE NATURAL ENVIRONMENT OR GENERAL AMENITY TO AN ACCEPTABLE LEVEL.

Landfill Gas

13.9 Sites that have been used for the deposit of refuse or waste may generate explosive or otherwise harmful gases. The District Council intends to ensure as far as practical that where development may be proposed at or near sites which have been so used, effective measures will be secured to prevent any hazard during construction and subsequent occupation of the development.

13.10 The Environment Agency, as waste regulation authority, holds a register of landfill sites, which identifies all known landfill sites. These are not featured on the Local Plan Proposals Map. The District Council is required to consult the Environment Agency as Waste Regulation Authority before granting consent for development within 250m of land which is or has within 30 years of the relevant planning application, been used for the deposit of refuse or waste. (The local Environmental Health Department will also be consulted.)

13.11 If an application for a new development/redevelopment or major change of use on or adjacent to a site included on the landfill register (also known as

the landfill atlas) is received, then the District Council will require such application to be accompanied by a full site-investigation report including gas monitoring.

13.12 Where the presence of gas is discovered or it is suspected that it may be present during site development, the District Council will require the applicant to arrange for an investigation to be carried out to determine its source and for satisfactory and effective remedial measures to prevent hazards from migrating gas (including accumulation into property or other confined spaces) during the course of development and during subsequent use of the site. Specialist design and construction advice will usually have to be sought by the developer in this regard.

POLICY EP2 - LANDFILL SITES

ON OR NEAR LANDFILL SITES OR WHERE THERE IS OTHERWISE REASON TO SUSPECT THAT POTENTIAL DANGER FROM EVOLVING OR MIGRATING GAS MAY BE PRESENT, DEVELOPMENT OR REDEVELOPMENT, INCLUDING CHANGE OF USE, WILL ONLY BE PERMITTED WHERE:

(1) THE APPLICANT/DEVELOPER HAS DEMONSTRATED EITHER THAT THERE IS NO DANGER FROM EVOLVING OR MIGRATING GAS OR THAT RELIABLE ARRANGEMENTS CAN BE MADE TO OVERCOME SUCH DANGER ; AND

(2) ANY NECESSARY REMEDIAL MEASURES CAN BE ACHIEVED WITHOUT UNACCEPTABLE ENVIRONMENTAL IMPACT.

THE DISTRICT COUNCIL WILL SEEK BY AGREEMENT OR BY IMPOSITION OF CONDITIONS ON ANY CONSENT FOR DEVELOPMENT, TO ENSURE MANAGEMENT OF GAS FROM CLOSED LANDFILL, AND THAT SUITABLE PRECAUTIONS ARE TAKEN IN CONSTRUCTION METHODS TOGETHER WITH ANY OTHER ARRANGEMENTS CONSIDERED NECESSARY TO SAFEGUARD AGAINST HAZARDS ASSOCIATED WITH LANDFILL GAS.

Unstable Land

13.13 Ground stability hazards and their effect on proposed development or a neighbouring area is an important issue that the District Council will take into account in determining planning applications.

13.14 It is in the developer's own interests to investigate whether proposed development land is stable. In addition to the obvious dangers of damage to buildings and structures and possible injury associated with unstable ground, ground movement increases the possibility of danger caused by migrating gas, the source of which need not be in the immediate vicinity of the site.

13.15 The marshes (including the general area of Minster Marshes, Monkton Marshes, Sarre Marshes and Wade Marshes) are an area known to the District Council where problems of ground instability are likely to be present.

13.16 Other sites which might comprise unstable ground include coastal strips, particularly where serious erosion is evident, land overlying the extensive Ramsgate caves and the Margate caves near Zion Place, and land overlying the disused railway tunnel (indicated on a Ordnance Survey Map) and extending between Ramsgate Main Sands and the railway line at Broadstairs near its junction with Salisbury Avenue.

13.17 Stability problems are also known to affect land (indicated on the Proposals Map) at Dane Valley Road, Margate. Sites identified as 'landfills' or 'areas of unknown fill' would also require particular consideration of the likelihood of instability. The landfill register is one source of reference. However, as the local authority contaminated land inspection process progresses additional information is likely to become available. Even with these sources of information, instability may affect other sites not known to the District Council.

13.18 In considering applications for development on land where known or suspected instability might render it unsuitable for development or could adversely affect it or neighbouring land, the District Council may require a specialist investigation and assessment arranged by the developer to determine stability and to identify any remedial measures required to deal with instability in order to determine the application.

13.19 Before requesting specialist information, the District Council will normally endeavour to provide some informal indication as to the relative importance of land stability in relation to other planning considerations to the likely outcome of the application.

POLICY EP3 - UNSTABLE LAND

IN CONSIDERING PLANNING APPLICATIONS FOR DEVELOPMENT ON LAND WHICH KNOWN OR SUSPECTED INSTABILITY MIGHT RENDER UNSUITABLE FOR DEVELOPMENT, THE DISTRICT COUNCIL MAY REQUIRE A SPECIALIST INVESTIGATION AND ASSESSMENT BY THE DEVELOPER TO DETERMINE STABILITY AND TO IDENTIFY ANY REMEDIAL MEASURES REQUIRED TO DEAL WITH IT BEFORE DETERMINING SUCH PLANNING APPLICATIONS.

DEVELOPMENT WILL BE RESISTED WHERE:

(1) INSTABILITY IS JUDGED BY THE DISTRICT COUNCIL TO BE SUCH THAT THE GROUND IS CONSIDERED UNSUITABLE TO ACCOMMODATE THE DEVELOPMENT PROPOSED;

(2) THE DEVELOPMENT WOULD, BY REASON OF GROUND INSTABILITY, ADVERSELY AFFECT NEIGHBOURING LAND; OR

(3) NECESSARY REMEDIAL MEASURES CANNOT BE CARRIED OUT WITHOUT UNACCEPTABLE ENVIRONMENTAL IMPACT.

WHERE THE DISTRICT COUNCIL IS SATISFIED THAT GROUND INSTABILITY CAN BE OVERCOME, PLANNING CONSENT MAY BE GRANTED SUBJECT TO CONDITIONS OR A LEGAL AGREEMENT SPECIFYING THE NECESSARY MEASURES TO BE CARRIED OUT.

Derelict & Contaminated Land

13.20 Part IIA of the Environmental Protection Act 1990 requires local authorities to prepare a strategy to identify and deal with contaminated land in their area. This strategy is based on the "suitable for use" principle. The application of this principle is to ensure that contaminated sites are the subject of the appropriate level of remediation to render them suitable for a particular end use. The Council is involved, with the Environment Agency, in a multi-agency approach to ensure that all contaminated land is identified and remdiated where required.

13.21 The new contaminated land regime involves three elements:

(1) Preparation of a strategy for the identification, prioritisation and investigation of potentially contaminated land, which satisfies the requirements of the DEFRA and the Environment Agency;

(2) Review of the District's land use, both historic and current, for contamination and the identification of sites which may be unsuitable for their current use; and

(3) Designation of 'unsuitable for use' sites as contaminated land, and remediation of these designated sites to make them suitable for the current or proposed use.

13.22 A Contaminated Land Strategy has been produced by the Council's Environmental Services department in line with government requirements. This provides guidance for the identification, inspection, assessment and remediation of land which may be designated as Contaminated Land. The strategy is aimed at developers, land and property owners, members of the general public and as a reference document for Council employees.

13.23 In Thanet, the protection of groundwater sources is a particular concern in relation to contaminated land, and this will be a key issue in assessing contamination hazards and risks.

13.24 Contamination is subject to controls under pollution control legislation. However, contamination or potential for it can be a material planning consideration where proposed use/development might pose unacceptable risks to health or the environment. The District Council wishes to encourage

recycling of "brownfield" sites, including, where practical, to bring derelict/contaminated sites back to beneficial use.

13.25 Where contamination is known or suspected, the developer will usually want to arrange for an investigation to assess site conditions, the nature of any hazards and to establish how the development might be designed to minimise risk. Sites which are believed to be landfills would also require specific consideration of the likelihood of contamination. The Landfill Register is only one source of reference, and contamination may affect other sites not known to the District Council. As the Contaminated Land Strategy is implemented it is expected that the Local Authority will gather additional information relating to land quality and historical use within the district. This information will be used in association with the landfill register as and when it becomes available.

13.26 In determining planning applications relating to sites likely to be affected by contamination, the District Council will take into account the suitability of the site for the particular purpose proposed, and whether proper account is taken of known or potential contamination. In assessing remediation and restoration proposals, the District Council will take into account the need to protect the value of natural habitats present within subject contamination sites.

13.27 In cases where contamination is known or strongly suspected to affect a proposed development site, an appropriate investigation will be required by the District Council prior to determination of the planning application. Such an investigation should identify any contamination and any remedial measures required to deal with the hazards, and should be provided by the applicant as part of the application.

13.28 In this context, an “appropriate investigation” would involve the preparation of an investigation strategy to be agreed with the District Planning Authority and the Environment Agency before any investigation work is carried out. This is to ensure that any investigation methods used will not in themselves result in contamination risks, either to human health, other land or any underlying groundwater resources. All investigation works must be carried out in compliance with the latest British Standards, and industry best practice.

13.29 The District Council will consult any department/body it considers appropriate to establish the significance of contamination and the suitability and adequacy of any safeguarding measures proposed. Where measures are necessary to safeguard against contamination hazards, planning permission may be granted subject to conditions that such measures will be carried out.

13.30 In the event that contamination is unexpectedly discovered during site development, developers and landowners are strongly advised to contact both the Council’s Environmental Protection Team, which has powers of intervention in relation to contaminated land generally, and the Environment Agency, which has powers of intervention in relation to groundwater protection. In these circumstances, the Environmental Protection Team will require a site assessment and any appropriate mitigation measures to ensure that the site is suitable for the proposed end use.

POLICY EP4 - DERELICT & CONTAMINATED LAND

DEVELOPMENT PROPOSALS THAT WOULD ENABLE DERELICT OR CONTAMINATED SITES TO BE BROUGHT INTO BENEFICIAL USE WILL NORMALLY BE PERMITTED, SO LONG AS THE SITES CAN BE RENDERED SUITABLE FOR THE PROPOSED END USE IN TERMS OF THE IMPACT ON HUMAN HEALTH, PUBLIC SAFETY AND THE ENVIRONMENT, INCLUDING UNDERLYING GROUNDWATER RESOURCES.

DEVELOPMENT ON LAND KNOWN OR SUSPECTED TO BE CONTAMINATED OR LIKELY TO BE ADVERSELY AFFECTED BY SUCH CONTAMINATION WILL ONLY BE PERMITTED WHERE:

(1) AN APPROPRIATE SITE INVESTIGATION AND ASSESSMENT (AGREED BY THE LOCAL PLANNING AUTHORITY) HAS BEEN CARRIED OUT AS PART OF THE APPLICATION TO ESTABLISH WHETHER CONTAMINATION IS PRESENT AND TO IDENTIFY ANY REMEDIAL MEASURES NECESSARY TO ENSURE THAT THE SITE IS SUITABLE FOR THE PROPOSED END USE;

(2) THE PROPOSED REMEDIAL MEASURES WOULD BE ACCEPTABLE IN PLANNING TERMS AND WOULD PROVIDE EFFECTIVE SAFEGUARDS AGAINST CONTAMINATION HAZARDS DURING THE DEVELOPMENT AND SUBSEQUENT OCCUPATION OF THE SITE.

PLANNING CONDITIONS WILL BE ATTACHED TO ANY CONSENT TO ENSURE THAT REMEDIAL MEASURES ARE FULLY IMPLEMENTED.

IN THE CASE OF SITES WHERE CONTAMINATION IS ONLY CONSIDERED TO BE A POSSIBLE RISK, A SITE INVESTIGATION WILL BE REQUIRED BY CONDITION.

Hazardous Substances

13.31 The siting of installations handling hazardous substances will be the subject of planning controls aimed at keeping these separate from housing and other land uses with which such installations might be incompatible in terms of safety. The area covered by this Local Plan already contains a number of installations handling hazardous substances, including high pressure, natural-gas transmission pipelines. Whilst these are subject to stringent controls under existing health and safety legislation, it is considered prudent to control the kinds of development permitted in the vicinity of these installations.

13.32 The District Council as local planning authority will seek the advice of the Health and Safety Executive about off-site risks to the public arising from any proposed development which would introduce one or more hazardous substances.

13.33 In determining applications for development on land which is in the vicinity of one or more installations handling hazardous substances, the District Council as local planning authority will take account of advice from the Health and Safety Executive about risks to the proposed development from the installation/s.

13.34 Under the present system of control over hazardous development and over development within the vicinity of hazardous installations, the activities, substances and quantities to which the above applies are defined by the Planning (Hazardous Substances) Regulations 1992, and Department of the Environment Circular 04/00.

Air Quality

13.35 In general terms, Thanet enjoys good air quality. The Environment Act 1995 created new duties for local authorities in dealing with poor air quality. The National Air Quality Strategy, published in January 2000, identifies the planning system as one of the key means of improving local air quality. PPS23 (2004) provides guidance on Air Quality and Land Use Planning.

13.36 All local authorities are required to carry out three-yearly Updating and Screening Assessments. This involves a general review and assessment of the seven national priority pollutants in relation to the national air-quality objectives. If it is concluded, on the basis of local circumstances and professional judgement, that there is a risk that one or more of the air-quality objectives may not be reached, a Detailed Assessment is required.

13.37 The Updating and Screening Assessment requires the use of simple monitoring and modelling techniques to estimate the levels of the various air pollutants, which should provide a quantitative assessment of whether the air quality objectives may be met or not. Where the Updating and Screening Assessment identifies a risk of exceeding an Air-Quality Objective, a Detailed Assessment will be required. The Detailed Assessment involves monitoring, data collection and predictive modelling with an aim of estimating the magnitude and geographical extent of air quality potentially exceeding the objective. If the Detailed Assessment indicates that the air-quality objectives will not be fully met, local authorities are required, under the 1995 Act, to declare an Air Quality Management Areas (AQMAs) and prepare an Air Quality Action Plan.

13.38 In the case of Thanet, the last Updating and Screening Assessment completed in May 2003 indicated that there were unlikely to be any such instances of air quality exceeding the objectives. However, following the conclusions of an Annual Review of monitoring data in May 2004, a Detailed Assessment of air quality at seven busy junctions confirmed that The Square, Birchington had failed objectives for nitrogen dioxide and fine particles. An AQMA will be declared and an Action Plan developed with an aim of achieving the air quality objectives within this area. The third round of review and assessment is due to begin in 2006 which will continue to reflect any changes in air quality resulting from variations in traffic flows, the development of Kent

International Airport and the business parks and any technological advances that might result in lower levels of pollution. This may require a review of Local Plan policies relating to air quality at that time.

13.39 The current Government guidance PPS23 makes it clear that air quality is nevertheless a "material consideration" in dealing with development proposals and the following policy will be applied where there is a risk that a particular proposal might cause the national air quality objectives to be exceeded.

POLICY EP5 - LOCAL AIR QUALITY MONITORING

PROPOSALS FOR NEW DEVELOPMENT THAT WOULD RESULT IN THE NATIONAL AIR-QUALITY OBJECTIVES BEING EXCEEDED WILL NOT BE PERMITTED.

DEVELOPMENT PROPOSALS THAT MIGHT LEAD TO SUCH AN EXCEEDANCE, OR TO A SIGNIFICANT DETERIORATION IN LOCAL AIR QUALITY RESULTING IN UNACCEPTABLE EFFECTS ON HUMAN HEALTH, LOCAL AMENITY OR THE NATURAL ENVIRONMENT, WILL REQUIRE THE SUBMISSION OF AN AIR QUALITY ASSESSMENT, WHICH SHOULD ADDRESS:

(1) THE EXISTING BACKGROUND LEVELS OF AIR QUALITY;
(2) THE CUMULATIVE EFFECT OF FURTHER EMISSIONS;
(3) THE FEASIBILITY OF ANY MEASURES OF MITIGATION THAT WOULD PREVENT THE NATIONAL AIR QUALITY OBJECTIVES BEING EXCEEDED, OR WOULD REDUCE THE EXTENT OF AIR QUALITY DETERIORATION.

Noise Pollution

13.40 In August 2000, a Draft Framework Directive on the Assessment and Reduction of Environmental Noise was published by the European Commission. This involves a proposal for environmental noise mapping to assess background noise levels and the noise impacts of new development.

13.41 There would be a requirement for local authorities to carry out noise mapping and produce noise reduction action plans for large urban areas and major noise generators. This requirement comes into force during the Plan period. Once the detailed requirements are known, this may trigger the need for a partial review of the Local Plan.

13.42 In the meantime, the control of noise through the planning system is addressed by PPG24, which states that noise, including aircraft noise, can be a material consideration in planning decisions. It advises local authorities to take into account the need to ensure that noisy and noise-sensitive developments are located away from each other to reduce the impact of noise.

13.43 It should be noted that aircraft noise is dealt with separately under Policies EP7 and EP8.

POLICY EP6 - GENERAL NOISE CONTROL

IN AREAS WHERE NOISE LEVELS ARE RELATIVELY HIGH, PERMISSION WILL BE GRANTED FOR NOISE-SENSITIVE DEVELOPMENTS ONLY WHERE ADEQUATE MITIGATION IS PROVIDED, OR THE IMPACT OF THE NOISE CAN BE REDUCED TO ACCEPTABLE LEVELS THROUGH BUILDING DESIGN OR LAYOUT OF DEVELOPMENT.

DEVELOPMENT PROPOSALS THAT GENERATE SIGNIFICANT LEVELS OF NOISE MUST BE ACCOMPANIED BY A SCHEME TO MITIGATE SUCH EFFECTS, BEARING IN MIND THE NATURE OF SURROUNDING USES. PROPOSALS THAT WOULD HAVE AN UNACCEPTABLE IMPACT ON NOISE-SENSITIVE USES WILL NOT BE PERMITTED.

Aircraft Noise

13.44 As mentioned in the Economic Development Chapter, the Council supports the development of Kent International Airport as a regional airport.

13.45 Policy EP7 seeks to limit the effect of aircraft noise on sensitive development such as housing, schools and hospitals, by restricting locations where such development may be sited. PPG24 introduces the concept of Noise Exposure Categories (NECs) in respect of residential development and encourages their use in control of noise-sensitive development. The four NECs range from circumstances where noise need not be a determining factor, to those where noise levels are such that permission should normally be refused.

13.46 In 1995, the District Council commissioned production of aircraft noise contours by Arup showing predicted noise levels and based on a study of Kent International Airport Traffic Forecasts by Alan Stratford Associates. The forecasts considered a range of high, medium and low traffic scenarios, including the possibility of increased aviation associated with the prospective major economic regeneration role of Central Thanet, and possible runway extension.

13.47 PPG24 indicates that in exercising planning control, regard should be paid not only to existing noise exposure but also any increase that may reasonably be expected in the foreseeable future. Noise predictions were prepared for the years 1996, 2000 and 2010.

13.48 At present, there is uncertainty regarding future aircraft noise levels at Kent International Airport. The Council is therefore adopting a precautionary approach in relation to aircraft noise, and for the purposes of Policy EP7, will continue to apply the 1996 (dBLAeq 16 hour) contour predictions, which formed the basis for the Policy in the adopted Local Plan, assuming the presence of military jets. However, the District Council will keep under review the need to consider adoption of alternative contour scenarios as circumstances develop,

with quieter commercial aircraft entering service and civilian air activity increasing. Accordingly, because the contours may be subject to change within the Plan period, they are not featured on the Proposals Map, but reproduced separately as an Appendix.

13.49 As mentioned in the Economic Development Chapter, an agreement is being discussed with the airport operators regarding future airport operations and related environmental impacts. In particular, this addresses the issue of aircraft noise, and noise abatement measures, and seeks a contraction in the aircraft noise contours from 2002.

Residential Development

13.50 PPG24 recommends particular noise ranges for each NEC, but indicates that local planning authorities may justify a range of NECs of up to 3dB(A) (decibel incorporating frequency weighting) above or below those recommended. Because the air noise contours are based on a scenario assuming low growth, no runway extension and no night flights, the District Council has adopted a precautionary approach to safeguarding sensitive development from the effects of aircraft noise.

13.51 Therefore, while the NECs in Policy EP7 are essentially calibrated as recommended in PPG24, the upper limit of category "B" has been reduced to 63dB(A). This contour lies almost wholly outside the built-up parts of the Thanet towns and villages. Restriction on residential development within this contour would not affect the ability to meet housing land provisions within the Local Plan period.

Other Noise-Sensitive Development

13.52 Noise-sensitive non-residential development such as schools and hospitals may occupy large sites and include elements of varying sensitivity. The NEC principle cannot therefore be sensibly applied, and it is appropriate in such circumstances to refer to specific guidance on internal noise standards. In respect of aircraft noise, PPG24 advises that 60dB(A) should be regarded as a desirable upper limit for major new noise sensitive development.

POLICY EP7 - AIRCRAFT NOISE

APPLICATIONS FOR NOISE SENSITIVE DEVELOPMENT OR REDEVELOPMENT ON SITES LIKELY TO BE AFFECTED BY AIRCRAFT NOISE WILL BE DETERMINED IN RELATION TO THE LATEST ACCEPTED PREDICTION OF EXISTING AND FORESEEABLE GROUND NOISE MEASUREMENT OF AIRCRAFT NOISE.

APPLICATIONS FOR RESIDENTIAL DEVELOPMENT WILL BE DETERMINED IN ACCORDANCE WITH THE FOLLOWING NOISE EXPOSURE CATEGORIES.

NEC PREDICTED AIRCRAFT NOISE LEVELS (Dbl Aeq.0700-23.00)

A <57 NOISE WILL NOT BE A DETERMINING FACTOR

B 57-63 NOISE WILL BE TAKEN INTO ACCOUNT IN DETERMINING APPLICATIONS, AND WHERE APPROPRIATE, CONDITIONS WILL BE IMPOSED TO ENSURE AN ADEQUATE LEVEL OF PROTECTION AGAINST NOISE (POLICY EP8 REFERS).

C 63-72 PLANNING PERMISSION WILL NOT BE GRANTED EXCEPT WHERE THE SITE LIES WITHIN THE CONFINES OF EXISTING SUBSTANTIALLY BUILT-UP AREA. WHERE RESIDENTIAL DEVELOPMENT IS EXCEPTIONALLY GRANTED, CONDITIONS WILL BE IMPOSED TO ENSURE AN ADEQUATE LEVEL OF PROTECTION AGAINST NOISE (POLICY EP8 REFERS).

D >72 RESIDENTIAL DEVELOPMENT WILL NOT BE PERMITTED.

APPLICATIONS FOR NON-RESIDENTIAL DEVELOPMENT INCLUDING SCHOOLS, HOSPITALS AND OTHER USES CONSIDERED SENSITIVE TO NOISE WILL NOT BE PERMITTED IN AREAS EXPECTED TO BE SUBJECT TO AIRCRAFT NOISE LEVELS EXCEEDING 60 dB(A) UNLESS THE APPLICANT IS ABLE TO DEMONSTRATE THAT NO ALTERNATIVE SITE IS AVAILABLE. PROPOSALS WILL BE EXPECTED TO DEMONSTRATE ADEQUATE LEVELS OF SOUND INSULATION WHERE APPROPRIATE IN RELATION TO THE PARTICULAR USE.

POLICY EP8 - AIRCRAFT NOISE & RESIDENTIAL DEVELOPMENT

WHEN PLANNING CONSENT IS GRANTED FOR RESIDENTIAL DEVELOPMENT ON ANY LAND EXPECTED TO BE SUBJECT TO A LEVEL OF AIRCRAFT NOISE OF ABOVE 57dB(A), SUCH CONSENT WILL BE SUBJECT TO PROVISION OF A SPECIFIED LEVEL OF INSULATION TO ACHIEVE A MINIMUM LEVEL OF SOUND ATTENUATION IN ACCORDANCE WITH THE FOLLOWING CRITERIA:**

NEC Predicted Aircraft Minimum Noise Levels Attenuation REQUIRED (dB(A) (frequency range 100-3150 Hz)

A <57 NO ATTENUATION MEASURES REQUIRED

B 57-63 20dB

C 63-72 30dB

** LAeq 57dB 07.00-23.00

Operational Notes

13.53 For the purposes of Policy EP7, noise sensitive development/redevelopment includes, schools, hospitals, and any other use the function or enjoyment of which could, in the District Council's opinion, be materially and adversely affected by noise.

13.54 The provisions of Policy EP8 will not apply to permissions relating to small extensions to existing houses provided:

(1) Permission for the construction of the house itself was not granted subject to the provisions of this Policy; or

(2) The extension is not intended to form a separate unit of living accommodation.

13.55 In such instances the sound insulation standards referred to in this Policy are brought to the attention of all applicants, but it is left to them whether they implement the standards within the new extension or not.

13.56 A guidance note which sets out brief specifications of works required to meet specific levels of sound attenuation (adapted from Building Research Establishment Digest 338) is available from the District Council. Alternative schemes can be considered where problems are likely to be encountered, eg, rooflights.

13.57 General information in respect of internal noise standards can be found in BS 8233:1987 (Sound insulation and noise reduction for buildings). Information for guidance about health and hospital buildings is available from NHS Estates; an executive agency of the Department of Health. The Department for Education publishes guidance for schools (Dept. of Education Design Note 17: Guidelines for Environmental Design in Educational Buildings).

Airport Public Safety Zones

13.58 In the past, Public Safety Zones (PSZs) around airports have been limited to the twenty largest airports in Great Britain. However, the PSZ policy is currently under review and zones are now identified on the basis of individual risk contours at a level of 1 in 100 000 of an incident occurring. The purpose of the zones is to prevent development that would result in a significant number of people being located within an identified risk contour.

13.59 The DfT Circular 1/2002 on Public Safety Zones sets out a general presumption against development in the Zones, and in particular, dwelling houses, mobile homes, caravan sites or other residential uses, or any non-residential development, except for certain low-density uses. This would preclude new schools, retail development, community facilities and other uses, but might allow, for example, low-density warehousing uses, surface car parking or public open space (without play facilities).

13.60 Kent International Airport is likely to be subject of an assessment regarding a PSZ in 2006 at the earliest. The requirement for a PSZ will be determined by this assessment. Should a PSZ be identified by the DfT, the extent will be shown on the Proposals Map and an appropriate policy relating to that area will be applied.

Light Pollution

13.61 PPG23 refers to light as a potential source of pollution, and advises that local planning authorities should assess its impact on general amenity and the natural environment. The Council also recognises the need for lighting to provide security and public safety, and the potential civic amenity value.

13.62 However, poorly designed or installed lighting can be obtrusive by introducing a suburban character into rural areas, and also wastes electricity. Different forms of light pollution are described below:

- Light Spillage - artificial illumination that results in the spillage of light that is likely to cause irritation, annoyance or distress to others
- Light Trespass - the spilling of light beyond the boundary of the property on which the light source is located
- Light Glare - the uncomfortable brightness of a light source when viewed against a dark background
- Sky Glow - the brightening of the night sky above our towns and cities.

13.63 The rural landscape in Thanet is gently undulating, generally very open, and largely devoid of trees and other significant vegetation. Poor outdoor lighting could therefore have a substantial adverse effect on the character of the area well beyond the site on which it is located.

13.64 In 1994, the Institution of Lighting Engineers (ILE) produced the Guidance Notes for the Reduction of Light Pollution. This identifies 4 different "environmental zones" in which different standards of light reduction should be applied:

- E1 – National Parks, AONBs and other "dark landscapes";
- E2 – Areas of "low district brightness" – rural locations outside those identified above;
- E3 – Areas of "medium district brightness" – urban locations; and
- E4 – Areas of "high district brightness" – urban centres with high night-time activity.

13.65 It is for the Local Planning Authority to identify the relevant areas of the District to which the different standards would apply, and these zones are identified on the Proposals Map by way of reference to other policy areas. Thus in this Plan:

(1) **Zone E1** comprises the Pegwell Bay Special Landscape Area and the former Wantsum Channel (as identified in Policy CC2);

(2) **Zone E2** comprises the rest of the rural areas outside built confines (as identified by Policy CC1); except Kent International Airport (as identified by Policy EC2);

(3) **Zone E3** comprises the urban areas and rural settlements within built confines (as identified by Policy CC1), and Kent International Airport (as identified by Policy EC2); and

(4) **Zone E4** comprises the amusement area at Margate Seafront (as identified by Policy T7).

POLICY EP9 - LIGHT POLLUTION

DEVELOPMENT THAT INCLUDES THE PROVISION OF NEW OUTDOOR LIGHTING SHOULD BE DESIGNED TO MINIMISE LIGHT GLARE, LIGHT TRESPASS, SPILLAGE AND SKY GLOW SO AS TO PRESERVE RESIDENTIAL AMENITY, THE CHARACTER OF THE SURROUNDINGS AND PREVENT DISTURBANCE TO IDENTIFIED WILDLIFE AREAS.

PROPOSALS THAT ARE UNACCEPTABLE IN THESE RESPECTS, OR WHICH EXCEED THE FOLLOWING MAXIMUM LIMITS, WILL NOT BE PERMITTED.

13.66 Within these areas, the ILE advises the following standards:

OBTRUSIVE LIGHT LIMITATIONS FOR EXTERIOR LIGHTING INSTALLATIONS							
ENVIRO N-MENTAL ZONES	SKY GLOW Upward Light Ratio [Max %]	LIGHT INTO WINDOWS Ev[lux] Before Curfew	After Curfew	SOURCE INTENSITY I[kcd] Before Curfew	After Curfew	BUILDING LUMINANCE (before curfew) Av. L (cd/m^2)	Max. L (cd/m^2)
E1	0	2	1*	0	0	0	0
E2	2.5	5	1	20	0.5	5	10
E3	5.0	10	2	30	1.0	10	60
E4	15.0	25	5	30	2.5	25	150

*From public road lighting installations ONLY.
(A curfew is a period in which more restrictive controls are applied to obtrusive light. For example, requesting that non-essential lighting, such as decorative flood lighting, should be switched off between 23:00 and dawn).

Flood Risk Areas

13.67 New Government guidance in PPS25, December 2005, states that the objectives of sustainable development require action on development and flood risk to be based on the precautionary principle. It goes on to say that a sustainable approach to flooding may therefore involve the avoidance of development in areas at risk. Alternatively, where development needs to be located in particular areas, it should be appropriate to its location in the flood

plain and have an appropriate level of protection to ensure that it is safe. A risk-based approach and a sequential test will be applied prior to a decision relating the type of development that can be accepted to the degree of flood risk.

13.68 The Environment Agency's "Policy & Practice for the Protection of Floodplains" (March 1997) also states that development should be guided away from areas at risk from flooding. The Agency recognises that, in some cases, development may sometimes have to be located in flood risk areas because of the nature of the use or the lack of alternative sites. In these circumstances, development should take account of all aspects of flood protection and prevention.

13.69 However, in Thanet, the main areas at risk of flooding are located in the former Wantsum Channel, away from the main population and service centres of the District. Consequently, the Council considers that the application of the precautionary principle leads to a highly restrictive approach to development in this flood risk area.

13.70 The flood risk area in Margate includes the Old Town area, which lies at the centre of the urban area and is an area identified for physical and economic regeneration. It also includes parts of Dane Valley along King Street, and the Dreamland Amusement Park and Tivoli Road areas. In these areas, the Council considers that commercial and residential development is acceptable, subject to full and proper safeguards in relation to flood risk. Residential development should be of three-storey construction with car parking and utility rooms at ground floor, living accommodation above and sleeping accommodation on the third floor. If this is not feasible for other planning reasons then residential accommodation should be of at least two-storey construction and should not result in the provision of sleeping accommodation at either basement or ground floor level. It must include an appropriate means of escape to upper floor levels.

13.71 These policies will obviously need to be regularly reviewed, as the evidence on the effects of global warming on future sea levels is refined and better established. The flood risk areas shown on the proposals map were produced with the best available data at the time of printing. However, these are subject to change and the most up to date maps can be found on the Environment Agency's website at http://www.environment-agency.gov.uk.

13.72 The District Council will consult the Environment Agency in respect of new development proposals, and developers and applicants are therefore strongly advised to contact the Environment Agency prior to submitting a planning application if flood risk is likely to be an issue. Emerging government guidance requires those proposing development to provide an assessment including issues such as whether any proposed development is likely to be affected by flooding from any source; whether it will increase flood risk elsewhere; and the measures proposed to deal these effects and risks.

POLICY EP10 - WANTSUM CHANNEL FLOOD RISK AREA

IN THE WANTSUM CHANNEL FLOOD RISK AREA, AS DEFINED ON THE PROPOSALS MAP, DEVELOPMENT WILL NOT BE PERMITTED UNLESS IT IS ESSENTIAL IN THAT PARTICULAR LOCATION AND THERE IS NO ALTERNATIVE LOCATION OUTSIDE THE FLOOD RISK AREA. APPLICANTS FOR PLANNING PERMISSION MUST SUBMIT A FLOOD RISK ASSESSMENT IN ACCORDANCE WITH GOVERNMENT GUIDANCE. WHERE DEVELOPMENT IS PERMITTED, THE DEVELOPER MUST ENSURE THAT:

- **THERE IS NO LOSS OF FLOOD STORAGE CAPACITY; OR**
- **FLOOD FLOWS ARE NOT IMPEDED; AND**
- **THE DEVELOPMENT IS PROTECTED TO AN APPROPRIATE STANDARD.**

POLICY EP11 - MARGATE FLOOD RISK AREA

IN THE MARGATE FLOOD RISK AREA, AS DEFINED ON THE PROPOSALS MAP, DEVELOPMENT WHICH IS LIKELY TO INCREASE THE OVERALL RISK OF FLOODING (INCLUDING THE CONSEQUENCES OF SURFACE WATER RUN-OFF), OR WHICH WOULD BE DETRIMENTAL TO THE INTEGRITY OF FLOOD DEFENCES WILL NOT BE PERMITTED. WHERE DEVELOPMENT IS PERMITTED, THE DESIGN SHOULD INCORPORATE MEASURES WHICH, SHOULD A FLOODING EVENT OCCUR, LESSEN THE RISK TO HUMAN HEALTH.

Surface Water Run-off

13.73 New development can increase the quantity and rate of flow of surface water run-off. In some parts of the District, surface water run-off is a potential problem, either in terms of flooding or other adverse effects on the water environment, such as the Stour Valley drainage system.

13.74 In cases where surface water run-off is considered to be an issue, appropriate attenuation measures will be required, such as sensitively designed balancing pools or other water flow control mechanisms to be jointly agreed with Thanet District Council, the Environment Agency and the statutory sewerage undertaker. The council will expect any measures for surface water control to be maintained in order to retain their long-term effectiveness.

13.75 The use of Sustainable Drainage Systems (SUDS) provides a significant contribution towards more sustainable development by managing environmental impacts at source rather than downstream or before it enters a watercourse. Encouragement will be given for the implementation of Sustainable Drainage Systems wherever practicable. SUDS can be applied to a range of schemes from small developments to major residential, leisure, commercial or industrial operations with large areas of hardstanding and roof. Incorporating SUDS needs to be considered early in the site evaluation and planning process, as well as at the detail design stage. There is a variety of

techniques that can be used: green roofs and rainwater reuse or permeable pavements control rainwater at source; infiltration trenches filled with stone create underground reservoirs; swales lead surface water overland from the drained surface to a storage or discharge system; basins hold back storm water for a few hours allowing the settlement of solids and ponds; and wetlands can be designed to accommodate considerable variations in water levels during storms, thereby enhancing flood storage capacity.

POLICY EP12 - SURFACE WATER RUN-OFF

DEVELOPMENT CONTRIBUTING TO AN UNACCEPTABLE FLOOD RISK DUE TO SURFACE WATER RUN-OFF WILL NOT BE PERMITTED. WHEREVER PRACTICABLE, THE INCLUSION OF SUSTAINABLE DRAINAGE SYSTEMS WILL BE REQUIRED TO ENSURE THAT SURFACE WATER RUN-OFF IS NOT INCREASED.

Water Supply

13.76 The Environment Agency has published its Regional Water Resources Strategy for the South-East developed with the water companies and the Government's industry regulator, OFWAT. The strategy looks 10 to 25 years ahead and covers all aspects of water resources management, including public water supply.

13.77 The District Council also supports proposed new measures designed to ensure the security of a long-term reliable water supply to East Kent. The Council would support the provision of a new reservoir at Broad Oak Water near Canterbury in the future, if this were required in the long term.

13.78 However, In the short and medium term, the District Council acknowledges that the provision of water supply will be met through measures which include demand management, leakage reduction and inter-company transfers where possible.

Groundwater Protection Zones

13.79 Damage to water resources may occur due to the physical disturbance of aquifers and groundwater flows by quarrying, new mineral workings, infill of old mineral workings, road construction, etc; or through contamination by waste disposal on land, industrial processes, disturbance of existing contaminated land, etc. It is therefore essential that adequate measures are undertaken to protect surface and groundwater resources.

13.80 There is also concern that, with declining underground water source reserves, this supply is more susceptible to pollution, whether from agricultural chemicals, industrial waste, or other contaminants. It is therefore all the more important that preventable water source pollution through necessary development does not occur.

13.81 These groundwater sources require protection from potentially polluting development, and Policy EP13 will therefore apply in these areas. In applying this Policy, the Council will consult the Environment Agency, and developers and applicants are strongly advised to contact the Environment Agency prior to submitting a planning application if groundwater protection is likely to be an issue.

13.82 The Environment Agency has developed a "Policy and Practice for the Protection of Groundwater". This seeks to ensure that new development does not present an unacceptable risk to groundwater resources or lead to a deterioration in the quality or potential yield of groundwater, and recommends appropriate protection measures for different classes of potentially polluting development.

13.83 The District Council will therefore expect new development to meet the requirements of the Environment Agency so as to ensure that such development will not lead to a material deterioration in the quality of surface or ground water.

13.84 The Environment Agency's Guidance Notes on "Protecting the Water Environment through Development Plans" (originally produced by the NRA) is available from the Environment Agency Southern Region Office in Worthing, West Sussex.

POLICY EP13 - GROUNDWATER PROTECTION ZONES

IF A PROPOSED DEVELOPMENT IN THE GROUNDWATER PROTECTION ZONES IDENTIFIED ON THE PROPOSALS MAP WOULD HAVE THE POTENTIAL TO RESULT IN A RISK OF CONTAMINATION OF GROUNDWATER SOURCES, IT WILL NOT BE PERMITTED UNLESS ADEQUATE MITIGATION MEASURES CAN BE INCORPORATED TO PREVENT SUCH CONTAMINATION TAKING PLACE.

Renewable Energy and Recycling

13.85 Government Policy (PPS22) stimulates the exploitation of renewable energy technology in order to help reduce emissions harmful to the environment and to conserve finite energy resource. The Council will adhere to the key principles set out in PPS22 which include considering the wider environmental and economic benefits of proposals for renewable energy projects and encouraging small scale projects. The Government has set a target to generate 10% of UK electricity from renewable energy resources by 2010. The emerging regional spatial strategy (the South-East Plan) aims to generate 5% of electricity from renewable energy by 2010. The characteristics of Thanet may offer locations where the technology is viable and the environmental, economic and social impact of renewable energy can be addressed satisfactorily.

13.86 The District Council generally supports the harnessing of renewable energy sources and efficient energy production technology. The Council also recognises the potential for energy saving measures in the location and design of new development. However, the benefits of efficient and renewable energy production need to be balanced against their environmental impacts. In many instances, environmentally sensitive sites may also be the most efficient location for renewable energy technology.

13.87 The level of impact will vary according to location (for example, much of the Thanet coast is a designated SPA/Ramsar site, candidate Special Area of Conservation and Site Of Special Scientific Interest, in which extremely sensitive control is required). Level of impact will also vary according to the scale and nature of development. (Proposals may range from individual household applications for small solar heating panels, new development designed/orientated so as to exploit passive solar energy, to large-scale projects capable of contributing to energy requirements of the wider community through established networks).

POLICY EP14 - RENEWABLE ENERGY

PROPOSALS FOR DEVELOPMENT NECESSARY FOR THE EXPLOITATION OF RENEWABLE ENERGY SOURCES WHICH POTENTIALLY CONTRIBUTE TO THE ACHIEVEMENT OF NATIONAL, REGIONAL AND LOCAL TARGETS FOR RENEWABLE ENERGY AND ENERGY EFFICIENCY WILL BE PERMITTED SUBJECT TO:

1 THE IMPACT OF THE PROPOSED DEVELOPMENT ON THE ENVIRONMENT IN TERMS OF LOCATION, APPEARANCE, SIZE, NOISE, VIBRATION AND ODOUR ; AND

2 THE SENSITIVITY OF THE PROPOSED LOCATION IN TERMS OF LANDSCAPING QUALITY, CULTURAL HERITAGE, FLORA, FAUNA AND WATER RESOURCES ; AND

3 THEIR EFFECT ON THE INTEGRITY OF INTERNATIONALLY AND NATIONALLY DESIGNATED AREAS OF IMPORTANCE FOR NATURE AND HERITAGE CONSERVATION.

13.88 *(The County Council is the responsible planning authority for deciding "County matter" waste applications [ie proposals for waste management, including deposit of refuse or waste materials or erection of buildings, plant or machinery designed to be used for treating, storing, processing or disposal of refuse or waste]. Specific policies relating to recycling of waste and energy production from waste are to be found in the Kent Waste Local Plan.)

Richborough Power Station

13.89 Richborough Power Station, which is situated at the boundary with Dover District, is a substantial complex of buildings in a sensitive landscape area (see Policy CC2) and adjacent to a Site of Special Scientific Interest (SSSI). Nearby

is Pegwell Bay, a Special Protection Area (SPA), Ramsar Site and two candidate Special Areas of Conservation (SAC). The site also lies adjacent to the River Stour, and proposals will also need to be weighed against policies for protection of the river corridor, water quality protection and flood risk area. Consent from the Environment Agency would be required for works within 15 metres of the top of the river bank.

13.90 The Power Station is allocated in the Kent Waste Local Plan as a location suitable in principle for:

(1) Preparation of category A (inert) wastes (eg builder's waste) for re-use (Policy W7vc);

(2) Separation and transfer of category B & C (degradable and putrescible wastes) as a step towards reduction in their use, re-use and recycling (Policy W9); and

(3) Waste to energy plant (Policy W11).

13.91 The District Council supports such allocation in principle, provided that such development would not have an unacceptable impact (including on landscape, wildlife, water resources, flooding, archaeology and traffic generation). A full assessment of the ecological, hydrological, archaeological and landscape impacts on the environment will be required. The Richborough site is located in close proximity to national and international sites of nature conservation interest, necessitating the identification of all potential mechanisms of impact on sensitive receptors. Appropriate safeguarding policies are included in the Waste Local Plan and these were formulated in consultation with the District Council. Policy EP14 indicates that the District Council generally supports proposals associated with renewable/efficient energy production. The Policy is considered to provide sufficient guidance in relation to this particular site that may be particularly conducive to such proposals.

13.92 It is recognised that certain proposals may arise which do not fall within the scope of Policy EP14, nor fall to be determined by the County Council as Waste Local Planning Authority. It is considered that existing Policies contained within this Plan provide adequate guidance in respect of other proposals that might arise during the Plan period.

TARGETS

LP Implementation Target	
Policy Area	Derelict & Contaminated Land
Relevant Policies	EP4
Indicator	Level of compliance with provisions of Policy EP4 during Plan period
Target	100% compliance with Policy EP4
Monitoring	Through DC Applications system in conjunction with Environmental Health

LP Implementation Target	
Policy Area	Aircraft Noise Impacts
Relevant Policies	EP7, EP8
Indicator	Level of compliance with provisions of Policies EP7 and EP8 during the Plan period
Target	100% compliance with Policies EP7 and EP8
Monitoring	Through DC Applications system in conjunction with Environmental Health
LP Implementation Target	
Policy Area	Wantsum Channel Flood Risk Area
Relevant Policies	EP10
Indicator	Number of dwellings permitted within Flood Risk Area during Plan period
Target	Nil during Plan period
Monitoring	Through DC Applications system

14. Community Facilities

14. Community Facilities

Introduction

14.1 This Chapter contains the District Council's planning policies relating to the provision and retention of social, cultural and community facilties. The Council considers that the provision of such facilities is an integral part of a comprehensive approach to the development of a "self -contained" community in the area.

OBJECTIVES

(1) **TO SAFEGUARD EXISTING FACILITIES FOR THE SPIRITUAL, CULTURAL AND SOCIAL NEEDS OF THE THANET COMMUNITY;**

(2) TO ALLOCATE LAND FOR NEW SOCIAL AND OTHER FACILITIES TO MEET SPECIFICALLY IDENTIFIED NEEDS; AND

(3) TO SET THE POLICY FRAMEWORK FOR THE REQUIREMENT OF DEVELOPMENT CONTRIBUTIONS TOWARDS SOCIAL AND OTHER FACILITIES.

Strategic Policy Background

14.2 The draft Regional Planning Guidance for the South-East states that health, education and other social considerations and infrastructure requirements need to be taken fully into account in development planning in the Region. Development plans should facilitate the modernisation of health services; enable the provision of facilities for education and training; and support the provision of other facilities required by local communities, wherever possible maximising the potential of existing community buildings.

14.3 The Structure Plan recognises the need to make provision for community needs – education, health, leisure, cultural and community facilities - and states that local authorities will have regard to these issues in preparing local plans.

Provision and Retention of Community Facilities

14.4 The District Council recognises the importance that the social, cultural, health and spiritual needs of the community are met as far as possible, and that such facilities, which are often difficult to replace, are not lost to more financially profitable use (Policy CF1 applies). It is recognised that proposals for new community facilities including emergency services, educational services, social services and places of worship are likely to arise within the Local Plan period. This Plan seeks to make provision for identified social and other needs, but it is considered that the other policies within the Local Plan provide adequate general guidance in relation to any other such proposals which may arise within the Plan period.

POLICY CF1 - COMMUNITY FACILITIES

(A) PLANNING PERMISSION WILL BE GRANTED FOR NEW COMMUNITY FACILITIES IF THE PROPOSALS ARE NOT CONTRARY TO OTHER LOCAL PLAN POLICIES AND THE COMMUNITY USE AND LOCATION ARE DEMONSTRATED AS APPROPRIATE.

(B) PLANNING PERMSSION WILL BE GRANTED FOR THE RE-USE OF EXISTING COMMUNITY FACILITIES FOR ALTERNATIVE (COMMUNITY) USES IF THE ALTERNATIVE USES ARE NOT CONTRARY TO OTHER LOCAL PLAN POLICIES AND THE ALTERNATIVE USE AND LOCATION ARE DEMONSTRATED AS APPROPRIATE.

(C) PLANNING PERMISSION FOR THE CHANGE OF USE OR THE RE-USE OF EXISTING COMMUNITY FACILITIES FOR NON-COMMUNITY USES WILL ONLY BE GRANTED IF:

(1) IT IS DEMONSTRATED THAT THERE IS NO LONGER A SUFFICIENT NEED FOR THE FACILITIES TO WARRANT RETENTION FOR COMMUNITY USE;

OR

(2) IT CAN BE DEMONSTRATED THAT ADEQUATE ALTERNATIVE ACCOMMODATION APPROPRIATE TO COMMUNITY USE, AND SUITABLY LOCATED, WILL BE PROVIDED.

Development Contributions

14.5 In the consideration of development proposals it is essential to ensure that adequate provision of community and social facilities, including education and health, is made to meet the future needs for the District. The Council expects service providers and particularly the County Council and Health Authorities to ensure adequate provision through their planned investment programmes. However, controls over public expenditure have significant impact on the ability of the County Council and other public sector agencies to provide the necessary services.

14.6 Circular 05/05 relating to planning obligations allows Local Authorities to seek provision for, or contributions towards, educational, social or other community facilities where these are required as a direct result of the development proposed. The Council will be dependent upon service providers to demonstrate the genuine need for any such new extended or expanded community facilities.

14.7 Structure Plan Policy sets out the need to provide necessary community facilities and services accessible by walking, cycling and by public transport from the area they serve. It is also a Council aim to seek to ensure that the District's infrastructure needs are met to secure economic development for the

area. Development proposals can often place additional demands on existing local community facilities and services. Therefore, where a development proposal is in all other respects acceptable, the Council will, where appropriate, seek planning obligations to require a developer to directly provide the necessary facilities or to ensure a contribution towards that provision.

14.8 Policy CF2 sets the general policy on development contributions. This is complemented by a number of other specific policies in the Plan. These are:

- Policy EC7 (Infrastructure)
- Policy H6 (New Primary School at Westwood)
- Policy H14 (Affordable Housing)
- Policy TR3 (Transport Infrastructure provision)
- Policy TR14 (Sustainable Transport)
- Policy SR4 (Provision of new sports facilities)
- Policy SR5 (Play Space)
- Policy SR6 (Amenity Areas).

POLICY CF2 - DEVELOPMENT CONTRIBUTIONS

WHERE A PROPOSED DEVELOPMENT WOULD DIRECTLY RESULT IN THE NEED TO PROVIDE NEW OR UPGRADED COMMUNITY FACILITIES (INCLUDING TRANSPORT INFRASTRUCTURE, EDUCATIONAL OR RECREATIONAL FACILITIES OR AFFORDABLE HOUSING), THE LOCAL PLANNING AUTHORITY WILL NEGOTIATE WITH THE APPLICANT FOR A CONTRIBUTION TOWARDS THE COST OF SUCH PROVISION, WHICH IS FAIRLY AND REASONABLY RELATED IN SCALE AND IN KIND TO THE PROPOSED DEVELOPMENT. A PLANNING OBLIGATION TO SECURE THE CONTRIBUTION WILL NORMALLY BE SOUGHT.

Training Facilities

14.9 Training and education are core elements of the Council's economic development strategy. In its SRB6 Bid, the Council recognised the need for continued improvements in the educational performance of the area. The Council is involved in the Thanet Lifelong Learning Partnership (TLLP), which is developing a training programme including, for example:

(1) Establishing a "Basic Skills" programme to improve educational levels across all sectors of the population, and reduce social exclusion;

(2) Assisting Thanet SMEs to develop integrated training plans and training key members of SME staff who themselves have training responsibilities;

(3) Expanding the Thanet Employment Training Initiative (TETI) to additional sectors, such as aviation, plastics and electronics;

(4) Supporting new start-up businesses through advice, guidance and mentoring; and

(5) assisting company expansion through pre-recruitment and customised training packages to suit the differing needs of Thanet's SMEs and inward investors.

14.10 The Council, as Local Planning Authority, granted planning consent for the development of the new Thanet Campus for Canterbury Christ Church University College at Thanet Reach, and is committed to supporting future education and training developments that underpin the economic regeneration of the area.

14.11 At present, the Council is not aware of any specific land use requirements resulting either from the TLLP programme or from individual training and education providers. However, it is important that the Local Plan gives positive support to the development of educational and training facilities in appropriate locations within the District. The Council will seek contributions from developers of appropriate commercial and other non-residential proposals towards the cost of providing new or extended facilities for related training or life-long learning.

POLICY CF3 - TRAINING FACILITIES

SUBJECT TO THE ENVIRONMENTAL, TRANSPORT AND OTHER POLICIES OF THIS PLAN, PROPOSALS FOR NEW EDUCATIONAL AND TRAINING FACILITIES WILL BE PERMITTED.

SUCH PROPOSALS SHOULD BE OF A HIGH STANDARD OF DESIGN, AND WELL-RELATED TO PUBLIC TRANSPORT FACILITIES, AND WHERE APPROPRIATE, TO THE GEOGRAPHICAL AREA WHICH THEY WOULD SERVE.

QEQM Hospital, Margate

14.12 In the 1984 Thanet Urban Local Plan, the Council allocated land for the extension of the then Margate Hospital site, to allow the provision of additional buildings and facilities. Considerable modernisation has taken place over the last ten years, and the East Kent Hospitals NHS Trust has identified QEQM as a site for future expansion as a result of the major reconfiguration of the pattern of healthcare services required in East Kent.

14.13 This expansion is essential to enable the continued modernisation of hospital services at the site, and improvements to the site layout. In particular, services from other sites in the East Kent area are being relocated to the QEQM, providing improved access to a comprehensive range of acute services for the population of the area. It is estimated that at least 300 extra beds are required and the number of hospital visits are estimated to go up by 27 000 per annum.

14.14 These proposals, together with NHS plan requirements and the improvement of significant areas of substandard accommodation, are likely to require at least an additional 30 000m^2 of floorspace.

14.15 One particular concern at the QEQM has been the quality and location of staff accommodation. Staff levels are predicted to increase from 1800 to 2200. It is a requirement of the 'New Deal', NHS plan and the Clinical Royal Colleges that junior doctors and some other staff have on-site accommodation. In addition, further on-site nurses' accommodation is essential to replace existing poor quality accommodation and to ensure quality staff can be attracted to the hospital. New accommodation must be to higher quality standards than that provided in the past. A current requirement is for at least 200 high quality staff units on-site.

14.16 The above development is forecast to take place during this plan period but it is essential that the hospital be provided with sufficient land for expansion to ensure that its needs can be met for the foreseeable future. This Local Plan therefore identifies land to the south-east of the existing hospital site for future expansion. This land was previously designated as Green Wedge land, but has been released exceptionally to meet the health and social needs of local people. However, in order to safeguard the Green Wedge in the longer term, new development at the Hospital should involve the minimum fresh land-take necessary. Accordingly the Council will expect all elements of detailed expansion proposals to make the most efficient use of the existing and allocated site. This should include appropriate use of multi-storey development as far as is compatible with the effective working of the site and the creation of a pleasant environment for both patients and staff, and limiting visual impact on the Green Wedge**.**

14.17 To minimise the visual impact of new development on the Green Wedge, it would be desirable for open uses, such as car parking, to be located on this site rather than amongst the high-density development within the existing hospital. This site, particularly the southern part, would be most suitable for the high-quality staff accommodation the hospital requires. Existing tree screens along Ramsgate Road and along the footpath should be retained wherever possible. In the interests of sustainable pedestrian and cycle movement it is desirable that a route as direct as possible is retained for the existing footpath connecting Ramsgate Road with St Peter's Road.

14.18 The hospital has frontages to Ramsgate Road and St Peter's Road, both of which are Primary Distributors in the local road hierarchy and where it is important to maintain free flow of cross-town and longer distance traffic. In supporting improvement and expansion of the hospital it is essential that the opportunity be taken to rationalise and improve current access arrangements. Specific proposals will be required to reflect a traffic impact assessment of such proposals and to incorporate suitable access improvements to accommodate any resultant increases in traffic and appropriate access for 'Blue Light' vehicles.

14.19 The Hospital is already a major generator of traffic in the area, and the Council will wish to see the implementation of a Green Transport Strategy for the Hospital, which can be implemented in parallel with development permitted by this Policy. An essential element of this Strategy should be to encourage

the greater use of public transport by staff and visitors. The creation of new staff accommodation on site should help to work towards this objective.

POLICY CF4 - QEQM HOSPITAL, MARGATE

LAND TO THE SOUTH-EAST OF THE EXISTING QEQM HOSPITAL, MARGATE, IS IDENTIFIED FOR RELEASE FOR EXPANSION OF THE HOSPITAL. NO OTHER DEVELOPMENT WILL BE PERMITTED ON THIS SITE.

DEVELOPMENT FOR HOSPITAL PURPOSES SHOULD MEET THE FOLLOWING CRITERIA:

(1) PROPOSALS SHOULD BE DESIGNED TO INVOLVE THE MINIMUM TAKE OF FRESH LAND, CONSISTENT WITH THE NEED TO PROVIDE A PLEASANT ENVIRONMENT FOR PATIENTS AND STAFF;

(2) DEVELOPMENT PROPOSALS SHOULD DEMONSTRATE HOW MORE EFFECTIVE USE CAN BE MADE OF THE HOSPITAL SITE AS A WHOLE;

(3) PROPOSALS SHOULD INCORPORATE THE RETENTION OF THE EXISTING FOOTPATH AND PROVISION OF A SUBSTANTIAL LANDSCAPING SCREEN; PROPOSALS SHOULD INCORPORATE A COMPREHENSIVE REVIEW OF ACCESS ARRANGEMENTS ASSOCIATED WITH THE HOSPITAL AND ACCESS PROVISION SHOULD REFLECT THE FINDINGS OF A SPECIFIC TRAFFIC IMPACT ASSESSMENT.

(4) PROPOSALS SHOULD BE COMPATIBLE WITH A GREEN TRANSPORT STRATEGY FOR THE HOSPITAL;

(5) THE LEVEL OF CAR PARKING ASSOCIATED WITH NEW DEVELOPMENT SHOULD BE LIMITED TO THE MINIMUM NECESSARY WITHIN THE CONTEXT OF THE GREEN TRANSPORT STRATEGY; AND

(6) NEW PARKING AREAS SHOULD, AS FAR AS POSSIBLE, BE LOCATED ON THE NEWLY ALLOCATED SITE.

Margate Cemetery

14.20 Margate Cemetery is now nearing capacity and therefore there is a need to expand. The following Policy allocates land for this expansion and for additional parking. Woodland burial schemes may be included on this site or in the new community woodlands proposed in the Sport and Recreation chapter.

POLICY CF5 - MARGATE CEMETERY

LAND, AS INDICATED ON THE PROPOSALS MAP, WILL BE ALLOCATED FOR THE EXPANSION OF MARGATE CEMETERY AND ANCILLARY USES AND WILL BE RETAINED FOR SUCH USE.

New School Education Centre

14.21 The County Council, as Education Authority, is developing a programme to accommodate future needs for secondary education in the District. This includes proposals for the expansion, improvement and rationalisation of a number of existing schools and facilities which have outgrown their present premises. The opportunity exists, within the Local Plan period, to relocate a number of schools and provide shared, modern, top-quality facilities by identifying a central site to accommodate such an educational cluster. In advance of the emerging Community Plan, the development may also incorporate adult education facilities, libraries and other community uses.

14.22 Thanet's urban area is extensively developed, and opportunities to provide a site of sufficient size are extremely limited. Following assessment of available site options to accommodate the scale and type of facilities required, it is considered that an area within the Broadstairs/Ramsgate Green Wedge would provide the only suitable location.

14.23 A site, as shown on the Proposals Map, is to be allocated to allow built development to be located in an extensive, landscaped parkland setting. This could be accommodated at the southern part of the wedge, where built elements will have far less visual impact. This allows for extensive open space to occupy the areas of the site which are more visible. The facility would be well related to its intended catchment and to public transport services. Its close proximity to Ramsgate Railway Station should encourage the use of public transport. Vehicular access would most appropriately be provided off Pysons Road. The proposed site does not fall beneath the flight path of Kent International Airport, thus reducing any disruption from aircraft noise which is currently an issue for some schools. In these circumstances, the potentially significant benefits are considered to override the presumption against development within the Green Wedge.

POLICY CF6 - NEW EDUCATION SITE

A SITE AROUND NEWLANDS FARM IS ALLOCATED TO PROVIDE AN EDUCATION COMPLEX. DEVELOPMENT WHICH WOULD PRECLUDE DEVELOPMENT FOR SUCH PURPOSE WILL BE REFUSED.

DEVELOPMENT WILL BE PERMITTED ONLY AT SUCH TIME AS A COMPREHENSIVE MASTER PLAN HAS BEEN DEVELOPED. THIS MASTER PLAN SHOULD:

- **IDENTIFY ALL ELEMENTS OF THE PROPOSED COMPLEX AND INDICATE NOTIONAL PHASING OF INDIVIDUAL ELEMENTS;**

- **DEMONSTRATE FULLEST CONSIDERATION IN MINIMISING IMPACT ON THE OPEN QUALITIES AND LONG VIEWS ACROSS THE GREEN WEDGE THROUGH CAREFUL SITING OF BUILT ELEMENTS AND LANDSCAPING;**

- **INCORPORATE A GREEN TRAVEL STRATEGY AND ACCESS ARRANGEMENTS BASED ON A TRAFFIC IMPACT STUDY REFLECTING THE SCALE AND NATURE OF EDUCATIONAL FACILITIES PROPOSED.**

- **DEMONSTRATE HOW USE OF THE PROPOSED FACILITIES BY THE WIDER COMMUNITY CAN BE ACHIEVED.**

15. Appendices

APPENDIX A1

HOUSING LAND SCHEDULE

This schedule lists sites forming part of the land supply and which are considered to have potential to provide 5 or more residential units. These are allocated under policy H1, H6 and H7 (or included as residential elements within other policies specified in the table at Appendix A2). Only new build sites are featured on the proposals map. This schedule consists of 2 lists showing which sites fall within each phasing period in support of Policy H3. It also identifies which sites were found in the Urban Housing Capacity Study, and those which are additional, separate allocations. See note to policies H2 & H3.

APPENDIX A1- HOUSING SITES – POLICY H3
(See note to policies H2 & H3).
(Sites from Urban Capacity Study feature appropriate reference in left column)

LIST 1 - SITES TO BE RELEASED FOR HOUSING IN THE PERIOD 2001-2006 UNDER POLICY H3

a) NEW-BUILD SITES SHOWN ON PROPOSALS MAP

Urban Capacity Study Ref.	Planning Reference	Site	Address	Capacity	Brownfield Site (unless stated)
1.1 – 4			Anne's Close Birchington	13	Greenfield
1.1 – 8	Stage 11/19	Land - Westbrook Hospital	Canterbury Road Margate	10	Greenfield
1.2 – 2	TH/99/0393		77 Sea Road Westgate	8	
1.2 – 11	TH/96/0313		5 – 7 Station Road Westgate	12	
1.2 – 12	TH/99/0960		115 Dane Road Margate	5	
1.2 – 14	TH/98/0868	Site of Ralph Grimshaw Court	Lymington Road Westgate	9	
1.2 – 16	TH/99/0684	1 – 30 Stanley Sykes Close	Dane Valley Road Margate	10	
1.2 – 17	TH/99/0724		59 Salisbury Avenue Broadstairs	15	
1.3 – 7	TH/98/0666	Former Laundry	Willsons Road Ramsgate	40	

Urban Capacity Study Ref.	Planning Reference	Site	Address	Capacity	Brownfield Site (unless stated)
1.3 – 9	TH/99/0549	Packers Lane (Warehouse)	106 King Street Ramsgate	12	
1.3 – 11	TH/99/0620		19 Church Street Ramsgate	12	
1.3 – 12	TH/99/0607		Clarendon Road/ Pierremont Avenue Broadstairs	6	
1.4 – 1	TH/99/0116 TH/99/0372	Birch Hill Park	Canterbury Road Birchington	17	
1.4 – 2	TH/99/0133 TH/99/0172 TH/99/0340 TH/99/0316	St Stephen's College	North Foreland Road Broadstairs	18	
1.4 – 3	TH/00/0108	Millmead Old People's Home	Millmead Road Margate	17	
1.4 – 4	TH/99/0302	16 – 18 (Wishing Towers)	Eastern Esplanade Margate	32	
1.4 – 6	NLUD 2	Royal Sea Bathing Hospital	Canterbury Road Margate	125	
1.4 – 8	NLUD 47	Ramsgate Hospital	West Cliff Road Ramsgate	52	
1.5 – 1	NLUD 8	1 to 6	Carroways Place Margate	7	
1.5 – 2	NLUD29	Land adjoining 64	Queen Street, Ramsgate	46	
1.6 – 1	TH/98/0539	Land fronting	Tothill Street, Minster	10	
1.7 – 1	TH/98/0591	Land adjacent	Dumpton Park Station	37	
1.7 – 4	TH/00/0102	Brown & Masons Yard	Poplar Road, Broadstairs	30	
1.7 – 5			22-26 Station Road, Westgate	8	
1.7 – 6	TH/98/0633	Reservoir Site	90 Southwood Road Ramsgate	15	
1.7 – 9	TH/97/0135		29 Ethelbert Crescent, Margate	25	
1.7 – 10	TH/95/0113		2-4 Albion Road, Ramsgate	22	
1.7 – 14	TH/94/0713		17-23 Dalby Square, Margate	12	

Urban Capacity Study Ref.	Planning Reference	Site	Address	Capacity	Brownfield Site (unless stated)
1.7 – 16	TH/99/0199		8-10 Crow Hill, Broadstairs	6	
1.7 – 23	TH/98/0658	Builders Yard	100 Grange Road, Ramsgate	12	
1.7 – 25	TH/97/0171	R/o 183-185 Former Dairy Site	Grange Road, Ramsgate	5	
1.7 – 26	TH/97/0542	Ivyside Hotel	23-31 Sea Road, Westgate	15	
1.7 – 28	TH/98/0313	East Northdown Farm	East Northdown Margate	13	Greenfield
1.7 – 30	TH/99/1101	Dumpton Greyhound Stadium	Hereson Road, Ramsgate	12	
1.7 – 30	TH/99/1101	Dumpton Greyhound Stadium	Hereson Road, Ramsgate	78	
1.7 – 31	TH/99/0225	R/o 28	High Street, Broadstairs	6	
1.7 – 32	TH/99/0654	St Mildreds Hotel	Beach Road, Westgate	18	
1.7 – 33	TH/00/0793	Rear of Upton Road	Selwyn Drive, Broadstairs	12	
1.7 – 38	NLUD 12	Church Site	Trinity Square, Margate	28	
1.7 – 49	NLUD 38	Caravan Park	Nethercourt Farm Road, Ramsgate	69	
1.7 – 54	Stage 11/18	Builder's Yard	Corner of Quex Road/Canterbury Rd, Westgate	13	
1.7 – 57		Ramsgate Waterfront	Ramgsate	200	
2.1 – 3	TH/97/0648	Land at	20 St Pauls Road, Margate	5	
2.1 – 4	TH/98/1000	Land at Grant Close	Victoria Road, Broadstairs	9	
2.1 – 8	TH/95/0410	Adj. 49 Ethelbert Rd.	Birchington	7	
2.1 – 9	TH/96/0748	St Cecilia's	83 Sea Road, Westgate	6	
2.1 – 11	TH/92/0618	St Augustines Abbey	St Augustines Road, Ramsgate	40	
2.1 – 12	TH/00/0102	Sunnyhurst & Copmanhurst	Essex Road, Westgate	7	

Urban Capacity Study Ref.	Planning Reference	Site	Address	Capacity	Brownfield Site (unless stated)
2.1 – 15	TH/99/1061	Land rear of	171 Dane Road, Margate	6	
N/A		Land North of Haine Road	Westwood	**(See note below)**	Greenfield
N/A		Land at	Monkton Road, Minster	50	Greenfield
N/A		Land forming part of allotments	Manston Road, Ramsgate	100	Greenfield

Note
While planning consent may have been obtained by 2006 in respect of the site at Westwood, it is not envisaged that any dwelling units would be realised on site in 2006. Thus no units are phased at the Westwood site in the 2001 –2006 period under Policy H3. In the case of land north of Monkton Road, Minster, only part of the site will be released in the period 2001-2006, and the maximum number of dwellings on that site in this period will be 50 units as shown above.

b) CONVERSION SITES (POLICY H1)
(NOT SHOWN ON PROPOSALS MAP) (list 1)

Urban Capacity Study Reference	Planning Reference	Site	Address	Capacity	Brownfield Site (unless stated)
3.1 – 2	TH/99/0976		19 Sea Road, Westgate	8	
3.1 – 6	TH/99/0819		5 Lewis Crescent, Margate	6	
3.1 – 9	TH/00/0472	3-5 Beryl Court Hotel	Ethelbert Crescent, Margate	16	
3.1 – 10	TH/00/0477		23 Harold Road, Margate	8	
3.1 – 11	TH/00/0945	36-38	Westgate Bay Avenue, Westgate	13	
3.1 – 13	TH/96/0300		28-29 Dalby Square, Margate	9	

3.1 – 14	TH/96/0743		33 Beresford Gardens, Margate	6	
3.1 – 17	TH/97/0570	Galleon Lights Hotel	12-14 Fort Crescent, Margate	6	
3.1 – 18	TH/97/0755		21-22 Ethelbert Crescent, Margate	10	
3.1 – 19	TH/97/0919		14 Royal Esplanade, Margate	10	
3.1 – 22	TH/98/0748		1-7 Ethelbert Road, Margate	7	
3.1 – 24	TH/98/0227		17-21 Warwick Road, Margate	13	
3.1 – 25	TH/99/0885		1 Sion Hill, Ramsgate	5	
3.1 – 29	TH/00/1089	Barkstone Court Hotel	27 Roxburgh Road, Westgate	8	
3.1 – 30	TH/01/0561		78 Northdown Road, Margate	5	
3.1 – 31	TH/00/0904		11 Ethelbert Terrace, Margate	5	
3.1 – 32	TH/00/0413		1 Callis Court Road, Broadstairs	7	
3.2 – 3	NLUD 25	180-182	High Street, Ramsgate	11	
3.2 – 4	TH/00/0998	13-15	Ramsgate Road, Broadstairs	6	

APPENDIX A1 - HOUSING SITES – POLICY H3
(See note to policies H2 & H3).

(Sites from Urban Capacity Study feature appropriate reference in left column).

LIST 2 - SITES TO BE RELEASED FOR HOUSING IN THE PERIOD 2006-2011 UNDER POLICY H3

a) NEW-BUILD SITES SHOWN ON PROPOSALS MAP

Urban Capacity Study Reference	Planning Reference	Site	Address	Capacity	Brownfield Site (unless stated)
1.2 – 3	Allocation		7 Market Place, Margate	7	
1.2 – 4	TH/98/0483	37 Albion Street	2 & 3 St Marys Road, Broadstairs	9	
1.2 – 9	TH/91/0471 & TH/01/0277		5 – 6A Marine Gardens, Margate	23	
1.2 – 10	TH/90/1199		16/17 Marine Terrace, Margate	12	
1.3 – 2	TH/95/0481		18-20 Dane Road, Margate	13	
1.3 – 3	TH/04/0543		3 Weigall Place, Ramsgate	6	
1.3 – 5	TH/89/1413	Eaton Garage	Eaton Road, Margate	8	
1.3 – 6		Depot	King Street, Margate	14	
1.3 – 13	Stage 11/13	Factory site	67 Dane Park Road, Ramsgate	10	
1.4 – 11	Extrnl request	St Augustine' s College	Canterbury Road, Westgate	145	
1.7 – 2	TH/96/0333 & 97/0020	Granville House	Victoria Parade, Ramsgate	53	
1.7 – 3	TH/98/0431	Land at	Camden Road, Broadstairs	6	
1.7 – 8	Allocation	Danepark Centre	Fairview Close, Margate	11	
1.7 – 11	TH/95/0019		7-11 Addington Road, Margate	5	
1.7 – 12	TH/89/1467		65 Hereson Road, Ramsgate	9	
1.7 – 13	Allocation	Church	St Luke's Avenue, Ramsgate	11	

Urban Capacity Study Reference	Planning Reference	Site	Address	Capacity	Brownfield Site (unless stated)
1.7 – 15			67/73 Northdown Road, Margate	5	
1.7 – 34	TH/99/0733	Scrapyard	St Luke's Avenue, Ramsgate	16	
1.7 – 46	NLUD 34	Gasholder Station	Hardres Road, Ramsgate	67	
2.1 – 2	TH/00/0779	Coffee Parlour	20 High Street/4 Marine Drive Margate	5	
2.1 – 7			167 Pegwell Road, Ramsgate	11	
N/A		Land North of Haine Road	Westwood	1,000 (see note in para. 3.46)	Greenfield
N/A		Land at	Monkton Road, Minster	50	Greenfield

b) CONVERSION SITES (POLICY H1)
(NOT SHOWN ON PROPOSALS MAP) (list 2)

Urban Capacity Study Reference	Planning Reference	Site	Address	Capacity	Brownfield Site (unless stated)
3.1 – 4	TH/96/0682	Courtlands Hotel	30 Norfolk Road, Margate	11	
3.1 – 12	TH/00/0304	Water Tower	Southwood Road, Ramsgate	15	
3.1 – 20	TH/98/0518		38-40 Surrey Road, Margate	5	
3.1 – 26	TH/99/0890	Savoy Hotel	41-43 Grange Road, Ramsgate	10	
3.2 – 1	TH/88/0308		213 Ramsgate Road, Broadstairs	20	
3.2 – 2	TH/96/0632		11-15 Albert Terrace, Margate	6	

APPENDIX A2

HOUSING LAND SCHEDULE

See note to policies H2 & H3.

Brownfield Sites where housing aspect dealt with in specific policy other than H1

POLICY	SITE	ADDRESS
HE13	Royal Sea Bathing Hospital	Canterbury Road Margate
EC8	Ramsgate Waterfront	Ramsgate

All Greenfield Sites

Policy	Site	Address	Area (HA)
H1, H6 & TC4	Land north of Haine Road	Westwood	29 (including school and landscaping)
H1 & H7	Land south of Monkton Road	Minster	2.4
H1	Allotment site	Manston Rd, Ramsgate	2.8
H1	Land at	Anne's Close, Birchington	0.795
H1	Land to west of	Westbrook Day Centre, Margate	0.226
H1	Land at East Northdown Farm	Margate	0.623

APPENDIX A3

SOURCES OF LAND SUPPLY (HOUSING UNITS)

Source	2001-2011	2001-2006	2006-2011
Previously developed sites Identified)	1,859	1,340	519
Previously developed sites (windfall)	1,084	625	459
Greenfield	1,257	507	750
TOTAL	4,200	2,472	1,728

This table shows, for information, the make up of the housing land supply and notional phasing as envisaged in the draft Plan. It does not reflect new commitments nor changes in capacity or phasing of sites arising since the draft plan. (See note to policies H2 & H3).

APPENDIX B - Landscape Character Areas

This appendix is a large map file. To help you download it easily, we have made the appendix available as a separate download alongside the main document at:

http://www.thanet.gov.uk/environment__planning/local_plan_and_ldf/adopted_local_plan_-_june_2006.aspx

APPENDIX C - Flood Risk Areas

This appendix is a large map file. To help you download it easily, we have made the appendix available as a separate download alongside the main document at:

http://www.thanet.gov.uk/environment__planning/local_plan_and_ldf/adopted_local_plan_-_june_2006.aspx

APPENDIX D - Thanet Road Hierarchy

This appendix is a large map file. To help you download it easily, we have made the appendix available as a separate download alongside the main document at:

http://www.thanet.gov.uk/environment__planning/local_plan_and_ldf/adopted_local_plan_-_june_2006.aspx

APPENDIX E

CYCLE PARKING REQUIREMENTS BY LAND-USE

Land-use Requirement	**Cycle Parking Provision**	
Class A1 – Shops	Up to 1,000 sq. m Up to 5,000 sq. m Over 5,000 sq. m	1 space per 200 sq. m – employees 1 space per 200 sq. m – customers 1 space per 400 sq. m – employees 1 space per 400 sq. m – customers 1 space per 2,500 sq. m – employees 1 space per 2,500 sq. m – customers
Class A 2 – Financial & Professional Services		1 space per 200 sq. m – employees 1 space per 1,000 sq. m – visitors
Class A 3 – Food & Drink		1 space per 20 seats – employees 1 space per 10 seats – customers
Class B1 – Business		1 space per 200 sq. m – employees 1 space per 1,000 sq. m – visitors
Class B2 – General Industrial		1 space per 200 sq. m – employees 1 space per 1,000 sq. m – visitors
Class B3 – Special Industrial Groups A to E		1 space per 200 sq. m – employees 1 space per 1,000 sq. m – visitors
Class B8 – Storage and Distribution		1 space per 200 sq. m – employees 1 space per 1,000 sq. m – visitors
Class C1 – Hotels		1 space per 10 bed spaces
Class C2 – Residential Institutions and Hospitals - Schools, Colleges and Training Centres		1 space per 10 bed spaces 1 space per 5 students

Class D1 - Non-residential Institutions - Primary Schools - Secondary Schools & Sixth Form Colleges - Libraries & Places of Worship		1 space per 2 consulting rooms employees and patients 1 space per 50 pupils 1 space per 5 pupils 1 space per 50 seats/100 sq. m
Class D2 - Assembly & Leisure - Sports Facilities		1 space per 300 seats – employees 1 space per 300 seats – customers 1 space per 10 staff 1 space per 10 participants plus 10% change-over provision

APPENDIX F - Quality Bus Corridors

This appendix is a large map file. To help you download it easily, we have made the appendix available as a separate download alongside the main document at:

http://www.thanet.gov.uk/environment__planning/local_plan_and_ldf/adopted_local_plan_-_june_2006.aspx

APPENDIX G

MAXIMUM CAR PARKING PROVISION (POLICIES TR16 AND TR18 REFER)

MAXIMUM CAR PARKING PROVISION	
1 Space per:	
FOOD RETAIL	**20 sq m gross floorspace**
NON-FOOD RETAIL	**30 sq m gross floorspace**
CINEMAS & CONFERENCE FACILITIES	**7 seats**
ASSEMBLY & LEISURE	**30 sq m gross floorspace**
B1 OFFICE	**43 sq m gross floorspace**
For all other uses, maximum provision will be limited to 70% of the levels set out in the Kent County Council Vehicle Parking Standards.	

APPENDIX H

SITES OF NATURE CONSERVATION INTEREST (SNCI's)
Kent Trust for Nature Conservation

Sites of Nature Conservation Interest		**Site reference No:**	**TH 1**
Site: Monkton Chalk Pit		**Map reference:**	TR 284656
		AONB:	No
LPA:	Thanet	**SLA:**	No
Parish:	Monkton	**AHNCV:**	No
Owner:	Thanet Countryside Trust	**TPO:**	No
		ASSA:	No
KTNC Grade: II		**Grade I/II Agricultural Land**:	No
Category:	Disused pit – grassland, scrub and cliffs	**Scheduled species:**	
Area:	5.9 ha/14 acres	**Public rights of way**:	No

DESCRIPTION

Large, deep chalk pit, disused for many years, now managed as a nature reserve by the Thanet Countryside Trust and very important for wildlife in terms of the Thanet area.

It contains a variety of habitats including short-turfed grassland dominated by fescues and with a wide variety of chalk herbs. Kidney vetch (*Anthyllis vulneria*) is present together with several common orchids. A notable feature is the abundance of the uncommon lesser centaury (*Centaurium pulchellum*), probably the largest population in Kent.

Rough grassland with a variety of coarser plants such as greater knapweed (*Centaurea scabiosa*), wild carrot (*Daucus carota*) and others associated with disturbance is widespread. Other habitats include mixed hawthorn/blackthorn/elder scrub which is developing especially on the north-facing side of the quarry; a damper area, with colonising sallows, which still contains a population of southern marsh orchid (*Dactylorhiza praetermissa*); and very dry chalk cliffs, beginning to be colonised by algae and bryophytes.

A good range of common lepidoptera occur in fairly large numbers and are well recorded. Invertebrates and bird fauna are regularly recorded.

Thirty-three bryophytes were recorded on the day of visit and the pit is likely to be the only area in Thanet for many of the species. The site is generally well recorded and is used for educational purposes.

(Note: KTNC holds more detailed information)

Other sites nearby:
Monkton Marshes SNCI
Minster station environs SNCI

KENT WILDLIFE TRUST

Sites of Nature Conservation Interest		**Site Ref No:**	**TH 7**
Site:	St Peter's Churchyard, Broadstairs	**Map Ref:**	TR 381684
LPA:	Thanet	**AONB:**	No
Parish:	Broadstairs and St Peter's	**SLA:**	No
Owner:	Church Commissioners	**TPO:**	Yes
Category:	Grassland, scrub, woodland	**Protected species:**	No
Area:	3.68 ha/9.09 acres	**Public rights of way:**	Yes

Date first notified: 1985

Date amended: November 1997

DESCRIPTION

The boundary of this very large churchyard is lined with mature sycamore, beech, ash and line trees. The grassland is kept very tightly mown in the small area immediately around the church building, but the rest of the area is generally unmanaged and has developed into a wilderness of secondary woodland with patches of open, rank grassland and scrub.

The secondary woodland is dominated by sycamore saplings and coppiced sycamore and ash, now grown tall. Areas of scrub are present, containing hawthorn, dog rose, dogwood and much bramble. Work was undertaken some years ago to control the secondary woodland, but this has grown up again and large, impenetrable thickets are overwhelming the gravestones and tombs.

There are still some small areas of rough grassland, often in the vicinity of the network of hard paths that run through the site. False oat-grass (*Arrhenatherum elatius)* and cock's foot (*Dactylis glomerata)* dominate these patches, but there are occasional stands for tor-grass (*Brachypodium pinnatum)* and a good range of common herbs occurs, including hardhead (*Centaurea nigra)*, oxeye daisy (*Leucanthemum vulgare)*, hedge bedstraw (*Galium album)*, lady's bedstraw (*G.verum)*, bird's-foot-trefoil (*Lotus corniculatus)* and field scabious (*Knautia arvensis)*. The grassland is notable for the large numbers of naturalised spring bulbs.

Some clearance work is currently being carried out at the western end of the yard.

Approximately 26 common lichen species are present on the tombs and church walls, and 17 bryophytes were recorded on tombs and trees, including *Zygodon viridissimus* and *Tortula intermedia* on the tombstones.

Breeding birds present include common warblers such as willow warbler, chiffchaff and whitethroat. Blue tit, great tit, blackbird (Birds of Conservation Concern. RSPB. Amber List. 1966) and hedge sparrow were present on a recent visit.

The site also supports a range of common butterflies, including meadow brown, green-veined white, gatekeeper and large white.

The churchyard is likely to provide an important wildlife refuge in inland Thanet, as the surrounding area is either under intensive cultivation with no trees or scrub or is built-up.

KENT WILDLIFE TRUST

Sites of Nature Conservation Interest		**Site Ref No:**	**TH 9**
Site:	Golf Course Roughs, Kingsgate	**Map Ref:**	TR 394702 TR 389698
LPA:	Thanet	**AONB:**	No
Parish:	Broadstairs and St Peter's	**SLA:**	No
Owner:	Private	**TPO:**	Yes
Category:	Grassland, scrub	**Protected species:**	Yes
Area:	46.56 ha/115.05 acres	**Public rights of way:**	No

Date first notified: 1985

Date amended: 1992, February 1999 (text)

DESCRIPTION

The roughs of North Foreland Golf Course comprise an area of considerable interest. They include unimproved and semi-improved chalk grassland, and the importance of the site is enhanced by its proximity to the coastal areas at North Foreland and Foreness, which form part of the Thanet Coast SSSI.

The roughs are generally dominated by erect brome (*Bromopsis erecta)*, with occasional patches of tor grass (*Brachypodium pinnatum)*. Where the soils are deeper and more neutral in character, false oat-grass (*Arrhenatherum elatius)* and cock's foot (*Dactylis glomerata)* are more common. There are small areas where finer grasses are present, including both red fescue (*Festuca rubra)* and sheep's fescue (*F.ovina)*, yellow oat-grass (*Trisetum flavescens)* and, rarely, quaking-grass (*Briza media)*.

A variety of chalk-loving herbs includes kidney vetch (*Anthyllis vulneraria)*, small scabious (*Scabiosa columbaria)*, wild thyme (*Thymus praecox)*, lesser cat-mint (County Scarce Plants. Atlas of Kent Flora. Philp. 1982) (*Clinopodium calamintha)*, wild carrot (*Daucus carota)*, salad burnet (*Sanguisorba minor)*, sainfoin (*Onobrychis sativa)* and wild clary (*Salvia verbenaca)*. Other grassland herbs include lady's bedstraw (*Galium verum)*, hardhead (*Centaurea nigra)* and bird's-foot-trefoil *(Lotus corniculatus)*. Where the grass is ranker, greater knapweed (*Centaurea scabiosa)* and hedge bedstraw (*Galium mollugo)* are common, with developing young scrub of hawthorn and blackthorn also intruding into the grassland. Both pyramidal orchid (*Anacamptis pyramidalis*)and common spotted-orchid (*Dactylorhiza fuchsii)* are regularly recorded.

Some of the wooded fringes to the site are included for their contribution to the faunal interest. They tend to be dominated by sycamore and exotic oaks, but they also have a varied scrub and ground flora, including stinking iris (*Iiris foetidissima),* ivy (*Hedera helix)* and mounds of bramble, together with hawthorn and wild privet. Occasional thickets of suckering young elm and blackthorn are features of the surrounds.

Thirty-eight species of birds have been recorded, including skylark, linnet, stonechat, song thrush (Birds of Conservation Concern. Red List. RSPB. 1996), redwing (Birds of Conservation Concern. Amber List. RSPB. 1996 and Protected under Wildlife & Countryside Act 1981), fieldfare (Red Data Birds in Britain. NCC and RSPB. 1990 and Birds of

Conservation Concern. Amber List. RSPB. 1996 and Protected under Wildlife & Countryside Act 1981), curlew (Birds of Conservation Concern. Amber List. RSPB. 1996) and common warblers. The area is likely to serve as a landfall for migrant birds in spring and autumn.

A variety of lepidoptera have recently been recorded, including marbled white, small health, large skipper, Essex skipper and small skipper, meadow brown, common blue and gatekeeper.

A small area of rough, unmanaged, semi-improved neutral grassland to the south-west is also included. This area is dominated by a range of grasses, including false oat-grass, cock's foot, common bent (*Agrostis capillaris)* and fescues. Herbs include bird's-foot-trefoil, meadow vetchling (*Lathyrus pratensis)*, smooth hawk's beard (*Crepis capillaris)* and yarrow (*Achillea millefolium)*. The grassland has become very scrubby, with increasing hawthorn and rose and would improve with some management. However, the area is likely to be very undisturbed and therefore useful to breeding birds and mammals.

KENT WILDLIFE TRUST

Sites of Nature Conservation Interest **Site Ref No: TH 12**

Site: Woods and Grassland, Minster Marshes **Map Ref:** TR 316636, 301646, 304643, 325625

LPA: Thanet **AONB:** No

Parish: Minster **SLA:** No

Owner: British Rail/Private **TPO:** Yes

Category: Grassland, scrub, ponds, woodland **Scheduled species:**

Area: 24.16 ha/59/67 acres **Public rights of way:** Yes

Date first notified: 1986

Date amended: June 1995

DESCRIPTION

This small mosaic of habitats close to Minster railway station includes:

(a) Areas of rough grassland with ant hills and a wide range of common herbs and grasses, including tall fescue (*Festuca arundinacea*) and cocksfoot (*Dactylis glomerata*) with lady's bedstraw (*Galium verum*), stone parsley (*Sison amomum*) and hardhead (*Centaurea nigra*). Finer turf with red fescue (*Festuca rubra*) also occurs in parts, and large areas of reeds are present in the very damp areas.

(b) Scrubby areas close to the railway line with heavily silted ponds now becoming scrubbed up with sallows. Common marsh plants occur here, including fool's water-cress (*Apium nodosum*), flote grass (*Glyceria spp*.) and yellow iris (*Iris pseudacorus*), in addition to pendulous sedge (*Carex pendula*) and false fox sedge (*C.otrubae*). A feature of this area is the growth of corticolous lichens and bryophytes on sallow and elder near the water. These are generally not common in Thanet.

(c) A small copse with mixed broadleaved trees comprising ash, alder, hawthorn and willow occurs at the western end of the site. The ground flora includes bramble, cow parsley (*Anthriscus sylvestris*) and male fern (*Dryopteris felix-mas)*. Wood sedge (*Carex sylvatica*) and several stands of stinking iris (*Iris foetidissima*) are also present.

(d) A large, heavily silted pond occurs on the western margin of the copse, with large alder coppice stools and much sallow. The vegetation consists mainly of lesser pond sedge (*Carex acutiformis*).

KENT WILDLIFE TRUST

Sites of Nature Conservation Interest		**Site Ref.No:**	**DO 21**
Site:	Ash Level and South Richborough Pasture	**Map Ref:**	TR 300618
LPA:	Dover	**AONB:**	No
Parish:	Preston/Ash/Sandwich	**SLA:**	No
Owner:	Private	**TPO:**	No
Category:	Grassland,dykes, scrub	**Protected species:**	Yes
Area:	1009ha/2495 acres	**Public rights of way:**	Yes

Date first notified: 1985

Date amended: 1994 (map), November 1997

DESCRIPTION

The site comprises an extensive area of low-lying agricultural land with interconnecting dyke systems, mostly situated to the south of the River Stour. The area is crossed by old drove roads edged with well-established hedgerows of hawthorn and blackthorn and containing the occasional oak. Old counter walls with their unimproved grassland also form an important feature. Many of the fields have been drained or converted to arable or improved pasture in recent years, but some semi-improved or rough pasture remains, particularly in the area south of Richborough Farm and that south of Richborough Power Station.

The dykes and their banks still retain wildlife interest. The water varies from brackish near the River Stour to fresh further inland. The Richborough stream is a wider and deeper waterway, with the occasional tall willow and scrub standing above the banks. Aquatic and marginal vegetation includes sea club-rush (*Bolboschoenus maritimus),* frobgit (*Hydrocharis morsus-ranae),* tubular water-dropwort (O*enanthe fistulosa),* brookweed (*Samolus valerandi)* and flowering-rush (*Butomus umbellatus)* among the more interesting specifies. Several species of pondweed (*Potomageton spp).* spiked water-milfoil (*Myriophyllum spicatum)* and water-crowfoot (*Ranunculus spp)* also occur, and bladderwort (*Ultricularia australis)* is one of the more unusual species to be found. Commoner species such as branched bur-reed (*Sparganium erectum),* common reed (*Phragmites australis)* and water-plantain (*Alisma plantago-aqyatuca)* are found throughout. Corn parsley (*Petroselinum segetum),* knotted hedge-parsley (*Torilis nodosa),* creeping-jenny (*ysimachia nummularia)* and stone parsley (*sison amomum)* are found in the bankside vegetation. Divided sedge (*Carex divisa)* is also scattered throughout, mainly in pasture areas.

Winter-wet semi-improved grassland south-west of Richborough Farm centred on TR 313596 supports marsh foxtail (*Alopecurus geniculatus)*, divided sedge (Scarce Plants in Britain. JNCC. 1994) cuckoo flower (*Cardamine pratensis)* and large quantities of rush species, including hard rush (*Juncus inflexus)*. Bulbous foxtail (Scarce Plants in Britain. JNCC. 1994) (County Rare Plants. Atlas of Kent Flora. Philp. 1982) *Alopecurus bulbosus* was recorded in the 1988 Rate Plant Survey, but its presence here now requires confirmation. A large overgrown pond with dense sallow scrub and several old mature ash and oak trees are also present in this ground. An area of semi-improved and improved pasture with species-rich dykes at TR 318594 is fringed to the north by an old embankment with hawthorn scrub. Grassy patches on top of the embankment support species typical of dry soils such as small clovers, including knotted clover

(*Trifolium striatum)* and subterranean clover (County Scarce Plants. Atlas of Kent Flora. Philp. 1982) (*T.subterraneum)*.

At TR 329620, the cattle-grazed pasture south of the power station between the railway and the River Stour is also semi-improved and contains corn parsley, knotted hedge-parsley, bulbous buttercup (*Ranunculus bulbosus)* and divided sedge ((Scarce Plants in Britain. JNCC. 1994) in the turf. Bird's-foot-trefoil (*Lotus corniculatus)* and meadow vetchling (*Lathyrus pratensis)* also occur occasionally. According to the present grazier, the land has not received artificial fertiliser for at least nine years. The ditches in this area include some with much open water and others dominated by common reed. The railway bank and reed bed forming the western margin of this area are included in the site. Wigeon (Red Data Book. NCC and RSPB. 1993) (Birds of Conservation Concern. Red List. RSPB. 1996), teal (Red Data Book. NCC and RSPB. 1993) (Birds of Conservation Concern. Red List. RSPB. 1996), pochard (Red Data Book. NCC and RSPB. 1993) (Birds of Conservation Concern. Red List. RSPB. 1996), bearded tit (Red Data Book. NCC and RSPB. 1993) (Protected under Wildlife & Countryside Act 1981) (Birds of Conservation Concern. Red List. RSPB. 1996), and tufted duck, a species of nature conservation concern in Kent, all frequent the lagoons in the north-western corner of this area.

The River Stour and both banks between TR 325601 and TR 333610, and the west bank only between TR 333617 and TR 333601, have been added to the site, and include an area of undeveloped scrub and reed bed. The area around TR 333601 is a transitional area of brackish inundated vegetation with some damp semi-improved neutral grassland and scattered scrub. Between the railway line and the river at TR 322594 an area of rough marshy grassland has much common reed, some open water and scattered scrub. Dittander (Scarce Plants in Britain. JNCC. 1994) (County Scarce Plants. Atlas of Kent Flora. Philp. 1982) (*Lepidium latifolium)* is frequent by the river in the western half of the area. Kingsfisher (Protected under Wildlife& Countryside Act RSPB 1996) (Birds of Conservation Concern. Amber List. RSPB. 1996) grey wagtail and common sandpiper are found on and near the river, and bearded tit (Red Data Book. NCC and RSPB. 1993) (Protected under Wildlife& Countryside Act RSPB 1996) (Birds of Conservation Concern. Amber List. RSPB. 1996) has been recorded nearby. Great crested grebe has been a winter/spring visitor.

Near Lower Goldstone, at TR 295613, a small area of ditch with a well-developed reed bed, adjacent grassy banks and blackthorn and hawthorn scrub is also important. Great willowherb (*Epilobium hirsutum)* and hemp agrimony (*Eupatorium cannabinum)* are abundant. Tree sparrow (Birds of Conservation Concern. Red List. RSPB. 1996) (Biodiversity UK Steering Group Report. Mid List. 1995) is regularly present here, and large numbers of fieldfare (Red Data Book. NCC and RSPB. 1993) (Protected under Wildlife & Countryside Act 1981) use this area in winter.

A fishing pond at TR 297604 has good marginal vegetation and a large central reed bed. Dragonflies found here include migrant hawker, brown hawker, common darter, ruddy darter and black-tailed skimmer.

Two fishing ponds with marginal vegetation at TR 322592, separated by a spit of rough grassland and scrub, are old gravel pits. There is a large reed bed and marshy grassland at the southern end. Common lizard is present. Dragonfly species include migrant hawker, brown hawker, common darter and ruddy darter. The common blue damselfly and blue-tailed damselfly also occur.

Elsewhere, the site includes only ditches and streams with their banks and a 3m margin along the top of the bank, drove roads wit their thick hedges, and counter walls. The whole area is notable for birds, particularly wintering raptors such as hen harrier (Red Data Book. NCC and RSPB 1993) (Protected under Wildlife& Countryside Act 1981) (Birds of Conservation Concern. Red List. RSPB. 1996) and merlin (Red Data Book. NCC and RSPB 1993) (Protected under Wildlife& Countryside Act 1981) (Birds of Conservation Concern. Red List. RSPB. 1996). Up to 2000 wigeon (Red Data Book. NCC & PSPB. 1993) (Birds of Conservation Concern. Amber List. RSPB. 1996), 1000 lapwing (Birds of Conservation Concern. Amber List. RSPB. 1996) and large numbers of teal (Red Data Book. NCC & PSPB. 1993) (Birds of Conservation Concern. Amber List. RSPB. 1996), also frequent the area in winter. Breeding birds include little grebe,

little owl, yellow wagtail, tree sparrow (Birds of Conservation Concern. Red List. RSPB. 1996) (Biodiversity UK Steering Group Report. Mid List. 1995), reed warbler, sedge warbler and reed bunting, (Birds of Conservation Concern. Red List. RSPB. 1996) (Biodiversity UK Steering Group Report. Mid List. 1995). Hairlike pondweed (Scarce Plants in Britain. JNCC. 1994) (County Scarce Plants. Atlas of Kent Flora. Philp. 1982). *Potamogeton trichoides* is found in the larger channels such as the Richborough Stream, and rootless duckweed (Scarce Plants in Britain. JNCC. 1994) (County Scarce Plants. Atlas of Kent Flora. Philp. 1982). *Wolffia arrhiza* is scattered widely and is often abundant in dykes.

Mammals recorded include rabbit, fox and hare (Biodiversity UK Steering Group Report. Short List. 1995), the latter being a declining species in the county. Banks along the Goshall Stream and a number of the dykes contain the burrows of water vole (Protected under Wildlife & Countryside Act 1981) (Biodiversity UK Steering Group Report. Short List. 1995), a nationally declining species.

22 species of common butterfly have been recorded. The drove roads with their rough, grassy margins and hedges support a number of species, including meadow brown, common blue, speckled wood, green-veined white, comma, small tortoiseshell, red admiral and gatekeeper. An important assemblage of 12 species of dragonflies has also been recorded. In addition to those mentioned above, these include yellow-winged darter and banded demoiselle. More species may be present at different times of year. The site also supports the two rare freshwater snail species *Segmentia nitida* (Biodiversity UK Steering Group Report. Short List. 1995) and (*Psidium pseudosphaerium)* in ditches in the vicinity of TR 295628 and TR 279615.

KENT WILDLIFE TRUST

Sites of Nature Conservation Interest	**Site Ref No: TH 13**
Site: St Nicholas at Wade Churchyard	**Map Ref:** TR 266667
LPA: Thanet	**AONB:** No
Parish: St Nicholas at Wade	**SLA:** No
Owner: Church Commissioners	**TPO:** Conservation Area
Category: Grassland, walls, tombs	**Protected species:** No
Area: 0.36 ha/0.89 acres	**Public rights of way:** No

Date first notified: November 1997

DESCRIPTION

Chest tombs and headstones within the churchyard are set amid grassland. The grassland is generally well managed but herb-rich, with an area of ranker grassland containing nettle (*Urtica dioica)* and elder scrub present in the southern corner. A good range of herbs includes oxeye daisy (*Leucanthemum vulgare)*, burnet saxifrage (*Pimpinella saxifraga)*, common sorrel (*Rumex acetosa),* bird's-food-trefoil (*Lotus corniculatus)* and abundant fiddle dock (*Rumex pulcher).* The latter, a species characteristic of dry East Kent grassland, was once common but is now in decline. Lady's bedstraw (*Galium verum)* is also widespread in the turf. A colony of strawberry clover (*Trifolium Fragiferum)*, a species associated with grassland close to the sea, is also found here. The fine grass species include red fescue (*Festuca rubra)*, yellow oat-grass (*Trisetum flavescen)s*, and meadow barley (*Hordeum secalinum).*

The walls of the church and churchyard, together with both acid and calcareous vertical stones and chest tombs, support over 60 species of lichens. A number of colonies of the fruticose lichen (*Ramalina subfarinaecea)*, together with *Opegrapha chevallieri* and *Haematomma ochrolechia var. porphyrium*, are present on the old plastered north wall of the church, while *Caloplaca ruderum*, a typical eastern species, occurs on the mortar of the south-facing wall. Lichens are very scarce in this part of Kent, due to the agricultural pollution and lack of suitable habitat.

KENT WILDLIFE TRUST

Sites of Nature Conservation Interest **Site Ref No: TH 14**

Site: St Mary Magdalene Churchyard, Monkton **Map Ref:** TR 278653

LPA: Thanet **AONB:** No

Parish: Monkton **SLA:** No

Owner: Church Commissioners **TPO:** Conservation Area

Category: Grassland, walls, tombs **Protected species:** No

Area: 0.75 ha/1.85 acres **Public rights of way:** No

Date first notified: November 1997

DESCRIPTION

This churchyard contains semi-improved grassland which is managed in the main area in front of the church entrance but is rather rank and unmanaged in the rest of the yard.

Where the grassland is managed, it supports a number of common meadow plants such as hardhead (*Centaurea nigra)*, oxeye daisy (*Leucanthemum vulgare)*, burnet saxifrage (*Pimpinella saxifraga)*, lady's bedstraw (*Galium verum)*, hedge bedstraw *G.album* and bird's-foot-trefoil (*Lotus corniculatus)*. Fiddle dock (*Rumex pulcher)*, a characteristic but declining species of East Kent grassland, is also common.

The remainder of the site is grass-dominated and rank, with false oat-grass (*Arrhenatherum elatius)* and cock's-foot (*Dactylis glomerata)* dominant and herbs generally rather suppressed. Increased frequency of mowing and removal of cuttings or occasional grazing would produce a more interesting flora in these areas. A narrow grass slope outside the church is very similar to adjacent grassland inside the gate, containing hardhead, burnet saxifrage and bird's-foot-trefoil in the turf.

The church walls and tombs support a fairly good number of lichen species, which are likely to be important in relation to the rest of the district, which is given over almost entirely to intensive farming and has few suitable habitats inland for lichens.

Butterflies recorded include common blue, meadow brown, gatekeeper, peacock, small tortoiseshell, small white and green-veined white.

KENT WILDLIFE TRUST

Sites of Nature Conservation Interest		**Site Ref No:**	**TH 15**
Site:	Ramsgate Cemetery	**Map Ref:**	TR 384661
LPA:	Thanet	**AONB:**	No
Parish:		**SLA:**	No
Owner:	Thanet District Council	**TPO:**	No
Category:	Grassland, tombs, walls, paths, Parkland trees	**Protected species:**	No
Area:	13.5 ha/33.4 acres	**Public rights of way:**	Yes

Date first notified: June 1998

DESCRIPTION

This very large cemetery, together with its equally large adjacent extension, contains a large expanse of well-managed short grassland which varies from being calcareous at the southern end to neutral towards the north. It probably represents one of the largest areas of semi-improved grassland outside SSSIs in Thanet district.

The grassland supports a variety of herb species, including oxeye daisy (*Leucanthemum vulgare)*, salad burnet (*Sanguisorba minor)*, mouse-ear hawkweed (*Pilosella offcinarum)*, cowslip (*Primula veris)* and primrose (*Primula vulgaris)*. Grasses include erect brome (*Bromopsis erecta)*, sheep's fescue (*Festuca ovina)* and red fescue (*F.rubra)*, together with cock's-foot (*Dactylis glomerata)* and false oat-grass (*Arrhenatherum elatius)*. Rye grass (*Lolium perenne)* is more dominant in the northern half of the site. Alexanders (*Smyrnium olusatrum)*, false brome (*Brachypodium sylvaticum)*, wild arum (*Arum maculatum*) and sweet violet (*Viola odorata)* are common in the shadier parts of the shrubberies. A colony of autumn lady's tresses (*Spiranthes spiralis)* (County Scarce Plants. Atlas of Kent Flora. Philp. 1982) is to be found near the path to the north of the main chapel, and this species may be present elsewhere. Large mature trees including beech, yew, Scots pine and sycamore are present around the circumference of the site and also line the many metalled paths.

The variety of tombs includes many made from granite and marble. At least 60 species of saxicolous lichens have been recorded on the tombs and on the cemetery walls, including an abundance of *Polysporina simplex* on granite and large colonies of *Protoblastenia rupestris* on limestone and marble. *Caloplaca crenularia* was found on a low acid stone within the extension, and *Lecidea fusco atra* was abundant on the well-lit parts of an east-facing brick wall. Of particular interest were a few colonies of *Stereocaulon vesuvianum* var. *symphycheileoides* on the iron railings around a large tomb and also in cracks on the top of an upright slate tomb. This species is scarce in Kent, although the variety is found in south-east England in urban areas in association with acid tops of walls and rusting iron.

Over 50 species of bryophytes have been recorded both in the grassland and on the tombs, paths and walls, particularly where mature trees give both shade and shelter.

APPENDIX I

List of Scheduled Ancient Monuments

Location	Monument No.	Title
Acol	259	Ring ditches and enclosures 500 yards (450m) ESE of College Farm
Acol	365	Settlement one mile (1610m) E of village.
Birchington	270	Group of ring ditches 400 yards (360m) NW of Great Brooksend Farm.
Broadstairs	261	Double ring ditch and two enclosures 400 yards (360m) NW of Dane Court.
St. Peter's	316	Anglo-Saxon cemetery, Dane Valley Road
Ramsgate	250	Anglo-Saxon cemetery S of Ozengell Grange
Minster	262	Enclosure and ring ditches 200 yards(180m) ENE of Minster Laundry
Margate/ Garlinge	97	Dent-de-Lion Gateway
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APPENDIX J - List of Scheduled Ancient Monuments

This appendix is a large map file. To help you download it easily, we have made the appendix available as a separate download alongside the main document at:

http://www.thanet.gov.uk/environment__planning/local_plan_and_ldf/adopted_local_plan_-_june_2006.aspx

Appendix K

Glossary of Terms

These definitions explain the meaning of terms as they occur throughout the plan and are not necessarily statutory definitions.

Affordable housing
Housing which is accessible to people who cannot afford to rent or buy housing locally on the open market

Allocation
Land identified on the Proposals Map for a particular use, which may or may not have planning permission

Ancient woodland
Identified by English Nature as having continuous woodland cover since 1600 AD

Annual Monitoring Report (AMR)
Document to demonstrate how planning policies are implemented and monitoring progress of documents included in the Local Development Scheme (LDS)

Area of Archaeological Potential
Areas known to have archaeological remains based on existing knowledge

Article 4 direction
Removes permitted development rights contained within the Town and Country Planning General Permitted Development Order 1995 on the grounds that to exercise these rights would have an adverse affect on the character of the area

Assisted Area Status
Areas in receipt of Central Government assistance for employment and economic purposes

Backland development
Development of land surrounded by existing properties, often garden land

Brownfield Site
Previously developed land which is, or was, occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed surface infrastructure

Circular
Document issued by Government giving interpretation of Acts of Parliament.

Commitments
Sites with planning permission for development, including those under construction and completed in the Plan period

Community Woodland
Woodland to which the public has free access for informal recreation

Compulsory Purchase Order
The acquisition of land compulsorily by a local authority or government department

Conservation Area
Area of special architectural or historical interest where it is desirable to preserve or enhance its character or appearance. These areas are designated by local planning authorities and are subject to additional planning controls

Countryside Agency (Formerly Countryside Commission)
Government's advisor on rural issues, including planning policy. (The Countryside Agency will become part of a new government body called 'Natural England')

Development Plan Document (DPD)
These are documents that the local planning authority must prepare under the new planning system and which have to be subject to community involvement, consultation and independent examination. These include a core strategy, general policies applicable to the whole District, allocations of land, site/area specific policies and a proposals map

English Heritage
Government's advisor on listed buildings, conservation areas, scheduled ancient monuments and related planning policy

English Nature
Government's advisor on nature conservation, including planning policy, which will become part of a new government body called 'Natural England'

Environment Agency
Government funded agency responsible for pollution control, waste regulation, water resources, flood defence, and inland fisheries, recreation, conservation and navigation of inland waterways

Environmental Impact Assessment (EIA)
Process of collecting information on the effects of individual development projects on various aspects of the environment

Environmental Statement
Formal document produced as a result of an environmental assessment

Farm diversification
Supplementing farm incomes by providing non-agricultural sources of revenue in order to maintain the viability of farm holdings

Fluvial flood plain
Largest area of potential flooding by a river once every one hundred years, or the worst recorded instance of a river's flood

Green corridor
Green areas which link open spaces/wildlife areas within urban areas or to the countryside

Green tourism
Tourism which safeguards and promotes an understanding of the environment

Green Wedge
Areas of countryside between the urban areas which play an important role in maintaining the separate character, and enhancing the appearance of urban areas

Greenfield land
Land that has not been previously developed for any use, has not been allocated for development in a local plan and does not have current planning permission

Groundwater Source Protection Zone
Areas defined by the Environment Agency in which certain types of development are restricted or prevented in order to ensure that groundwater sources remain free from contamination or pollution

Habitats Directive
European legislation to protect an increasing number of wild species that are seriously threatened. Important sites are protected by designations as Special Protection Areas (SPA) and Special Areas of Conservation (SAC).

Kent and Medway Structure Plan
Prepared by the County Council to give a broad strategic framework within which local plans are prepared (due to be replaced by the Regional Spatial Strategy – see below)

Listed Building
A building of architectural or historical importance, graded according to its importance (Grade I, II*, II). The list is kept by English Heritage. Buildings on the lists are subject to special planning control

Local Development Document (LDD)
A Local Development Document is the term given to the documents that form the Local Development Framework under the new planning system

Local Development Framework (LDF)
The LDF is like a 'folder' containing all the documents that together make up a local council's part of the statutory development plan under the new planning system

Local Development Scheme (LDS)
This sets out the programme for preparing the documents which will form the Local Development Framework

Minerals Local Plan
Prepared by the County Council setting out policies to provide for the supply of minerals

National Nature Reserve
Areas of national/international importance, which are owned or leased by English Nature or a body approved by them, or managed in accord with Nature Reserve Agreements

Office of the Deputy Prime Minister (ODPM)
This was created as a central department in its own right in May 2002, bringing together key responsibilities for regional and local government, fire, housing, planning and regeneration. The ODPM has recently been re-named the Department for Communities and Local Government

Planning and Compulsory Purchase Act 2004
Government legislation introducing a new planning system

Planning Policy Guidance (PPG)
Planning Policy Guidance notes set out Government policy on different aspects of planning. PPGs must be taken into account by local planning authorities in the preparation of development plans, and may be material to decisions on individual planning applications and appeals

Planning Policy Statements (PPS)
Planning Policy Statements are gradually replacing Planning Policy Guidance notes as they are reviewed under the new planning system

Proposals Map
A map of the District showing the Local Plan's proposals and where policies apply

Ramsar site
Sites of Wetland habitat of international importance designated under the Ramsar Convention, to which the British Government is a signatory. These sites are important for wintering and migratory birds and the feeding grounds they provide. English Nature is the responsible body for identifying Ramsar sites

Regionally Important Geological Sites (RIGS)
Sites important for their geological formations, designated by a local forum of geologists

Regional Spatial Strategy (RSS)
A spatial plan for the whole of the south-east called 'The South-East Plan', currently being prepared by the South East Regional Assembly (SEERA) under the new planning system.

Rural Development Area
Rural areas with the greatest concentration of social and economic problems.

Scheduled Ancient Monuments
Ancient monuments of national importance included on a schedule maintained by the Department of National Heritage as advised by English Heritage

SEERA
South East of England Regional Assembly

Site of Nature Conservation Interest (SNCI)
Locally significant nature conservation site identified by the Kent Wildlife Trust and considered to be of countywide importance. These are not statutory in the same way as SSSIs but form an integral part of the formulation of planning policy relating to nature conservation issues. These have recently been renamed as Local Wildlife Sites

Site of Special Scientific Interest (SSSI)
SSSIs are designated by English Nature under the Wildlife & Countryside Act 1981. They consist of areas which are important in the national context for their flora, fauna, geological or physiographical features

Special Area of Conservation (SAC)
Natural habitat sites of international importance, designated under the Habitats Directive

Special Landscape Area (SLA)
Landscapes of countywide importance where priority is given to the enhancement and conservation of natural beauty

Special Protection Area (SPA)
The habitats of species of wild birds of international importance to ensure their survival and reproduction, designated under the European Directive 79/409 on the Conservation of Wild Birds. The Government is required to avoid pollution or disturbance to SPAs and designates SPAs following advice from English Nature

Statement of Community Involvement (SCI)
Statutory document under the new planning system stating how and when public participation will be carried out and how this will apply to different documents

Strategic Environmental Appraisal (SEA)
Process of testing the effects of a Plan's policies on aspect of the environment

Supplementary Planning Guidance (SPG)
Guidance on specific or sensitive planning issues which add detail to policies in the Plan

Sustainable Development
The commonly used definition of sustainable development was put forward by the Brundtland Commission (World commission on Environment and Development*, Our Common Future*, Oxford University Press, 1987): "To meet the needs of the present without compromising the ability of future generations to meet their own needs"

Town and Country Planning Act 1990
The legislation governing land use planning under which this plan was produced. This has since been superseded by the Planning and Compulsory Purchase Act 2004

Town and Country Planning (General Permitted Development) Order 1995 (GDO)
Lists operations where planning permission is granted automatically and a planning application is not necessary

Town and Country Planning (Use Classes) Order 1987
Statutory instrument defining broad categories of land use and buildings

Tree Preservation Order (TPO)
Gives protection to individual trees, groups of trees or woodland by preventing works to trees, such as cutting down, topping or lopping, without the express consent of the planning authority

Urban Capacity Study
A study to determine the number of houses that could be built in an urban area, accounting for assumptions of densities and car parking provision

Village Confines
The core of rural settlements, within which minor residential development may be acceptable on suitable sites. They do not define the extent of a village, its community or its built up area

Waste Local Plan
Statutory plan, prepared by the County Council containing policies in respect of development which involves the depositing of refuse or waste material. This is being replaced by a Waste Development Framework (WDF)

Windfall sites
Previously developed sites (not specifically allocated or identified in the Local Plan) which unexpectedly become available

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Department for Transport

Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England

Presented to Parliament pursuant to Section 9(8) of the Planning Act 2008

Moving Britain Ahead

June 2018

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1. Introduction

Background

1.1 The UK aviation sector plays an important role in the modern economy, contributing around £20 billion per year[1] and directly supporting approximately 230,000 jobs.[2] The positive impacts of the aviation sector extend beyond its direct contribution to the economy by also enabling activity in other important sectors like business services, financial services, and the creative industries. The UK has the third largest aviation network in the world, and London's airports serve more routes than the airports of any other European city.

1.2 However, London and the South East are now facing longer term capacity problems. Heathrow Airport is operating at capacity today, Gatwick Airport is operating at capacity at peak times, and the whole London airports system is forecast to be full by the mid-2030s.[3] There is still spare capacity elsewhere in the South East for point to point and especially low cost flights. However, with very limited capability at London's major airports, London is beginning to find that new routes to important long haul destinations are being set up elsewhere in Europe. This is having an adverse impact on the UK economy, and affecting the country's global competitiveness.[4]

1.3 In September 2012, the Coalition Government established the independent Airports Commission to examine the scale and timing of any requirement for additional capacity to maintain the UK's position as Europe's most important aviation hub, and identify and evaluate how any need for additional capacity should be met in the short, medium and long term.[5]

1.4 In its Interim Report in December 2013, the independent Airports Commission concluded that there was a need for one additional runway to be in operation in the South East of England by 2030.[6] It also confirmed three shortlisted capacity schemes for further analysis: a Second Runway at Gatwick Airport (proposed by Gatwick Airport Ltd.), a Northwest Runway at Heathrow Airport (proposed by Heathrow Airport Ltd.), and an Extended Northern Runway at Heathrow Airport (proposed by Heathrow Hub Ltd.). The Airports Commission then consulted further on the three shortlisted schemes, plus proposals for a new airport in the inner Thames Estuary. In September 2014, the Airports Commission concluded not to consider further an inner Thames Estuary scheme.[7]

1.5 In its Final Report in July 2015, the Airports Commission unanimously concluded that the proposal for a Northwest Runway at Heathrow Airport, combined with a significant

[1] ONS, Input-Output Supply and Use tables, 2014
[2] ONS, Business Register and Employment Survey, 2014
[3] *https://www.gov.uk/government/publications/airport-expansion-updated-cost-and-benefits-appraisal Updated Appraisal Report,* p11
[4] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/440316/airports-commission-final-report.pdf *Airports Commission: Final Report*, p3
[5] https://www.gov.uk/government/organisations/airports-commission
[6] https://www.gov.uk/government/publications/airports-commission-interim-report
[7] https://www.gov.uk/government/publications/inner-thames-estuary-airport-summary-and-decision

package of measures to address its environmental and community impacts, presented the strongest case and offered the greatest strategic and economic benefits.

1.6 The Airports Commission's remit also required it to look at how to make best use of existing airport infrastructure, before new capacity becomes operational.[8] The Commission noted in its final report that a new runway will not open for at least 10 years. It therefore considered it imperative that the UK continues to grow its domestic and international connectivity in this period, which it considered would require the more intensive use of existing airports other than Heathrow and Gatwick.[9]

1.7 On 14 December 2015, the Government accepted the Airports Commission's recommendation for increased capacity in the South East of England, and its shortlisted scheme options. The Government also confirmed that it would begin work on the building blocks of an Airports National Policy Statement ('Airports NPS'), and this is what happened.[10]

1.8 The Government believes that an NPS is the most appropriate method to put in place the planning framework for a new runway in the South East of England.[11] All three shortlisted airport schemes would have been classed as nationally significant infrastructure projects under the Planning Act 2008, and the Government's view is that an Airports NPS, and a development consent application made under the Planning Act 2008, is the most appropriate route to deliver the Government's preferred scheme.

1.9 In its announcement on 14 December 2015, the Government made clear that it would be important to undertake further work regarding the final location of the preferred scheme. This included additional work on air quality, noise, carbon, and mitigating impacts on affected local communities.

1.10 On 25 October 2016 the Government announced that a Northwest Runway at Heathrow Airport, combined with a significant package of supporting measures, was its preferred scheme to deliver additional airport capacity in the South East of England. It also confirmed that this would be included in a draft Airports NPS, to be the subject of consultation according to the procedures laid down in the Planning Act 2008.[12]

1.11 The draft Airports NPS and supporting Appraisal of Sustainability were published on 2 February 2017 and a 16 week public consultation was launched. On publishing the draft Airports NPS, the Government made a commitment to continue updating its evidence base on airport capacity, including revised passenger demand forecasts and the impact of the publication of the final Air Quality Plan (the UK plan for tackling roadside nitrogen dioxide concentrations). On 24 October 2017, the Government published and conducted an 8 week public consultation on a revised draft Airports NPS and other documents which were published alongside it. The revisions were made on the basis of changes to the evidence base and as a result of initial consideration of the responses to the February consultation and other broader government policy changes. Having considered the responses to both the February and October consultations, and the report published by the Transport Committee on 23 March 2018, the Government has made some further changes, principally to provide greater clarity and reflect updates to wider Government policies.

[8] *Airports Commission: Interim Report*, paragraph 5.2
[9] *Airports Commission: Final Report*, paragraph 16.40
[10] https://www.gov.uk/government/speeches/aviation-capacity
[11] Throughout this document, unless specified otherwise, the term "NPS" refers to the Airports NPS. Other NPSs, for example the National Networks NPS, are referred to in full as required
[12] https://www.gov.uk/government/speeches/airport-capacity

Purpose and scope of the Airports NPS

1.12 The Airports NPS provides the primary basis for decision making on development consent applications for a Northwest Runway at Heathrow Airport, and will be an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England. Other NPSs may also be relevant to decisions on airport capacity in this geographical area.

1.13 The Airports NPS sets out:

- The Government's policy on the need for new airport capacity in the South East of England;
- The Government's preferred location and scheme to deliver new capacity; and
- Particular considerations relevant to a development consent application to which the Airports NPS relates.

1.14 It sets out planning policy in relation to applications for any airport nationally significant infrastructure project in the South East of England, and its policies will be important and relevant for the examination by the Examining Authority, and decisions by the Secretary of State, in relation to such applications.

1.15 In particular, the Secretary of State will use the Airports NPS as the primary basis for making decisions on any development consent application for a new Northwest Runway at Heathrow Airport, which is the Government's preferred scheme. The policies in the Airports NPS will have effect in relation to the Government's preferred scheme, having a runway length of at least 3,500m and enabling at least 260,000 additional air transport movements per annum.[13] It will also have effect in relation to terminal infrastructure associated with the Heathrow Northwest Runway scheme and the reconfiguration of terminal facilities in the area between the two existing runways at Heathrow Airport. For the avoidance of doubt, the Airports NPS does not identify any statutory undertaker as the appropriate person or appropriate persons to carry out the preferred scheme.

1.16 It is possible that an applicant for development consent in respect of the preferred scheme will promote more than one application for development consent, dealing with different components individually. To the extent that this is the case, the Secretary of State will apply the Airports NPS to such applications to the extent that he or she determines to be appropriate in the circumstances.

1.17 For a scheme to be compliant with the Airports NPS, the Secretary of State would expect to see these elements comprised in its design, and their implementation and delivery secured, particularly with regard to runway length and increased capacity of air transport movements. Other NPSs may also be relevant to decisions on nationally significant infrastructure projects at airports but, if there is conflict between the Airports NPS and other NPSs, the conflict should be resolved in favour of the NPS that has been most recently designated.

1.18 Under section 104 of the Planning Act 2008, the Secretary of State must decide any application in accordance with any relevant NPS unless he or she is satisfied that to do so would:

[13] The Airports NPS stipulates the length of the new runway to ensure that the new infrastructure can accommodate the largest commercial aircraft, as they operate many of the long haul flights that support the UK's position as a major aviation hub

- Lead to the UK being in breach of its international obligations;
- Be unlawful;
- Lead to the Secretary of State being in breach of any duty imposed by or under any legislation;
- Result in adverse impacts of the development outweighing its benefits; or
- Be contrary to legislation about how the decisions are to be taken.[14]

1.19 The Airports NPS refers in some places to other relevant documents. These other documents may be replaced, updated or amended over the lifetime of the Airports NPS, and so successor documents should be referred to when this is the case.

1.20 Unlike the regime for the granting of planning permission under the Town and Country Planning Act 1990, there is no provision in the Planning Act 2008 for the making of an 'outline' application for development consent, followed by 'reserved matters' approval. This does not mean, however, that development cannot be phased, so that particular parts are brought forward at different times, or that the details of a proposal cannot be reserved for determination later. Guidance by the Ministry of Housing, Communities and Local Government recognises that development projects advanced through the development consent order process may be phased, but emphasises that every phase of the project contained in a development consent application must be considered in the application for the order and the order itself.[15]

Duration

1.21 The Airports NPS covers development that is anticipated to be required by 2030 as well as other development required to support it. It will remain in place until it is withdrawn, amended or replaced. It will be reviewed, in accordance with the Planning Act 2008, when the Secretary of State considers it appropriate to do so. When considering whether to review the Airports NPS, the Secretary of State will look at whether there has been a significant change in any circumstances on which the policy was based and whether such change was anticipated when the Airports NPS was designated.

Territorial extent

1.22 The Airports NPS covers England only. Some aspects of aviation noise policy are devolved but others are reserved.[16]

1.23 Aviation policy is largely a reserved matter, though planning policy is not. Specifically:

- The National Assembly for Wales has devolved powers relating to airports in terms of land use planning and surface access policy;
- The Scottish Parliament has competence for planning in Scotland, and some powers in relation to aerodromes are also devolved to the Scottish Parliament; and
- The Northern Ireland Executive and Assembly have devolved powers relating to airports in terms of regional land use planning, surface access policy and funding,

[14] Planning Act 2008, section 104 – decisions in cases where an NPS has effect
[15] https://www.gov.uk/government/publications/guidance-on-the-pre-application-process-for-major-infrastructure-projects
[16] For the avoidance of doubt, references to matters which are "reserved" in this section refer to those matters of legislative responsibility reserved to the Westminster Parliament under the UK's devolution arrangements

and environmental policy. The Northern Ireland Executive also has responsibility for airport economic regulation, has powers over land in relation to aviation safety, has the ability to grant aid for airports infrastructure, and may exercise certain controls relating to the management of airports.

European Union

1.24 On 29 March 2017 the Government formally notified the European Council of its intention to withdraw from the European Union, as provided for under Article 50 of the Treaty on European Union. Until the UK has left the EU, it remains a full Member of the European Union and all the rights and obligations of EU membership remain in force. Therefore, for the time being, European Union legislation applies to the development of this policy and to decision making in relation to the preferred scheme.

1.25 The UK and EU negotiating teams reached agreement in March 2018 on the terms of a transition or implementation period that will start on 30 March 2019, when the UK formally ceases to be a member of the EU, and last until 31 December 2020. The agreed text states that "Union law shall be applicable to and in the United Kingdom during the transition period". The limited exceptions to this are set out in the published text.

1.26 The Government has also introduced legislation to ensure that the UK exits the EU with maximum certainty and continuity. The EU Withdrawal Bill ends the supremacy of European Union (EU) law in UK law and converts EU law as it stands at the moment of exit into domestic law. The same rules and laws will apply on the day after exit as on the day before. It will then be for democratically elected representatives in the UK to decide on any changes to that law, after full scrutiny and proper debate.

Appraisal of Sustainability

1.27 An Appraisal of Sustainability is required by the Planning Act 2008 in relation to any NPS. An Appraisal of Sustainability, which describes the analysis of reasonable alternatives to the preferred scheme, has been carried out to inform the Airports NPS. The Appraisal of Sustainability informs the development of the Airports NPS by assessing the potential economic, social and environmental impacts of options to increase airport capacity.

1.28 The Appraisal of Sustainability also incorporates a strategic environmental assessment (pursuant to Directive 2001/42/EC as transposed by SI 2004/1633).[17] The Appraisal of Sustainability was published alongside the Airports NPS.

1.29 The overall conclusions of the Appraisal of Sustainability show that (provided any scheme remains within the parameters and boundaries in this policy), whilst there will be inevitable harm caused by a new Northwest Runway at Heathrow Airport in relation to some topics, the need for such a scheme, the obligation to mitigate such harm as far as possible, and the benefits that such a scheme will deliver, outweigh such harm. However, this is subject to the assessment of the effects of the preferred scheme, identification of suitable mitigation, and measures to secure and deliver the relevant mitigation.

[17] Directive 2001/42/EC of the European Parliament and of the Council on the assessment of the effects of certain plans and programmes on the environment

1.30 The preferred scheme has been subject to further refinement by Heathrow Airport since the conclusion of the work of the Airports Commission. These refinements were not captured within the Airports Commission's appraisals and are not expected to significantly alter the key appraisal findings. The Government expects any applicant to carry out a further and more detailed study, and to secure appropriate mitigation measures, ahead of seeking development consent.

Habitats Regulations Assessment

1.31 The Airports NPS has also been assessed under the Habitats and Wild Birds Directive and Regulations.[18] A Habitats Regulations Assessment has been undertaken at a strategic level, and was published alongside the Airports NPS.

1.32 The strategic level Habitats Regulations Assessment, conducted in accordance with the Conservation of Habitats and Species Regulations 2010,[19] concluded that the potential for the preferred scheme to have adverse effects on the integrity of European sites for the purposes of Article 6(3) of the Habitats Directive could not be ruled out. This is because more detailed project design information and detailed proposals for mitigation are not presently available and inherent uncertainties exist at this stage. The Airports NPS has thus been considered in accordance with Article 6(4) of the Habitats Directive. Consideration has been given to alternative solutions to the preferred scheme, and the conclusion has been reached that there are no alternatives that would deliver the objectives of the Airports NPS in relation to increasing airport capacity in the South East and maintaining the UK's hub status. In line with Article 6(4) of the Directive, the Government considers that meeting the overall needs case for increased capacity and maintaining the UK's hub status, as set out in chapter two, amount to imperative reasons of overriding public interest supporting its rationale for the designation of the Airports NPS. At detailed design stage, and in so far as it may be necessary, the matters set out in the Airports NPS will be relevant to determining whether there are alternative solutions and imperative reasons of overriding public interest, provided that the design remains consistent with the objectives of the Airports NPS.

1.33 Any development brought forward through an Airports NPS that was likely to have a significant effect on a European site, either alone or in combination with other plans or projects, would be subject to a project-level Habitats Regulations Assessment at the detailed design stage. If it could not be concluded that there would be no adverse effects on site integrity, the project would not receive development consent on this basis, unless (a) there were no alternative solutions, (b) there were imperative reasons of overriding public interest in support, and (c) the necessary compensatory measures to protect the site were secured.

Equality Assessment

1.34 The Airports NPS has been informed by an Equality Assessment, which was published alongside the Airports NPS.

1.35 Under the Equality Act 2010, public bodies have a statutory duty to ensure race, disability and equality are considered in the exercise of their functions. The Equality

[18] Council Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna; and Directive 2009/147/EC of the European Parliament and of the Council on the conservation of wild birds

[19] http://www.legislation.gov.uk/uksi/2010/490/contents/made Since the revised draft Airports National Policy Statement was published, the Conservation of Habitats and Species Regulations 2017 have come into force

Assessment considered the potential equalities implications of airport expansion, including the effect on persons or groups of persons who share certain characteristics protected by the Equality Act 2010. The Equality Assessment concludes that all of the shortlisted schemes will have effects on these groups, but that such effects can be managed and can ultimately be within appropriate limits. The Airports NPS requires that final impacts on affected groups should be the subject of a detailed review, carefully designed through engagement with the local community, and approved by the Secretary of State. It should be possible to fully or partially mitigate negative equalities impacts through good design, operations and mitigation plans.

Health Impact Analysis

1.36 The Airports NPS has been subject to a Health Impact Analysis, which was published alongside the Airports NPS.

1.37 The Health Impact Analysis identified impacts which would affect the population's health, including noise, air quality and socio-economic impacts. In order to be compliant with the Airports NPS, a further project level Health Impact Assessment is required. The application should include and propose health mitigation, which seeks to maximise the health benefits of the scheme and mitigate any negative health impacts.

Relationship between the Airports NPS and the Aviation Policy Framework

1.38 The Airports NPS sets out Government policy on expanding airport capacity in the South East of England, in particular by developing a Northwest Runway at Heathrow Airport. Any application for a new Northwest Runway development at Heathrow will be considered under the Airports NPS. Other Government policy on airport capacity has been set out in the Aviation Policy Framework, published in 2013.[20] The Airports NPS does not affect Government policy on wider aviation issues, for which the 2013 Aviation Policy Framework and any subsequent policy statements still apply.[21]

1.39 On 21 July 2017, the Government issued a call for evidence on a new Aviation Strategy.[22] Having analysed the responses, the Government has confirmed that it is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have positive and negative impacts, including on noise levels. We consider that any proposals should be judged on their individual merits by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts.

[20] https://www.gov.uk/government/publications/aviation-policy-framework
[21] This includes changes to the UK airspace policy published in the Government's response to the consultation, *UK Airspace policy: a framework for balanced decisions on the design and use of airspace*
[22] *Beyond the Horizon: The Future of Aviation* https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/636625/aviation-strategy-call-for-evidence.pdf - see paragraphs 7.19 to 7.21

Development covered by the Airports NPS

1.40 The Airports NPS has effect in relation to the delivery of additional airport capacity through the provision of a Northwest Runway at Heathrow Airport. It also applies to proposals for new terminal capacity located between the new Northwest Runway and the existing Northern Runway at Heathrow Airport, as well as the reconfiguration of terminal facilities in the area between the two existing runways at Heathrow Airport. Each of these elements is also capable of constituting a nationally significant infrastructure project.

1.41 The Airports NPS does not have effect in relation to an application for development consent for an airport development not comprised in an application relating to the Heathrow Northwest Runway, and proposals for new terminal capacity located between the Northwest Runway at Heathrow Airport and the existing Northern Runway and reconfiguration of terminal facilities between the two existing runways at Heathrow Airport. Nevertheless, the Secretary of State considers that the contents of the Airports NPS will be both important and relevant considerations in the determination of such an application, particularly where it relates to London or the South East of England. Among the considerations that will be important and relevant are the findings in the Airports NPS as to the need for new airport capacity and that the preferred scheme is the most appropriate means of meeting that need.

1.42 As indicated in paragraph 1.39 above, airports wishing to make more intensive use of existing runways will still need to submit an application for planning permission or development consent to the relevant authority, which should be judged on the application's individual merits. However, in light of the findings of the Airports Commission on the need for more intensive use of existing infrastructure as described at paragraph 1.6 above, the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow. As indicated in paragraph 1.39 above, the Government's policy on this issue will continue to be considered in the context of developing a new Aviation Strategy.

2. The need for additional airport capacity

The importance of aviation to the UK economy

2.1 International connectivity, underpinned by strong airports and airlines, is important to the success of the UK economy. It is essential to allow domestic and foreign companies to access existing and new markets, and to help deliver trade and investment, linking us to valuable international markets and ensuring that the UK is open for business. It facilitates trade in goods and services, enables the movement of workers and tourists, and drives business innovation and investment, being particularly important for many of the fastest growing sectors of the economy.

2.2 International connectivity attracts businesses to cluster round airports, and helps to improve the productivity of the wider UK economy. Large and small UK businesses rely on air travel, while our airports are the primary gateway for vital time-sensitive freight services. Air travel also allows us ever greater freedom to travel and visit family and friends across the globe, and brings millions of people to the UK to do business or enjoy the best the country has to offer.

2.3 The UK benefits from a strong and substantially privatised airport sector, with a regulatory system that supports growth while ensuring the interests of passengers are at its heart. The Government believes that this is the right approach for the airport sector, but that Government has an important role to play in strategic decisions like planning future airport capacity.

2.4 The UK has the third largest aviation network in the world after the USA and China,[23] and London's airports serve more routes than any other European city.[24] The UK's airports handled over 268 million passengers in 2016, a 6.7% increase from the previous year.[25] The sector benefits the UK economy through its direct contribution to GDP and employment, and by facilitating trade and investment, manufacturing supply chains, skills development, and tourism.

2.5 In 2014 the UK aviation sector generated around £20 billion[26] of economic output, and directly employed around 230,000 workers,[27] supporting many more jobs indirectly. The UK has the second largest aircraft manufacturing industry in the world after the USA, and will benefit economically from growth in employment and exports from future aviation growth.[28] Air Passenger Duty remains an important contributor to Government revenue, raising over £3 billion in2015/16.[29] Heathrow Airport directly supports around 75,000 jobs on site.[30]

[23] *The Global Competitiveness Report 2014-2015*, World Economic Forum, 2015, based on available airline seat kilometres
[24] *Airports Commission: Final Report*, p55
[25] https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-Airport-data/Airport-data-2016/
[26] ONS, Input-Output Supply and Use tables, 2014
[27] ONS, Business Register and Employment Survey, 2014
[28] UK Aerospace Industry Survey, Aerospace, Defence, Security Trade Association, 2010
[29] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/691309/Feb18_Receipts_NS_Bulletin_Final.pdf
[30] https://www.heathrowexpansion.com/local-community/local-benefits/

2.6 Businesses from across the UK utilise our aviation network to access markets worldwide. The UK's strong services sector, which provides significant export earnings for the country, is particularly reliant on aviation. The sector includes, among others, financial services, insurance, creative industries, education, and health – all of which rely on face-to-face engagement with customers for success.

2.7 Air freight is also important to the UK economy. Although only a small proportion of UK trade by weight is carried by air, it is particularly important for supporting export-led growth in sectors where goods are of high value or time critical. Heathrow Airport is the UK's biggest freight port by value.[31] Over £178 billion of air freight was sent between UK and non-European Union countries in 2016, representing over 45% of the UK's extra-European Union trade by value.[32] This is especially important in the advanced manufacturing sector, where air freight is a key element of the time-critical supply chain. By 2030, advanced manufacturing industries such as pharmaceuticals or chemicals, whose components and products are predominantly moved by air, are expected to be among the top five UK export markets by their share of value.[33] In the future, UK manufacturing competitiveness and a successful and diverse UK economy will drive the need for quicker air freight.

2.8 Aviation also brings many wider benefits to society and individuals, including travel for leisure and visiting family and friends. This drives further economic activity. In 2013, for example, the direct gross value added of the tourism sector, one of the important beneficiaries of a strong UK aviation sector, was £59 billion.[34] Likewise, 2015 saw the value of inbound tourism rise to over £22 billion,[35] with the wider UK tourism industry forecast to grow significantly over the coming decades.

2.9 The importance of aviation to the UK economy, and in particular the UK's hub status, has only increased following the country's decision to leave the European Union. As the UK develops its new trading relationships with the rest of the world, it will be essential that increased airport capacity is delivered, in particular to support development of long haul routes to and from the UK, especially to emerging and developing economies.

The need for new airport capacity

2.10 However, challenges exist in the UK's aviation sector, stemming in particular from capacity constraints. These constraints are affecting our ability to travel conveniently and to a broader range of destinations than in the past. They create negative impacts on the UK through increased risk of flight delays and unreliability, restricted scope for competition and lower fares, declining domestic connectivity, erosion of the UK's hub status[36] relative to foreign competitors, and constraining the scope of the aviation sector to deliver wider economic benefits.

2.11 The UK now faces a significant capacity challenge. Heathrow Airport is currently the busiest two-runway airport in the world, while Gatwick Airport is the busiest single runway airport in the world. London's airports are filling up fast, and will all be full by the mid-2030s if we do not take action now.[37]

[31] https://www.uktradeinfo.com/Statistics/BuildYourOwnTables/Pages/Home.aspx
[32] https://www.uktradeinfo.com/Statistics/Pages/Statistics.aspx
[33] HSBC Trade Forecast Tool, Accessed 2015
[34] Estimates of the Economic Importance of Tourism 2008-2013, Office for National Statistics, December 2014
[35] https://www.visitbritain.org/2015-snapshot. This figure represents tourism by all modes of transport. The equivalent figure for inbound tourists by air is £19 billion in 2015
[36] Defined as the frequency of flights and the density of a route network
[37] *Updated Appraisal Report*, p11

2.12 Aviation demand is likely to increase significantly between now and 2050.[38] All major airports in the South East of England[39] are expected to be full by the mid-2030s, with four out of five full by the mid-2020s. By 2050 demand at these airports is expected to outstrip capacity by at least 34%, even on the department's low demand forecast.[40] There is relatively little scope to redistribute demand away from the region to less heavily utilised capacity elsewhere in the country.[41]

2.13 The UK's hub status, stemming from the convenience and variety of its direct connections across the world, is already being challenged by restricted connectivity.[42] Hub airports at Paris, Frankfurt and Amsterdam have spare capacity and are able to attract new flights to growth markets in China and South America.[43] These competitors have benefited from the capacity constraints at Heathrow Airport, and have seen faster growth over the past few years. The UK's airports also face growing competition from hubs in the Middle East like Dubai, Abu Dhabi, Doha and Istanbul. Heathrow Airport was overtaken by Dubai in 2015 as the world's busiest international passenger airport.[44]

2.14 The consequences of not increasing airport capacity in the South East of England – the 'do nothing' or 'do minimum scenarios' – are detrimental to the UK economy and the UK's hub status. International connectivity will be restricted as capacity restrictions mean airlines prioritise their routes, seeking to maximise their profits. Capacity constraints therefore lead to trade-offs in destinations, and while there is scope to respond to changing demand patterns, this necessarily comes at the expense of other connections. Domestic connectivity into the largest London airports will also decline as competition for slots encourages airlines to prioritise more profitable routes.

2.15 Operating existing capacity at its limits means there will be little resilience to unforeseen disruptions, leading to delays. Fares are likely to rise as demand outstrips supply, and the lack of available slots makes it more difficult for new competitors to enter the market.

2.16 The Government believes that not increasing capacity will impose costs on passengers and on the wider economy. The Airports Commission estimated that direct negative impacts to passengers, such as fare increases and delays, would range from £21 billion to £23 billion over 60 years.[45] Without expansion, capacity constraints would impose increasing costs on the rest of the economy over time, lowering economic output by making aviation more expensive and less convenient to use, with knock-on effects in lost trade, tourism and foreign direct investment.

2.17 It is very challenging to put a precise figure on these impacts, but using alternative approaches the Airports Commission estimated these costs to be between £30 billion and £45 billion over 60 years.[46] The Airports Commission urged caution interpreting these figures, which overlap with the direct passenger costs reported above and so are not wholly additional. But they do illustrate that not increasing airport capacity carries real economic costs to the whole economy beyond aviation passengers. Having reviewed this further, the Government accepts this analysis and considers that

[38] *Updated Appraisal Report*, p8
[39] Defined as Gatwick, Heathrow, London City, Luton and Stansted
[40] *Updated Appraisal Report*, p11
[41] *Airports Commission: Interim Report*, pp117-126
[42] For more analysis on the UK's hub status, see *Airports Commission: Interim Report*, pp90-92
[43] *Airports Commission: Final Report*, p249
[44] http://www.aci.aero/News/Releases/Most-Recent/2016/09/09/Airports-Council-International-releases-2015-World-Airport-Traffic-Report-The-busiest-become-busier-the-year-of-the-international-hub-airport
[45] *Airports Commission: Final Report*, p81; present value over 60 years
[46] *Airports Commission: Final Report*, p81

recent demand growth in the South East suggests an even greater possible cost if expansion is not undertaken.[47]

2.18 The Government also acknowledges the local and national environmental impacts of airports and aviation, for example noise and emissions, and believes that capacity expansion should take place in a way that satisfactorily mitigates these impacts wherever possible. Expansion must be deliverable within national targets on greenhouse gas emissions and in accordance with legal obligations on air quality.

The Airports Commission

2.19 To address these issues, in September 2012, the Coalition Government established the independent Airports Commission, led by Sir Howard Davies. The Airports Commission had two objectives:

- To produce an Interim Report, setting out the nature, scale and timing of steps needed to maintain the UK's global hub status alongside recommendations for making better use of the UK's existing runway capacity over the next five years; and
- To produce a Final Report, setting out recommendations on how to meet any need for additional airport capacity in the longer term.[48]

2.20 The Airports Commission was asked to take appropriate account of the national, regional and local implications of any expansion. As well as seven discussion papers and an appraisal framework, the Airports Commission delivered its recommendations to Government in its Interim Report in December 2013 and its Final Report in July 2015. It also published a summary and decision paper in September 2014 on whether to add an inner Thames Estuary airport proposal to a shortlist for further appraisal.[49]

Alternatives to additional runway capacity

2.21 The Airports Commission explored potential alternatives to additional runway capacity, which included:

- Doing nothing;
- A 'do minimum' set of alternatives with very limited provision for additional capacity;
- Redistribution methods, for example changing the rate of Air Passenger Duty, changing slot allocation regimes, traffic distribution rules, and prohibiting certain types of flights;
- Investment in high speed rail and improved surface access options; and
- New technologies.[50]

2.22 The Airports Commission found that none of these options delivered a sufficient increase in capacity, and that many required investment far in excess of the cost of runway expansion. However, the Airports Commission did note that the need to make best use of existing infrastructure would remain.[51]

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[47] *Updated Appraisal Report*, p11
[48] https://www.gov.uk/government/organisations/airports-commission/about/terms-of-reference
[49] https://www.gov.uk/government/publications/inner-thames-estuary-airport-summary-and-decision
[50] *Airports Commission: Final Report*, p84
[51] *Airports Commission: Final Report*, paragraph 16.1 and 16.40

The Airports Commission's shortlisting process

2.23 The Airports Commission consulted widely on its appraisal framework, which contained its criteria for sifting proposed schemes,[52] and the Government is satisfied that the appraisal framework was appropriate. The Airports Commission received 52 proposals, with three options developed by the Airports Commission itself. The Airports Commission took advice from a number of relevant stakeholders, including NATS Holdings, the Civil Aviation Authority, Network Rail, and the Highways Agency (as it then was). The Government believes that the Airports Commission has analysed all the options put forward to the appropriate degree of detail, and discounted non-shortlisted schemes fairly and objectively according to the sift criteria. The Government does not consider that any of the non-shortlisted schemes represents a reasonable alternative to its preferred scheme.

2.24 The three shortlisted schemes were:

- Gatwick Second Runway scheme;
- Heathrow Northwest Runway scheme (which the Airports Commission recommended and is the Government's preferred scheme); and
- Heathrow Extended Northern Runway scheme.

2.25 The Government has made clear in its announcement of 14 December 2015 that it agrees with the Airports Commission's three shortlisted schemes for expansion, and has taken forward its further work on this basis. As set out at paragraph 1.40 of this document, the Airports NPS will only have effect in relation to a scheme located at Heathrow Airport for the provision of a Northwest Runway, and not the other shortlisted schemes.

The Airports Commission's conclusions

2.26 In its Interim Report in December 2013,[53] the Airports Commission concluded that there was a need for one additional runway to be in operation in the South East of England by 2030. It also set in train a period of further consultation on three shortlisted schemes (Gatwick Second Runway scheme, Heathrow Northwest Runway scheme, and Heathrow Extended Northern Runway scheme), as well as the option of a new airport in the inner Thames Estuary. In September 2014, the Airports Commission concluded that a new airport in the inner Thames Estuary did not perform sufficiently well to warrant consideration alongside the three schemes that it decided to shortlist.

2.27 In its Final Report in July 2015, the Airports Commission concluded that the proposed Northwest Runway at Heathrow Airport presented the strongest case for expansion and would offer the greatest strategic and economic benefits to the UK. A copy of the illustrative Heathrow Northwest Runway scheme masterplan is included at Annex B. The Airports Commission also made clear that expansion would have to involve a significant package of supporting measures to address the environmental and community impacts of the new runway.

2.28 The Commission's remit also required it to look at how to make best use of existing airport infrastructure, before new capacity becomes operational.[54] The Commission noted in its final report that a new runway will not open for at least 10 years. It

[52] https://www.gov.uk/government/publications/sift-criteria-for-long-term-capacity-options-at-uk-airports
[53] *Airports Commission: Interim Report*, p11
[54] *Airports Commission: Interim Report*, paragraph 5.2

therefore considered it imperative that the UK continues to grow its domestic and international connectivity in this period, which it considered would require more intensive use of existing airports other than Heathrow and Gatwick.[55]

The Government's work

2.29 The Government has reviewed the Airports Commission's work and the representations Government has received on the issue of airport capacity, and is confident that the Airports Commission's arguments and reasoning are clear and thorough.

2.30 The Airports Commission undertook an extensive appraisal over two and a half years, consulting widely and analysing all the evidence before making its final recommendations. Since then, the Government has reviewed the Airports Commission's work and concluded that its evidence base on the case for expansion and its use of this evidence are both sound.[56] This has given the Government the assurance required to use the evidence to inform its further work, which is set out in more detail later. The Government has therefore considered the Airports Commission data in great depth and also carried out its own further work, all of which informs the Airports NPS.

2.31 In coming to these decisions, the Government has fully considered the Airports Commission's Interim and Final Reports, as well as the inner Thames Estuary summary and decision paper. The Government also received a range of information from a variety of stakeholders in response to those reports, which was taken into account by the Government in reaching its preference.

2.32 Having reviewed the work of the Airports Commission and considered the evidence put forward on the issue of airport capacity, the Government believes that there is clear and strong evidence that there is a need to increase capacity in the South East of England by 2030 by constructing one new runway. The Government also agrees with the Airports Commission that this can be delivered within the UK's obligations under the Climate Change Act 2008.[57] The Government considers that following the country's decision to leave the European Union the country will increasingly look beyond Europe to the rest of the world, and so the importance of maintaining the UK's hub status, and in that context long haul connectivity in particular, has only increased.

2.33 The next chapter of the Airports NPS sets out how the Government has identified the most effective and appropriate way to address the overall need for increased airport capacity, and maintain the UK's hub status, while meeting air quality and carbon obligations and identifies that the Northwest Runway at Heathrow is the Government's preferred scheme.

[55] *Airports Commission: Final Report*, paragraph 16.40
[56] https://www.gov.uk/government/publications/airport-expansion-further-review-and-sensitivities-report
[57] https://www.gov.uk/government/publications/airport-expansion-dft-review-of-the-airports-commissions-final-report *Review of the Airports Commission Final Report*, p19

3. The Government's preferred scheme: Heathrow Northwest Runway

Overview

3.1 While the previous chapter of the Airports NPS sets out the Government's underlying policy and evidence on the need to expand airport capacity in the South East of England, this chapter sets out why the Government has stated its preference for the Heathrow Northwest Runway scheme.

3.2 As set out in the previous chapter, the Airports Commission undertook a detailed shortlisting process, which resulted in three shortlisted schemes being considered by the Government for additional airport capacity:

- Gatwick Second Runway scheme;
- Heathrow Northwest Runway scheme (which the Airports Commission recommended and is the Government's preferred scheme);
- Heathrow Extended Northern Runway scheme.

3.3 The Government accepted the Airports Commission's three shortlisted schemes on 14 December 2015, agreeing with the Airports Commission's conclusion that one new runway in the South East of England by 2030 would be required to meet the need for additional capacity.

3.4 Following the publication of the Airports Commission's Final Report, the Government undertook further work on:

- Air quality;
- Noise;
- Carbon emissions; and
- Impacts on local communities.

3.5 The Government has carried out additional sensitivities, which show the worst case scenarios on noise, carbon and the economy, within the Appraisal of Sustainability.

3.6 The work on air quality, which demonstrated that expansion (with mitigation) is capable of taking place within legal limits, is outlined in the Government's air quality re-analysis[58] and the Appraisal of Sustainability. Both documents contain a worst case scenario.

3.7 The Government agrees with the Airports Commission's assessment that a new runway is deliverable within the UK's climate change obligations.[59]

[58] https://www.gov.uk/government/publications/airport-expansion-further-updated-air-quality-re-analysis
[59] https://www.gov.uk/government/publications/airport-expansion-dft-review-of-the-airports-commissions-final-report *Review of the Airports Commission Final Report*, p19

3.8 Following engagement with all three shortlisted scheme promoters, the Government has recommended a package of community supporting measures.

3.9 The Government also carried out additional work in relation to surface access, and further economic analysis. This work has allowed the Government to consider carefully the effectiveness of each of the three schemes to meet the need for additional capacity.

3.10 The detailed results of this work can be found in a number of reports published by the Government on 25 October 2016:

- A formal review by the Department for Transport of the Airports Commission's Final Report;[60]
- An air quality re-analysis to test the Airports Commission's work against the Government's air quality plan;[61]
- A further review of the Airports Commission's analytical approach, providing greater assurance in those areas where needed;[62]
- A comparison of the originally shortlisted schemes' compensation packages against other expansion projects around the world;[63]
- An assurance report by Highways England on the schemes' road surface access proposals;[64] and
- A non-binding statement of principles between Heathrow Airport and the Secretary of State for Transport on the Heathrow Northwest Runway scheme.[65]

3.11 On 25 October 2016, the Government announced that its preferred scheme to meet the need for new airport capacity in the South East of England was a Northwest Runway at Heathrow Airport.[66] It also confirmed that this would be included in a draft Airports NPS, which would be subject to consultation in accordance with the procedures laid down in the Planning Act 2008.

3.12 The draft Airports NPS and supporting Appraisal of Sustainability were published on 2 February 2017 and a 16 week public consultation was launched. On publishing the draft Airports NPS, the Government made a commitment to continue updating its evidence base on airport capacity, including revised passenger demand forecasts and the impact of the publication of the final Air Quality Plan (the UK plan for tackling roadside nitrogen dioxide concentrations). On 24 October 2017, the Government published and conducted an 8 week public consultation on a revised draft Airports NPS and other documents which were published alongside it. The revisions were made on the basis of changes to the evidence base and as a result of initial consideration of the responses to the February consultation and other broader government policy changes. Having considered the responses to both the February and October consultations, and the report published by the Transport Committee on 23 March 2018, the Government has made some further changes, principally to provide greater clarity and reflect updates to wider Government policies. The Government believes that the Heathrow Northwest Runway scheme, of all the three shortlisted schemes, is the most effective and most appropriate way of meeting the

[60] https://www.gov.uk/government/publications/airport-expansion-dft-review-of-the-airports-commissions-final-report
[61] https://www.gov.uk/government/publications/airport-expansion-further-analysis-of-air-quality-data
[62] https://www.gov.uk/government/publications/airport-expansion-further-review-and-sensitivities-report
[63] https://www.gov.uk/government/publications/airport-expansion-global-comparison-of-airport-mitigation-measures
[64] https://www.gov.uk/government/publications/airport-expansion-highways-england-assurance-report
[65] https://www.gov.uk/government/publications/heathrow-airport-limited-statement-of-principles
[66] https://www.gov.uk/government/speeches/airport-capacity

needs case set out in chapter 2. As such, the Government has also concluded that the other shortlisted schemes do not represent true alternatives to the preferred scheme.

3.13 The remainder of this chapter is broken down into two distinct sections. The first section focuses on why the Government prefers the Heathrow Northwest Runway Scheme to the Gatwick Second Runway scheme in terms of delivering additional airport capacity by 2030. The second section focuses on why the Government prefers the Heathrow Northwest Runway scheme to the Heathrow Extended Northern Runway scheme.

3.14 Increasing airport capacity in the South East of England and maintaining the UK's hub status can be expected to result in both positive and negative impacts, as would be the case for any major infrastructure project. Important positive impacts are expected to include better international connectivity and providing benefits to passengers and the UK economy as a whole (for example for the freight industry). The negative impacts are expected to include environmental impacts, for example on air quality and affected local communities.

3.15 In its considerations on a preferred scheme, the Government has fully taken into account the work of the Airports Commission, information provided by a variety of stakeholders, and the results of the Government's further work outlined in paragraphs 3.4-3.10 above. As set out below, the Government has considered the positive and negative effects from each of the three shortlisted schemes, and reached its conclusion by weighing these expected effects, along with considering how positive effects can be enhanced and negative effects mitigated.

Heathrow Northwest Runway and Gatwick Second Runway

3.16 In identifying the preferred scheme, a wide range of factors has been taken into account, including:

- International connectivity and strategic benefits;
- Passenger and wider economic benefits;
- Domestic connectivity and regional impacts;
- Surface access links;
- Views of airlines, regional airports and the business community;
- Financeability;
- Deliverability; and
- Local environmental impacts.

3.17 While the Government acknowledges the differences between the three shortlisted schemes, carbon impacts (unlike the factors above) have not been considered as a differentiating factor between schemes due to the Airports Commission's overarching assessment that all three are deliverable within the UK's climate change obligations.

International connectivity and strategic benefits, including freight

3.18 Heathrow Airport is best placed to address this need by providing the biggest boost to the UK's international connectivity. Heathrow Airport is one of the world's major hub airports, serving around 180 destinations worldwide with at least a weekly service,

including a diverse network of onward flights across the UK and Europe.[67] Building on this base, expansion at Heathrow Airport will mean it will continue to attract a growing number of transfer passengers, providing the added demand to make more routes viable. In particular, this is expected to lead to more long haul flights and connections to fast-growing economies, helping to secure the UK's status as a global aviation hub, and enabling it to play a crucial role in the global economy.

3.19 By contrast, expansion at Gatwick Airport would not enhance, and would consequently threaten, the UK's global aviation hub status. Gatwick Airport would largely remain a point to point airport, attracting very few transfer passengers. Heathrow Airport would continue to be constrained, outcompeted by competitor hubs which lure away transfer passengers, further weakening the range and frequency of viable routes. At the UK level, there would be significantly fewer long haul flights in comparison to the preferred scheme, with long haul destinations served less frequently. Expansion at Heathrow Airport is the better option to ensure the number of services on existing routes increases and allows airlines to offer more frequent new routes to vital emerging markets.

3.20 This was demonstrated by the forecasts produced by the Airports Commission, and continues to be found in the department's 2017 forecasts.[68] Compared to no expansion, the Government estimate that a Northwest Runway at Heathrow Airport by 2040 would result in 113,000 additional flights a year across the UK as a whole (including 43,000 long haul), and 28 million additional passengers a year. By way of comparison, the Heathrow Extended Northern Runway would add 85,000 more flights and 22 million additional passengers.[69] [70]

3.21 Compared to no expansion, the Second Runway scheme at Gatwick would add 15,000 flights and 10 million passengers by 2040, across the UK as a whole, increasing to 77,000 and 23 million respectively in 2050. The Government project that 8,000 of these additional flights would be long haul in 2040, rising to 17,000 in 2050.[71] Gatwick Airport has recently been successful in securing a number of long haul routes to the USA and Canada from low cost carriers, a new market segment.

3.22 As set out above, the ease with which businesses can move staff around the globe is an important facilitator of trade and for businesses locating and remaining in the UK. The broader range and greater frequency of long haul flights at Heathrow Airport best meets this need. It would deliver benefits for UK passengers (both business and leisure) by allowing them to travel to more destinations flexibly. These benefits include the additional frequency of flights, for example connecting the UK to long haul destinations daily instead of weekly, or several times a day instead of daily. Businesses from across the UK currently take advantage of Heathrow Airport's international connections, and will continue to benefit from these following expansion. In particular, the additional capacity delivered at Heathrow Airport will support growth

[67] CAA, 2016

[68] An important uncertainty to the central estimates concerns the forecasts of future aviation demand and allocation across UK airports. The Airports Commission reflected this uncertainty using five demand scenarios, as well as two carbon policy regimes. The Department for Transport has further considered uncertainty through the use of low, central and high demand scenarios. Further uncertainty arises from the choice of individual modelling assumptions. More information on the Airports Commission's scenarios and sensitivity analysis, can be found in the *Further Review and Sensitivities Report*. More information on the department's 2017 scenarios and sensitivity analysis can be found in the Updated Appraisal Report

[69] *Updated Appraisal Report,* p14 and 17.This number includes all point to point and transfer passengers at UK airports, and refers to terminal passengers who are counted each time they land or take off at a UK airport. Further disaggregation is provided in the Updated Appraisal Report

[70] Due to the expected use of larger planes with higher load factors, the department's 2017 forecasts find smaller increases in ATMs are needed to deliver similar increases in passenger numbers. This is particularly evident for Gatwick, where load factors have increased notably over the past few years. Further information is provided in the Updated Appraisal Report

[71] *Updated Appraisal Report,* p 14 and 17

in important sectors of the UK economy, including tourism, financial services, and the creative industries.

3.23 The aviation sector can also boost the wider economy by providing more opportunities for trade through air freight. The time-sensitive air freight industry, and those industries that use air freight, benefit from greater quantity and frequency of services, especially long haul. By providing more space for cargo, lowering costs, and by the greater frequency of services, this should in turn provide a boost to trade and GDP benefits.[72]

3.24 As set out above, expansion at Heathrow Airport delivers the biggest boost in long haul flights, and the greatest benefit therefore to air freight. This is further facilitated by the existing and proposed airport development of freight facilities as part of the Northwest Runway scheme. Heathrow Airport currently has a substantial freight handling operation, around 20 times larger by tonnage[73] than that at Gatwick Airport, and accounting for 34% of the UK's non-European Union trade by value – around 170 times more than Gatwick Airport.[74] Expansion at Heathrow Airport will further strengthen the connections of firms from across the UK to international markets.

Passenger and wider economic benefits

3.25 Without expansion, passengers and other users of airports are likely to suffer from higher fares and more delays. High demand for air travel at airports with limited or no scope for increased capacity could weaken competition, allowing airlines to charge higher fares. As airports fill up and operate at full capacity, there is little resilience to deal with any disruption, leading to delays.

3.26 Expansion via the Heathrow Northwest Runway scheme is best placed to address this need. Heathrow Airport is currently the busiest two runway airport in the world, already operating at full capacity, with substantial pent up demand from passengers and airlines. Expansion at Heathrow Airport would increase the availability of services, and increase competition between airlines. This would lower fares that passengers can expect to face relative to no expansion, leading to significant benefits to business and leisure passengers and the wider economy. Crucially, the extent of the pent up demand at Heathrow Airport means that these benefits will be experienced more rapidly once the new capacity is operational, with both Heathrow schemes providing more passenger benefits by 2050 than the Gatwick Second Runway scheme, and with total benefits (not including wider trade benefits) of up to £74 billion over 60 years for the Northwest Runway scheme.[75] [76] These benefits are expected to be realised by passengers across the UK as they make use of the additional services provided by the expanded airport. Cumulative benefits delivered by a Northwest Runway scheme remain highest throughout most of the appraisal period, until the mid-2070s, although total benefits are slightly lower than would be delivered by Gatwick expansion over the full 60 year assessment.[77]

3.27 The Government also recognises the role airports can play in supporting wider economic growth in the local community. Expansion at Heathrow Airport is expected to result in larger benefits to the wider economy than expansion at Gatwick Airport. These additional benefits come from workers moving to more productive jobs around the expanded airport as well as the productivity benefits from firms who will enjoy lower aviation transport costs. Heathrow Airport already has a more developed cluster

[72] *Updated Appraisal Report*, p16
[73] https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-airport-data/Airport-data-2016/
[74] HMRC, 2016, https://www.uktradeinfo.com/Statistics/BuildYourOwnTables/Pages/Home.aspx
[75] For clarity of presentation, only the central demand scenario estimate is presented here. This value is the same for the department's carbon-traded and carbon-capped scenarios – see the Updated Appraisal Report for further details
[76] This includes passenger benefits to UK residents, non-UK residents and international-to-international interliners
[77] *Updated Appraisal Report*, p45

of businesses in its surrounding area, which should enable an even larger economic boost from expansion in the local economy.[78]

3.28 Expansion via the Heathrow Northwest Runway scheme should deliver additional jobs at the airport, through its supply chain and in the local community. The Heathrow Northwest Runway scheme is expected to generate up to 114,000 additional jobs in the local area by 2030,[79] with Heathrow Airport also pledging to provide 5,000 additional apprenticeships by this time. The number of local jobs created at an expanded Heathrow Airport is predicted to be much greater than at Gatwick Airport (up to 21,000 by 2030 and 60,000 by 2050),[80] and the jobs would also be created more quickly. The numbers are higher at Heathrow Airport because the additional capacity is forecast to be used more quickly following expansion and, importantly, because the types of services offered at an expanded Heathrow Airport are likely to be more complex, particularly with the greater number of full service airlines operating there.

3.29 Expansion brings a wide set of non-monetised benefits such as local job creation, trade, and freight benefits, which indicate a stronger case for a Heathrow scheme than for the Gatwick Second Runway scheme.[81]

Domestic connectivity

3.30 The Government recognises the importance that the nations and regions of the UK attach to domestic connectivity, particularly connections into Heathrow Airport. Airports across the UK provide a vital contribution to the economic wellbeing of the whole of the UK. Without expansion, there is a risk that, as airlines react to limited capacity, they could prioritise routes away from domestic connections. The Government therefore sees expansion at Heathrow Airport as an opportunity to not only protect and strengthen the frequency of existing domestic routes, but to secure new domestic routes to the benefit of passengers and businesses across the UK.

3.31 Passengers from across the UK are likely to benefit from the improved international connectivity provided by expansion. In 2040, 5.9 million additional passengers from outside of London and the South East are forecast to make one way international journeys[82] from Heathrow Airport. Under a Gatwick Second Runway scheme, 3.8 million additional passengers from outside London and the South East would be forecast to make one way international journeys from Gatwick Airport in 2040. By way of comparison, under a Heathrow Extended Northern Runway scheme, 4.6 million additional passengers from outside London and the South East would be forecast to make one way international journeys from Heathrow Airport in 2040. While expansion will also see some displacement of passengers from regional airports to the London system, overall regional airports are expected to continue displaying strong growth in passenger numbers by 2050.[83]

3.32 An expanded Heathrow Airport should therefore mean that more passengers from across the UK are likely to benefit from lower fares and access to important international markets from the airport.

3.33 The Government expects to see expansion at Heathrow Airport driving an increase in the number of UK airports with connections specifically into the airport. Heathrow

[78] *Updated Appraisal Report*, p27
[79] *Updated Appraisal Report*, p29
[80] *Ibid*.
[81] *Updated Appraisal Report*, p42
[82] Defined as any passenger who travels to (or from) an international destination from a region outside of London and the South East, and uses the expanded airport as part of this journey. A one-way journey is counted as either an outbound or an inbound journey. Return passengers are therefore counted twice.
[83] *Updated Appraisal Report*, p20

Airport and Gatwick Airport set out plans on domestic connectivity which they say they could deliver by 2030:

- at least 14 domestic routes for Heathrow Airport, compared to the eight routes currently in operation; and
- at least 12 domestic routes for Gatwick Airport, compared to the six currently offered.[84]

The following table provides examples of potential domestic routes:[85]

Heathrow Airport under expansion in 2030[86]	Gatwick Airport under expansion in 2030
8 domestic routes operating today (Aberdeen, Belfast City, Edinburgh, Glasgow, Inverness, Leeds Bradford, Manchester, Newcastle) **plus** Belfast International, Durham Tees Valley, Humberside, Liverpool, Newquay, Prestwick **Total: 14**	**6 domestic routes operating today** (Aberdeen, Belfast International, Edinburgh, Glasgow, Inverness, Newquay) **plus** Belfast City, Derry-Londonderry, Dundee, Leeds Bradford, Manchester, Newcastle **Total: 12**

Government expectation on domestic connectivity

3.34 The Government recognises that air routes are in the first instance a commercial decision for airlines and are not in the gift of an airport operator. But the Government is determined that new routes will be secured, and will hold Heathrow Airport to account on this. The Government requires Heathrow Airport to demonstrate it has worked constructively with its airline customers to protect and strengthen existing domestic routes, and to develop new domestic connections, including to regions currently unserved.

Surface access links

3.35 To realise the benefits of expansion, passengers and users must have good access to the airport. On this basis Heathrow Airport has the advantage, because of its more accessible location and more varied surface access links.

3.36 Heathrow Airport already has good surface transport links to the rest of the UK. It enjoys road links via the M25, M4, M40 and M3, and rail links via the London Underground Piccadilly Line, Heathrow Connect, and Heathrow Express. In the future, it will connect to Crossrail, and link to HS2 at Old Oak Common. Plans are being developed for improved rail access: the proposed Western Rail Access could link the airport to the Great Western Main Line, and Southern Rail Access could join routes to the South Western Railway network and London Waterloo Station. This varied choice of road and rail connections makes Heathrow Airport accessible to both passengers

[84] The DfT 2017 aviation forecasts do not take account of the ability of airport levers to strengthen specific routes. Domestic routes proposed by promoters are therefore not included in the updated forecasts
[85] Table excludes UK Crown Dependencies
[86] Taken from promoter plans for domestic connections at Heathrow Airport and Gatwick Airport, compared to existing domestic connections at both airports. The Government would expect Heathrow Airport's plan to be broadly equivalent for the Extended Northern Runway proposal if it was taken forward

and freight operators in much of the UK, and provides significant resilience to any disruption.

3.37 Access to Gatwick relies on the M23 and the Brighton Main Line, which means it serves London well but makes it less convenient for onward travel to the rest of the UK. It is also less resilient than Heathrow Airport. Heathrow Airport has advantages over Gatwick Airport with its greater integration into the national transport network, benefitting both passengers and freight operators. It also currently has significantly larger freight operations than Gatwick Airport, around 20 times larger in terms of total tonnage[87] and around 170 times larger in terms of value.[88]

3.38 The airport scheme promoters have pledged to meet the cost of surface access schemes required to enable a runway to open. For Gatwick Airport, this covers the full cost of the works (including the M23 and A23) needed to support expansion. The two Heathrow schemes would pay for the full cost of M25, A4 and A3044 works, as well as other local road works. They would make a contribution towards the cost of the proposed Western Rail Access and Southern Rail Access schemes. Improvements which are already underway, such as Thameslink and Crossrail, will be completed, and the Government has not assumed any change to these schemes' existing funding.

3.39 The majority of the surface access costs where a split of beneficiaries is expected (for example, where multiple businesses and the public at large benefit from a new road junction or rail scheme) are likely to be borne by Government, where the schemes provide greater benefits for non-airport users. The airport contribution would be subject to a negotiation, and review by regulators.

3.40 Because of the early stages of development, there is some variability of surface access costs, which are subject to more detailed development and, for example, choices over precise routes. The additional public expenditure effects of the options would likely be as follows:

- For both Heathrow proposals, there is no Government road spend directly linked to expansion; the promoter would pay for changes to the M25, A4 and A3044 and any local roads. The Western and Southern Rail schemes are at different levels of development and the cost estimates will change as these schemes are developed. The Government would expect the costs of the schemes to be partly offset by airport contributions, which would be negotiated when the schemes reach an appropriate level of development.
- For the Gatwick proposal, there would be no additional public expenditure solely because of expansion, as all road enhancement costs for airport expansion would be met by the scheme promoter. The Government has assumed that any improvements to the Brighton Main Line that may be required would take place regardless of expansion and would be publicly funded.

Views and support of airlines, regional airports and the business community

3.41 The benefits of expansion will be delivered only if airlines and the industry choose to use the new capacity, and pay for it via airport charges. There is much greater airline support for expansion via the Heathrow Northwest Runway scheme than the other two schemes, subject to various concerns being met, for example on costs.

3.42 The majority of regional airports who have stated a public preference support expanding Heathrow Airport, on the basis of its current status as the UK's hub (though

[87] https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-airport-data/Airport-data-2016/
[88] https://www.uktradeinfo.com/Statistics/BuildYourOwnTables/Pages/Home.aspx

Birmingham Airport has supported expansion at Gatwick Airport). This support is driven by airports' considerations on connectivity and other commercial issues.

3.43 Expansion is critical for business confidence in the UK. The Heathrow Northwest Runway scheme has strong support from the wider business community across the whole of the UK, including from the Confederation of British Industry,[89] the British Chambers of Commerce,[90] the Federation of Small Businesses,[91] the manufacturers' organisation EEF,[92] and regional business groups across the UK. 61% of the directors asked by the Institute of Directors stated that their preference was for expansion at Heathrow Airport, compared to 39% who favoured expansion at Gatwick Airport.[93]

Financeability

3.44 While the Gatwick Second Runway scheme would be significantly cheaper than the two schemes at Heathrow, with the Heathrow Northwest Runway the most expensive of the three shortlisted schemes, all three are private sector schemes which the Government believes could be financeable without Government support.[94]

3.45 The level of debt and equity required for the Gatwick Second Runway scheme would be significantly lower than for the Heathrow schemes, but the Airports Commission noted that the Gatwick Second Runway scheme would have comparatively higher demand risk, which is harder for Government to mitigate compared to the Heathrow schemes.[95] Both Heathrow schemes build on a strong track record of proven demand that has proven resistant to economic downturns. Independent financial advisers have undertaken further work for the Government, and agree that all three schemes are financeable without Government support.

Deliverability and safety

3.46 The three shortlisted schemes involve different levels of delivery risk. Gatwick Airport said its Second Runway scheme is capable of being delivered by 2025, while Heathrow Airport said its Northwest Runway scheme is capable of being delivered by 2026. The Gatwick Second Runway scheme would be much simpler to build. The process for delivering powers for the Heathrow schemes will be more complex because the schemes themselves are more complex. The delivery dates for both Heathrow schemes are therefore likely to be more risky than that for the scheme at Gatwick.

3.47 The Airports Commission worked with the Civil Aviation Authority and NATS Holdings to review the operational and airspace implications of all three shortlisted schemes, including conducting fast-time simulation modelling of the proposed airspace routes. This work concluded that, while safely managing the expected increase in air traffic for any scheme will be challenging, it should nevertheless be achievable given modernisation of airspace in the South East of England and taking advantage of new technologies – changes which will be necessary with or without expansion.

3.48 The Airports Commission also asked the Health and Safety Laboratory (HSL) to review the scale of increase in crash risk associated with each of the schemes. This review considered two risks: the background risk, which accounts for aircraft cruising in UK airspace, and an airfield crash rate, relating to aircraft taking off and landing at a

[89] http://mediacentre.heathrow.com/pressrelease/details/81/Expansion-News-23/4789
[90] http://www.britishchambers.org.uk/press-office/press-releases/bcc-while-britain-dithers-on-aviation,-others-do.html
[91] https://www.fsb.org.uk/media-centre/press-releases/heathrow-s-third-runway-sends-clear-signal-britain-is-open-for-business
[92] https://www.eef.org.uk/about-eef/media-news-and-insights/media-releases/2016/oct/eef-comment-on-heathrow-expansion
[93] https://www.iod.com/news-campaigns/news/articles/Business-leaders-welcome-Airports-Commission-recommendations
[94] The Airports Commission estimated capital costs at £9 billion for the Gatwick Second Runway scheme, £14.4 billion for the Heathrow Extended Northern Runway Scheme, and £17.6 billion for the Heathrow Northwest Runway scheme, not including surface access costs
[95] *Airports Commission: Final Report*, p270

specific airfield.[96] This review concluded that "the changes to the background crash risk are minimal regardless of whether or not expansion takes place at the airports."[97] In addition the increase in airfield crash risks for both airports was proportionate to the additional number of flights anticipated, meaning that the "scenario for Heathrow with the highest crash rates represents an increase of 60% in the crash rate compared to 2013. At Gatwick Airport, the crash rate is more than doubled in the scenario with the highest rates."[98] As noted by HSL, "there is a high level of uncertainty in the calculated crash rates" due to the limited number of previous incidents to assess. Of the over 36 million aircraft movements examined by HSL that are of relevance to either Heathrow or Gatwick's airfield crash risk, only three resulted in accidents.[99] The Civil Aviation Authority conducted a preliminary safety assessment of the schemes and concluded that the schemes were feasible in principle from a safety perspective.[100]

Local environmental, health and community impacts

3.49 Decisions on airport capacity must rightly balance local, environmental and social considerations against the national and local benefits stemming from expansion. As set out above, in terms of economic and strategic benefits, expansion via the Heathrow Northwest Runway scheme best meets the need for additional capacity in the South East of England. However, set against these positive impacts, airport expansion can also have negative impacts. For example, all three schemes will have significant impacts on the environment and local communities.

3.50 The Appraisal of Sustainability presents an assessment of the likely environmental, social and economic impacts of all three schemes. The Health Impact Analysis also presents an assessment of the health impacts. The following discussion of assessments of the three schemes considers the impacts of expansion without the benefits of the mitigation package put forward by scheme promoters or required by the Government under this NPS. The *Updated Appraisal Report* monetises, where possible, the air quality, noise and carbon impacts affecting people from each of the three schemes. These monetised values are small relative to the size of the monetised economic benefits of each scheme over the 60-year appraisal period. The Appraisal of Sustainability shows that, while all three schemes are expected to lead to a reduction in air quality and increased noise (without consideration of potential mitigations of the three schemes), the Gatwick Second Runway scheme would have a lower level of adverse effects relating to noise and air quality than either scheme at Heathrow. All three schemes will have an impact on the natural environment, including biodiversity, water and landscape. Negative effects upon quality of life, health and amenity were assessed, when unmitigated, to be of a greater magnitude for the two Heathrow expansion schemes and of a lower magnitude for the Gatwick Second Runway scheme. This is primarily because Gatwick Airport is in a more rural location, with fewer people impacted by the airport. The Appraisal of Sustainability also outlines measures to mitigate these local impacts to ensure that legal obligations will be met.

[96] *Operational Efficiency: Ground Risk Analysis*, Health and Safety Laboratory, p3 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/437269/operational-efficiency-ground-risk-analysis.pdf
[97] *Operational Efficiency: Ground Risk Analysis*, Health and Safety Laboratory, pvi https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/437269/operational-efficiency-ground-risk-analysis.pdf
[98] *Operational Efficiency: Ground Risk Analysis*, Health and Safety Laboratory, p15 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/437269/operational-efficiency-ground-risk-analysis.pdf
[99] *Operational Efficiency: Ground Risk Analysis,* Health and Safety Laboratory, p9 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/437269/operational-efficiency-ground-risk-analysis.pdf
[100] *Airports Commission: Final report*, p243

As set out below, the Government believes this demonstrates how the commitment to ensure that local impacts of expansion will be mitigated satisfactorily can be met.

3.51 Heathrow Airport has committed to ensuring its landside airport-related traffic is no greater than today. The airport will be expected to achieve a public transport mode share of at least 50% by 2030, and at least 55% by 2040, for passengers.

3.52 The Government agrees with the evidence set out by the Airports Commission that expansion at Heathrow Airport is consistent with the UK's climate change obligations.[101]

3.53 The Appraisal of Sustainability identifies that, in addition to changes due to local noise and air quality impacts, communities may be affected by airport expansion through loss of, and/or additional demand for housing, community facilities or services, including recreational facilities. In addition, there will be effects on parks, open spaces and the historic environment, which will affect the quality of life of local communities which benefit from access to these facilities and features. These effects will be of a higher magnitude for the two Heathrow expansion schemes and a lower magnitude for Gatwick Second Runway. Overall, each of the three schemes is expected to have negative impacts on local communities, with more severe impacts expected from the Heathrow schemes. Impacts of all three schemes will not be felt equally across social groups. Equality impacts are set out in chapter four.

3.54 The Heathrow Northwest Runway scheme will be accompanied by a package of measures to mitigate the impact of airport expansion on the environment and affected communities.[102] The Government agrees with the Airports Commission's conclusion that "to make expansion possible…a comprehensive package of accompanying measures [should be recommended to] make the airport's expansion more acceptable to its local community, and to Londoners generally".[103] This is expected to include a highly valued scheduled night flight ban of six and a half hours between 11pm and 7am (with the exact start and finish times to be determined following consultation), and the offer of a predictable, though reduced, period of respite for local communities.

3.55 To mitigate environmental and social impacts, Heathrow Airport and Gatwick Airport both announced compensation packages (covering residential property acquisition, noise insulation, and other community measures like funding for schools), of more than £1 billion at Heathrow Airport and more than £200 million at Gatwick Airport (over 15-20 years from 2020). Heathrow Airport's package reflects the much greater number of people affected in the local area.

Heathrow Northwest Runway and Heathrow Extended Northern Runway

3.56 The Heathrow Extended Northern runway scheme has two advantages over the Heathrow Northwest Runway scheme: lower capital costs (£14.4 billion for the Extended Northern Runway scheme compared to £17.6 billion for the Northwest Runway scheme), and significantly fewer houses being demolished (242 rather than 783), as well as avoiding impacts on a number of commercial properties.

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[101] https://www.gov.uk/government/publications/airport-expansion-dft-review-of-the-airports-commissions-final-report *Review of the Airports Commission Final Report*, p19

[102] By way of comparison, the Government engaged Ernst & Young to prepare a report on the approaches taken by other international airports in addressing the local impacts of the airport - https://www.gov.uk/government/publications/airport-expansion-global-comparison-of-airport-mitigation-measures

[103] *Airports Commission: Final Report*, p4

3.57 However, the Government made a preference for the Heathrow Northwest Runway based on a number of factors:

- Resilience;
- Respite from noise for local communities; and
- Deliverability.

3.58 The Heathrow Northwest Runway scheme would provide respite by altering the pattern of arrivals and departures across the runways over the course of the day to give communities breaks from noise. However, respite would decrease from one half to one third of the day. The Heathrow Extended Northern Runway scheme has much less potential for respite. It would use both runways for arrivals and departures for most of the day, although it may be able to 'switch off' one runway for a short time during non-peak periods with a corresponding reduction in capacity.[104]

3.59 The Heathrow Northwest Runway scheme should provide greater resilience than the Heathrow Extended Northern Runway scheme because of the way the three separate runways could operate more flexibly when needed to reduce delays, and the less congested airfield. It delivers greater capacity (estimated on a like for like basis by the Airports Commission at 740,000 flights departing and arriving per annum compared to the Extended Northern Runway scheme at 700,000),[105] accordingly higher economic benefits, and a broader route network. It also provides greater space for commercial development, which could be used to enhance onsite freight capacity.

3.60 The Airports Commission assessed the Heathrow Extended Northern Runway scheme to be deliverable.[106] However, the Extended Northern Runway scheme has no direct global precedent. As such, there is greater uncertainty as to what measures may be required to ensure that the airport can operate safely, and what the impact of those measures may be, including the restriction on runway capacity.

Carbon emissions

3.61 Although not a differentiating factor between the three shortlisted schemes, the Government has considered the issue of carbon emissions, given the Government's commitment to tackle climate change, and its legal obligations under the Climate Change Act 2008.

3.62 The Airports Commission identified carbon impacts from expansion in four areas: a net increase in air travel; airside ground movements and airport operations; changes in travel patterns as a result of the scheme's surface access arrangements; and construction of new infrastructure. Emissions from air travel, specifically international flights, are by far the largest of these impacts.[107]

3.63 To address uncertainties over the future policy treatment of international aviation emissions,[108] the Airports Commission used two carbon policy scenarios in its analysis.

3.64 The first was a 'carbon capped' scenario, in which emissions from the UK aviation sector are limited to the Committee on Climate Change's planning assumption for the

[104] *Airports Commission: Final Report*, pp180-184
[105] *Airports Commission: Final Report*, p29
[106] *Airports Commission: Final Report*, p236
[107] Intra-UK flights account for approximately 6% of the total emissions from all flights departing UK airports. These emissions are included in the UK's carbon budgets
[108] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/186683/aviation-and-climate-change-paper.pdf *Airports Commission: discussion paper 03: aviation and climate change*, pp12-16

sector of 37.5 million tonnes of carbon dioxide in 2050. The second was a 'carbon traded' scenario, in which emissions are traded as part of a global carbon market, allowing reductions to be made where they are most efficient across the global economy.

3.65 The Airports Commission then assessed whether the needs case could be met under each of these scenarios, that is whether expansion would still deliver the necessary improvements and provide benefits to passengers and the wider economy. The Government has updated this analysis to take account of the latest passenger demand forecasts.

3.66 This further analysis reinforces the conclusion that any one of the three shortlisted schemes could be delivered within the UK's climate change obligations, as well as showing that a mix of policy measures and technologies could be employed to meet the Committee of Climate Change's planning assumption.[109]

3.67 Of the three shortlisted schemes, the Heathrow Northwest Runway scheme produces the highest carbon emissions in absolute terms. However, this is in part due to the greater additional connectivity provided by the scheme, and, in relation to the increase in emissions caused by expansion under any of the schemes, the differences between the schemes are small. Both of the carbon policy scenarios incorporated measures to ensure that the increased emissions from any of the shortlisted schemes were not additional overall either at the global level (in the carbon traded case) or at the UK level (in the carbon capped case).

3.68 The further analysis also shows that, in both carbon policy scenarios, the Heathrow Northwest Runway scheme would deliver significant benefits to passengers and the wider economy (such as lower fares, improved frequency and higher productivity), and would do so more quickly than the Gatwick Second Runway scheme. Both Heathrow schemes provide more passenger benefits by 2050 than the Gatwick Second Runway scheme.

3.69 The Government has considered this further analysis, and concludes both that expansion via a Northwest Runway at Heathrow Airport (as its preferred scheme) can be delivered within the UK's carbon obligations, and that the scheme is the right choice on economic and strategic grounds regardless of the future regime to deal with emissions from international aviation.[110]

Strategic environmental assessment

3.70 Strategic environmental assessments are required by the law. A strategic environmental assessment is set out in full in the Appraisal of Sustainability.[111] It demonstrates that airport expansion will attract additional air traffic, which impacts upon quality of life and wellbeing, in particular through noise, air quality, housing, community facilities, and access to nature and cultural heritage. Negative impacts upon quality of life were of a greater scale within the two Heathrow schemes and of lower magnitude for the Gatwick Second Runway scheme. However, when assessing against the objective of maximising economic benefits and improving competitiveness and employment, the Heathrow Northwest Runway scheme generates the most benefits, as well as producing the highest direct benefits to passengers.

[109] *Updated Appraisal Report,* p36
[110] *Updated Appraisal Report*, p35 and p42
[111] https://www.gov.uk/government/publications/appraisal-of-sustainability-for-the-revised-draft-airports-national-policy-statement

Conclusion

3.71 This section summarises the factors the Government considered when evaluating each of the three schemes shortlisted by the Airports Commission against the needs case presented in chapter 2. As part of this, the Government identified where schemes could have negative impacts, for example on the local environment. It considered the predicted beneficial effects of the three schemes, particularly in relation to the needs case and economic considerations. It also assessed how the schemes could conform to wider Government strategic objectives and meet legal obligations, for example on air quality. Bringing these considerations together, the Government's decision on a preferred scheme balances this range of factors, enabling it to determine which scheme, overall, is the most effective and appropriate means of meeting the needs case and maintaining the UK's hub status in particular.

3.72 The Appraisal of Sustainability provides an assessment of the schemes against a number of the factors considered in this chapter. It concludes that the Heathrow Northwest Runway scheme is best placed to maximise the monetised economic benefits that the provision of additional airport capacity could deliver in the short term, although this scheme is likely to do so with the greatest negative impact on local communities. However, the Appraisal of Sustainability also identifies measures which can help to mitigate these impacts, for example by reducing noise, ensuring that the development is in accordance with legal obligations on air quality, showing how future carbon targets could be met, and assessing future demand scenarios.

3.73 Building on this assessment, the Government has identified a number of attributes in the manner of strategic effects, which it believes only the preferred scheme is likely to deliver to meet the overall needs case for increased capacity in the South East of England and to maintain the UK's hub status. The Government has afforded particular weight to these:

- Expansion via the Heathrow Northwest Runway scheme would provide the biggest boost to connectivity, particularly in terms of long haul flights. This is important to a range of high value sectors across the economy in the UK which depend on air travel, as well as for air freight. It will enable more passengers to fly where they need to, when they need to.
- Expansion via the Heathrow Northwest Runway scheme would provide benefits to passengers and to the wider economy sooner than the other schemes. This is regardless of the technical challenges to its delivery. It would also provide the greatest boost to local jobs.
- Heathrow Airport is better connected to the rest of the UK by road and rail. Heathrow Airport already has good road links via the M25, M4, M40 and M3, and rail links via the London Underground Piccadilly Line, Heathrow Connect and Heathrow Express. In the future, it will be connected to Crossrail, and linked to HS2 at Old Oak Common. The number of such links provides resilience.
- The Heathrow Northwest Runway scheme delivers the greatest support for freight. The plans for the scheme include a doubling of freight capacity at the airport. Heathrow Airport already handles more freight by value than all other UK airports combined, and twice as much as the UK's two largest container ports.

3.74 The needs case has shown the importance of developing more capacity more quickly, and in a form which passengers and businesses want to use. The Heathrow Northwest Runway scheme is best placed to deliver this capacity, delivering the greatest benefits soonest as well as providing the biggest boost to the UK's international connectivity,

doing so in the 2020s at a point when without the scheme 4 out of 5 London airports would be full, with all the problems to passengers this could entail. Taken together, benefits to passengers and the wider economy are substantial, even having regard to the proportionally greater environmental disbenefits estimated for the Heathrow Northwest Runway. Even though the preferred scheme's environmental disbenefits are larger than those of the Gatwick Second Runway scheme, when all benefits and disbenefits are considered together,[112] overall the Heathrow Northwest Runway scheme is considered to deliver the greatest net benefits to the UK.

3.75 A number of mitigation measures will need to be applied to reduce the impacts of the Heathrow Northwest Runway scheme felt by the local community and the environment. Airport expansion is also expected to be accompanied by an extensive and appropriate compensation package for affected parties. With these safeguards in place, the Government considers that the Heathrow Northwest Runway scheme delivers the greatest strategic and economic benefits, and is therefore the most effective and appropriate way of meeting the needs case.

[112] *Updated Appraisal Report*, p44

4. Assessment principles

General principles of assessment

4.1 The statutory framework for deciding applications for development consent is contained in the Planning Act 2008. This chapter of the Airports NPS sets out general policies in accordance with which applications relating to a Northwest Runway at Heathrow Airport are to be decided. This chapter is specific to assessments necessary for the Heathrow Northwest Runway scheme, but is not exhaustive as to the assessments that may be applicable to that scheme.

4.2 The Airports NPS covering the Heathrow Northwest Runway scheme establishes the needs case for that proposed development, provided it adheres to the detailed policies and protections set out in the Airports NPS, and the legal constraints contained within the Planning Act 2008. The statutory framework for deciding nationally significant infrastructure project applications where there is a relevant designated NPS is set out in section 104 of the Planning Act 2008.[113]

4.3 The Airports NPS applies to schemes at Heathrow Airport (in the area shown, for this purpose, illustratively, within the scheme boundary map at Annex A) that include a runway of at least 3,500m in length and that are capable of delivering additional capacity of at least 260,000 air transport movements per annum, and associated infrastructure and surface access facilities. In particular, it also applies to the reconfiguration of and provision of new terminal capacity to be located between the two existing runways at Heathrow Airport. The Secretary of State's policy in relation to other airport infrastructure in the South East of England is set out at paragraph 1.41 above.

4.4 In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State will take into account:

- Its potential benefits, including the facilitation of economic development (including job creation) and environmental improvement, and any long term or wider benefits; and
- Its potential adverse impacts (including any longer term and cumulative adverse impacts) as well as any measures to avoid, reduce or compensate for any adverse impacts.

4.5 In this context, environmental, safety, social and economic benefits and adverse impacts should be considered at national, regional and local levels. These may be identified in the Airports NPS, or elsewhere. The Secretary of State will also have regard to the manner in which such benefits are secured, and the level of confidence in their delivery.

[113] Planning Act 2008, section 104 – decisions in cases where an NPS has effect

4.6 The National Networks NPS sets out the Government's policies to deliver development of nationally significant infrastructure projects on the national road and rail networks and strategic rail freight interchanges. It provides planning guidance for promoters of nationally significant infrastructure projects on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State.

4.7 Where the applicant's proposals in relation to surface access meet the thresholds to qualify as nationally significant infrastructure projects under the Planning Act 2008, or is associated development under section 115 of the Planning Act 2008, the Secretary of State will consider those aspects by reference to both the National Networks NPS and the Airports NPS, as appropriate. To the extent that discrete aspects of the surface access proposals do not qualify as nationally significant and cannot be included in a development consent application as associated development (for example), the applicant will be expected to pursue or secure necessary consent(s) through the most appropriate alternative consenting regime. This might include, for example, the Town and Country Planning Act 1990, the Highways Act 1980, or the Transport and Works Act 1992, promoted by a third party if need be.

4.8 The Secretary of State will consider any relevant nationally significant road and rail elements of the applicant's proposals in accordance with the National Networks NPS and with the Airports NPS. If there is conflict between the Airports NPS and other NPSs, the conflict should be resolved in favour of the NPS that has been most recently designated. The Airports NPS and the National Networks NPS may also be a material consideration in decision making on applications for road and rail schemes associated with or related to the preferred scheme that fall under the Town and Country Planning Act 1990, the Transport and Works Act 1992, or other legislation relating to planning. Whether, and to what extent, the Airports NPS and the National Networks NPS are a material consideration will be judged on a case by case basis by the relevant decision makers.

4.9 The Examining Authority should only recommend, and the Secretary of State will only impose, requirements in relation to a development consent, that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects.[114] The need for requirements in respect of the phasing of the scheme is likely to be an important consideration, so that effects of construction and operational phases are properly mitigated, as well as any changes in the operations of the airport that may occur in line with the phasing of physical works and commencement of operations. Guidance on the use of planning conditions or any successor to it should be taken into account where requirements are proposed.

4.10 Obligations under section 106 of the Town and Country Planning Act 1990 should only be sought where they are necessary to make the development acceptable in planning terms, (including where necessary to ensure compliance with the Airports NPS), directly related to the proposed development, and fairly and reasonably related in scale and kind to the development.[115]

Scheme variation

4.11 While the Government has decided that a Northwest Runway at Heathrow Airport is its preferred scheme to deliver additional airport capacity (an illustrative masterplan is at

[114] National Planning Policy Framework, March 2012, paragraph 206, or any successor document
[115] Town and Country Planning Act 1990, section 106; Regulation 122(2) Community Infrastructure Levy Regulations 2010; National Planning Policy Framework, March 2012, paragraph 204

Annex B of the Airports NPS), this does not limit variations resulting in the final scheme for which development consent is sought. To benefit from the full support of policy within the Airports NPS, any application(s) will have to fall within the boundaries and parameters set out in the Airports NPS. However, the form of a development for which an application is made is a matter for the applicant. The Airports NPS does not prejudice the viability or merits of any particular application, detailed scheme or applicant. It governs the location, limits and nature of such schemes. It will be for an Examining Authority, and ultimately the Secretary of State, to determine whether any future application is compliant with the Airports NPS, meets the need for additional capacity, and is of benefit to the UK, whilst minimising any harm caused.

Environmental Impact Assessment

4.12 All proposals for projects that are subject to the European Union's Environmental Impact Assessment Directive,[116] and are likely to have significant effects on the environment, must be accompanied by an environmental statement, describing the aspects of the environment likely to be significantly affected by the project.[117] The Directive specifically requires an Environmental Impact Assessment to identify, describe and assess effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. Schedule 4 to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017[118] sets out the information that should be included in the environmental statement. This includes a description of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short-, medium- and long-term, permanent and temporary, positive and negative effects of the project, and also the measures envisaged for avoiding or mitigating significant adverse effects.

4.13 When examining a proposal to which the Airports NPS applies, the Examining Authority should ensure that likely significant effects at all stages of the project have been adequately assessed. The effects of any changes in operations, including the number of air traffic movements, during the construction and operational phases must be properly assessed and appropriate mitigation secured for any significant effects. Any requests for environmental information not included in the original environmental statement should be proportionate and focus only on likely significant effects. In the Airports NPS, the terms 'effects', 'impacts' or 'benefits' should accordingly be understood to mean likely significant effects, impacts or benefits.

4.14 When considering significant cumulative effects, any environmental statement should provide information on how the effects of an applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence if they are not part of the baseline).[119]

4.15 The Examining Authority should consider how significant cumulative effects, and the interrelationship between effects, might as a whole affect the environment, even

[116] Directive 2014/52/EU of the European Parliament and of the Council amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment. The amendments to Directive 2011/92/EU made by Directive 2014/52/EU have been transposed into domestic legislation. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 have, subject to transitional arrangements, with amendments, consolidated the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 and various amending regulations

[117] http://www.legislation.gov.uk/uksi/2017/572/contents/made

[118] Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (S.I. 2017/572)

[119] The applicant should refer to the Planning Inspectorate's advice on assessing cumulative effects https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/12/Advice-note-17V4.pdf

though they may be acceptable when considered on an individual basis or with mitigation measures in place.

4.16 In some instances it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.

4.17 Effort should be made to refine the detail of the proposed development. However, where details are still to be finalised, such as in respect of the phasing of the development and operational changes at the airport, the applicant is advised to set out in the environmental statement the relevant design parameters used for the assessment. The environmental statement should explain, with reference to the parameters, what the maximum extent of the proposed development may be (for example in terms of site area) or the extent of change in respect of operational impacts, and assess the potential adverse effects which the project could have, to ensure that the impacts of the project as it may be constructed have been properly assessed.

4.18 Should the Secretary of State decide to grant development consent for an application where details are still to be finalised, this will need to be reflected in appropriate development consent requirements in the development consent order. It may be the case that development consent is granted for a proposal and, at a later stage, the applicant wishes (for technical or commercial reasons) to construct it in such a way that it is outside the terms of what has been consented, for example because its extent will be greater than has been provided for in terms of the consent. In this situation, it will be necessary for the applicant to apply for a change to be made to the development consent provided under the Planning Act 2008.

Habitats Regulations Assessment

4.19 Prior to granting development consent, the Secretary of State as competent authority must comply with the duties under the Conservation of Habitats and Species Regulations 2017. Under these regulations, if the competent authority considers that the proposed development is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and is not connected with or necessary to the management of that site, it must make an Appropriate Assessment of the implications for the site in view of the site's conservation objectives.[120] [121] The applicant should also refer to the Airports NPS sections on biodiversity, land use, and air quality. The competent authority must consult Natural England to ensure that impacts on European sites are adequately considered.

4.20 The applicant is required to provide sufficient information with their applications for development consent to enable the Secretary of State to carry out an Appropriate Assessment if required. This information should include details of any measures that are proposed to minimise or avoid any likely significant effects on a European site. The information provided may also assist the Secretary of State in concluding that an Appropriate Assessment is not required because significant effects on European sites

[120] This includes candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in Regulation 8 of the Conservation of Habitats and Species Regulations 2017

[121] Directive 2011/92/EU was amended in 2014 by Directive 2014/52/EU. As amended, Article 2(3) of the Directive provides that, where an obligation to assess environmental effects arises simultaneously from the EIA Directive and the Habitats Directive (Directive 92/43/EU) and/or the Wild Birds Directive (Directive 2009/147/EC), Member States "shall, where appropriate, ensure that coordinated and/or joint procedures" are provided for

are sufficiently unlikely that they can be excluded. If it is concluded there is likely to be a significant effect, or such effects cannot be ruled out (alone or in combination), an Appropriate Assessment is required.

4.21 If an Appropriate Assessment for a proposed airport development concludes that it is not possible to rule out an adverse effect on the integrity of a European site, the Habitats Directive permits a derogation, subject to the proposal meeting three tests. These tests are (a) that there are no less damaging alternative solutions, (b) that there are imperative reasons of overriding public interest for the proposal going ahead, and (c) that adequate and timely compensation measures will be put in place to ensure the overall coherence of the network of protected sites is maintained. At detailed design stage, and in so far as it may be necessary, the matters set out in the Airports NPS will be relevant to determining whether there are alternative solutions and imperative reasons of overriding public interest, provided that the design remains consistent with the objectives of the Airports NPS.

4.22 Where a development may negatively affect any priority natural habitat type or priority species,[122] any imperative reasons of overriding public interest case would need to be established solely on one or more of the grounds relating to human health, public safety or beneficial consequences of primary importance to the environment. The competent authority may only rely on other (i.e. social or economic) imperative reasons of overriding public interest if it has first obtained an opinion from the European Commission.

Equalities

4.23 The Airports Commission's stated objective on equalities was "to reduce or avoid disproportionate impacts on any social group".[123] At consultation stage, the Airports Commission carried out a high level Equality Impact Assessment.

4.24 The Appraisal of Sustainability to the Airports NPS sets out an assessment of equalities impacts, informed by the work of the Airports Commission. The Airports Commission was clear that its assessment was based upon current scheme design, and that a more detailed Equality Impact Assessment would likely be necessary as design, supporting measures and operational plans were developed.

4.25 The Airports Commission's assessment identified different types of equalities impacts for each of its shortlisted schemes, but no substantial difference in the overall extent of equalities impacts. The Airports Commission's assessment, and the assessment carried out for the Appraisal of Sustainability that informs the Airports NPS, both concluded that negative equalities impacts could be well mitigated through good design and operation, and supporting measures and plans.

4.26 The Department for Transport has reviewed the Airports Commission's work, informed by the Equality Assessment carried out as part of the Appraisal of Sustainability. The Government is satisfied that the scope of the Airports Commission's work was appropriate at this stage of scheme development, that the Airports Commission's approach was consistent with the Equality Act 2010, and that its conclusion is consistent with the evidence produced.

4.27 For any application to be considered compliant with the Airports NPS, it must be accompanied by a project level Equality Impact Assessment examining the potential impact of that project on groups of people with protected characteristics. In order to

[122] As listed in Annex I and II of the Habitats Directive
[123] *Airports Commission: Appraisal Framework*, p98

benefit from the support of the Airports NPS, the results of that project level Equality Impact Assessment must be within the legal limits and parameters of acceptability outlined in the Appraisal of Sustainability that informs the Airports NPS.

Assessing alternatives

4.28 The applicant should comply with all legal obligations and policy set out in the Airports NPS on the assessment of alternatives. In particular:

- The Environmental Impact Assessment Directive requires projects with significant environmental effects to include a description of the reasonable alternatives studied by the applicant which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the significant effects of the project on the environmental effects;
- There may also be other specific legal obligations requiring the consideration of alternatives, for example, under the Habitats and Water Framework Directives; and
- There may be policies in the Airports NPS requiring consideration of alternatives, for example the flood risk sequential test.

Criteria for 'good design' for airports infrastructure

4.29 The applicant should include design as an integral consideration from the outset of a proposal.

4.30 Visual appearance should be an important factor in considering the scheme design, as well as functionality, fitness for purpose, sustainability and cost. Applying 'good design' to airports projects should therefore produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction, and matched by an appearance that demonstrates good aesthetics as far as possible.

4.31 A good design should meet the principal objectives of the scheme by eliminating or substantially mitigating the adverse impacts of the development, for example by improving operational conditions. It should also mitigate any existing adverse impacts wherever possible, for example in relation to safety or the environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into account capital cost, economics and environmental impacts.

4.32 Scheme design will be an important and relevant consideration in decision making. The Secretary of State will need to be satisfied that projects are sustainable and as aesthetically sensitive, durable, adaptable and resilient as they can reasonably be, having regard to regulatory and other constraints and including accounting for natural hazards such as flooding. The Secretary of State will also need to be satisfied that extant security, customs and immigration measures are maintained or reprovided.

4.33 The scheme should take into account, as far as possible, both functionality, including fitness for purpose and sustainability, and aesthetics, including the scheme's contribution to the quality of the area in which it would be located. The applicant will want to consider the role of technology in delivering new airports projects. Professional, independent advice on the design aspects of a proposal should be undertaken to ensure good design principles are embedded into infrastructure proposals.

4.34 There may be opportunities for the applicant to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform, and vegetation.

4.35 The applicant should be able to demonstrate in its application how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, the applicant should set out the reasons why the favoured choice has been selected. The Examining Authority and Secretary of State will take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security standards which the design has to satisfy.

Costs

4.36 The relationship between cost and affordability for a scheme is governed by the regulated funding of the airport and funding from other sources, and the need to comply with the Government's guidance on compulsory acquisition of land under the Planning Act 2008.[124] This guidance is relevant to any scheme that will require the compulsory acquisition of land, which is expected in relation to any scheme to which this NPS applies which would include any application for development consent for a Northwest Runway at Heathrow Airport. That guidance sets out what a promoter must demonstrate if it is to be granted powers of compulsory acquisition - including in relation to impediments to a scheme and financial resources.

4.37 Heathrow Airport is subject to economic regulation by the Civil Aviation Authority (CAA) under the Civil Aviation Act 2012. As part of the CAA's discharge of its duty under the Civil Aviation Act 2012 to further the interests of users of air transport services (passengers and cargo owners), the CAA has granted an economic licence to the operator of Heathrow Airport to levy airport charges. This licence sets a maximum yield per passenger that can be recovered by the operator of Heathrow Airport through airport charges (the "maximum yield"). This maximum yield is set by the CAA having conducted a process that scrutinises, among other things, the business plan submitted by the licence holder and developed through constructive engagement with the airlines, as well as other submissions from airlines and stakeholders. This process of scrutiny of costs will include benchmarking exercises from industry professionals and assessments by an Independent Fund Surveyor as well as by the CAA. Expansion will also be subject to specific gateway reviews by airlines and stakeholders. The final business plan will include details of the future capital expenditure that the licensee proposes to incur.

4.38 For the development of new capacity at Heathrow, the CAA will set the maximum yield having regard to the matters required by the Civil Aviation Act 2012. The CAA will consider, among other things:

- the need to secure that the licence holder is able to finance its provision of airport operation services; and
- the economy and efficiency of the proposals set out in any business plan (including such capital expenditure proposals as are contained in it),

as part of its process of setting the maximum yield per passenger in the period covered by the price control.

[124] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/236454/Planning_Act_2008_-_Guidance_related_to_procedures_for_the_compulsory_acquisition_of_land.pdf

4.39 The applicant should demonstrate in its application for development consent that its scheme is cost-efficient and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime.

4.40 Detailed scrutiny of any business plan put forward by the licence holder will fall under the CAA's regulatory process under the Civil Aviation Act 2012, and the detailed matters considered under that process are not expected to be scrutinised in the same way during the examination and determination of an application for development consent. The CAA is a statutory consultee for all proposed applications relating to airports or which are likely to affect an airport or its current or future operation. The applicant is expected to provide the CAA with the information it needs to enable it to assist the Examining Authority in considering whether any impediments to the applicant's development proposals, insofar as they relate to the CAA's economic regulatory and other functions, are capable of being properly managed.

Climate change adaptation

4.41 The Planning Act 2008 requires the Secretary of State to have regard to the desirability of mitigating, and adapting to, climate change in designating an NPS.[125]

4.42 This section sets out how the Airports NPS puts Government policy on climate change adaptation into practice, and in particular how the applicant and the Secretary of State will take into account the effects of climate change when developing and considering airports infrastructure applications. Climate change mitigation is essential to minimise the most dangerous impacts of climate change, as previous global greenhouse gas emissions will already mean some degree of continued climate change for at least the next 30 years. Climate change is likely to mean that the UK will experience on average hotter, drier summers and warmer, wetter winters. There is potentially an increased risk of flooding, drought, heatwaves, intense rainfall events and other extreme events such as storms and wildfires, as well as rising sea levels.

4.43 Adaptation is therefore necessary to deal with the potential impacts of these changes that are already happening. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the provision of green infrastructure.

4.44 The Government has published a set of UK Climate Projections, and every five years prepares a statutory UK Climate Change Risk Assessment and National Adaptation Programme.[126] In addition, the Climate Change Act 2008 adaptation reporting power has been used by Government to invite reporting authorities (a defined list of public bodies and statutory undertakers, including airports) to consider the impact on them of current and predicted climate change, and to report on progress implementing adaptation actions.[127] Successive strategies for adaptation reporting will be laid alongside five yearly updates to the National Adaptation Programme.

4.45 New airports infrastructure will typically be a long-term investment which will need to remain operational over many decades, in the face of a changing climate. Consequently, the applicant must consider the impacts of climate change when planning design, build and operation. Any accompanying environmental statement

[125] Planning Act 2008, section 10(3)(a)
[126] Climate Change Act 2008, section 58
[127] Climate Change Act 2008, section 62

should set out how the proposal will take account of the projected impacts of climate change.

4.46 Detailed consideration must be given to the range of potential impacts of climate change using the latest UK Climate Projections available at the time, and to ensuring any environmental statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of any environmental statement, the Examining Authority should consider whether it needs to request additional information from the applicant.

4.47 Where transport infrastructure has safety-critical elements, and the design life of the asset is 60 years or greater, the applicant should apply the latest available UK Climate Projections, considering at least a scenario that reflects a high level of greenhouse gas emissions at the 10%, 50% and 90% probability levels, to assess the impacts of climate change over the lifetime of the development.

4.48 The applicant should demonstrate that there are no critical features of infrastructure design which may be seriously affected by more radical changes to the climate beyond those projected in the latest set of UK Climate Projections. Any potential critical features should be assessed, taking account of the latest credible scientific evidence on, for example, sea level rise, and on the basis that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime through potential further mitigation or adaptation.

4.49 Any adaptation measures should be based on the latest set of UK Climate Projections,[128] the most recent UK Climate Change Risk Assessment,[129] consultation with statutory consultation bodies, and any other appropriate climate projection data. Any adaptation measures must themselves also be assessed as part of any Environmental Impact Assessment and included in the environmental statement, which should set out how and where such measures are proposed to be secured.

4.50 If any proposed adaptation measures themselves give rise to consequential impacts, the Secretary of State will consider the impact in relation to the application as a whole and the assessment principles set out in the Airports NPS.

4.51 Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so.

4.52 Where adaptation measures are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project or the surrounding environment, the Secretary of State may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development.

Pollution control and other environmental protection regimes

4.53 Issues relating to discharges or emissions from a proposed project which affect air quality, water quality, land quality or the marine environment, or which include noise, may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes. Relevant permissions will need to be obtained for any activities within the development that are regulated under those regimes before the activities can be operated.

[128] http://ukclimateprojections.metoffice.gov.uk/
[129] https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-government-report

4.54 In deciding an application, the Secretary of State should focus on whether the development is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The Secretary of State should assess the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that, in terms of the control and enforcement, the relevant pollution control regime will be properly applied and enforced. Decisions under the Planning Act 2008 should complement but not duplicate those taken under the relevant pollution control regime.

4.55 These considerations apply in an analogous way to other environmental regulatory regimes, including those on land drainage, flood defence, and biodiversity.

4.56 When an applicant applies for an environmental permit, the relevant regulator (in this case the Environment Agency) requires that processes are in place that are sufficient for the grant of the permit and to ensure compliance with conditions attached to any permit. In examining the impacts of the project, the Examining Authority may wish to seek the views of the regulator on the scope of the permit or consent and any management plans (such as any produced for noise) that would be included in an environmental permit application.

4.57 The applicant should begin pre-application discussions with the Environment Agency as early as possible. It is expected, however, that an applicant will have first considered what the Environment Agency is likely to require as a starting point for discussion. Some consents require a significant amount of preparation: as an example, the Environment Agency strongly recommends the applicant should start work towards submitting the permit application at least six months prior to the submission of a development consent order application, where it wishes to parallel track the applications. This will help ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the Examining Authority and the Secretary of State.

4.58 The Secretary of State will be satisfied that development consent can be granted taking full account of environmental impacts. This will require close cooperation with the Environment Agency, the local planning authority and pollution control authority, and other relevant bodies, such as Natural England, Drainage Boards, and water and sewerage undertakers, to ensure that, in the case of potentially polluting developments:

- The relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework; and
- The effects of existing sources of pollution in and around the project are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits.

4.59 The Secretary of State should not refuse consent on the basis of regulated impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted.

Common law nuisance and statutory nuisance

4.60 Section 158 of the Planning Act 2008 provides a defence of statutory authority in civil or criminal proceedings for nuisance. Such a defence is also available in respect of anything else authorised by an order granting development consent. The defence does not extinguish the local authority's duties under Part III of the Environmental Protection Act 1990 to inspect its area and take reasonable steps to investigate complaints of statutory nuisance and to serve an abatement notice where satisfied of its existence, likely occurrence or recurrence.

4.61 During the examination of an application for development consent for infrastructure covered under the Airports NPS, possible sources of nuisance under section 79(1) of the Environmental Protection Act 1990 and under sections 76 and 77 of the Civil Aviation Act 1982 should be considered by the Examining Authority. The Examining Authority should also consider how those sources of nuisance might be mitigated or limited so they can recommend appropriate requirements that the Secretary of State might include in any subsequent order granting development consent.

4.62 The defence of statutory authority is subject to any contrary provision made by the Secretary of State in any particular case by an order granting development consent.[130]

Security and safety considerations

4.63 National security considerations apply across all national infrastructure sectors. The Department for Transport acts as the sector sponsor department for the aviation sector, and in this capacity has lead responsibility for security matters and for directing the security approach to be taken, working with the Civil Aviation Authority. The Department for Transport works closely with Government agencies, including the Centre for the Protection of National Infrastructure, to reduce the vulnerability of the aviation sector to terrorism and other national security threats.

4.64 Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development. The nature of the aviation sector as a target for terrorism means that security considerations will likely apply in the case of the infrastructure project for which development consent may be sought under the Airports NPS.

4.65 Where national security implications have been identified, the applicant should consult with relevant security experts from the Centre for the Protection of National Infrastructure and the Department for Transport to ensure that physical, procedural and personnel security measures have been adequately considered in the design process, and that adequate consideration has been given to the management of security risks. If the Department for Transport, taking advice from the Civil Aviation Authority, Centre for the Protection of National Infrastructure and others it considers appropriate, forms the opinion that it is satisfied that current and potential future security needs are adequately addressed in the project and that relevant guidance on these matters has been appropriately taken into account in the application, it will provide confirmation of this to the Secretary of State, and the Examining Authority should not need to give any further consideration to the details of the security measures during the examination.

[130] Planning Act 2008, section 158(3)

4.66 The applicant should only include such security-related information in the application as is necessary to enable the Examining Authority to examine the development consent issues and make a properly informed recommendation on the application.

4.67 In exceptional cases where examination of an application would involve public disclosure of information about defence or national security which would not be in the national interest, the Secretary of State can intervene and may appoint an examiner to consider evidence in closed session.

4.68 Air transport is one of the safest forms of travel, and the UK is a world leader in aviation safety. Maintaining and improving that record, while ensuring that regulation is proportionate and cost-effective, remains of primary importance to the UK. Since 2003, rules and standards for aviation safety in Europe have increasingly been set by the European Aviation Safety Agency. The UK will continue to work closely with the European Aviation Safety Agency to ensure that a high and uniform level of civil aviation safety is maintained across Europe. The preferred scheme at Heathrow must comply with the UK's civil aviation safety regime, regulated by the Civil Aviation Authority.

4.69 There remains a considerable threat to aviation security from terrorism. The UK meets this threat with a multi-layered aviation security regime built on intelligence, effective risk management and robust, proportionate measures, brought together under the National Aviation Security Programme. The regulations governing aviation security in the UK have their basis in UK and European law, and are enforced by the Civil Aviation Authority on behalf of the Secretary of State. The design and operation of the Heathrow Northwest Runway scheme, to which the Airports NPS relates, must comply with aviation security regulations and guidance in the same way as existing airports. There may also be other security considerations linked to any application for development consent under the Airports NPS.

Health

4.70 The construction and use of airports infrastructure has the potential to affect people's health, wellbeing and quality of life. Infrastructure can have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests.

4.71 New or enhanced airports infrastructure may also have indirect health impacts, for example if they affect access to key public services, local transport, opportunities for cycling and walking, or the use of open space for recreation and physical activity. It should also be noted, however, that the increased employment stemming from airport expansion may have indirect positive health impacts.

4.72 As described elsewhere in the Airports NPS, where the proposed project has likely significant environmental impacts that would have an effect on human beings, any environmental statement should identify and set out the assessment of any likely significant health impacts.

4.73 The applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. These impacts may affect people simultaneously, so the applicant, the Examining Authority and the Secretary of State (in determining an application for development consent) should consider the cumulative impact on health.

Accessibility

4.74 The Government is committed to creating a more accessible and inclusive transport network that provides a range of opportunities and choices for all people to connect with jobs, services and leisure opportunities. This commitment extends to all the users of new airports infrastructure, and to the associated surface access facilities.

4.75 In 2008, the Department for Transport published *Access to Air Travel for Disabled Persons and Persons with Reduced Mobility – Code of Practice*,[131] which sets out the legal framework and gives advice and information. Since then, the Equality Act 2010 has updated and extended the legal framework for accessibility.[132]

4.76 In accordance with legal and best practice in relation to accessibility:

- The Government requires the applicant to include clear details of how plans will improve access on and around the airport by designing and delivering schemes (both new construction and upgrade or refurbishment) that address the accessibility needs of all those who use, or are affected by, surface access infrastructure, including those with physical and/or mental impairments as well as older users. Every opportunity to deliver improvements in accessibility on and to the existing national road network should also be taken;
- The Government will continue to work to ensure that all bus and train fleets comply with legal access standards by 2020, and to improve rail station access for those with impairments in accordance with legislation and best practice; and
- The car will continue to play an important role, providing disabled people with independence where other forms of transport are not accessible or available. Easy access and car parking provision at the airports is essential to this goal and must meet standards set down in guidance (such as the Department for Transport's *Inclusive Mobility*).[133]

[131] http://webarchive.nationalarchives.gov.uk/+/http:/www.dft.gov.uk/transportforyou/access/aviationshipping/accesstoairtravelfordisabled.pdf
[132] http://www.legislation.gov.uk/ukpga/2010/15/contents
[133] https://www.gov.uk/government/publications/inclusive-mobility

5. Assessment of impacts

Introduction

5.1 This chapter focuses on the potential impacts of the Heathrow Northwest Runway scheme, the assessments that any applicant will need to carry out, and the specific planning requirements that they will need to meet, in order to gain development consent.

5.2 In its Final Report, the Airports Commission recommended that "to make expansion possible…a comprehensive package of accompanying measures [should be recommended to] make the airport's expansion more acceptable to its local community, and to Londoners generally".[134]

5.3 When the Government stated in December 2015 that it agreed with the Airports Commission that one additional runway was required in the South East of England by 2030, it also emphasised the importance of securing the best possible deal for communities affected by the preferred scheme to increase airport capacity. The Government undertook further work, including through engagement with all three shortlisted scheme promoters, during 2016 to develop a package of location-specific measures to mitigate the impacts of increased capacity, and to enhance beneficial effects.

5.4 The Government announced on 25 October 2016 that its preferred scheme to deliver additional airport capacity in the South East of England was a Northwest Runway at Heathrow Airport. Alongside this, it set out a number of supporting measures that any application for development consent will be required to demonstrate and secure in order to mitigate the impacts of expansion on the environment and affected communities.

Surface access

Introduction

5.5 The Government's objective for surface access is to ensure that access to the airport by road, rail and public transport is high quality, efficient and reliable for passengers, freight operators and airport workers who use transport on a daily basis. The Government also wishes to see the number of journeys made to airports by sustainable modes of transport maximised as much as possible. This should be delivered in a way that minimises congestion and environmental impacts, for example on air quality.

5.6 A Northwest Runway at Heathrow Airport will have a range of impacts on local and national transport networks serving the airport, during both the construction and operational phases. Passengers, freight operators and airport workers share the

[134] *Airports Commission: Final Report*, p4

routes to and from the airport with other road and rail users, including commuters, leisure travellers and business users. Without effective mitigation, expansion is likely to increase congestion on existing routes and have environmental impacts such as increased noise and emissions.

5.7 The Airports Commission identified three major rail improvements which would support a new Northwest Runway at Heathrow Airport. These were Crossrail, a Western Rail Link to Heathrow and Southern Rail Access to the airport. Notwithstanding the requirements for the applicant's assessment set out below, Government has supported, or is supporting, all three of these schemes subject to a satisfactory business case and the agreement of acceptable terms with the Heathrow aviation industry. Crossrail is in construction and full services are anticipated to commence in 2019. The Western Rail Link to Heathrow was one of the schemes named as being in the 'develop' phase in the Rail Network Enhancements Pipeline, published in March 2018 and, subject to obtaining planning consent, it is expected to commence operations before 2030. Any Southern Rail Access to Heathrow is at an earlier stage of development and, subject to an acceptable business case and obtaining planning consent, should commence operations as soon as reasonably practicable after a new runway has opened.

5.8 It is important that improvements are made to Heathrow Airport's transport links to be able to support the increased numbers of people and freight traffic which will need to access the expanded airport, should development consent be granted.

Applicant's assessment

5.9 The applicant must prepare an airport surface access strategy in conjunction with its Airport Transport Forum, in accordance with the guidance contained in the Aviation Policy Framework.[135] The airport surface access strategy must reflect the needs of the scheme contained in the application for development consent, including any phasing over its development, implementation and operational stages, reflecting the changing number of passengers, freight operators and airport workers attributable to the number of air traffic movements. The strategy should reference the role of surface transport in relation to air quality and carbon. The airport surface access strategy must contain specific targets for maximising the proportion of journeys made to the airport by public transport, cycling or walking. The strategy should also contain actions, policies and defined performance indicators for delivering against targets, and should include a mechanism whereby the Airport Transport Forum can oversee implementation of the strategy and monitor progress against targets alongside the implementation and operation of the preferred scheme.

5.10 The applicant should assess the implications of airport expansion on surface access network capacity using the WebTAG methodology stipulated in the Department for Transport guidance,[136] or any successor to such methodology. The applicant should consult Highways England, Network Rail and highway and transport authorities, as appropriate, on the assessment and proposed mitigation measures. The assessment should distinguish between the construction and operational project stages for the development comprised in the application.

5.11 The applicant should also consult with Highways England, Network Rail and relevant highway and transport authorities, and transport operators, to understand the target completion dates of any third party or external schemes included in existing rail, road or other transport investment plans. It will need to assess the effects of the preferred

[135] https://www.gov.uk/government/publications/aviation-policy-framework, paragraphs 4.20-4.21
[136] https://www.gov.uk/guidance/transport-analysis-guidance-webtag

scheme as influenced by such schemes and plans. Such consultation and assessment, both of third party schemes on which the preferred scheme depends, and others which interact with it, all of which may be subject to their own planning, funding and approval processes, must be understood in terms of implications of the timings for the applicant's own surface access proposals.

5.12 The applicant will need to demonstrate that Highways England, Network Rail and any relevant highway and transport authorities and transport providers have been consulted, and are content with the deliverability of any new transport schemes or other changes required to existing links to allow expansion within the timescales required for the preferred scheme as a whole, the requirements of the Airports NPS and other statutory requirements. This includes changes to the M25 to allow a new runway to cross the motorway, local road changes, and improvements including the diversion of the A4 and A3044, changes to the Colnbrook Freight branch railway and on-airport station works and safeguarding. On the strategic road network, it will be important to ensure that any changes to the M25 which the applicant proposes will be implemented consistently with the Secretary of State's statutory directions and guidance set out in Highways England's licence. This includes ensuring that sufficient provision is made to accommodate flexibility and future-proofing in planning the long-term development, improvement and operation of Highways England's network.

5.13 For schemes and related surface access proposals or other works impacting on the strategic road network, the applicant should have regard to DfT Circular 02/2013, *The Strategic Road Network and the delivery of sustainable development*[137] (or prevailing policy), and the National Networks NPS. This sets out the way in which the highway authority for the strategic road network will engage with communities and the development industry to deliver sustainable development and economic growth, whilst safeguarding the primary function and purpose of the network.

5.14 The surface access systems and proposed airport infrastructure may have the potential to result in severance in some locations. Where appropriate, the applicant should seek to deliver improvements or mitigation measures that reduce community severance and improve accessibility.

Mitigation

5.15 In its application, the applicant should set out the mitigation measures that it considers are required to minimise and mitigate the effect of expansion on existing surface access arrangements.

5.16 The applicant should demonstrate in its assessment that the proposed surface access strategy will support the additional transport demands generated by airport expansion. This should be appropriately secured.

5.17 Any application for development consent and accompanying airport surface access strategy must include details of how the applicant will increase the proportion of journeys made to the airport by public transport, cycling and walking to achieve a public transport mode share of at least 50% by 2030, and at least 55% by 2040 for passengers. The applicant should also include details of how, from a 2013 baseline level, it will achieve a 25% reduction of all staff car trips by 2030, and a reduction of 50% by 2040.[138]

5.18 The applicant should commit to annual public reporting on performance against these specific targets. The airport surface access strategy should consider measures and

[137] https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development
[138] These mode share targets are derived from *Heathrow Airport Ltd. Statement of Principles*, part 5, paragraph 1.6 https://www.gov.uk/government/publications/heathrow-airport-limited-statement-of-principles

incentives which could help to manage demand by car users travelling to and from the airport, as well as physical infrastructure interventions, having at all times due regard to the effect of its strategy on the surrounding area and transport networks. The strategy should also include an assessment of the feasibility of the measures proposed as well as the benefits and disbenefits related to those measures, including any implications for Highways England, Network Rail and affected relevant highway authorities and transport providers. These measures could be used to help achieve mode share targets and should be considered in conjunction with measures to mitigate air quality impacts as described in the Airports NPS.

5.19 The Government expects the applicant to secure the upgrading or enhancing of road, rail or other transport networks or services which are physically needed to be completed to enable the Northwest Runway to operate. This includes works to the M25, local road changes and improvements including the diversion of the A4 and A3044, and on-airport station works and safeguarding, as set out in more detail in paragraph 5.12.

5.20 Where a surface transport scheme is not solely required to deliver airport capacity and has a wider range of beneficiaries, the Government, along with relevant stakeholders, will consider the need for a public funding contribution alongside an appropriate contribution from the airport on a case by case basis. The Government recognises that there may be some works which may not be required at the time the additional runway opens, but will be needed as the additional capacity becomes fully utilised. The same principle applies that, where a transport scheme is not solely required to deliver airport capacity, the Government, along with relevant stakeholders, will consider the need for a public funding contribution alongside an appropriate contribution from the airport on a case by case basis.

Decision making

5.21 The applicant's proposals will give rise to impacts on the existing and surrounding transport infrastructure. The Secretary of State will consider whether the applicant has taken all reasonable steps to mitigate these impacts during both the development and construction phase and the operational phase. Where the proposed mitigation measures are insufficient to effectively offset or reduce the impact on the transport network, arising from expansion, of additional passengers, freight operators and airport workers, the Secretary of State will impose requirements on the applicant to accept requirements and / or obligations to fund infrastructure or implement other measures to mitigate the adverse impacts, including air quality.

5.22 Provided the applicant is willing to commit to transport planning obligations to satisfactorily mitigate transport impacts identified in the transport assessment (including environment and social impacts), with costs being considered in accordance with the Department for Transport's policy on the funding of surface access schemes, development consent should not be withheld on surface access grounds.

Air quality

Introduction

5.23 Increases in emissions of pollutants during the construction or operational phases of the scheme could result in the worsening of local air quality. Increased emissions can contribute to adverse impacts on human health and on the natural environment.

5.24 The European Union has established common, health-based and ecosystem based ambient concentration limit values for the main pollutants in the Ambient Air Quality Directive (2008/50/EC) ('the Air Quality Directive'),[139] which member states are required to meet by specified dates.

5.25 Where compliance by those dates has not been achieved, the member state is required to put in place an action plan showing how the period of exceedance in each non-compliant area will be kept as short as possible. In December 2015, the UK submitted its national air quality plan for nitrogen dioxide, including a zonal plan for Greater London and the South East, for the approval of the European Commission.

5.26 In November 2016 the High Court ordered the Government to produce a modified air quality plan that delivers compliance in the shortest possible time. The Government published a final, modified air quality plan on 26 July 2017. The European Commission were notified of this plan on 31 July 2017.[140]

5.27 Other relevant legislation includes the fourth daughter Air Quality Directive (2004/107/EC), which sets targets for levels in outdoor air of certain toxic heavy metals and polycyclic aromatic hydrocarbons, and the National Emission Ceilings Directive (2016/2284/EU),[141] which sets national emission limits for a range of atmospheric pollutants.

5.28 Air quality impacts are generated by all types of infrastructure development to varying degrees, and the geographical extent and distribution can cover a large area. At Heathrow Airport in 2015, aircraft movements were modelled to have contributed 17% on average to local NOx concentrations at nearby roadside locations. Road transport, by comparison, accounted for 64% of NOx concentrations in the same areas. Off-road transport and mobile machinery (a category which would include airside vehicles) contributed 5%[142].

5.29 The Airports Commission identified (and in some cases quantified the impact of) a number of measures that would help mitigate any negative impacts on air quality.[143] In addition, for the Heathrow Northwest Runway scheme, the Airports Commission recommended the following supporting measures:

- That Heathrow Airport should be held to performance targets to increase the percentage of employees and passengers accessing the airport by public transport; and
- That the introduction of a congestion or access charge for road vehicles should be considered.

5.30 The Airports Commission undertook extensive analysis on air quality and concluded that expansion could take place within legal obligations (including in a high demand growth scenario). The Department for Transport conducted a study of the implications of the Government's 2015 national air quality plan on the conclusions of the Airports Commission's air quality assessment.[144]

5.31 Since this work was completed in June 2016, updated international evidence on vehicle emission forecasts was published at the end of September 2016. The Department for Transport has conducted further analysis to assess the impact that this updated evidence base would have on estimated compliance with EU limit values of

[139] The Ambient Air Quality Directive (2008/50/EC) was brought into law in England through the Air Quality Standards Regulations 2010
[140] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf
[141] This Directive succeeds an earlier National Emissions Ceilings Directive (2001/81/EC) and contains transitional provisions
[142] Based on 2015 data from the Pollution Climate Mapping Model for roads affected by Heathrow emissions
[143] https://www.gov.uk/government/consultations/airports-commission-air-quality-assessment
[144] https://www.gov.uk/government/publications/airport-expansion-further-analysis-of-air-quality-data

expansion options at Heathrow Airport and Gatwick Airport. This analysis has been updated to take account of the revised aviation demand forecasts and the Government's final air quality plan. The result of this analysis helped inform the Government's view that, with a suitable package of policy and mitigation measures, including the Government's modified air quality plan, the Heathrow Northwest Runway scheme would be capable of being delivered without impacting the UK's compliance with air quality limit values.

Applicant's assessment

5.32 The applicant should undertake an assessment of the project, to be included as part of the environmental statement, demonstrating to the Secretary of State that the construction and operation of the Northwest Runway will not affect the UK's ability to comply with legal obligations. Failure to demonstrate this will result in refusal of development consent.

5.33 The environmental statement should assess:

- Existing air quality levels for all relevant pollutants referred to in the Air Quality Standards Regulations 2010 and the National Emission Ceilings Regulations 2002 (as amended) or referred to in any successor regulations;
- Forecasts of levels for all relevant air quality pollutants at the time of opening, (a) assuming that the scheme is not built (the 'future baseline'), and (b) taking account of the impact of the scheme, including when at full capacity; and
- Any likely significant air quality effects of the scheme, their mitigation and any residual likely significant effects, distinguishing between those applicable to the construction and operation of the scheme including any interaction between construction and operational changes and taking account of the impact that the scheme is likely to cause on air quality arising from road and other surface access traffic.

5.34 Defra publishes future national projections of air quality based on evidence of future emissions. Projections may be updated as the evidence base changes. The applicant's assessment should, in so far as practicable, be based on the latest available projections.

Mitigation

5.35 The Secretary of State will need to be satisfied that the mitigation measures put forward by the applicant are acceptable, including at the construction stage. A management / project plan may help record and secure mitigation measures.

5.36 Mitigation measures may affect the project design, layout, construction and operation, and / or may comprise measures to improve air quality in pollution hotspots beyond the immediate locality of the scheme.

5.37 While the precise package of mitigations should be subject to consultation with local communities and relevant stakeholders to ensure the most effective measures are taken forward, an extensive range of mitigation measures is likely to be required.

5.38 In addition, Heathrow Airport should continue to strive to meet its public pledge to have landside airport-related traffic no greater than today. To achieve this, it should set out and regularly review its plans to meet the mode share targets set at paragraph 5.17 above. Heathrow Airport should also develop and keep under review plans to improve the impact of road freight serving the airport.

5.39 Other mitigation measures which may be put forward by the applicant could include, but are not limited to:

- Landing charges structured to reward airlines for operating cleaner flights (for example NOx emissions charging);
- Zero- or low-emission hybrid or electric vehicle use (ultra-low emission vehicles), charging and fuel facilities;
- Reduced or single engine taxiing (improved taxiing efficiency);
- Reducing emissions from aircraft at the gate (for example installation of fixed electrical ground power and preconditioned air to aircraft stands to reduce the use of auxiliary power unit);
- Modernised heating supplies in airport buildings;
- Changes to the layout of surface access arrangements;
- Traffic restrictions and / or traffic relocation around sensitive areas;
- An emissions-based access charge; and
- Physical means, including barriers to trap or better disperse emissions and speed control on roads.

5.40 Mitigation measures at the construction stage should also be provided and draw on best practice from other major construction schemes, including during the procurement of contractors. Specific measures could include but are not limited to:

- Development of a construction traffic management plan (which may include the possible use of rail and consolidation sites or waterways);
- The use of low emission construction plant / fleet, fitting of diesel particulate filters, and use of cleaner engines;
- The use of freight consolidation sites;
- Active workforce management / a worker transport scheme;
- Construction site connection to grid electricity to avoid use of mobile generation; and
- Selection of construction material to minimise distance of transport and increase recycling percentages of the material where appropriate.

5.41 The implementation of mitigation measures may require working with partners to support their delivery.

Decision making

5.42 The Secretary of State will consider air quality impacts over the wider area likely to be affected, as well as in the vicinity of the scheme. In order to grant development consent, the Secretary of State will need to be satisfied that, with mitigation, the scheme would be compliant with legal obligations that provide for the protection of human health and the environment.

5.43 Air quality considerations are likely to be particularly relevant where the proposed scheme:

- is within or adjacent to Air Quality Management Areas,[145] roads identified as being above limit values, or nature conservation sites (including Natura 2000 sites and Sites of Special Scientific Interest);
- would have effects sufficient to bring about the need for new Air Quality Management Areas or change the size of an existing Air Quality Management Area, or bring about changes to exceedances of the limit values, or have the potential to have an impact on nature conservation sites; and
- after taking into account mitigation, would lead to a significant air quality impact in relation to Environmental Impact Assessment and / or to a deterioration in air quality in a zone or agglomeration.

Noise

Introduction

5.44 The impact of noise from airport expansion is a key concern for communities affected, and the Government takes this issue very seriously. High exposure to noise is an annoyance, can disturb sleep, and can also affect people's health. Aircraft operations are by far the largest source of noise emissions from an airport, although noise will also be generated from ground operations and surface transport, and during the construction phase of a scheme.

5.45 Aircraft noise is not only determined by the number of aircraft overhead, but also by engine technologies and airframe design, the paths the aircraft take when approaching and departing from the airport, and the way in which the aircraft are flown.

5.46 Over recent decades, there have been reductions in aviation noise due to technological and operational improvements, and this trend is expected to continue.[146] New technology is already making aircraft quieter. Newer generation aircraft coming into service have a noise footprint typically 50% smaller on departure than the ones they are replacing, and at least 30% smaller on arrival. In addition, further opportunities for noise reductions are expected in the next decade as part of the UK airspace modernisation programme. One of the key benefits of this programme is expected to be "reduced noise from aircraft overflying communities, with less 'holding' at lower altitudes".[147] However, evidence has shown that people's sensitivity to noise has increased in recent years, and there has been growing evidence that exposure to high levels of aircraft noise can adversely affect people's health.[148] Expansion will lead to a rise in the number of flights in the local area compared to a no expansion scenario.

5.47 The Government wants to strike a fair balance between the negative impacts of noise (on health, amenity, quality of life and productivity) and the positive impacts of flights. There is no European or national legislation which sets legally binding limits on aviation noise emissions. Major airports are, however, under a legal obligation[149] to

[145] https://uk-air.defra.gov.uk/aqma/
[146] *The Sustainable Aviation Noise Roadmap, A Blueprint for Managing Noise from Aviation Sources to 2050*: http://www.sustainableaviation.co.uk/road-maps/
[147] UK Airspace Policy: A framework for balanced decisions on the design and use of airspace, p21, para 3.9, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/588186/uk-airspace-policy-a-framework-for-balanced-decisions-on-the-design-and-use-of-airspace-web-version.pdf
[148] *CAP 1164, Aircraft noise, sleep disturbance and health effects 2014*: http://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=6275
CAP 1506, Survey of noise attitudes 2014: Aircraft http://www.gov.uk/government/publications/survey-of-attitudes-to-aviation-noise
[149] The EU Environmental Noise Directive 2002/49 which is implemented in England by the Environmental Noise (England) Regulations 2006 (S.I. 2006/2238 as amended)

develop strategic noise maps and produce Noise Action Plans based on those maps, on a five yearly basis. They are also required to review and, if necessary, revise action plans when a major development occurs affecting the existing noise situation. In addition, the Government already expects the noise-designated airports (Heathrow, Gatwick and Stansted) to produce noise exposure maps on an annual basis.

5.48 The International Civil Aviation Organisation introduced the concept of a 'Balanced Approach' to noise management (resolution A33/7). This is given legal effect in the UK through EU Regulation 598/2014.[150]

5.49 The Airports Commission undertook a thorough assessment of the noise impacts of the proposed development. The Airports Commission used a "noise scorecard" to assess the noise impacts of the scheme in 2030, 2040 and 2050.[151] The noise scorecard included both conventional metrics, which assess noise levels over a period of time (daytime, night time and 24-hour), and more innovative metrics that assess the number of times a location is overflown by aircraft whose noise impacts exceed a specified level.

5.50 The Airports Commission's assessment was based on 'indicative' flight path designs, which the Government considers to be a reasonable approach at this stage in the process. Precise flight path designs can only be defined at a later stage after detailed airspace design work has taken place. This work will need to consider the various options available to ensure a safe and efficient airspace which also mitigates the level of noise disturbance. Once the design work has been completed, the airspace proposal will be subject to extensive consultation as part of the separate airspace decision making process established by the Civil Aviation Authority.

5.51 The Airports Commission concluded that "expansion at Heathrow must be taken forward with a firm guarantee that the airport and its airlines will be held to the very highest standards of noise performance". In addition, the Airports Commission stated that "the airport should not be allowed to expand without appropriate conditions being put in place in respect of its noise impacts".[152]

Applicant's assessment

5.52 Pursuant to the terms of the Environmental Impact Assessment Regulations,[153] the applicant should undertake a noise assessment for any period of change in air traffic movements prior to opening, for the time of opening, and at the time the airport is forecast to reach full capacity, and (if applicable, being different to either of the other assessment periods) at a point when the airport's noise impact is forecast to be highest. This should form part of the environmental statement. The noise assessment should include the following:

- A description of the noise sources;
- An assessment of the likely significant effect of predicted changes in the noise environment on any noise sensitive premises (including schools and hospitals) and noise sensitive areas (including National Parks and Areas of Outstanding Natural Beauty);
- The characteristics of the existing noise environment, including noise from aircraft, using noise exposure maps, and from surface transport and ground operations

[150] Regulation (EU) No 598/2014 of the European Parliament and of the Council on the establishment of rules and procedures with regard to the introduction of noise-related operating restrictions at Union airports within a Balanced Approach and repealing Directive 2002/30/EC
[151] *Airports Commission: Final Report*, p170-171
[152] *Airports Commission: Final Report*, p276
[153] Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (S.I. 2017/572)

associated with the project, the latter during both the construction and operational phases of the project;

- A prediction on how the noise environment will change with the proposed project; and
- Measures to be employed in mitigating the effects of noise.

These should take into account construction and operational noise (including from surface access arrangements) and aircraft noise. The applicant's assessment of aircraft noise should be undertaken in accordance with the developing indicative airspace design. This may involve the use of appropriate design parameters and scenarios based on indicative flightpaths.

5.53 Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. For the prediction, assessment and management of construction noise, reference should be made to any British Standards and other guidance which give examples of mitigation strategies. In assessing the likely significant impacts of aircraft noise, the applicant should have regard to the noise assessment principles, including noise metrics, set out in the national policy on airspace.

Mitigation

5.54 Noise management at airports where a noise problem has been identified is subject to the concept of a 'Balanced Approach', referred to above. EU Regulation 598/2014, which adopts the Balanced Approach,[154] also lays down a procedure for the adoption of noise-related operating restrictions, in particular a requirement for prior consultation.

5.55 The Government recognises that aircraft noise is a significant concern to communities affected and that, as a result of additional runway capacity, noise- related action will need to be taken. Such action should strike a fair balance between the negative impacts of noise and positive impacts of flights.

5.56 The Government also recognises that predictable periods of relief from aircraft noise (known as respite) are important for communities affected, and that noise at night is widely regarded as the least acceptable aspect of aviation noise for those communities, with the costs on communities of aircraft noise during the night (particularly the health costs associated with sleep disturbance) being higher.

5.57 While the package and detail of noise mitigation measures should be subject to consultation with local communities and other stakeholders to ensure the most appropriate and effective measures are taken forward, in the context of Government policy on sustainable development, the Government expects the applicant to make particular efforts to avoid significant adverse noise impacts and mitigate other adverse noise impacts as a result of the Northwest Runway scheme and Heathrow Airport as a whole.

5.58 The Secretary of State will consider whether the mitigation measures put forward by the applicant following consultation are acceptable. The noise mitigation measures should ensure the impact of aircraft noise is limited and, where possible, reduced compared to the 2013 baseline assessed by the Airports Commission.[155]

[154] For the purposes of EU Regulation 598/2014, an airport means an airport which has more than 50,000 civil aircraft movements per calendar year (a movement being a take-off or landing), on the basis of the average number of movements in the last three calendar years before the noise assessment

[155] With reference to the 2013 baseline for the 54 decibel LAeq, 16h noise contour assessed by the Airports Commission. LAeq,16h indicates the annual average noise levels for the 16-hour period between 0700 – 2300

5.59 The applicant should specifically seek to deliver the mitigation measures set out in paragraphs 5.60-5.62 below.

5.60 The applicant should put forward plans for a noise envelope. Such an envelope should be tailored to local priorities and include clear noise performance targets. As such, the design of the envelope should be defined in consultation with local communities and relevant stakeholders, and take account of any independent guidance such as from the Independent Commission on Civil Aviation Noise. The benefits of future technological improvements should be shared between the applicant and its local communities, hence helping to achieve a balance between growth and noise reduction. Suitable review periods should be set in consultation with the parties mentioned above to ensure the noise envelope's framework remains relevant.

5.61 The applicant should put forward plans for a runway alternation scheme that provides communities affected with predictable periods of respite (though the Government acknowledges that the duration of periods of respite that currently apply will be reduced). Predictability should be afforded to the extent that this is within the airport operator's control.[156] The details of any such scheme, including timings, duration and scheduling, should be defined in consultation with local communities and relevant stakeholders, and take account of any independent guidance such as from the Independent Commission on Civil Aviation Noise.

5.62 The Government also expects a ban on scheduled night flights for a period of six and a half hours, between the hours of 11pm and 7am, to be implemented.[157] The rules around its operation, including the exact timings of such a ban, should be defined in consultation with local communities and relevant stakeholders, in line with EU Regulation 598/2014. In addition, outside the hours of a ban, the Government expects the applicant to make particular efforts to incentivise the use of the quietest aircraft at night.

5.63 It is recognised that Heathrow Airport already supports a number of initiatives to mitigate aircraft noise, such as developing quieter operating procedures (like steeper descent approaches) and keeping landing gear up as long as possible. The applicant is expected to continue to do so, and to explore all opportunities to mitigate operational noise in line with best practice. The implementation of such measures may require working with partners to support their delivery.

5.64 Noise mitigation measures at the construction stage should also be provided. These should draw on best practice from other major construction schemes, with due regard given to any relevant British Standards and other guidance, and should be taken into account during the procurement of contractors.

5.65 Other measures to mitigate noise during the construction and operation of the development may include one or more of the following:

- Reducing noise at point of generation and containment of noise generated;
- Where possible, optimising the distance between source and noise-sensitive receptors, and incorporating good design to minimise noise transmission through screening by natural barriers or other buildings; and
- Restricting activities allowed on the site.

5.66 The Secretary of State will expect the applicant to put forward proposals as to how these measures may be secured and enforced, including the bodies who may enforce

[156] Examples of circumstances outside of an airport operator's control might be severe weather disruption and similar events
[157] 11pm to 7am is the standard night period used in noise measurement, and is used in World Health Organisation guidelines and the Environmental Noise Directive

the measures. These bodies might include the Secretary of State, local authorities (including those over a wider area), and / or the Civil Aviation Authority.

Decision making

5.67 The proposed development must be undertaken in accordance with statutory obligations for noise.[158] Due regard must have been given to national policy on aviation noise, and the relevant sections of the Noise Policy Statement for England,[159] the National Planning Policy Framework,[160] and the Government's associated planning guidance on noise.[161] However, the Airports NPS must be used as the primary policy on noise when considering the Heathrow Northwest Runway scheme, and has primacy over other wider noise policy sources.

5.68 Development consent should not be granted unless the Secretary of State is satisfied that the proposals will meet the following aims for the effective management and control of noise, within the context of Government policy on sustainable development:

- Avoid significant adverse impacts on health and quality of life from noise;
- Mitigate and minimise adverse impacts on health and quality of life from noise; and
- Where possible, contribute to improvements to health and quality of life.

Carbon emissions

Introduction

5.69 The Planning Act 2008 requires that a national policy statement must give reasons for the policy set out in the statement and an explanation of how the policy set out in the statement takes account of Government policy relating to the mitigation of, and adaptation to, climate change.[162] The Government has a number of international and domestic obligations to limit carbon emissions. Emissions from both the construction and operational phases of the project will be relevant to meeting these obligations.

5.70 The Government's key objective on aviation emissions, as outlined in the Aviation Policy Framework, is to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions.[163] This must be achieved while minimising the risk of putting UK businesses at a competitive international disadvantage. The development of the Heathrow Northwest Runway scheme being considered under the Airports NPS does not override this objective.

5.71 The UK's obligations on greenhouse gas emissions are set under the 2008 Climate Change Act. Under this framework, the UK has a 2050 target to reduce its greenhouse gas emissions by at least 80% on 1990 levels, and has a series of five year carbon budgets on the way to 2050.

Coverage of aviation emissions under the UK's Climate Change Act

5.72 Whilst UK domestic aviation emissions are included in the 2050 target, international aviation emissions are not currently formally included within the UK's 'net carbon account' for greenhouse gas emissions and are therefore not included in the 2050 target as defined by the Climate Change Act, nor within the first five carbon budgets. The Climate Change Act says that the Government must "take into account" the

[158] EU Regulation 598/2014; The Environmental Noise (England) Regulations 2006
[159] Noise policy statement for England, March 2010, https://www.gov.uk/government/publications/noise-policy-statement-for-england
[160] National Planning Policy Framework, March 2012, paragraph 123, or any successor document
[161] https://www.gov.uk/guidance/noise--2
[162] Planning Act 2008, section 5(8)
[163] *Aviation Policy Framework*, paragraph 12

"estimated amount of reportable emissions from international aviation for the budgetary period or periods in question" when setting carbon budgets. The Committee on Climate Change has interpreted the requirement to take these emissions into account as requiring the UK to aim to meet a 2050 target which includes these emissions, and has made its recommendations for the levels of the existing carbon budgets on this basis.

5.73 The Government has accepted the Committee on Climate Change's recommendations on the first five carbon budgets. The fifth carbon budget, for the period 2028-2032, was set in July 2016 in line with the Committee on Climate Change's advice. In effect, this means that carbon budgets for other sectors of the UK economy have been set at a level which the Committee on Climate Change considers is consistent with meeting the overall 2050 target when international aviation emissions are included.

Impacts

5.74 The carbon impact of the proposed development falls into four areas: increased emissions from air transport movements (both international and domestic) as a result of increased demand, emissions from airport buildings and ground operations, emissions from surface transport accessing the expanded airport, and emissions caused by construction. The first is by far the largest of these impacts.

5.75 The Airports Commission used two sets of carbon scenarios: one in which a cap is imposed on UK aviation emissions in line with the Committee on Climate Change's planning assumption of 37.5 million tonnes of CO_2 in 2050; and another in which an international trading mechanism allows carbon emissions from aviation to be offset by paying for emissions reductions in other sectors of the global economy. The analysis also assumed certain carbon-limiting developments largely outside the applicant's control. These include growth in numbers of more fuel-efficient aircraft, increasing use of biofuels, and other airline operational measures.

Applicant's assessment

5.76 Pursuant to the terms of the Environmental Impact Assessment Regulations,[164] the applicant should undertake an assessment of the project as part of the environmental statement, to include an assessment of any likely significant climate factors. The applicant should provide evidence of the carbon impact of the project (including embodied carbon), both from construction and operation, such that it can be assessed against the Government's carbon obligations, including but not limited to carbon budgets. The applicant should quantify the greenhouse gas impacts before and after mitigation to show the impacts of the proposed mitigation. This will require emissions to be split into traded sector and non-traded sector emissions, and for a distinction to be made between international and domestic aviation emissions.

5.77 As far as possible, the applicant's assessment should also seek to quantify impacts including:

- Emissions from surface access due to airport and construction staff;
- Emissions from surface access due to freight and retail operations and construction site traffic.
- Emissions from surface access due to airport passengers / visitors; and
- Emissions from airport operations including energy and fuel use.

[164] Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (S.I. 2017/572). Regulation 5(2)(c) refers to the significant effects of the proposed development on, among other factors, climate.

This should be undertaken in both a 'do minimum' and also in the 'do something' scenario for the opening, peak operation, and worst case scenarios.

Mitigation

5.78 The Secretary of State will need to be satisfied that the mitigation measures put forward by the applicant are acceptable, including at the construction stage. A management / project plan may help clarify and secure mitigation at this stage. The applicant is expected to take measures to limit the carbon impact of the project, which may include, but are not limited to:

- Zero or low-emission hybrid or electric vehicle use (ultra-low emission vehicles), charging and fuel facilities;
- Reduced engine taxiing (improved taxiing efficiency);
- Reducing emissions from aircraft at the gate;
- Reduced emissions from airport buildings (for example from lower carbon heating);
- Changes to the layout of surface access arrangements; and
- Encouraging increased use of public transport by staff and passengers.

5.79 Aircraft are expected to become cleaner as technology and standards improve and fleets evolve. It is recognised that the applicant already supports a number of initiatives to reduce the carbon emissions from flights, such as reduced-engine taxiing and ground-towing, and airspace and navigational reform.

5.80 Mitigation measures at the construction stage should also be provided and draw on best practice from other major construction schemes, including during the procurement of contractors. Specific measures could include but are not limited to:

- Development of a construction traffic management plan (which may include the possible use of rail and consolidation sites);
- Transport of materials to site by alternative modes to road (for example by rail or water);
- Increased efficiency in use of construction plant;
- Use of energy efficient site accommodation;
- Reduction of waste, and the transport of waste;
- Construction site connection to grid electricity to avoid use of mobile generation;
- Selection of construction material to utilise low carbon options; and
- Selection of construction material to minimise distance of transport.

5.81 The implementation of mitigation measures may require working with partners to support their delivery.

Decision making

5.82 Any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets.

5.83 Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout, and use of materials) in both design and construction should be presented as part of any application for development consent. The Secretary of

State will consider the effectiveness of such mitigation measures in order to ensure that, in relation to design and construction, the carbon footprint is not unnecessarily high. The Secretary of State's view of the adequacy of the mitigation measures relating to design, construction and operational phases will be a material factor in the decision making process.

Biodiversity and ecological conservation

Introduction

5.84 Biodiversity is the variety of plant and animal life in the world or in a particular habitat, and encompasses all species of plants and animals and the complex ecosystems of which they are a part. Government policy for the natural environment, including on biodiversity, is set out in the *Natural Environment White Paper*.[165] The biodiversity section in the *Natural Environment White Paper* sets out a vision of moving progressively from new biodiversity loss to net gain, by supporting healthy, well-functioning ecosystems and establishing more coherent ecological networks that are more resilient to current and future pressures. It is also a requirement of the Water Framework Directive to protect and enhance biodiversity associated with the water environment. Geological conservation relates to the sites that are designated for their geology and / or geomorphological importance.[166]

5.85 The Government's biodiversity strategy is set out in *Biodiversity 2020: A Strategy for England's wildlife and ecosystem services*.[167] Its aim is to halt overall biodiversity loss, support healthy, well-functioning ecosystems, and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. The contribution that the planning system should make to enhancing the local and natural environment, including establishing coherent ecological networks, is set out in the National Planning Policy Framework, to which the applicant should also refer.[168]

5.86 The National Planning Policy Framework states that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life. This includes moving from a net loss of biodiversity to achieving net gains for nature.[169]

5.87 The wide range of legislative provisions at the international and national level that can impact on planning decisions affecting biodiversity and ecological conservation is set out in the Planning Practice Guidance on biodiversity and ecosystems.[170] This includes a description of the potential impacts on internationally, nationally and locally protected sites which may arise through development, and should therefore be considered through further assessment.

5.88 Airport development may require the netting of open watercourses to manage the risk of bird strike, which may have a detrimental impact on water environment and biodiversity.

Applicant's assessment

5.89 The applicant should ensure that the environmental statement submitted with its application for development consent clearly sets out any likely significant effects on

[165] https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature
[166] A list of designated sites is included in the Geological Conservation Review held by the Joint Nature Conservation Committee
[167] https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services
[168] National Planning Policy Framework, March 2012, paragraph 109, or any successor document
[169] National Planning Policy Framework, March 2012, paragraph 9, or any successor document
[170] http://planningguidance.communities.gov.uk/blog/guidance/natural-environment/biodiversity-ecosystems-and-green-infrastructure/

internationally, nationally and locally designated sites of ecological or geological importance, protected species, and habitats and other species identified as being of principal importance for the conservation of biodiversity.

5.90 The Environmental Impact Assessment should reflect the principles of *Biodiversity 2020* and identify how the effects on the natural environment will be influenced by climate change, and how ecological networks and their physical and biological process will be maintained.

5.91 The applicant should show how the project has taken advantage of and maximised opportunities to conserve biodiversity and geological conservation interests.

Mitigation

5.92 The Secretary of State will consider what requirements should be attached to any consent and / or in any planning obligations entered into in order to ensure that mitigation measures are delivered and monitored for their effectiveness.

5.93 The Secretary of State will take account of any mitigation measures agreed between the applicant and Natural England, and whether Natural England has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences.

5.94 The applicant's proposal should address the mitigation hierarchy (which supports efforts to conserve and enhance biodiversity), which is set out in the National Planning Policy Framework.[171]

5.95 Compensation ratios relating to the effects of the preferred scheme should be considered in more detail during the design. The application of 2:1 compensation ratio is considered to represent the minimum requirement. However, there are other mechanisms for establishing compensation ratios, such as Defra's biodiversity offsetting metric. Equally, it is important to note that habitat ratios form only one part of potential compensation which should be considered, and the location and quality of any compensation land is of key importance. In this regard, habitat creation, where required, should be focused on areas where the most ecological and ecosystems services benefits can be realised.

Decision making

5.96 As a general principle, and subject to the specific policies set out below and the Infrastructure Planning (Decisions) Regulations 2010,[172] development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated.[173] Where significant harm cannot be avoided or mitigated, as a last resort appropriate compensation measures should be sought. The development consent order, or any associated planning obligations, will need to make provision for the long term management of such measures.

5.97 In taking decisions, the Secretary of State will ensure that appropriate weight is attached to designated sites of international, national and local importance, protected

[171] National Planning Policy Framework, March 2012, paragraph 118, or any successor document
[172] http://www.legislation.gov.uk/uksi/2010/305/regulation/7/made
[173] https://www.gov.uk/government/collections/biodiversity-offsetting Biodiversity offsets are measurable conservation outcomes resulting from actions designed to compensate for residual adverse biodiversity impacts arising from a development after mitigating measures have been taken. The goal of biodiversity offsets is to achieve no net loss and, preferably, a net gain of biodiversity

species, habitats and other species of principal importance for the conservation of biodiversity, and to biodiversity and geological interests within the wider environment.

International sites

5.98 The most important sites for biodiversity are those identified through international conventions and European Directives. The Habitats Regulations provide statutory protection for European sites and require an assessment of impacts upon such sites.[174] The Government considers that the following wildlife sites should have the same protection as European sites:

- Potential Special Protection Areas and possible Special Areas of Conservation;
- Listed or proposed Ramsar sites;[175] and
- Sites identified or required as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

5.99 At this stage, it is not possible to rule out adverse effects of the Heathrow Northwest Runway scheme, given that more detailed project design information, and detailed proposals for mitigation, are not presently available. However, the applicant will need to demonstrate that Article 6(3) or 6(4) of the Habitats Directive are complied with in order to satisfy the competent authority that development consent can be granted on that basis.

Sites of Special Scientific Interest

5.100 Many Sites of Special Scientific Interest are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of Sites of Special Scientific Interest that are not covered by an international designation, will be given a high degree of protection. All National Nature Reserves are notified as Sites of Special Scientific Interest.

5.101 Where a proposed development on land within or outside a Site of Special Scientific Interest is likely to have an adverse effect on the site (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect on the site's notified special interest features is likely, an exception should be made only where the benefits of the development at this site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest. The Secretary of State will ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest, are acceptable. Where necessary, requirements and / or planning obligations should be used to ensure these proposals are delivered.

Regional and local sites

5.102 Sites of regional and local biodiversity interest (which include Local Nature Reserves, Local Wildlife Sites and Nature Improvement Areas) have a fundamental role to play in meeting overall national biodiversity targets, contributing to the quality of life and the wellbeing of the community, and supporting research and education. The Secretary of State will give due consideration to such regional or local designations. However,

[174] This includes candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in Regulation 8 of the Conservation of Habitats and Species Regulations 2010

[175] Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site

given the need for new infrastructure, these designations should not be used in themselves to refuse development consent, although adequate compensation should always be considered, and ecological corridors and their physical processes should be maintained as a priority to mitigate widespread impacts.

Irreplaceable habitats including ancient woodland and veteran trees

5.103 Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost, it cannot be recreated. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided.[176] Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this.

Biodiversity within and around developments

5.104 The proposed development comprised in the preferred scheme should provide many opportunities for building in beneficial biodiversity as part of good design. When considering proposals, the Secretary of State will consider whether the applicant has maximised such opportunities in and around developments, and particularly to establishing and enhancing green infrastructure. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.

Protection of other habitats and species

5.105 In addition to the habitats and species that are subject to statutory protection or international, regional or local designation, other habitats and species have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State will ensure that the applicant has taken measures to ensure that these other habitats and species are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection. The Secretary of State will refuse consent where harm to these other habitats, or species and their habitats, would result, unless the benefits of the development (including need) clearly outweigh that harm. In such cases, compensation will generally be expected to be included in the design proposals.

Land use including open space, green infrastructure and Green Belt

Introduction

5.106 Access to high quality open spaces and the countryside[177] and opportunities for sport and recreation can be a means of providing necessary mitigation and / or compensation requirements. Green infrastructure can enable developments to provide positive environmental and economic benefits.

[176] This does not prevent the loss of such trees where the decision maker is satisfied that their loss is unavoidable

[177] All open space of public value, including not just land but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity

5.107 Green Belts, defined in a development plan,[178] are situated around certain cities and built up areas, including London. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. Further information on the purposes and protection of Green Belt is set out in the National Planning Policy Framework.[179]

5.108 Best and most versatile agricultural land is land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals. The National Planning Policy Framework sets out how local planning authorities should take into account the economic and other benefits of best and most versatile agricultural land.[180] Planning practice guidance for the natural environment provides additional guidance on best and most versatile agricultural land and soil issues.

5.109 Development of land will affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water regime, organic matter content, soil biodiversity and soil process.

5.110 Construction and operation of airport facilities is a potential source of contaminative substances (for example, through de-icing or leaks and spills of fuel). Where pre-existing land contamination is being considered through development, the objective is to ensure that the site is suitable for its intended use. Risks would require consideration in accordance with the contaminated land statutory guidance as a minimum.[181]

Applicant's assessment

5.111 The applicant should identify existing and proposed land uses[182] near the project, including any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. The applicant should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors.

5.112 Existing open space, sports and recreational buildings and land should not be developed unless the land is no longer needed or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. If the applicant is considering proposals which would involve developing such land, it should have regard to any local authority's assessment of need for such types of land and buildings.

5.113 During any pre-application discussions with the applicant, the local planning authority should identify any concerns it has about the impacts of the application on land use, having regard to the development plan and relevant applications and including, where relevant, whether it agrees with any independent assessment that the land is no longer needed. These are also matters that local authorities may wish to include in their Local Impact Report which can be submitted after an application for development consent has been accepted.

[178] Or else so designated under the Green Belt (London and Home Counties) Act 1938
[179] National Planning Policy Framework, March 2012, paragraphs 79-92, or any successor document
[180] National Planning Policy Framework, March 2012, paragraph 112, or any successor document
[181] https://www.gov.uk/government/publications/contaminated-land-statutory-guidance
[182] For example, where a planning application has been submitted

5.114 The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances which are already the subject of Government guidance.[183] The applicant should therefore determine whether the proposal, or any part of it, is within an established Green Belt and, if so, whether its proposal may be considered inappropriate development within the meaning of Green Belt policy. Metropolitan Open Land and land designated a Local Green Space in a local or neighbourhood plan are subject to the same policies of protection as Green Belt, and inappropriate development should not be approved except in very special circumstances.

5.115 The applicant should take into account the economic and other benefits of best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, the applicant should seek to use areas of poorer quality land in preference to that of a higher quality. The applicant should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed.

5.116 For developments where land may be affected by contamination, or existing mitigation is in place in respect of historic contamination, the applicant should have regard to the statutory regime contained in Part IIA of the Environmental Protection Act 1990 and relevant Government guidance relating to or dealing with contaminated land.[184]

5.117 The applicant should safeguard any mineral resources on the proposed site for the preferred scheme as far as possible.

Mitigation

5.118 The applicant can minimise the direct effects of a project on the existing use of the proposed site, or proposed uses near the site, by the application of good design principles, including the layout of the project and the protection of soils during construction.[185]

5.119 Where green infrastructure is affected, the applicant should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space, including appropriate access to National Trails and other public rights of way.

5.120 The Secretary of State must also consider whether mitigation of any adverse effects on green infrastructure or open space is adequately provided for by means of requirements, planning obligations, or any other means, for example to provide exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility. Alternatively, where sections 131 and 132 of the Planning Act 2008 apply,[186] any replacement land provided under those sections will need to conform to the requirements of those sections.

5.121 Where the preferred scheme has an impact on a mineral safeguarding area, the Secretary of State must ensure that the applicant has put forward appropriate mitigation measures to safeguard mineral resources.

[183] https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#paragraph_044
[184] https://www.gov.uk/government/collections/land-contamination-technical-guidance
[185] https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites
[186] http://www.legislation.gov.uk/ukpga/2008/29/section/131 and http://www.legislation.gov.uk/ukpga/2008/29/section/132

5.122 Where a project has a sterilising effect on land use, there may be scope for this to be mitigated through, for example, using the land for nature conservation or wildlife corridors.

5.123 Public rights of way, National Trails and other rights of access to land are important recreational facilities for walkers, cyclists and equestrians. The applicant is expected to take appropriate mitigation measures to address adverse effects on National Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve access. In considering revisions to an existing right of way, consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements or other provisions in respect of these measures might be attached to any grant of development consent.

Decision making

5.124 The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields, unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be no longer needed, or the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities.

5.125 Where networks of green infrastructure have been identified in development plans, they should normally be protected from development and, where, possible, strengthened by or integrated within it. The Secretary of State will also have regard to the effect of the development upon and resulting from existing land contamination, as well as the mitigation proposed.

5.126 The Secretary of State will take into account the economic and other benefits of the best and most versatile agricultural land, and ensure the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.

5.127 When located in the Green Belt, projects may comprise inappropriate development. Inappropriate development is by definition harmful to the Green Belt and there is a presumption against it except in very special circumstances. The Secretary of State will need to assess whether there are very special circumstances to justify inappropriate development. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to the Green Belt, when considering any application for such development. In exchange for, or so as to ensure the reprovision of, lost Green Belt land,[187] the Secretary of State may require the provision of other land by the applicant, to be declared as Green Belt under the Green Belt (London and the Home Counties) Act 1938. The provision of such land should be in accordance with the National Planning Policy Framework or any successor document, and take into account relevant development plan policies.

[187] The term “Green Belt land” refers to land designated as Green Belt land under a local development plan and/or land declared as Green Belt under the 1938 Act.

Home Office assets

Introduction

5.128 There are two Immigration Removal Centres (IRCs) to the north-west of Heathrow Airport, run as one facility, within the land shown inside the red line on the scheme boundary map (at Annex A). Detention at immigration removal centres plays a vital role as part of the infrastructure which allows the Government to maintain effective immigration control and secure the UK's borders. The IRCs are Harmondsworth IRC and the Colnbrook IRC.

5.129 Continuous service provision of the IRCs at Heathrow is necessary. This consideration extends to the need to provide appropriate road access to the IRCs.

Assessment

5.130 The applicant should show how it has considered the impacts of the project upon the existing IRCs. This should include the process in identifying alternative means of addressing the impact of the project on the IRCs, including the means by which they will be reprovided.

5.131 The applicant should discuss the provision to be made in substitution for the existing IRCs with the Home Office and any local authority whose area is likely to be affected by a replacement facility.

5.132 The applicant's assessment should also set out how a replacement IRC would function in relation to neighbouring land uses, as well as how it can best be accommodated without adversely affecting such uses. These are also matters which local authorities may wish to address in their local impact report, which can be submitted after an application for development consent has been submitted.

Decision making

5.133 The Secretary of State considers that replacement facilities in substitution for the affected IRCs should be provided prior to any works which may significantly interfere with the service and facilities provided by the existing IRCs. The Secretary of State will consider whether the applicant has taken all reasonable steps to mitigate impacts of the project on the existing IRCs. Where necessary, the Secretary of State will impose requirements or obligations upon the applicant to deliver suitable replacement facilities.

5.134 Provided that the applicant is willing to commit to appropriate provision of such facilities on a continuous service basis and with constant road access, and to mitigate the effect of the project on the existing and replacement IRCs, development consent should not be withheld on the grounds of its effects on the existing IRCs.

Resource and waste management

Introduction

5.135 Government policy on hazardous and non-hazardous waste is intended to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Where this is not possible, waste management regulation ensures that waste is disposed of in a way that is least damaging to the environment and to human health.

5.136 Sustainable waste management is implemented through the waste hierarchy:

- Waste prevention;
- Preparing for reuse;
- Recycling;
- Other recovery, including energy recovery; and
- Disposal.

5.137 The targets for preparation for re-use and recycling of municipal waste (50%), and for construction and demolition waste (70%) set out by the Waste Framework Directive (2008/98/EC)[188] should be considered 'minimum acceptable practice' for the construction and operation of any new airport infrastructure. Exceeding these targets if possible by aiming for exemplar performance in resource efficiency and waste management is recommended, to align with the principles of the EU Action Plan for the Circular Economy.[189]

5.138 Large airport infrastructure projects may generate hazardous and non-hazardous waste during construction and operation. The Environment Agency's environmental permitting regime incorporates operational waste management controls for certain activities. When the applicant applies to the Environment Agency for an environmental permit, the Environment Agency will require the application to demonstrate that processes are in place to meet all relevant conditions.

5.139 In addition, the Heathrow Northwest Runway scheme would involve the removal of the Lakeside energy from waste plant.

5.140 Waste generated and sent to landfill during construction and operation will be an ongoing management issue, and will continue to have adverse effects on the environment into and beyond the operational phase. The principal adverse effects of sending waste to landfill include:

- Permanent loss of materials from potential use higher up the waste management hierarchy;
- Reduction of local and regional landfill capacity;
- Visual, noise, health and other nuisance impacts on local communities;
- Environmental degradation and pollution;
- Greenhouse gas emissions; and
- Environmental implications of transporting waste to landfill sites.

Applicant's assessment

5.141 The applicant should set out the arrangements that are proposed for managing any waste produced in the application for development consent. The arrangements described should include information on the proposed waste recovery and disposal system for all waste generated by the development. The applicant should seek to minimise the volume of waste sent for disposal unless it can be demonstrated that the alternative is the best overall environmental, social and economic outcome when considered over the whole lifetime of the project.

5.142 The effects of removing the Lakeside energy from waste plant upon capacity for treatment of waste will require assessment.

[188] http://ec.europa.eu/environment/waste/framework/
[189] http://ec.europa.eu/environment/circular-economy/index_en.htm

Mitigation

5.143 The applicant should set out a comprehensive suite of mitigations to eliminate or significantly reduce the risk of adverse impacts associated with resource and waste management.

5.144 The Government recognises the role of the Lakeside Energy from Waste plant in local waste management plans. The applicant should make reasonable endeavours to ensure that sufficient provision is made to address the reduction in waste treatment capacity caused by the loss of the Lakeside Energy from Waste plant.

Decision making

5.145 The Secretary of State will consider the extent to which the applicant has proposed an effective process that will be followed to ensure effective management of hazardous and non-hazardous waste arising from all stages of the lifetime of the development. The Secretary of State should be satisfied that the process set out provides assurance that:

- Waste produced will be properly managed, both onsite and offsite;
- The waste from the proposed development can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arising should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arising in the area; and
- Adequate steps have been taken to ensure that all waste arising from the site is subject to the principles of the waste hierarchy[190] and are dealt with at the highest possible level within the hierarchy.

5.146 Where necessary, the Secretary of State will require the applicant to develop a resource management plan to ensure that appropriate measures for sustainable resource and waste management are secured.

Flood risk

Introduction

5.147 Climate change over future decades is likely to result in milder, wetter winters and hotter, drier summers in the UK, while sea levels will continue to rise. Within the lifetime of the proposed development, these factors will lead to increased flood risk in areas susceptible to flooding, and to an increased risk of flooding in some areas not currently thought of as being at risk. In addition to increasing flood risk, longer term climate change will result in changes to weather-related disruption, most often caused by wind, rain, snow and ice. The applicant, the Examining Authority and the Secretary of State in taking decisions should take account of the policy on climate change adaptation as set out in the National Planning Policy Framework[191] and other supporting guidance.[192]

5.148 The National Planning Policy Framework sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.[193] But where development is necessary, it should be made safe without

[190] Article 4 of the revised EU Waste Framework Directive (Directive 2008/98/EC) sets out the 'waste hierarchy' with five steps for dealing with waste, ranked according to environmental impact
[191] National Planning Policy Framework, March 2012, paragraph 99, or any successor document
[192] https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances and https://www.gov.uk/government/publications/adapting-to-climate-change-for-risk-management-authorities
[193] National Planning Policy Framework, March 2012, paragraphs 100-104, or any successor document

increasing flood risk elsewhere. Supporting guidance[194] explains that essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk is permissible in areas of high flood risk, subject to the Exception Test. In addition, as set out in the National Planning Policy Framework, new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.[195]

5.149 Loss of flood plain storage may increase the overall flood risk for the catchment. The extent of any impact will depend on the ability of the development to manage storage of water on or off-site.

5.150 There is the potential for airport expansion to result in increased risk from climate change effects, particularly to increased surface water runoff rate and pressure on potable water supply. There may also be effects on groundwater.

5.151 Where the Airports NPS mentions the UK Climate Change Risk Assessment, the reader should refer to the most recent version of the document.

Applicant's assessment

5.152 Applications for projects in the following locations should be accompanied by a flood risk assessment:

- Flood Zones 2 and 3 (medium and high probability of river and sea flooding);
- Flood Zone 1 (low probability of river and sea flooding) for projects of 1 hectare or greater, or projects which may be subject to other sources of flooding (local watercourses, surface water, groundwater or reservoirs), or where the Environment Agency has notified the local planning authority that there are critical drainage problems.

5.153 The applicant should identify and assess the risks of all forms of flooding to and from the preferred scheme, and demonstrate how these flood risks will be managed, taking climate change into account.[196]

5.154 In preparing a flood risk assessment the applicant should:

- Consider the risk of all forms of flooding arising from the development comprised in the preferred scheme, in addition to the risk of flooding to the project, and demonstrate how these risks will be managed and, where relevant, mitigated, so that the development remains safe throughout its lifetime;[197]
- Take into account the impacts of climate change, clearly stating the development lifetime over which the assessment has been made;
- Consider the need for safe access and exit arrangements;
- Include the assessment of residual risk after risk reduction measures have been taken into account, and demonstrate that this is acceptable for the development;
- Consider if there is a need to remain operational during a worst case flood event over the preferred scheme's lifetime; and
- Provide evidence for the Secretary of State to apply the Sequential Test and Exception Test,[198] as appropriate.

[194] http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/
[195] National Planning Policy Framework, March 2012, paragraph 99, or any successor document
[196] https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications
[197] Updated flood maps are available on the Environment Agency's website
[198] National Planning Policy Framework, March 2012, paragraphs 100-104, or any successor document

5.155 Where the preferred scheme may be affected by, or may add to, flood risk, the applicant is advised to seek early pre-application discussions with the Environment Agency, and, where relevant, other flood risk management bodies such as lead local flood authorities, Internal Drainage Boards, sewerage undertakers, highways authorities and reservoir owners and operators. These discussions can be used to identify the likelihood and possible extent and nature of the flood risk, help scope the flood risk assessment, and identify the information that may be required by the Secretary of State to reach a decision on the application. If the Environment Agency has concerns about proposals on flood risk grounds, the applicant is encouraged to discuss these concerns at a sufficiently early stage with the Environment Agency and explore ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns, before the application for development consent is submitted.

5.156 For local flood risk (surface water, groundwater and ordinary watercourse flooding), local flood risk management strategies and surface water management plans provide useful sources of information for consideration in a flood risk assessment. Surface water flood issues need to be understood to allow them to be taken into account, for example by clearly identifying and managing flow routes.

5.157 When assessing the potential impacts of climate change on airports which can be wider than flooding impacts, such as implications from heat and water availability and the potential adaptation strategies for them, the applicant should take into account the latest UK Climate Change Risk Assessment, the latest set of UK Climate Projections, and other relevant sources of climate change evidence.

Mitigation

5.158 The applicant should ensure that the preferred scheme design takes into account flood risk, and should put forward measures to mitigate the impact of flooding.

5.159 Mitigation measures will need to be developed as part of the applicant's application for development consent to ensure that it is safe from flooding, and will not increase flood risk elsewhere for the proposed development's lifetime, taking into account climate change.

5.160 To satisfactorily manage flood risk and the impact of the natural water cycle on people, property and ecosystems, good design and infrastructure may need to be secured using requirements or planning obligations. This may include the use of sustainable drainage systems but could also include vegetation to help to slow runoff, hold back peak flows, and make landscapes more able to absorb the impact of severe weather events.

5.161 In the Airports NPS, the term sustainable drainage systems is used and taken to cover the whole range of sustainable approaches to surface water drainage management including:

- Source control measures including rainwater recycling and drainage;
- Infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities;
- Filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns;
- Filter drains and porous pavements to allow rainwater and runoff to infiltrate into permeable material below ground and provide storage if needed;

- Basins and ponds to hold excess water after rain and allow controlled discharge that avoids flooding; and
- Flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding.

5.162 Site layout and surface water drainage systems should be able to cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.

5.163 The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, taking into account climate change, unless specific off-site arrangements are made and result in the same net effect.

5.164 It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the main application site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation or a development consent order requirement.

5.165 The sequential approach should be applied to the layout and design of the project. Vulnerable uses should be located on parts of the site at lower probability and residual risk of flooding. The applicant should seek opportunities where appropriate to use open space for multiple purposes such as amenity, wildlife habitat, and flood storage uses. Opportunities can be taken to lower flood risk by improving flow routes, flood storage capacity and using sustainable drainage systems.

Decision making

5.166 Where flood risk is a factor in determining an application for development consent, the Secretary of State will need to be satisfied that, where relevant:

- The application is supported by an appropriate flood risk assessment; and
- The Sequential Test[199] has been applied as part of site selection and, if required, the Exception Test.[200]

5.167 When determining an application, the Secretary of State will need to be satisfied that flood risk will not be increased elsewhere, and will only consider development appropriate in areas at risk of flooding where, informed by a flood risk assessment, following the Sequential Test and, if required, the Exception Test, it can be demonstrated that:

- Within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and
- Over its lifetime, development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning, and that priority is given to the use of sustainable drainage systems.

5.168 The applicant should take into account the potential impacts of climate change using the latest UK Climate Change Risk Assessment, the latest set of UK Climate Projections, and other relevant sources of climate change evidence. The applicant should also ensure any environment statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new

[199] National Planning Policy Framework, March 2012, paragraph 101, or any successor document
[200] National Planning Policy Framework, March 2012, paragraph 102, or any successor document

infrastructure. Should a new set of UK Climate Projections become available after the preparation of an environmental statement, the Examining Authority or the Secretary of State will consider whether they need to request additional information from the applicant as part of the development consent application.

5.169 When determining an application, the Secretary of State will need to be satisfied that the potential effects of climate change on the development have been considered as part of the design.

5.170 For construction work which has drainage implications, approval for the preferred scheme's overall approach to drainage systems will form part of any development consent issued by the Secretary of State.[201] The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any technical standards issued by the Government[202] or to any National Standards[203] issued under Schedule 3 to the Flood and Water Management Act 2010.[204] In addition, the development consent order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any sustainable drainage systems, including any necessary access rights to property. The Secretary of State will need to be satisfied that the most appropriate body would be given the responsibility for maintaining any sustainable drainage systems, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local authority, or another body such as the Internal Drainage Board.

5.171 If the Environment Agency continues to have concerns, and therefore objects to the grant of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied that all reasonable steps have been taken by the applicant and the Environment Agency to attempt to resolve the concerns. Similarly, if the lead local flood authority objects to the development consent on the grounds of surface or other local sources of flooding, the Secretary of State can grant consent, but would need to be satisfied that all reasonable steps have been taken by the applicant and the lead local flood authority to attempt to resolve the concerns.

Water quality and resources

Introduction

5.172 Airport infrastructure projects can have adverse effects on the water environment, including groundwater, inland surface water and transitional waters.[205] During construction and operation, it can lead to increased demand for water, involve discharges to water, and cause adverse ecological effects resulting from physical modifications to the water environment. There may also be an increased risk of spills and leaks of pollutants to the water environment. These effects could lead to adverse impacts on health or on protected and other species and habitats, and could, in

[201] Drainage implications as defined in Paragraph 7(2) of Schedule 3 to the Flood and Water Management Act 2010 http://www.legislation.gov.uk/ukpga/2010/29/schedule/3/crossheading/requirement-for-approval
[202] https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards
[203] The National Standards set out requirements for the design, construction, operation and maintenance of sustainable drainage systems, and may include guidance to which the Secretary of State will have regard
[204] http://www.legislation.gov.uk/ukpga/2010/29/contents
[205] As defined in the Water Framework Directive (2000/60/EC), transitional waters are bodies of surface water in the vicinity of river mouths which are partly saline in character as a result of their proximity to coastal waters by which are substantially influenced by freshwater flows

particular, result in surface waters, groundwaters or protected areas[206] failing to meet environmental objectives established under the Water Framework Directive.[207]

5.173 The Government's planning policies make clear that the planning system should contribute to and enhance the natural and local environment by, among other things, preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, water pollution. The Government has issued guidance on water supply, wastewater and water quality considerations in the planning system.[208] Where applicable, an application for development consent has to contain a plan with accompanying information identifying water bodies in a river basin management plan.[209]

5.174 Development may result in an increased potential for impacts on the water environment, especially the quality of the surface and groundwater through the discharge of waters contaminated with de-icer along with hydrocarbons and other pollutants.

Applicant's assessment

5.175 The applicant should make sufficiently early contact with the relevant regulators, including the Environment Agency, for abstraction licensing and environmental permitting, and with the water supply company likely to supply the water. Where the proposed development is subject to an Environmental Impact Assessment and the development is likely to have significant adverse effects on the water environment, the applicant should ascertain the existing status of, and carry out an assessment of, the impacts of the proposed project on water quality, water resources and physical characteristics as part of the environmental statement.

5.176 Any environmental statement should describe:

- The existing quality of water affected by the proposed project;
- Existing water resources affected by the proposed project and the impacts of the proposed project on water resources;
- Existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project, and any impact of physical modifications to these characteristics;
- Any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive and source protection zones around potable groundwater abstractions; and
- Any cumulative effects.

5.177 The applicant should assess the effects on the surrounding water and wastewater treatment network in cooperation with the relevant water and sewerage undertaker(s). It should also address any future water infrastructure needed for the preferred scheme, including for supplies and sewerage treatment, and the effects on the surrounding water and wastewater treatment network. This assessment would be based on the additional wastewater flows which would need to be treated at sewage treatment works and should be developed through liaison with the relevant water and sewerage undertaker(s).

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[206] Protected areas are areas which have been designated as requiring special protection under specific community legislation for the protection of their surface water and groundwater or for the conservation of habitats and species directly depending on water
[207] Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for Community action in the field of water policy
[208] http://planningguidance.communities.gov.uk/blog/guidance/water-supply-wastewater-and-water-quality/
[209] http://www.legislation.gov.uk/uksi/2009/2264/made

Mitigation

5.178 The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling.

5.179 The Secretary of State will need to consider whether the mitigation measures put forward by the applicant which are needed for operation and construction (and which may be over and above any which may form part of the development consent application) are acceptable.

5.180 The project should adhere to any national standards for sustainable drainage systems, which introduce a hierarchical approach to drainage design that promotes the most sustainable approach but recognises the feasibility and use of conventional drainage systems as part of a sustainable solution for any given site given its constraints.

5.181 The risk of impacts on the water environment can be reduced through careful design to adhere to good pollution practice.

Decision making

5.182 Activities that discharge to the water environment are subject to pollution control, and the considerations set out at paragraphs 4.53-4.59 above covering the interface between planning and environmental permitting therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the environment, and to the control regimes relating to works to, and structures in, on, or under, a controlled water.

5.183 The Secretary of State will generally need to give more weight to impacts on the water environment where a project would have adverse effects on the achievement of the environmental objectives established under the Water Framework Directive.

5.184 The Secretary of State will need to be satisfied that a proposal has had regard to the Thames river basin management plan and the Water Framework Directive and its daughter Directives on priority substances and groundwater. In terms of Water Framework Directive compliance, the overall aim of development should be to prevent deterioration in status of water bodies, to support the achievement of the objectives in the Thames river basin management plan and not to jeopardise the future achievement of good status for any affected water bodies. If the development is considered likely to cause deterioration of water body status or to prevent the achievement of good groundwater status or of good ecological status or potential, compliance with Article 4.7 of the Water Framework Directive must be demonstrated. Any use of Article 4.7 must be reported in the Thames river basin management plan.

5.185 The Secretary of State will need to consider the interactions of the preferred scheme with other plans, such as statutory water resources management plans.

5.186 The Secretary of State will need to consider proposals put forward by the applicant to mitigate adverse effects on the water environment, taking into account the likely impact of climate change on water availability, and whether appropriate requirements should be attached to any development consent and / or planning obligations. If the Environment Agency continues to have concerns, and objects to the grant of development consent on the grounds of impacts on water quality / resources, the Secretary of State can grant consent, but will need to be satisfied that all reasonable steps have been taken by the applicant and the Environment Agency to try to resolve the concerns.

Historic environment

Introduction

5.187 The construction and operation of airports and associated infrastructure has the potential to result in adverse impacts on the historic environment above and below ground. This could be as a result of the scale, form and function of the development, and the wider impacts it can create in terms of associated infrastructure to connect the airport to existing transport networks, changes in aircraft movement on the ground and in the surrounding airspace, additional noise and light levels, and the need for security and space to ensure the airport's operation.

5.188 The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

5.189 Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called 'heritage assets'. Heritage assets may be buildings, monuments, sites, places, areas or landscapes, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance. Significance derives not only from a heritage asset's physical presence, but also from its setting.[210]

5.190 Some heritage assets have a level of significance that justifies official designation. Categories of designated heritage assets are:

- World Heritage Sites;
- Scheduled Monuments;
- Listed Buildings;
- Protected Wreck Sites;
- Protected Military Remains;
- Registered Parks and Gardens;
- Registered Battlefields; and
- Conservation Areas.[211]

5.191 Non-designated heritage assets of archaeological interest that are demonstrably equivalent to Scheduled Monuments should be considered subject to the policies for designated heritage assets.[212] The absence of designation for such heritage assets does not indicate lower significance.

5.192 The Secretary of State will also consider the impacts on other non-designated heritage assets on the basis of clear evidence that the assets have a significance that merits consideration in that decision, even though those assets are of lesser value than designated heritage assets. The non-designated heritage assets would be identified

[210] Setting of a heritage asset is the surroundings in which it is experienced. Its extent is not fixed, and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral

[211] The issuing of licences to undertake works on protected wreck sites in English waters is the respons bility of the Secretary of State for Culture, Media and Sport and does not form part of development consent orders. The issuing of licences for protected military remains is the responsibility of the Secretary of State for Defence

[212] There will be archaeological interest in a heritage asset if it holds, or may potentially hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and the people and cultures that made them

either through the development plan process by local authorities, including through 'local listing', or through the nationally significant infrastructure project examination and decision making process.

Applicant's assessment

5.193 As part of the environmental statement, the applicant should provide a description of the significance of the heritage assets affected by the proposed development, and the contribution of their setting to that significance. The level of detail should be proportionate to the asset's importance, and no more than is sufficient to understand the potential impact of the proposal on the significance of the asset. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. At a minimum, the relevant Historic Environment Record[213] should be consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation. The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage asset affected can be adequately understood from the application and supporting documents.

5.194 Detailed studies will be required on those heritage assets affected by noise, light and indirect impacts based on the guidance provided in *The Setting of Heritage Assets*[214] and the *Aviation Noise Metric*.[215] Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to assess the impact.

5.195 The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible:

- Enhancing, through a range of measures such as sensitive design, the significance of heritage assets or setting affected;
- Considering measures that address those heritage assets that are at risk, or which may become at risk, as a result of the scheme; and
- Considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to or interpretation, understanding and appreciation of the heritage assets affected by the scheme.

Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary or permanent.

Decision making

5.196 In determining applications, the Secretary of State will seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (including by development affecting the setting of a heritage asset), taking account of the available evidence and any necessary expertise from:

[213] Historic Environment Records are information services maintained and updated by (or on behalf of) local authorities and National Park Authorities with a view to providing access to comprehensive and dynamic resources relating to the historic environment of an area for public benefit and use. Details of Historic Environment Records in England are available from the Heritage Gateway website. Historic England should also be consulted where relevant

[214] https://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/

[215] https://www.historicengland.org.uk/images-books/publications/aviation-noise-metric/

- Relevant information provided with the application and, where applicable, relevant information submitted during examination of the application;
- Any designation records included on the National Heritage List for England;
- Historic landscape character records;
- The relevant Historic Environment Record(s) and similar sources of information;
- Representations made by interested parties during the examination; and
- Expert advice, where appropriate and when the need to understand the significance of the heritage asset demands it.

5.197 The Secretary of State must also comply with the regime relating to Listed Buildings, Conservation Areas and Scheduled Monuments set out in The Infrastructure Planning (Decisions) Regulations 2010.[216]

5.198 In considering the impact of a proposed development on any heritage assets, the Secretary of State will take into account the particular nature of the significance of the heritage asset and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal.

5.199 The Secretary of State will take into account: the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets; the contribution of their settings; and the positive contribution their conservation can make to supporting sustainable communities – including to their quality of life, their economic vitality, and to the public's enjoyment of these assets. The Secretary of State will also take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example screen planting).

5.200 When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State will give great weight to the asset's conservation. The more important the asset, the greater the weight should be. The Secretary of State will take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation, the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality, and the desirability of new development making a positive contribution to local character and distinctiveness.

5.201 Once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Given that heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

5.202 Substantial harm to or loss of a Grade II Listed Building or a Grade II Registered Park or Garden should be exceptional. Substantial harm to or loss of designated sites of the highest significance, including World Heritage Sites, Scheduled Monuments, Grade I and II* Listed Buildings, Protected Wreck Sites, Registered Battlefields, and Grade I and II* Registered Parks and Gardens should be wholly exceptional.

5.203 Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the

[216] http://www.legislation.gov.uk/uksi/2010/305/regulation/3/made

harm to the significance of the heritage asset, the greater the justification that will be needed for any loss.

5.204 Where the proposed development will lead to substantial harm to or the total loss of significance of a designated heritage asset, the Secretary of State will refuse consent unless it can be demonstrated that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm, or alternatively that all of the following apply:

- The nature of the heritage asset prevents all reasonable uses of the site;
- No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;
- Conservation by grant funding or some form of charitable or public ownership is demonstrably not possible; and
- The harm or loss is outweighed by the benefit of bringing the site back into use.

5.205 Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

5.206 Not all elements of a World Heritage Site or conservation area will necessarily contribute to its significance. The Secretary of State will treat the loss of a building (or other element) that makes a positive contribution to the significance of a World Heritage Site or conservation area's significance either as substantial harm or less than substantial harm, as appropriate, taking into account the relative significance of the elements affected and their contribution to the significance of the World Heritage Site or conservation area as a whole.

5.207 Where the loss of significance of any heritage asset is justified on the merits of the new development, the Secretary of State will consider imposing a requirement on the consent, or require the applicant to enter into an obligation, that will prevent the loss occurring until it is reasonably certain that the relevant part of the development is to proceed.

5.208 The applicant should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance and better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.[217]

Recording

5.209 A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given.

5.210 Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the nature and level of the asset's significance. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should

[217] Further good practice advice on decision making in the historic environment can be found at: https://www.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/

also be required to deposit the archive generated in a local museum or other public repository willing to receive it.

5.211 Where appropriate, the Secretary of State will impose requirements to the development consent order to ensure that the work is undertaken in a timely manner, in accordance with a written scheme of investigation that complies with the policy in the Airports NPS and has been agreed in writing with the relevant local authority, and that the completion of the exercise is properly secured.

5.212 Where there is a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction.

Landscape and visual impacts

Introduction

5.213 For airport development, landscape and visual effects also include tranquillity effects, which would affect people's enjoyment of the natural environment and recreational facilities. In this context, references to landscape should be taken as covering local landscape, waterscape and townscape character and quality, where appropriate.

Applicant's assessment

5.214 Where the development is subject to an Environmental Impact Assessment, the applicant should undertake an assessment of any likely significant landscape and visual impacts and describe them in the environmental statement. The landscape and visual assessment should reference any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the preferred scheme. In addition, the applicant's assessment should take account of any relevant policies based on these assessments in local development documents.

5.215 The applicant's assessment should include any significant effects during construction of the preferred scheme and / or the significant effects of the completed development and its operation on landscape components and landscape character, including historic characterisation. This should include assessment of any landscape and visual impacts as a result of the development, for example surface access proposals or aviation activity.

5.216 The assessment should include the visibility and conspicuousness of the preferred scheme during construction and the presence and operation of the preferred scheme and potential impacts on views and visual amenity. This should include any noise and light pollution effects, including on local amenity, tranquillity and nature conservation.

Mitigation

5.217 Adverse landscape and visual effects may be minimised through appropriate design (including choice of materials), and landscaping schemes. Materials and designs for the Heathrow Northwest Runway scheme should be given careful consideration.

Decision making

Landscape impact

5.218 Landscape effects depend on the nature of the existing landscape likely to be changed and nature of the effect likely to occur. Both these factors need to be considered in judging the impact of the preferred scheme on the landscape. The preferred scheme

needs to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the development should aim to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.

Development proposed within nationally designated areas

5.219 Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. National Parks, the Broads and Areas of Outstanding Natural Beauty have the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the Secretary of State has a statutory duty to have regard to in decisions.

5.220 The Secretary of State should refuse development consent in these areas except in exceptional circumstances and where it can be demonstrated that it is in the public interest. Consideration of such applications should include an assessment of:

- The need for the development, including in terms of any national considerations, and the impact of consenting, or not consenting it, upon the local economy;
- The cost of, and scope for, developing elsewhere, outside the designated area, or meeting the need for it in some other way; and
- Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

5.221 Where consent is given in these areas, the Secretary of State should be satisfied that the applicant has ensured that the preferred scheme will be carried out to high environmental standards and, where possible, includes measures to enhance other aspects of the environment. Where necessary, the Secretary of State should consider the imposition of appropriate requirements to ensure these standards are delivered.

Developments outside nationally designated areas which might affect them

5.222 The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The development should aim to avoid compromising the purposes of designation, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints.

Developments in other areas

5.223 Outside nationally designated areas, there are local landscapes and townscapes that are highly valued locally and may be protected by local designation. Where a local development document in England has policies based on landscape character assessment, these should be given particular consideration. However, local landscape designations should not be used in themselves as reasons to refuse consent, as this may unduly restrict acceptable development.

5.224 In taking decisions, the Secretary of State will consider whether the preferred scheme has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including by reasonable mitigation.

Visual impact

5.225 The Secretary of State will judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development.

Land instability

Introduction

5.226 The effects of land instability may result in landslides, subsidence or ground heave. Failing to deal with this issue could cause harm to human health, local property and associated infrastructure, and the wider environment. They occur in different circumstances for different reasons and vary in their predictability and in their effect on development.

Applicant's assessment

5.227 Where necessary, land stability should be considered in respect of new development, as set out in the National Planning Policy Framework and supporting planning guidance.[218] Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land instability. If land stability could be an issue, the applicant should seek appropriate technical and environmental expert advice to assess the likely consequences of proposed developments on sites where subsidence, landslides and ground compression is known or suspected. Applicants should liaise with the Coal Authority if necessary.

5.228 A preliminary assessment of ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared. The applicant should ensure that any necessary investigations are undertaken to confirm that their sites are and will remain stable, or can be made so as part of the development. The site needs to be assessed in the context of surrounding areas where subsidence, landslides and land compression could threaten the development during its anticipated life or damage neighbouring land or property. This could be in the form of a land stability or slope stability risk assessment report.

Mitigation

5.229 The applicant has a range of mechanisms available to mitigate and minimise risks of land instability. These include:

- Establishing the principle and layout of new development, for example avoiding mine entries and other hazards;
- Ensuring proper design of structures to cope with any movement expected and other hazards such as mine and / or ground gases; or
- Requiring ground improvement techniques, usually involving the removal of poor material and its replacement with suitable inert and stable material. For development on land previously affected by mining activity, this may mean prior extraction of any remaining mineral resource.

Dust, odour, artificial light, smoke and steam

5.230 The construction and operation of airports infrastructure has the potential to create a range of emissions such as dust, odour, artificial light, smoke and steam. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Protection Act 1990.[219] These may also be covered by pollution control or other environmental consenting regimes.

[218] https://www.gov.uk/guidance/land-stability
[219] http://www.legislation.gov.uk/ukpga/1990/43/part/III

5.231 Because of the potential effects of these emissions and in view of the availability of the defence of statutory authority against nuisance claims described previously, it is important that the potential for these impacts is considered by the applicant in its application, by the Examining Authority in examining applications, and by the Secretary of State in taking decisions on development consent.

5.232 For nationally significant infrastructure projects of the type covered by the Airports NPS, some impact on amenity for local communities is likely to be unavoidable. Impacts should be kept to a minimum and should be at a level that is acceptable.

Applicant's assessment

5.233 Where the development is subject to an Environmental Impact Assessment, the applicant should assess any likely significant effects on amenity from emissions of dust, odour, artificial light, smoke and steam, and describe these in the environmental statement.

5.234 In particular, the assessment provided by the applicant should describe:

- The type and quantity of emissions;
- Aspects of the development which may give rise to emissions during construction, operation and decommissioning;
- Premises or locations that may be affected by the emissions;
- Effects of the emission on identified premises or locations; and
- Measures to be employed in preventing or mitigating the emissions.

5.235 The applicant is advised to consult the relevant local planning authority and, where appropriate, the Environment Agency, about the scope and methodology of the assessment.

Mitigation

5.236 The Secretary of State should ensure the applicant has provided sufficient information to show that any necessary mitigation will be put into place. In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning emissions of dust, odour, artificial light, smoke and steam from the development to reduce any loss to amenity which might arise during the construction and operation of the development. A construction management plan may help clarify and secure mitigation.

Decision making

5.237 The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of dust, odour, artificial light, smoke and steam. This includes the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

5.238 If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorised project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be disapplied, in whole or in part, through a provision in the development consent order.

Community compensation

Introduction

5.239 The Secretary of State recognises that, in addition to providing economic growth and employment opportunities, airport expansion will also have negative impacts upon local communities. This will include impacts through land take requiring the compulsory acquisition of houses that fall within the new boundary of the airport, exposure to air quality impacts, and aircraft noise, that is both an annoyance and can have an adverse impact on health and cognitive development.

5.240 The Secretary of State expects the applicant to provide an appropriate community compensation package, relevant to planning. This will include financial compensation to residents who will see their homes compulsorily acquired, as well as ongoing financial compensation to the local community. In addition to controlling and reducing aircraft noise impacts, the applicant will be required to commit appropriate resources to mitigate the impacts of aircraft through noise insulation programmes for both private homes and public buildings such as schools.

5.241 A number of statutory protections are provided in these areas, and the applicant must fulfil its statutory duties in a timely and efficient manner.

5.242 Under planning law, residential and agricultural owners in the area within the red line on the map shown in Annex A will be able to make a claim for statutory blight upon the designation of the Airports NPS.

5.243 In addition, compensation can be sought in respect of loss of value of a property arising from the development during construction (under the Compulsory Purchase Act 1965)[220] and for loss of value arising from the operation of an expanded airport (under Part 1 of the Land Compensation Act 1973)[221] after one year of operation.

5.244 People are entitled to know what steps will be taken to help protect them against aircraft noise and, where appropriate, to help them to move house.

5.245 In addition to statutory requirements, Heathrow Airport has publicly committed to a community compensation package comprising a number of more generous offers:

- To pay 125% of market value, plus taxes and reasonable moving costs, for all owner occupied homes within the compulsory acquisition zone;[222]
- To pay 125% of market value, plus taxes and reasonable moving costs, for all owner occupied homes within an additional voluntary purchase / acquisition zone incorporating the area known as the Heathrow Villages;[223]
- Following a third party assessment, to provide full acoustic insulation for residential property within the full single mode easterly and westerly 60dB LAeq (16hr)[224] noise contour of an expanded airport;
- Following a third party assessment, to provide a contribution of up to £3,000 for acoustic insulation for residential properties within the full single mode easterly and

[220] http://www.legislation.gov.uk/ukpga/1965/56/contents
[221] http://www.legislation.gov.uk/ukpga/1973/26/contents
[222] http://your.heathrow.com/newpropertycompensation/
[223] http://your.heathrow.com/newpropertycompensation/
[224] Leq is the measure used to describe the average sound level experienced over a period of time (usually sixteen hours for day and eight hours for night) resulting in a single dec bel value. Leq is expressed as LAeq when it refers to the A-weighted scale

westerly 57dB LAeq (16hr) or the full 55dB Lden[225] noise contours of an expanded airport, whichever is the bigger; and

- To deliver a programme of noise insulation and ventilation for schools and community buildings within the 60dB LAeq (16hr) contour.[226]

5.246 In addition to the statutory requirements and the public commitments made by Heathrow Airport, the Government also supports the Airports Commission's recommendation for an additional component of ongoing community compensation proportionate to environmental impacts.

5.247 The Airports Commission suggested this should take the form of a national noise levy paid for by passengers. The Government does not consider a national levy appropriate, but supports the development of a community compensation fund at an expanded Heathrow Airport. The Government expects that the size of the community compensation fund will be proportionate to the environmental harm caused by expansion of the airport. The Government notes that, in its consideration of a noise levy, the Airports Commission considered that a sum of £50 million per annum could be an appropriate amount at an expanded Heathrow Airport, and that, over a 15 year period, a community compensation fund could therefore distribute £750 million to local communities.

5.248 Expansion at Heathrow Airport is likely to increase the amount of locally collected business rates in the area. The Government will consider how authorities can benefit from this through a business rate retention scheme and the opportunities for authorities to work together to share the benefits. Heathrow Airport is currently the highest single site business rates payer in the UK.[227]

Applicant's assessment

5.249 The Government expects to see arrangements being made for the community compensation schemes which Heathrow Airport has publicly stated would be provided, and for a community compensation fund.

5.250 The applicant should seek to minimise impacts on local people, to consult on the details of its works, and to put them in place quickly. The Government also looks to the applicant to consult on the detail of a community compensation fund.

Decision making

5.251 The Secretary of State will consider whether and to what extent the applicant has sought to minimise impacts on local people, has consulted on the details of its works, and has put mitigations in place, at least to the level committed to in Heathrow Airport's public commitments. This includes whether the applicant has set out appropriate eligibility criteria, how delivery will be ensured, and whether the applicant has made reasonable efforts to put the works in place quickly.

5.252 The Secretary of State will also consider whether the applicant has consulted on the details of a community compensation fund, including source of revenue, size and duration of fund, eligibility, and how delivery will be ensured.

5.253 The Secretary of State will expect the applicant to demonstrate how these provisions are secured, and how they will be operated. The applicant will also need to show how these measures will be administered to ensure that they are relevant to planning when in operation. The mechanisms for enforcing these provisions should also be

[225] Lden is the 24 hour LAeq calculated for an annual period, but with a five decibel weighting for evening and a ten decibel weighting for night to reflect people's greater sensitivity to noise within these periods
[226] http://your.heathrow.com/newpropertycompensation/
[227] http://www.cvsuk.com/news-resources/news/draft-list-release

demonstrated, along with the appropriateness of any identified enforcing body, which may include the Secretary of State.

Community engagement

Introduction

5.254 The Government recognises that the planning, construction, and subsequent operation of a Northwest Runway will bring both significant impacts and opportunities to communities living around Heathrow Airport. Communities will wish to participate fully in the development and delivery of expansion, and the Government expects them to be able to do so.

5.255 There will be many opportunities for communities to engage as expansion is taken forward. The Government is required to consult on and publicise the Airports NPS, and the applicant is subject to pre-application consultation duties. Additional consultations on issues such as airspace change, overseen by the Civil Aviation Authority, will take place outside of the planning process. Ongoing engagement will also be required as the applicant takes forward its compensation package.

5.256 The Government wishes to maximise local stakeholder engagement with the expansion process, and it wishes to encourage any applicant and local stakeholders to strengthen the way in which the airport and local stakeholders work together to make engagement effective. Local stakeholders, including those representing communities around Heathrow Airport, have the experience and expertise to identify solutions tailored to their specific circumstances. A number of engagement forums already exist at Heathrow Airport. These have developed over time in response to emerging needs and are consistent with the Government's view that, in principle, it encourages collaborative local solutions.

5.257 A community engagement board will be developed at Heathrow Airport to help to ensure that local communities are able to contribute effectively to the delivery of expansion, including to consultations and evidence gathering during the planning process.

Applicant's assessment

5.258 The applicant must engage constructively with the community engagement board throughout the planning process, with its membership (including an independent chair), and with any programme(s) of work the community engagement board agrees to take forward.

Decision making

5.259 The Secretary of State will consider whether the applicant has engaged constructively with this community engagement board throughout the planning process.

Skills

Introduction

5.260 The Government is committed to helping people into jobs and improving the skills of the UK workforce, with a target of three million new apprenticeships being created in the current Parliament.[228] Continuing to create jobs and new training opportunities will

[228] https://www.gov.uk/government/news/government-kick-starts-plans-to-reach-3-million-apprenticeships

help to consolidate the national economic recovery, put the UK on the path to full employment and raise the nation's productivity. Apprenticeships have an essential role to play within this work, helping individuals to develop key skills which will benefit both them and employers.

5.261 To help deliver the Government's wider skills agenda, the Department for Transport published *Transport Skills Strategy: building sustainable skills* in January 2016, setting out its skills strategy for transport, including aviation, and an additional 30,000 apprenticeships by 2020 across the road and rail sectors.[229] The Strategic Transport Apprenticeship Taskforce has been created to deliver this work.[230]

5.262 The Government notes that Heathrow Airport already makes a significant contribution to local employment and already has a number of skills and employment initiatives designed to support the business needs of the airport. The Heathrow Academy, established in 2004, supports recruitment and retention of local residents across the retail, construction, aviation and logistics sectors, and includes apprenticeships as a part of the package.[231]

5.263 The Government notes that, with expansion, Heathrow Airport has publicly committed to ensuring 10,000 apprenticeships before 2030, thereby doubling the number currently available at the airport and in its supply chain and airport-related businesses.[232]

5.264 The Heathrow Northwest Runway scheme represents an opportunity to grow the number of jobs and apprenticeships supported by the applicant and its supply chain and airport-related businesses, particularly in neighbouring communities.

Applicant's assessment

5.265 Heathrow Airport should put in place arrangements for the delivery of the 5,000 new apprenticeships which it has publicly stated would be created. Heathrow Airport should set out the timetable for delivering the apprenticeships, provide information on the areas and skills to be covered by these apprenticeships, the breakdown between opportunities to be created within the core airport and those being offered by companies within its supply chain and other airport-related businesses, and the qualification level and standards which they will need to achieve. Heathrow Airport should also set out how it will publicly report progress against the target.

5.266 The Government expects the applicant to maximise the employment and skills opportunities for local residents, including apprenticeships.

5.267 Heathrow Airport will also need to show how these measures will be administered to ensure that they are relevant to planning when in operation. The mechanisms for enforcing these provisions should also be demonstrated, along with the appropriateness of any identified enforcing body, which may include the Secretary of State.

Decision making

5.268 The Secretary of State will consider whether Heathrow Airport has set out a credible plan to implement its commitment to deliver a total of 10,000 apprenticeships at an expanded airport.

[229] https://www.gov.uk/government/publications/transport-infrastructure-skills-strategy-building-sustainable-skills
[230] https://www.gov.uk/government/news/strategic-transport-apprenticeship-taskforce-to-boost-apprenticeships
[231] http://www.heathrow.com/company/heathrow-jobs/heathrow-academy
[232] https://www.heathrowexpansion.com/uk-growth-opportunities/job-opportunities/

5.269 The Secretary of State will consider how these provisions are secured, and how they will be operated.

Ruling out a fourth runway

Introduction

5.270 As part of its work, the Airports Commission considered the possibility that, in addition to the increased capacity provided by a Northwest Runway at Heathrow Airport, the airport might wish in the future to develop a fourth runway. The Airports Commission found no sound case for such a development.

5.271 First, the Airports Commission concluded that the airspace around the airport would be increasingly difficult to manage if a fourth runway was built. It noted that the airport could safely support 800,000 air transport movements per year at a four runway site, only 60,000 more than under the (three runway) Heathrow Northwest Runway scheme, but that the airspace impacts would lead to reduced numbers of air transport movements at the other airports in the London area.

5.272 Second, the Airports Commission concluded that it would be increasingly challenging to physically accommodate a fourth runway at the Heathrow Airport site. Taken together, these conclusions mean that building a fourth runway at Heathrow Airport would result in significant costs while providing less overall additional benefit.

5.273 Finally, the Airports Commission noted that there would be no guarantee that the potential demand for a further runway would be backed by a strong economic or environmental case. Any project to deliver a fourth runway at Heathrow Airport would be costly and extremely difficult to deliver given all of these considerations.

5.274 The Airports Commission also noted the importance of a clear signal from Government on limiting expansion to reassure local communities that Heathrow Airport will not expand any further.

Decision making

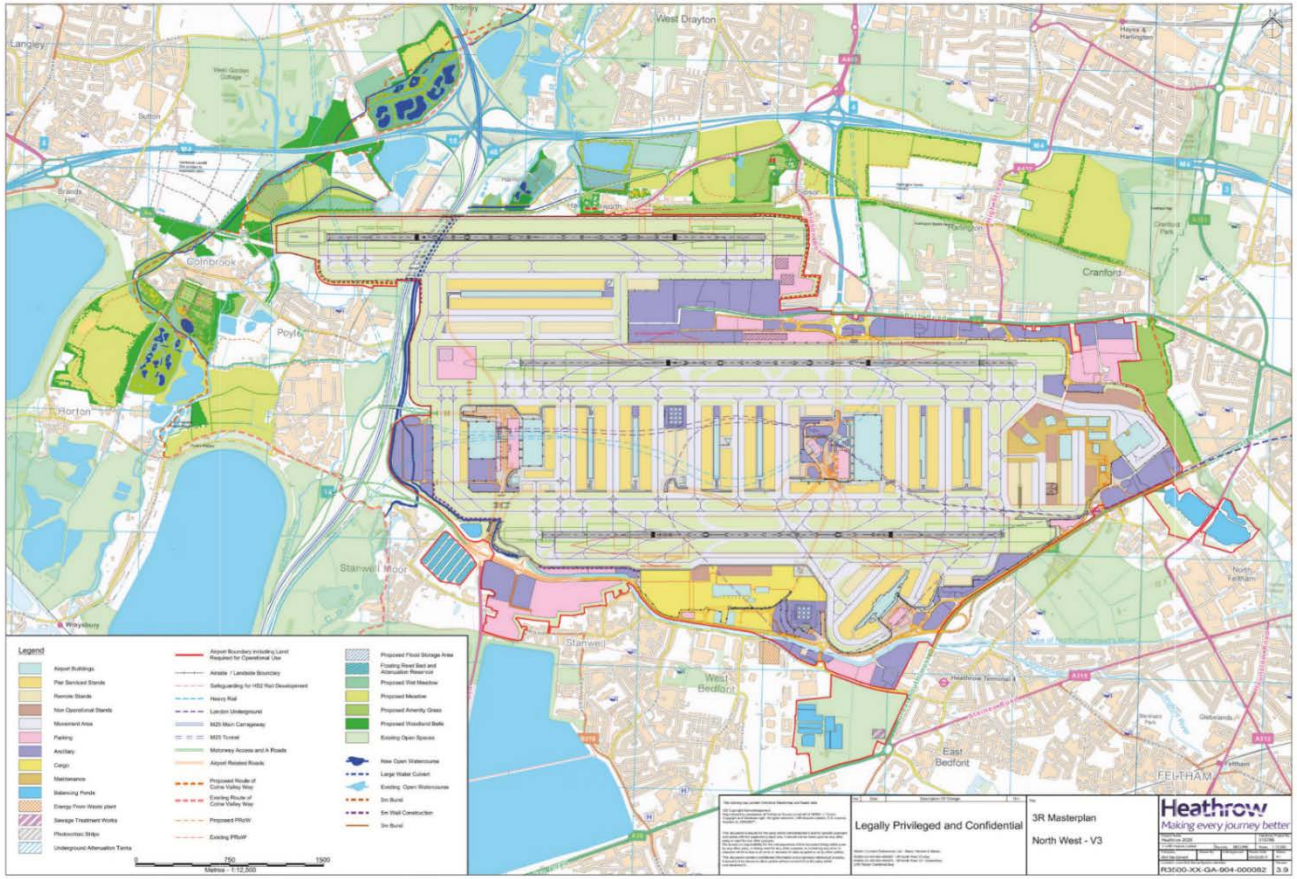
5.275 The Government agrees with the Airports Commission's recommendation and the analysis that underpins it, and therefore does not see a need for a fourth runway at Heathrow Airport. An application in the vicinity of Heathrow Airport for a fourth runway would not be supported in policy terms, and should be seen as being in conflict with the Airports NPS.

Annex A: Heathrow Northwest Runway scheme boundary map



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Annex B: Illustrative Heathrow Northwest Runway scheme masterplan



NB: This map is for illustrative purposes and is a masterplan of the Heathrow Northwest Runway scheme as submitted by Heathrow Airport to the Airports Commission. It should not be considered as a detailed site plan; the full detail and design of the scheme will be considered as part of Heathrow Airport's development consent application.



Michaelmas Term
[2020] UKSC 52
On appeal from: [2020] EWCA Civ 214

JUDGMENT

R (on the application of Friends of the Earth Ltd and others) (Respondents) *v* Heathrow Airport Ltd (Appellant)

before

Lord Reed, President
Lord Hodge, Deputy President
Lady Black
Lord Sales
Lord Leggatt

JUDGMENT GIVEN ON

16 December 2020

Heard on 7 and 8 October 2020

Appellant
Lord Anderson of Ipswich KBE QC
Michael Humphries QC
Richard Turney
Malcolm Birdling
(Instructed by Bryan Cave Leighton Paisner LLP)

Respondent (1)
David Wolfe QC
Peter Lockley
Andrew Parkinson

(Instructed by Leigh Day (London))

Respondent (2)
Tim Crosland, Director, Plan B Earth

Respondents:
(1) Friends of the Earth
(2) Plan B Earth

LORD HODGE AND LORD SALES: (with whom Lord Reed, Lady Black and Lord Leggatt agree)

Introduction

1. This case concerns the framework which will govern an application for the grant of development consent for the construction of a third runway at Heathrow Airport. This is a development scheme promoted by the appellant, Heathrow Airport Ltd ("HAL"), the owner of the airport.

2. As a result of consideration over a long period, successive governments have come to the conclusion that there is a need for increased airport capacity in the South East of England to foster the development of the national economy.

3. An independent commission called the Airports Commission was established in 2012 under the chairmanship of Sir Howard Davies to consider the options. In its interim report dated 17 December 2013 the Airports Commission reached the conclusion that there was a clear case for building one new runway in the South East, to come into operation by 2030. In that report the Airports Commission set out scenarios, including a carbon-traded scenario under which overall carbon dioxide (CO_2) emissions were set at a cap consistent with a goal to limit global warming to 2ºC. The Commission reduced the field of proposals to three main candidates. Two of these involved building additional runway capacity at Heathrow Airport, either to the north west of the existing two runways ("the NWR Scheme") or by extending the existing northern runway ("the ENR Scheme"). The third involved building a second runway at Gatwick airport ("the G2R Scheme").

4. The Airports Commission carried out an extensive consultation on which scheme should be chosen. In its final report dated 1 July 2015 ("the Airports Commission Final Report") the Commission confirmed that there was a need for additional runway capacity in the South East by 2030 and concluded that, while all three options could be regarded as credible, the NWR Scheme was the best way to meet that need, if combined with a significant package of measures which addressed environmental and community impacts.

5. The Government carried out reviews of the Airports Commission's analysis and conclusions. It assessed the Airports Commission Final Report to be sound and robust. On 14 December 2015 the Secretary of State for Transport ("the Secretary of State") announced that the Government accepted the case for airport expansion;

agreed with, and would consider further, the Airports Commission's short-list of options; and would use the mechanism of a national policy statement ("NPS") issued under the Planning Act 2008 ("the PA 2008") to establish the policy framework within which to consider an application by a developer for a development consent order ("DCO"). The announcement also stated that further work had to be done in relation to environmental impacts, including those arising from carbon emissions.

6. In parallel with the development of national airports policy, national and international policy to combat climate change has also been in a state of development. The Climate Change Act 2008 ("the CCA 2008") was enacted on the same day as the PA 2008. It sets a national carbon target (section 1) and requires the Government to establish carbon budgets for the UK (section 4). There are mechanisms in the CCA 2008 to adjust the national target and carbon budgets (in sections 2 and 5, respectively) as circumstances change, including as scientific understanding of global warming develops.

7. In 1992, the United Nations adopted the United Nations Framework Convention on Climate Change. 197 states are now parties to the Convention. Following the 21st Conference of the parties to the Convention, on 12 December 2015 the text of the Paris Agreement on climate change was agreed and adopted. The Paris Agreement set out certain obligations to reduce emissions of greenhouse gases, in particular CO_2, with the object of seeking to reduce the rate of increase in global warming and to contain such increase to well below 2^{o}C above, and if possible to 1.5^{o}C, above pre-industrial levels. On 22 April 2016 the United Kingdom signed the Paris Agreement and on 17 November 2016 the United Kingdom ratified the Agreement.

8. An expansion of airport capacity in the South East would involve a substantial increase in CO_2 emissions from the increased number of flights which would take place as a result. The proposals for such expansion have therefore given rise to a considerable degree of concern as to the environmental impact it would be likely to have on global warming and climate change. This is one aspect of the proposals for expansion of airport capacity, among many others, which have made the decision whether to proceed with such expansion a matter of controversy.

9. On 25 October 2016, the Secretary of State announced that the NWR Scheme was the Government's preferred option. In February 2017 the Government commenced consultation on a draft of an Airports NPS which it proposed should be promulgated pursuant to the PA 2008 to provide the national policy framework for consideration of an application for a DCO in respect of the NWR Scheme. A further round of consultation on a draft of this NPS was launched in October 2017. There were many thousands of responses to both consultations. In June 2018 the Government published its response to the consultations. It also published a response

to a report on the proposed scheme dated 1 November 2017 by the Transport Committee (a Select Committee of the House of Commons).

10. On 5 June 2018 the Secretary of State laid before Parliament the final version of the Airports NPS ("the ANPS"), together with supporting documents. As is common ground on this appeal, the policy framework set out in the ANPS makes it clear that issues regarding the compatibility of the building of a third runway at Heathrow with the UK's obligations to contain carbon emissions and emissions of other greenhouse gases could and should be addressed at the stage of the assessment of an application by HAL for a DCO to allow it to proceed with the development. As is also common ground, the ANPS makes it clear that the emissions obligations to be taken into account at the DCO stage will be those which are applicable at that time, assessed in the light of circumstances and the detailed proposals of HAL at that time.

11. On 25 June 2018 there was a debate on the proposed ANPS in the House of Commons, followed by a vote approving the ANPS by 415 votes to 119, a majority of 296 with support from across the House.

12. On 26 June 2018 the Secretary of State designated the ANPS under section 5(1) of the PA 2008 as national policy. It is the Secretary of State's decision to designate the ANPS which is the subject of legal challenge in these proceedings.

13. Objectors to the NWR Scheme commenced a number of claims against the Secretary of State to challenge the lawfulness of the designation of the ANPS on a wide variety of grounds. For the most part, those claims have been dismissed in the courts below in two judgments of the Divisional Court (Hickinbottom LJ and Holgate J) in the present proceedings, [2019] EWHC 1070 (Admin); [2020] PTSR 240, and an associated action ([2019] EWHC 1069 (Admin)) and in the judgment of the Court of Appeal in the present proceedings: [2020] EWCA Civ 214; [2020] PTSR 1446.

14. The Divisional Court dismissed all the claims brought by objectors, including those brought by the respondents to this appeal (Friends of the Earth - "FoE" - and Plan B Earth). FoE is a non-governmental organisation concerned with climate change. Plan B Earth is a charity concerned with climate change.

15. However, the Court of Appeal allowed appeals by FoE and Plan B Earth and granted declaratory relief stating that the ANPS is of no legal effect and that the Secretary of State had acted unlawfully in failing to take into account the Paris

Agreement in making his decision to designate the ANPS. The Court of Appeal set out four grounds for its decision:

> (i) The Secretary of State breached his duty under section 5(8) of the PA 2008 to give an explanation of how the policy set out in the ANPS took account of Government policy, which was committed to implementing the emissions reductions targets in the Paris Agreement ("the section 5(8) ground");
>
> (ii) The Secretary of State breached his duty under section 10 of the PA 2008, when promulgating the ANPS, to have regard to the desirability of mitigating and adapting to climate change, in that he failed to have proper regard to the Paris Agreement ("the section 10 ground");
>
> (iii) The Secretary of State breached his duty under article 5 of the Strategic Environmental Assessment Directive ("the SEA Directive", Directive 2001/42/EC of the European Parliament and of the Council on the assessment of the effects of certain plans and programmes on the environment) to issue a suitable environmental report for the purposes of public consultation on the proposed ANPS, in that he failed to refer to the Paris Agreement ("the SEA Directive ground"); and
>
> (iv) The Secretary of State breached his duty under section 10 of the PA 2008, when promulgating the ANPS, in that he failed to have proper regard to (a) the desirability of mitigating climate change in the period after 2050 ("the post 2050 ground") and (b) the desirability of mitigating climate change by restricting emissions of non-CO_2 impacts of aviation, in particular nitrous oxide ("the non-CO_2 emissions ground").

16. The Court of Appeal also rejected a submission by HAL, relying on section 31 of the Senior Courts Act 1981, that it should exercise its discretion as to remedy to refuse any relief, on the grounds that (HAL argued) it was highly likely that even if there had been no breach of duty by the Secretary of State the decision whether to issue the ANPS would have been the same.

17. HAL appeals to this court with permission granted by the court. HAL is joined in the proceedings as an interested party. It has already invested large sums of money in promoting the NWR Scheme and wishes to carry it through by applying for a DCO in due course and then building the proposed new runway. The Secretary of State has chosen not to appeal and has made no submissions to us. However, HAL

is entitled to advance all the legal arguments which may be available in order to defend the validity of the ANPS.

18. Prior to the Covid-19 pandemic, Heathrow was the busiest two-runway airport in the world. The pandemic has had a major impact in reducing aviation and the demand for flights. However, there will be a lead time of many years before any third runway at Heathrow is completed and HAL's expectation is that the surplus of demand for aviation services over airport capacity will have been restored before a third runway would be operational. Lord Anderson QC for HAL informed the court that HAL intends to proceed with the NWR Scheme despite the pandemic.

The Planning Act 2008

19. We are grateful to the Divisional Court for their careful account of the PA 2008, on which we draw for this section. The PA 2008 established a new unified "development consent" procedure for "nationally significant infrastructure projects" defined to include certain "airport-related development" including the construction or alteration of an airport that is expected to be capable of providing air passenger services for at least 10m passengers per year (sections 14 and 23). Originally, many of the primary functions under the Act were to be exercised by the Infrastructure Planning Commission, established under section 1. However, those functions were transferred to the Secretary of State by the Localism Act 2011.

20. The mischiefs that the Act was intended to address were identified in the White Paper published in May 2007, Planning for a Sustainable Future (Cm 7120) ("the 2007 White Paper"). Prior to the PA 2008, a proposal for the construction of a new airport or extension to an airport would have required planning permission under the Town and Country Planning Act 1990. An application for permission would undoubtedly have resulted in a public inquiry, whether as an appeal against refusal of consent or a decision by the Secretary of State to "call in" the matter for his own determination. As paragraph 3.1 of the 2007 White Paper said:

> "A key problem with the current system of planning for major infrastructure is that national policy and, in particular, the national need for infrastructure, is not in all cases clearly set out. This can cause significant delays at the public inquiry stage, because national policy has to be clarified and the need for the infrastructure has to be established through the inquiry process and for each individual application. For instance, the absence of a clear policy framework for airports development was identified by the inquiry secretary in his report on the planning inquiry as one of the key factors in the very long

> process for securing planning approval for Heathrow Terminal 5. Considerable time had to be taken at the inquiry debating whether there was a need for additional capacity. The Government has since responded by publishing the Air Transport White Paper to provide a framework for airport development. This identifies airport development which the Government considers to be in the national interest, for reference at future planning inquiries. But for many other infrastructure sectors, national policy is still not explicitly set out, or is still in the process of being developed."

21. Paragraph 3.2 identified a number of particular problems caused by the absence of a clear national policy framework. For example, inspectors at public inquiries might be required to make assumptions about national policy and national need, often without clear guidance and on the basis of incomplete evidence. Decisions by Ministers in individual cases might become the means by which government policy would be expressed, rather than such decisions being framed by clear policy objectives beforehand. In the absence of a clear forum for consultation at the national level, it could be more difficult for the public and other interested parties to have their say in the formulation of national policy on infrastructure. The ability of developers to make long-term investment decisions is influenced by the availability of clear statements of government policy and objectives, and might be adversely affected by the absence of such statements.

22. The 2007 White Paper proposed that national policy statements would set the policy framework for decisions on the development of national infrastructure.

> "They would integrate the Government's objectives for infrastructure capacity and development with its wider economic, environmental and social policy objectives, including climate change goals and targets, in order to deliver sustainable development."

The role of Ministers would be to set policy, in particular the national need for infrastructure development (para 3.4).

23. Paragraph 3.11 envisaged that any public inquiry dealing with individual applications for development consent would not have to consider issues such as whether there is a case for infrastructure development, or the types of development most likely to meet the need for additional capacity, since such matters would already have been addressed in the NPS. It was said that NPSs should have more weight than other statements of policy, whether at a national or local level: they

should be the primary consideration in the determination of an application for a DCO (para 3.12), although other relevant considerations should also be taken into account (para 3.13). To provide democratic accountability, it was said that NPSs should be subject to Parliamentary scrutiny before being adopted (para 3.27).

24. In line with the 2007 White Paper recommendation, Part 2 of the PA 2008 provides for NPSs which give a policy framework within which any application for development consent, in the form of a DCO, is to be determined. Section 5(1) gives the Secretary of State the power to designate an NPS for development falling within the scope of the Act; and section 6(1) provides that "[t]he Secretary of State must review each [NPS] whenever the Secretary of State thinks it appropriate to do so".

25. The content of an NPS is governed by section 5(5)-(8) which provide that:

> "(5) The policy set out in [an NPS] may in particular -
>
> (a) set out, in relation to a specified description of development, the amount, type or size of development of that description which is appropriate nationally or for a specified area;
>
> (b) set out criteria to be applied in deciding whether a location is suitable (or potentially suitable) for a specified description of development;
>
> (c) set out the relative weight to be given to specified criteria;
>
> (d) identify one or more locations as suitable (or potentially suitable) or unsuitable for a specified description of development;
>
> (e) identify one or more statutory undertakers as appropriate persons to carry out a specified description of development;
>
> (f) set out circumstances in which it is appropriate for a specified type of action to be taken to mitigate the impact of a specified description of development.

> (6) If [an NPS] sets out policy in relation to a particular description of development, the statement must set out criteria to be taken into account in the design of that description of development.
>
> (7) [An NPS] must give reasons for the policy set out in the statement.
>
> (8) The reasons must (in particular) include an explanation of how the policy set out in the statement takes account of Government policy relating to the mitigation of, and adaptation to, climate change."

As is made clear, the NPS may (but is not required to) identify a particular location for the relevant development.

26. In addition, under the heading "Sustainable development", section 10 provides (so far as relevant to these claims):

> "(1) This section applies to the Secretary of State's functions under sections 5 and 6.
>
> (2) The Secretary of State must, in exercising those functions, do so with the objective of contributing to the achievement of sustainable development.
>
> (3) For the purposes of subsection (2) the Secretary of State must (in particular) have regard to the desirability of -
>
> (a) mitigating, and adapting to, climate change; …"

27. The process for designation of an NPS is also set out in the Act. The PA 2008 imposed for the first time a transparent procedure for the public and other consultees to be involved in the formulation of national infrastructure policy in advance of any consideration of an application for a DCO.

28. The Secretary of State produces a draft NPS, which is subject to (i) an appraisal of sustainability ("AoS") (section 5(3)), (ii) public consultation and

publicity (section 7), and (iii) Parliamentary scrutiny (sections 5(4) and 9). In addition, there is a requirement to carry out a strategic environmental assessment under the SEA Directive as transposed by the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) ("the SEA Regulations") (see regulation 5(2) of the SEA Regulations).

29. The consultation and publicity requirements are set out in section 7, which so far as relevant provides:

> "(1) This section sets out the consultation and publicity requirements referred to in sections 5(4) and 6(7).
>
> (2) The Secretary of State must carry out such consultation, and arrange for such publicity, as the Secretary of State thinks appropriate in relation to the proposal. This is subject to subsections (4) and (5).
>
> (3) In this section 'the proposal' means -
>
> (a) the statement that the Secretary of State proposes to designate as [an NPS] for the purposes of this Act or
>
> (b) (as the case may be) the proposed amendment.
>
> (4) The Secretary of State must consult such persons, and such descriptions of persons, as may be prescribed.
>
> (5) If the policy set out in the proposal identifies one or more locations as suitable (or potentially suitable) for a specified description of development, the Secretary of State must ensure that appropriate steps are taken to publicise the proposal.
>
> (6) The Secretary of State must have regard to the responses to the consultation and publicity in deciding whether to proceed with the proposal."

30. A proposed NPS must be laid before Parliament (section 9(2) and (8)). The Act thus provides an opportunity for a committee of either House of Parliament to scrutinise a proposed NPS and to make recommendations; and for each House to scrutinise it and make resolutions (see section 9(4)).

31. An NPS is not the end of the process. It simply sets the policy framework within which any application for a DCO must be determined. Section 31 provides that, even where a relevant NPS has been designated, development consent under the PA 2008 is required for development "to the extent that the development is or forms part of a nationally significant infrastructure project". Such applications must be made to the relevant Secretary of State (section 37).

32. Chapter 2 of Part 5 of the Act makes provision for a pre-application procedure. This provides for a duty to consult pre-application, which extends to consulting relevant local authorities and, where the land to be developed is in London, the Greater London Authority (section 42). There are also duties to consult the local community, and to publicise and to take account of responses to consultation and publicity (sections 47-49; and see also regulation 12 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/572), which makes provision for publication of and consultation on preliminary environmental information). Any application for a DCO must be accompanied by a consultation report (section 37(3)(c)); and adequacy of consultation is one of the criteria for acceptance of the application (section 55(3) and (4)(a)).

33. Part 6 of the PA 2008 is concerned with "Deciding applications for orders granting development consent". Once the application has been accepted, section 56 requires the applicant to notify prescribed bodies and authorities and those interested in the land to which the application relates, who become "interested parties" to the application (section 102). The notification must include a notice that interested parties may make representations to the Secretary of State. Section 60(2) provides that where a DCO application is accepted for examination there is a requirement to notify any local authority for the area in which land, to which the application relates, is located (see section 56A)) and, where the land to be developed is in London, the Greater London Authority, inviting them each to submit a "local impact report" (section 60(2)).

34. The Secretary of State may appoint a panel or a single person to examine the application ("the Examining Authority") and to make a report setting out its findings and conclusions, and a recommendation as to the decision to be made on the application. The examination process lasts six months, unless extended (section 98); and the examination timetable is set out in the Infrastructure Planning (Examination Procedure) Rules 2010 (SI 2010/103) ("the Examination Rules"). In addition to local

impact reports (section 60), the examination process involves written representations (section 90), written questions by the Examining Authority (rules 8 and 10 of the Examination Rules), and hearings (which might be open floor and/or issue specific and/or relating to compulsory purchase) (sections 91-93). As a result of the examination process, the provisions of the proposed DCO may be amended by either the applicant or the Examination Authority, eg in response to the representations of interested parties; and it is open to the Secretary of State to modify the proposed DCO before making it.

35. Section 104 constrains the Secretary of State when determining an application for a DCO for development in relation to which an NPS has effect, in the following terms (so far as relevant to these claims):

> "(2) In deciding the application the Secretary of State must have regard to -
>
> > (a) any [NPS] which has effect in relation to development of the description to which the application relates (a 'relevant [NPS]'), …
> >
> > (b) any local impact report …,
> >
> > (c) any matters prescribed in relation to development of the description to which the application relates, and
> >
> > (d) any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision.
>
> (3) The Secretary of State must decide the application in accordance with any relevant [NPS], except to the extent that one or more of subsections (4) to (8) applies.
>
> (4) This subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant [NPS] would lead to the United Kingdom being in breach of any of its international obligations.

(5) This subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant [NPS] would lead to the Secretary of State being in breach of any duty imposed on the Secretary of State by or under any enactment.

(6) This subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant [NPS] would be unlawful by virtue of any enactment.

(7) This subsection applies if the Secretary of State is satisfied that the adverse impact of the proposed development would outweigh its benefits.

(8) This subsection applies if the Secretary of State is satisfied that any condition prescribed for deciding an application otherwise than in accordance with [an NPS] is met.

(9) For the avoidance of doubt, the fact that any relevant [NPS] identifies a location as suitable (or potentially suitable) for a particular description of development does not prevent one or more of subsections (4) to (8) from applying."

36. Section 104 is complemented by section 106 which, under the heading "Matters which may be disregarded when determining an application", provides (so far as relevant to these claims):

"(1) In deciding an application for an order granting development consent, the Secretary of State may disregard representations if the Secretary of State considers that the representations -

(a) …

(b) relate to the merits of policy set out in [an NPS]….

(2) In this section 'representation' includes evidence."

That is also reflected in sections 87(3) and 94(8), under which the Examining Authority may disregard representations (including evidence) or refuse to allow representations to be made at a hearing if it considers that they "relate to the merits of the policy set out in [an NPS] …".

37. By section 120(1), a DCO may impose requirements in connection with the development for which consent is granted, eg it may impose conditions considered appropriate or necessary to mitigate or control the environmental effects of the development. Section 120(3) is a broad provision enabling a DCO to make provision relating to, or to matters ancillary to, the development for which consent is granted including any of the matters listed in Part 1 of Schedule 5 (section 120(4)). That schedule lists a wide range of potentially applicable provisions, including compulsory purchase, the creation of new rights over land, the carrying out of civil engineering works, the designation of highways, the operation of transport systems, the charging of tolls, fares and other charges and the making of byelaws and their enforcement.

38. Section 13 concerns "Legal challenges relating to [NPSs]". Section 13(1) provides:

> "A court may entertain proceedings for questioning [an NPS] or anything done, or omitted to be done, by the Secretary of State in the course of preparing such a statement only if -
>
> (a) the proceedings are brought by a claim for judicial review, and
>
> (b) the claim form is filed before the end of the period of six weeks beginning with the day after -
>
> (i) the day on which the statement is designated as [an NPS] for the purposes of this Act, or
>
> (ii) (if later) the day on which the statement is published."

It was under section 13 that the claims by objectors to the ANPS were brought.

The Climate Change Act 2008

39. Again, we gratefully draw on the account given by the Divisional Court. As they explain, the UK has for a long time appreciated the desirability of tackling climate change, and wished to take a more rigorous domestic line. In the 2003 White Paper, "Our Energy Future - Creating a Low Carbon Economy", the Government committed to reduce CO_2 emissions by 60% on 1990 levels by 2050; and to achieve "real progress" by 2020 (which equated to reductions of 26-32%). The 60% figure emanated from the EU Council of Ministers' "Community Strategy on Climate Change" in 1996, which determined to limit emissions to 550 parts per million (ppm) on the basis that to do so would restrict the rise in global temperatures to 2ºC above pre-industrial levels which, it was then considered, would avoid the serious consequences of global warming. However, by 2005, there was scientific evidence that restricting emissions to 550ppm would be unlikely to be effective in keeping the rise to 2ºC; and only stabilising CO_2 emissions at something below 450ppm would be likely to achieve that result.

40. Parliament addressed these issues in the CCA 2008.

41. Section 32 established a Committee on Climate Change ("the CCC"), an independent public body to advise the UK and devolved Governments and Parliaments on tackling climate change, including on matters relating to the UK's statutory carbon reduction target for 2050 and the treatment of greenhouse gases from international aviation.

42. Section 1 gives a mandatory target for the reduction of UK carbon emissions. At the time of designation of the ANPS, it provided:

> "It is the duty of the Secretary of State [then, the Secretary of State for Energy and Climate Change: now, the Secretary of State for Business, Enterprise and Industrial Strategy ('BEIS')] to ensure that the net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline."

The figure of 80% was substituted for 60% during the passage of the Bill, as evolving scientific knowledge suggested that the lower figure would not be sufficient to keep the rise in temperature to 2ºC in 2050. Therefore, although the CCA 2008 makes no mention of that temperature target, as the CCC said in its report on the Paris Agreement issued in October 2016 (see para 73 below):

> "This 2050 target was derived as a contribution to a global emissions path aimed at keeping global average temperatures to around 2ºC above pre-industrial levels."

The statutory target of a reduction in carbon emissions by 80% by 2050 was Parliament's response to the international commitment to keep the global temperature rise to 2ºC above pre-industrial levels in 2050. Since the designation of the ANPS, the statutory target has been made more stringent. The figure of 100% was substituted for 80% in section 1 of the CCA 2008 by the Climate Change Act 2008 (2050 Target Amendment) Order 2019/1056.

43. The Secretary of State for BEIS has the power to amend that percentage (section 2(1) of the CCA 2008), but only:

> (i) if it appears to him that there have been significant developments in scientific knowledge about climate change since the passing of the Act, or developments in European or international law or policy (section 2(2) and (3)): the Explanatory Note to the Act says, as must be the case, that "this power might be used in the event of a new international treaty on climate change";
>
> (ii) after obtaining, and taking into account, advice from the CCC (section 3(1)); and
>
> (iii) subject to Parliamentary affirmative resolution procedure (section 2(6)).

44. Section 1 of the CCA 2008 sets a target that relates to carbon only. Section 24 enables the Secretary of State for BEIS to set targets for other greenhouse gases, but subject to similar conditions to which an amendment to the section 1 target is subject.

45. In addition to the carbon emissions target set by section 1 - and to ensure compliance with it (see sections 5(1)(b) and 8) - the Secretary of State for BEIS is also required to set for each succeeding period of five years, at least 12 years in advance, an amount for the net UK carbon account ("the carbon budget"); and ensure that the net UK carbon account for any period does not exceed that budget (section 4). The carbon budget for the period including 2020 was set to be at least 34% lower than the 1990 baseline.

46. Section 10(2) sets out various matters which are required to be taken into account when the Secretary of State for BEIS sets, or the CCC advises upon, any carbon budget, including:

> "(a) scientific knowledge about climate change;
>
> (b) technology relevant to climate change;
>
> (c) economic circumstances, and in particular the likely impact of the decision on the economy and the competitiveness of particular sectors of the economy;
>
> (d) fiscal circumstances, and in particular the likely impact of the decision on taxation, public spending and public borrowing;
>
> (e) social circumstances, and in particular the likely impact of the decision on fuel poverty;
>
> (f) …
>
> (h) circumstances at European and international level;
>
> (i) the estimated amount of reportable emissions from international aviation and international shipping …"

Therefore, although for the purposes of the CCA 2008 emissions from greenhouse gases from international aviation do not generally count as emissions from UK sources (section 30(1)), by virtue of section 10(2)(i), in relation to any carbon budget, the Secretary of State for BEIS and the CCC must take such emissions into account.

47. The evidence for the Secretary of State explains that the CCC has interpreted that as requiring the UK to meet a 2050 target which includes these emissions. The CCC has advised that, to meet the 2050 target on that basis, emissions from UK aviation (domestic and international) in 2050 should be no higher than 2005 levels, ie 37.5 megatons (million tonnes) of CO_2 ($MtCO_2$). This is referred to by the respondents as "the Aviation Target". However, the Aviation Policy Framework

issued by the Government in March 2013 explains that the Government decided not to take a decision on whether to include international aviation emissions in its carbon budgets, simply leaving sufficient headroom in those budgets consistent with meeting the 2050 target including such emissions, but otherwise deferring a decision for consideration as part of the emerging Aviation Strategy. The Aviation Strategy is due to re-examine how the aviation sector can best contribute its fair share to emissions reductions at both the UK and global level. It is yet to be finalised.

The SEA Directive

48. Again, in this section we gratefully draw on the careful account given by the Divisional Court. As they explain, Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment as amended ("the EIA Directive"), as currently transposed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (SI 2017/571), requires a process within normal planning procedures. (For the purposes of these claims, the transposing regulations have not materially changed over the relevant period; and we will refer to them collectively as "the EIA Regulations".) The SEA Directive as transposed by the SEA Regulations concerns the environmental impact of plans and programmes. The SEA Directive and Regulations applied to the ANPS. The EIA Directive would apply when there was a particular development for which development consent was sought, at the DCO stage.

49. Recital (1) to the SEA Directive states:

> "Article 174 of the Treaty provides that Community policy on the environment is to contribute to, *inter alia*, the preservation, protection and improvement of the quality of the environment, the protection of human health and the prudent and rational utilisation of natural resources and that it is to be based on the precautionary principle. Article 6 of the Treaty provides that environmental protection requirements are to be integrated into the definition of Community policies and activities, in particular with a view to promoting sustainable development."

As suggested here, the SEA Directive relies upon the "precautionary principle" where appropriate.

50. Recital (4) states:

> "Environmental assessment is an important tool for integrating environmental considerations into the preparation and adoption of certain plans and programmes which are likely to have significant effects on the environment in the member states, because it ensures that such effects of implementing plans and programmes are taken into account during their preparation and before their adoption."

51. Recital (9) states:

> "This Directive is of a procedural nature, and its requirements should either be integrated into existing procedures in member states or incorporated in specifically established procedures. With a view to avoiding duplication of the assessment, member states should take account, where appropriate, of the fact that assessments will be carried out at different levels of a hierarchy of plans and programmes."

Thus, the requirements of the SEA Directive are essentially procedural in nature; and it may be appropriate to avoid duplicating assessment work by having regard to work carried out at other levels or stages of a policy-making process (see article 5(2)-(3) below).

52. Recital (17) states:

> "The environmental report and the opinions expressed by the relevant authorities and the public, as well as the results of any transboundary consultation, should be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure."

53. The objectives of the SEA Directive are set out in article 1:

> "The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment."

54. Article 3(1) requires an "environmental assessment" to be carried out, in accordance with articles 4 to 9, for plans and programmes referred to in article 3(2)-(4) which are likely to have significant environmental effects. Article 3(2) requires strategic environmental assessment generally for any plan or programme which is prepared for (inter alia) transport, town and country planning or land use and which sets the framework for future development consent for projects listed in Annexes I and II to the EIA Directive. Strategic environmental assessment is also required for other plans and programmes which are likely to have significant environmental effects (article 3(4)). By virtue of sections 104 and 106 of the PA 2008, the ANPS designated under section 5 sets out the framework for decisions on whether a DCO for the development of an additional runway at Heathrow under Part 6 of that Act should be granted. That development would, in due course, require environmental impact assessment under the EIA Directive and Regulations; and there is no dispute that the ANPS needed to be subjected to strategic environmental assessment under the SEA Directive and the SEA Regulations.

55. Article 2(b) of the SEA Directive defines "environmental assessment" for the purposes of the Directive:

> "'environmental assessment' shall mean the preparation of an environmental report, the carrying out of consultations, the taking into account of the environmental report and the results of the consultations in decision-making and the provision of information on the decision in accordance with articles 4 to 9."

56. Article 4(1) requires "environmental assessment to be carried out during the preparation of a plan or programme and before its adoption ...", which in this instance would refer to the Secretary of State's decision to designate the ANPS.

57. Article 5 sets out requirements for an "environmental report". By article 2(c):

> "'environmental report' shall mean the part of the plan or programme documentation containing the information required in article 5 and Annex I."

In the case of the ANPS the environmental report was essentially the AoS.

58. Article 5(1) provides:

> "Where an environmental assessment is required under article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I."

Annex I states, under the heading, "Information referred to in article 5(1)":

> "The information to be provided under article 5(1), subject to article 5(2) and (3), is the following:
>
> (a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;
>
> (b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;
>
> (c) the environmental characteristics of areas likely to be significantly affected;
>
> (d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to [the Habitats and Birds Directives];
>
> (e) the environmental protection objectives, established at international, Community or member state level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;
>
> (f) the likely significant effects on the environment, including on issues such as biodiversity, population,

> human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
>
> (g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;
>
> (h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;
>
> (i) a description of the measures envisaged concerning monitoring in accordance with article 10;
>
> (j) a non-technical summary of the information provided under the above headings."

Thus, the information required by the combination of article 5(1) and Annex I is subject to article 5(2) and (3), which provide:

> "(2) The environmental report prepared pursuant to paragraph 1 shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.
>
> (3) Relevant information available on environmental effects of the plans and programmes and obtained at other levels of decision-making or through other Community legislation may be used for providing the information referred to in Annex I." (Emphasis added)

59. Accordingly, the information which is required to be included in an "environmental report", whether by article 5(1) itself or by that provision in conjunction with Annex I, is qualified by article 5(2) and (3) in a number of respects. First, the obligation is only to include information that "may reasonably be required", which connotes the making of a judgment by the plan-making authority. Second, that judgment may have regard to a number of matters, including current knowledge and assessment methods. In addition, the contents and level of detail in a plan such as the ANPS, the stage it has reached in the decision-making process and the ability to draw upon sources of information used in other decision-making, may affect the nature and extent of the information required to be provided in the environmental report for the strategic environmental assessment.

60. The stage reached by the ANPS should be seen in the context of the statutory framework of the PA 2008, as set out above (see paras 19-38). Section 5(5) authorises the Secretary of State to set out in an NPS the type and size of development appropriate nationally or for a specified area and to identify locations which are either suitable or unsuitable for that development. In addition, the Secretary of State may set out criteria to be applied when deciding the suitability of a location. Section 104(3) requires the Secretary of State to decide an application for a DCO in accordance with a relevant NPS, save in so far as any one or more of the exceptions in section 104(4)-(8) applies, which include the situation where the adverse impacts of a proposal are judged to outweigh its benefits (section 104(7)). Section 106(1) empowers the Secretary of State to disregard a representation objecting to such a proposal in so far as it relates to the merits of a policy contained in the NPS.

61. In the present case, the Secretary of State made it plain in the strategic environmental assessment process that the AoS drew upon and updated the extensive work which had previously been carried out by, and on behalf of, the Airports Commission, including numerous reports to the Airports Commission and its own final report. It is common ground that the Secretary of State was entitled to take that course.

62. Article 6 of the SEA Directive sets out requirements for consultation. Article 6(1) requires that the draft plan or programme and the environmental report be made available to the public and to those authorities designated by a member state under article 6(3) which, by virtue of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes. In England, the designated authorities are Natural England, Historic England and the Environment Agency (see regulation 4 of the SEA Regulations). In the case of the ANPS, the Secretary of State also had to consult those designated authorities on the scope and level of detail of the information to be included in the environmental report (article 5(4)).

63. In relation to the consultation process, article 6(2) provides:

> "The authorities referred to in para 3 and the public referred to in para 4 shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme or its submission to the legislative procedure."

64. "The public referred to in [article 6(4)]" is a cross-reference to the rules made by each member state for defining the public affected, or likely to be affected by, or having an interest in the decision-making on the plan. Regulation 13(2) of the SEA Regulations leaves this to be determined as a matter of judgment by the plan-making authority.

65. Article 8 requires the environmental report prepared under article 5, the opinions expressed under article 6, and the results of any transboundary consultations under article 7 to be "taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure".

66. In *Cogent Land LLP v Rochford District Council* [2012] EWHC 2542 (Admin); [2013] 1 P & CR 2, Singh J held that a defect in the adequacy of an environmental report prepared for the purposes of the SEA Directive may be cured by the production of supplementary material by the plan-making authority, subject to there being consultation on that material (see paras 111-126). He held that articles 4, 6(2) and 8 of the Directive, along with their transposition in the SEA Regulations, are consistent with that conclusion; and that none of the previous authorities on the SEA Directive (which he reviewed) suggested otherwise. He held that SEA is not a single document, still less is it the same thing as the "environmental report". Rather, it is a process, during the course of which an environmental report must be produced (see para 112). The Court of Appeal endorsed this analysis in *No Adastral New Town Ltd v Suffolk Coastal District Council* [2015] EWCA Civ 88; [2015] Env LR 28, in deciding that SEA failures in the early stages of an authority's preparation of its Core Strategy (a statutory development plan) were capable of being, and were in fact, cured by the steps taken in subsequent stages (see paras 48-54). We agree with this analysis.

67. It follows that strategic environmental assessment may properly involve an iterative process; and that it is permissible for a plan-making authority to introduce alterations to its draft plan subject to complying with the information requirements in article 5 and the consultation requirements in articles 6 and 7.

68. Regulation 12 of the SEA Regulations transposes the main requirements in article 5 of the Directive governing the content of an environmental report as follows (emphasis added):

> "(2) The report shall identify, describe and evaluate the likely significant effects on the environment of -
>
> (a) implementing the plan or programme; and
>
> (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.
>
> (3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of -
>
> (a) current knowledge and methods of assessment;
>
> (b) the contents and level of detail in the plan or programme;
>
> (c) the stage of the plan or programme in the decision-making process; and
>
> (d) the extent to which certain measures are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment."

Schedule 2 replicates the list of items in Annex I to the SEA Directive. No issue is raised as to the adequacy of that transposition.

69. As the Divisional Court observed, it is plain from the language "as may reasonably be required" that the SEA Regulations, like the SEA Directive, allow the plan-making authority to make a judgment on the nature of the information in Schedule 2 and the level of detail to be provided in an environmental report, whether as published initially or in any subsequent amendment or supplement.

Factual background

70. At the heart of the challenge to the ANPS is the Paris Agreement (para 7 above) which acknowledged that climate change represents "an urgent and potentially irreversible threat to human societies and the planet" (Preamble to the Decision to adopt the Paris Agreement). In article 2 the Paris Agreement sought to enhance the measures to reduce the risks and impacts of climate change by setting a global target of "holding the increase in the global average temperature to well below 2ºC above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5ºC above pre-industrial levels". Each signatory of the Paris Agreement undertook to take measures to achieve that long-term global temperature goal "so as to achieve a balance between anthropogenic emissions by sources and removals by sinks of greenhouse gases in the second half of this century …" (article 4(1)). Each party agreed to prepare, communicate and maintain successive nationally determined contributions ("NDCs") that it intended to achieve and to pursue domestic mitigation measures with the aim of achieving the objectives of such NDCs (article 4(2)). A party's successive NDC was to progress beyond its current NDC and was to reflect its highest possible ambition (article 4(3)).

71. Notwithstanding the common objectives set out in articles 2 and 4(1), the Paris Agreement did not impose an obligation on any state to adopt a binding domestic target to ensure that those objectives were met. The specific legal obligation imposed in that regard was to meet any NDC applicable to the state in question. So far as concerns the United Kingdom, it is common ground that the relevant NDC is that adopted and communicated on behalf of the EU, which set a binding target of achieving 40% reduction of 1990 emissions by 2030. This is less stringent than the targets which had already been set in the fourth and fifth carbon budgets issued pursuant to section 4 of the CCA 2008, which were respectively a 50% reduction on 1990 levels for the period 2023-2027 and a 57% reduction for the period 2028-2032.

72. Before the United Kingdom had signed or ratified the Paris Agreement two Government Ministers made statements in the House of Commons about the Government's approach to the Paris Agreement. On 14 March 2016 the Minister of State for Energy, Andrea Leadsom MP, told the House of Commons that the Government "believe we will need to take the step of enshrining the Paris goal of net zero emissions in UK law - the question is not whether, but how we do it, and there is an important set of questions to be answered before we do". Ten days later (24 March 2016) Amber Rudd MP, Secretary of State for Energy and Climate Change, responded to an oral question on what steps her department was taking to enshrine the net zero emissions commitment of the Paris Climate Change Conference by stating that "the question is not whether we do it but how we do it."

73. The Government received advice from the CCC on the UK's response to the Paris goal. At a meeting on 16 September 2016 the CCC concluded that while a new long-term target would be needed to be consistent with the Paris goal, "the evidence was not sufficient to specify that target now".

74. In October 2016 the CCC published a report entitled "UK Climate Action following the Paris Agreement" on what domestic action the Government should take as part of a fair contribution to the aims of the Paris Agreement. In that report the CCC stated that the goals of the Paris Agreement involved a higher level of global ambition in the reduction of greenhouse gases than that which formed the basis of the UK's existing emissions reduction targets. But the CCC advised that it was neither necessary nor appropriate to amend the 2050 target in section 1 of the CCA 2008 or alter the level of existing carbon budgets at that time. It advised that there would be "several opportunities to revisit the UK's targets in the future" and that "the UK 2050 target is potentially consistent with a wide range of global temperature outcomes". In its executive summary (p 7) the CCC summarised its advice:

> "Do not set new UK emissions targets now … The five-yearly cycle of pledges and reviews created by the Paris Agreement provides regular opportunities to consider increasing UK ambition."

75. In October 2017 the Government published its "Clean Growth Strategy" which set out its policies and proposals to deliver economic growth and decreased emissions. In Annex C in its discussion of UK climate action it acknowledged the risks posed by the growing level of global climate instability. It recorded the global goals of the Paris Agreement and that global emissions of greenhouse gases would need to peak as soon as possible, reduce rapidly thereafter and reach a net zero level in the second half of this century. It recorded the CCC's advice in these terms:

> "In October 2016 the [CCC] said that the Paris Agreement target 'is more ambitious than both the ambition underpinning the UK 2050 target and previous international agreements', but that the UK should not set new UK emissions targets now, as it already had stretching targets and achieving them will be a positive contribution to global climate action. The CCC advised that the UK's fair contribution to the Paris Agreement should include measures to maintain flexibility to go further on UK targets, the development of options to remove greenhouse gases from the air, and that its targets should be kept under review."

76. In December 2017 Plan B Earth and 11 other claimants commenced judicial review proceedings against the Secretary of State for BEIS and CCC alleging that the Secretary of State had unlawfully failed to revise the 2050 target in section 1 of the CCA 2008 in line with the Paris Agreement.

77. The Secretary of State pleaded:

> "[While] the Government is fully committed to the objectives in the Paris Agreement, the legal obligation upon the Parties is to prepare, communicate and maintain nationally determined contributions to reduce net emissions, with a view to achieving the purpose of holding global average temperature increases to 'well below 2ºC' above pre-industrial levels and pursuing efforts to limit them to 1.5ºC. This is not the same as a legal duty or obligation for the Parties, individually or collectively, to achieve this aim." (Emphasis in original)

The CCC also explained its position in its written pleadings:

> "The CCC recommended no change to the existing UK 2050 target (at that time, October 2016), not because a more ambitious target was unfeasible, but rather because the existing UK target was potentially consistent with more ambitious global temperature goals, including that in the Paris Agreement."

78. At an oral hearing ([2018] EWHC 1892 (Admin); [2019] Env LR 13), Supperstone J refused permission to proceed with the judicial review, holding among other things that the Paris Agreement did not impose any legally binding target on each contracting party, that section 2 of the CCA 2008 gave the Secretary of State the power, but did not impose a duty, to amend the 2050 target in the event of developments in scientific knowledge or European or international law or policy, and that on the basis of the advice of the CCC, the Secretary of State was plainly entitled to refuse to change the 2050 target. Asplin LJ refused permission to appeal on 22 January 2019.

79. In January 2018 the CCC published "An independent assessment of the UK's Clean Growth Strategy". In that report the CCC explained that the aim of the Paris Agreement for emissions to reach net zero in the second half of the century was likely to require the UK to revise its statutory 2050 target to seek greater reductions and advised that "it is therefore essential that actions are taken now to enable these

deeper reductions to be achieved" (p 21). The CCC invited the Secretary of State for BEIS to seek further advice from it and review the UK's long-term emissions targets after the publication of the report by the Intergovernmental Panel on Climate Change ("IPCC") on the implications of the Paris Agreement's 1.5ºC goal.

80. In January 2018 the Government published "A Green Future: Our 25 Year Plan to Improve the Environment" in which it undertook to continue its work in providing international leadership to meet the goals of the Paris Agreement (for example, p 118). In early 2018 governments, including the UK Government, were able to review a draft of the IPCC report and in early June 2018 the UK Government submitted final comments on the draft of the IPCC report.

81. On 17 April 2018 the Government announced at the Commonwealth Heads of Government Meeting that after the publication of the IPCC report later that year, it would seek the advice of the CCC on the implications of the Paris Agreement for the UK's long-term emissions reductions targets.

82. At the same time the Government was working to develop an aviation strategy which would address aviation emissions. In April 2018, after public consultation, the Department for Transport published "Beyond the Horizon: The Future of UK Aviation - Next Steps towards an Aviation Strategy" in which it undertook to investigate technical and policy measures to address aviation emissions and how those measures related to the recommendations of the CCC. It stated (para 6.24):

> "The government will look again at what domestic policies are available to complement its international approach and will consider areas of greater scientific uncertainty, such as the aviation's contribution to non-carbon dioxide climate change effects and how policy might make provision for their effects."

83. On 1 May in response to an oral parliamentary question concerning the offshore wind sector Claire Perry MP, Minister of State for Energy and Clean Growth, stated that the UK was the first developed nation to have said that it wanted to understand how to get to a zero-carbon economy by 2050.

84. On 5 June 2018, the Government issued its response to the consultation on the draft ANPS and the Secretary of State laid the proposed ANPS before Parliament. On the same day, the Secretary of State presented a paper on the proposed ANPS to a Cabinet sub-committee giving updated information on the three short-listed schemes and the Government's preference for the NWR scheme. In

relation to aviation emissions it stated that it was currently uncertain how international carbon emissions would be incorporated into the Government's carbon budget framework, that policy was developing and would be progressed during the development of the Aviation Strategy. The Government's position remained that action to address aviation emissions was best taken at an international level.

85. On 14 June 2018 the Chair of the CCC (Lord Deben) and Deputy Chair (Baroness Brown) wrote to the Secretary of State expressing surprise that he had not referred to the legal targets in the CCA 2008 or the Paris Agreement commitments in his statement to the House of Commons on the proposed ANPS on 5 June and stressing the need for his department to consider aviation's place in the overall strategy for UK emissions reduction. They stated that the Government should not plan for higher levels of aviation emissions "since this would place an unreasonably large burden on other sectors".

86. The Secretary of State responded on 20 June 2018 stating that the Government remained committed to the UK's climate change target and that the proposed ANPS made it clear that an increase in carbon emissions that would have a material impact on the Government's ability to meet its carbon reduction targets would be a reason to refuse development consent for the NWR. He stated that the Government was confident that the measures and requirements set out in the proposed ANPS provided a strong basis for mitigating the environmental impacts of expansion. He explained that the forthcoming Aviation Strategy would put in place a framework for UK carbon emissions to 2050, "which ensures that aviation contributes its fair share to action on climate change, taking into account the UK's domestic and international obligations".

87. After the Parliamentary debate on 25 June 2018 (para 11 above), the Secretary of State designated the ANPS as national policy on 26 June 2018 (para 12 above). Section 5 of the ANPS focused on the potential impacts of the NWR Scheme and the assessments that any applicant would have to carry out and the planning requirements which it would have to meet in order to gain development consent. In its discussion of greenhouse gas emissions the ANPS stated that the applicant would have to undertake an environmental impact assessment quantifying the greenhouse gas impacts before and after mitigation so that the project could be assessed against the Government's carbon obligations. In para 5.82 the ANPS stated:

> "Any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets."

88. As in this appeal a challenge has been made as to the factual basis of the Secretary of State's decision not to consider the possible new domestic emissions targets which might result from the Paris Agreement, it is necessary to mention the evidence before the Divisional Court on this matter. In her first witness statement Ms Caroline Low, the Director of the Airport Capacity Programme at the Department for Transport, stated (para 458):

> "In October 2016 the CCC said that the Paris Agreement 'is more ambitious than both the ambition underpinning the UK 2050 target and previous international agreements' but that the UK should not set new UK emissions targets now, as it already has stretching targets and achieving them will be a positive contribution to global climate action. Furthermore, the CCC acknowledged in the context of separate legal action brought by Plan B against the Secretary of State for Business, Energy and Industrial Strategy that it is possible that the existing 2050 target could be consistent with the temperature stabilization goals set out in the Paris Agreement. Subsequently, in establishing its carbon obligations for the purpose of assessing the impact of airport expansion, my team has followed this advice and considered existing domestic legal obligations as the correct basis for assessing the carbon impact of the project, and that it is not appropriate at this stage for the government to consider any other possible targets that could arise through the Paris Agreement."

89. Her account was corroborated by Ms Ursula Stevenson, an engineering and project management consultant whom the Secretary of State retained to deal with the process for consideration of the environmental impacts of the NWR Scheme. She stated (witness statement para 3.128) that the Department had followed the CCC's advice when preparing the AoS required by the PA 2008 (see para 28 above) and accordingly had considered existing domestic legal obligations to be the correct basis for assessing the carbon impact of the project. She added:

> "At this stage, it is not possible to consider what any future targets [sic] might be recommended by the CCC to meet the ambitions of the Paris Agreement. It is expected that, should more ambitious targets be recommended and set through the carbon budgets beyond 2032, then government will be required to make appropriate policy decisions across all sectors of the economy to limit emissions accordingly."

She emphasised (para 3.129) that the obligations under the CCA 2008 could be made more stringent in future, should that prove necessary, and that the ANPS provided that any application for a DCO would have to be assessed by reference to whatever obligations were in place at that time.

90. The IPCC Special Report on Global Warming of 1.5ºC was published on 8 October 2018. It concluded that limiting global warming to that level above pre-industrial levels would significantly reduce the risks of challenging impacts on ecosystems and human health and wellbeing and that it would require "deep emissions reductions" and "rapid, far-reaching and unprecedented changes to all aspects of society". To achieve that target global net emissions of CO_2 would need to fall by about 45% from 2010 levels by 2030, reaching zero by 2050.

91. The Government commissioned the CCC to advise on options by which the UK should achieve (i) a net zero greenhouse gas target and/or (ii) a net zero carbon target in order to contribute to the global ambitions set out in the Paris Agreement, including whether now was the right time to set such a target.

92. In December 2018 the Department for Transport published consultation materials on its forthcoming Aviation Strategy. In "Aviation 2050: The future of UK aviation" the Department stated (paras 3.83-3.87) that it proposed to negotiate in the International Civil Aviation Organisation (the UN body responsible for tackling international aviation climate emissions) for a long-term goal for international aviation that is consistent with the temperature goals of the Paris Agreement and that it would consider appropriate domestic action to support international progress. It stated that the Government would review the CCC's revised aviation advice and advice on the implications of the Paris Agreement. In the same month, in a paper commissioned and published by the Department and written by David S Lee, "International aviation and the Paris Agreement temperature goals" the author acknowledged that the Paris Agreement had a temperature-based target which implied the inclusion of all emissions that affect the climate. The author stated that aviation had significant climate impacts from the oxides of nitrogen, particle emissions, and effects on cloudiness but that those impacts were subject to greater scientific uncertainty than the impacts of CO_2. It recorded that examples of CO_2 emission equivalent metrics indicated up to a doubling of aviation CO_2 equivalent emissions to account for those non-CO_2 effects.

93. On 1 May 2019 Parliament approved a motion to declare a climate and environmental emergency.

94. On the following day, the CCC published a report entitled "Net zero: The UK's contribution to stopping global warming", in which they recommended that

legislation should be passed as soon as possible to create a new statutory target of net-zero greenhouse gases by 2050 and the inclusion of international aviation and shipping in that target (p 15). That recommendation, so far as it related to the CO_2 target, was implemented on 26 June 2019 when the Climate Change Act (2050 Target Amendment) Order 2019 amended section 1(1) of the CCA 2008.

95. On 24 September 2019 the CCC wrote to the Secretary of State for Transport advising that the international aviation and shipping emissions should be brought formally within the UK's net-zero statutory 2050 target. The statutory target has not yet been changed to this effect but international aviation and shipping are taken into account when the carbon budgets are set against the statutory target: section 10(2)(i) of the CCA 2008.

96. On 25 June 2020 the CCC published its 2020 Progress Report to Parliament entitled "Reducing UK emissions", in which it recommended that international aviation and shipping be included in the UK climate targets when the Sixth Carbon Budget is set (which should be in 2021) and net zero plans should be developed (p 22). It recommended that the UK's airport capacity strategy be reviewed in the light of COVID-19 and the net-zero target and that action was needed on non-CO_2 effects from aviation (p 180). The parties to this appeal have stated in the agreed Statement of Facts and Issues that it was expected that the Government's Aviation Strategy will be published before the end of 2020.

97. From this narrative of events it is clear that the Government's response to the targets set in the Paris Agreement has been developing over time since 2016, that it has led to the amendment of the statutory CO_2 target in section 1(1) of the CCA 2008 approximately one year after the Secretary of State designated the ANPS, and that the Government is still in the process of developing its Aviation Strategy in response to the advice of the CCC.

98. Before turning to the legal challenges in this appeal it is also important to emphasise that, as we have stated in para 10 above, HAL, FoE and Plan B Earth agree that should the NWR Scheme be taken forward to a DCO application, the ANPS would not allow it to be assessed by reference to the carbon reduction targets, including carbon budgets, that were in place when the ANPS was designated in June 2018. The ANPS requires that the scheme be assessed against the carbon reduction targets in place at the time when a DCO application is determined: para 5.82 of the ANPS which we have set out in para 87 above. There is therefore no question of the NWR Scheme being assessed in future against outdated emissions targets.

The judgments of the Divisional Court and the Court of Appeal

99. A number of objectors to the NWR Scheme and the ANPS brought a large number of disparate claims in these proceedings to challenge the ANPS. The Divisional Court heard the claims on a "rolled up" basis, that is to say by considering the question of whether to grant permission to apply for judicial review at the same time as considering the merits of the claims should permission be granted. The hearing lasted for seven days and involved a full merits consideration of all the claims by the Divisional Court. In a judgment of high quality, described by the Court of Appeal as a tour de force, the Divisional Court dismissed all of the claims. For some claims it granted permission to apply for judicial review and then dismissed them on the merits. For others, it decided that they were not reasonably arguable on the merits and refused to grant permission. After thorough examination, the Divisional Court reached the conclusion that none of the claims which form the subject of grounds (i) to (iv) in the present appeal were reasonably arguable, and accordingly refused permission to apply for judicial review in relation to each of them.

100. In relation to those claims, the Court of Appeal decided that they were both arguable and that they were made out as good claims. Accordingly, the Court of Appeal granted permission in relation to them for the respondents to apply for judicial review of the decision to designate the ANPS and then held that the ANPS was of no legal effect unless and until a review was carried out rectifying the legal errors.

Analysis

Ground (i) - the section 5(8) ground

101. This ground raises a question of statutory interpretation. Section 5(7) and (8) of the PA 2008, which we set out in para 25 above, provide that an NPS must give reasons for the policy set out in the statement and that the reasons must explain how the policy in the NPS "takes account of Government policy relating to the mitigation of, and adaptation to, climate change".

102. Mr Crosland for Plan B Earth presented this argument. Mr Wolfe QC for FoE adopted his submissions. Mr Crosland submits that it was unlawful for the Secretary of State when stating the reasons for the policy in the ANPS in June 2018 to have treated as irrelevant the Government's commitment to (a) the temperature target in the Paris Agreement and (b) the introduction of a new net-zero carbon target. The Government's commitment to the Paris Agreement targets constituted "Government

policy" within the meaning of section 5(8) of the PA 2008 and so should have been addressed in giving the reasons for the ANPS.

103. Plan B Earth advanced this argument before the Divisional Court, which rejected the submission. The Divisional Court held that the Paris Agreement did not impose an obligation on any individual state to implement its global objective in any particular way, Parliament had determined the contribution of the UK towards global targets in section 1 of the CCA 2008 as a national carbon cap which represented the relevant policy in an entrenched form, and the Secretary of State could not change that carbon target unless and until the conditions set out in that Act were met.

104. The Court of Appeal disagreed with the approach of the Divisional Court and held that Government policy in section 5(8) was not confined to the target set out in the CCA 2008. The words "Government policy" were words of the ordinary English language. Taking into account the consequences of the Paris Agreement involved no inconsistency with the provisions of the CCA 2008. Based on the Secretary of State's written pleadings the Court of Appeal concluded that the Secretary of State had received and accepted legal advice that he was legally obliged not to take into account the Paris Agreement and the court characterised that as a misdirection of law. We address that conclusion in the next section of this judgment at paras 124-129 below. The court held that section 5(8) of the PA 2008 simply required the Government to take into account its own policy. The statements of Andrea Leadsom MP and Amber Rudd MP in March 2016 (para 72 above) and the formal ratification of the Paris Agreement showed that the Government's commitment to the Paris Agreement was part of "Government policy" by the time of the designation of the ANPS in June 2018.

105. The principal question for determination is the meaning of "Government policy" in section 5(8) of the PA 2008. We adopt a purposive approach to this statutory provision which expands upon the obligation in section 5(7) that an NPS give reasons for the policy set out in it and interpret the statutory words in their context. The purpose of the provision is to make sure that there is a degree of coherence between the policy set out in the NPS and established Government policies relating to the mitigation of and adaptation to climate change. The section speaks of "Government policy", which points toward a policy which has been cleared by the relevant departments on a government-wide basis. In our view the phrase is looking to carefully formulated written statements of policy such as one might find in an NPS, or in statements of national planning policy (such as the National Planning Policy Framework), or in government papers such as the Aviation Policy Framework. For the subsection to operate sensibly the phrase needs to be given a relatively narrow meaning so that the relevant policies can readily be identified. Otherwise, civil servants would have to trawl through Hansard and press statements to see if anything had been said by a minister which might be

characterised as "policy". Parliament cannot have intended to create a bear trap for ministers by requiring them to take into account any ministerial statement which could as a matter of ordinary language be described as a statement of policy relating to the relevant field.

106. In our view, the epitome of "Government policy" is a formal written statement of established policy. In so far as the phrase might in some exceptional circumstances extend beyond such written statements, it is appropriate that there be clear limits on what statements count as "Government policy", in order to render them readily identifiable as such. In our view the criteria for a "policy" to which the doctrine of legitimate expectations could be applied would be the absolute minimum required to be satisfied for a statement to constitute "policy" for the purposes of section 5(8). Those criteria are that a statement qualifies as policy only if it is clear, unambiguous and devoid of relevant qualification: see for example *Inland Revenue Comrs v MFK Underwriting Agents Ltd* [1990] 1 WLR 1545, 1569 per Bingham LJ; *R (Gaines-Cooper) v Comrs for Her Majesty's Revenue and Customs* [2011] UKSC 47; [2011] 1 WLR 2625, paras 28 and 29 per Lord Wilson of Culworth, delivering the judgment with which the majority of the court agreed, and para 70 per Lord Mance. The statements of Andrea Leadsom MP and Amber Rudd MP (para 72 above) on which the Court of Appeal focused and on which Plan B Earth particularly relied do not satisfy those criteria. Their statements were not clear and were not devoid of relevant qualification in this context. They did not refer to the temperature targets at all and they both left open the question of how the Paris Agreement goal of net zero emissions would be enshrined in UK law. Andrea Leadsom went out of her way to emphasise that "there is an important set of questions to be answered before we do." The statements made by these ministers were wholly consistent with and plainly reflected the fact that there was then an inchoate or developing policy being worked on within Government. This does not fall within the statutory phrase.

107. We therefore respectfully disagree with the Court of Appeal in so far as they held (para 224) that the words "Government policy" were ordinary words which should be applied in their ordinary sense to the facts of a given situation. We also disagree with the court's conclusion (para 228) that the statements by Andrea Leadsom MP and Amber Rudd MP constituted statements of "Government policy" for the purposes of section 5(8).

108. Although the point had been a matter of contention in the courts below, no party sought to argue before this court that a ratified international treaty which had not been implemented in domestic law fell within the statutory phrase "Government policy". Plan B Earth and FoE did not seek to support the conclusion of the Court of Appeal (para 228) that it "followed from the solemn act of the United Kingdom's ratification of [the Paris Agreement]" that the Government's commitment to it was part of "Government policy". The fact that the United Kingdom had ratified the Paris Agreement is not of itself a statement of Government policy in the requisite sense.

Ratification is an act on the international plane. It gives rise to obligations of the United Kingdom in international law which continue whether or not a particular government remains in office and which, as treaty obligations, "are not part of UK law and give rise to no legal rights or obligations in domestic law" (*R (Miller) v Secretary of State for Exiting the European Union* [2017] UKSC 5; [2018] AC 61, para 55). Ratification does not constitute a commitment operating on the plane of domestic law to perform obligations under the treaty. Moreover, it cannot be regarded in itself as a statement devoid of relevant qualification for the purposes of domestic law, since if treaty obligations are to be given effect in domestic law that will require law-making steps which are uncertain and unspecified at the time of ratification.

109. Before applying these conclusions to the facts of this case, it is necessary to consider another argument which HAL advances in this appeal. HAL renews an argument which the Divisional Court had accepted at least in part. HAL argues that because Parliament had set out the target for the reduction of carbon emissions in section 1 of the CCA 2008 and had established a statutory mechanism by which the target could be altered only with the assent of Parliament, "Government policy" was entrenched in section 1 and could not be altered except by use of the subordinate legislation procedure in sections 2 and 3 of the CCA 2008. The statutory scheme had either expressly or by necessary implication displaced the prerogative power of the Government to adopt any different policy in this field. In support of this contention HAL refers to the famous cases of *Attorney General v De Keyser's Royal Hotel Ltd* [1920] AC 508 and *R v Secretary of State for the Home Department, Ex p Fire Brigades Union* [1995] 2 AC 513, to which this court referred in *R (Miller) v Secretary of State for Exiting the European Union* [2017] UKSC 5; [2018] AC 61.

110. The short answer to that submission is that it is possible for the Government to have a policy that it will seek Parliamentary approval of an alteration of the carbon target, which is to be taken into account in section 5(8) of the PA 2008. The ousting of a prerogative power in a field which has become occupied by a corresponding power conferred or regulated by statute is a legal rule which is concerned with the validity of the exercise of a power, and to the extent that exercise of powers might require reference to the target set out in section 1 of the CCA 2008 it would not be open to the Government to make reference to a different target, not as yet endorsed by Parliament under the positive resolution procedure applicable to changes to that statutory target. However, the rule does not address what is Government policy for the purposes of section 5(8) of the PA 2008. If at the date when the Secretary of State designated the ANPS, the Government had adopted and articulated a policy that it would seek to introduce a specified new carbon target into section 1 of the CCA 2008 by presenting draft subordinate legislation to that effect for the approval of Parliament, the Secretary of State could readily record in the ANPS that the Government had resolved to seek that change but that it required the consent of Parliament for the new target to have legal effect. Further, questions such as how to

mitigate non-CO_2 emissions fell outside the carbon emissions target in the CCA 2008.

111. Turning to the facts of the case, it is clear from the narrative of events in paras 70-96 above that in June 2018, when the Secretary of State for Transport designated the ANPS, the Government's approach on how to adapt its domestic policies to contribute to the global goals of the Paris Agreement was still in a process of development. There was no established policy beyond that already encapsulated in the CCA 2008. The Government followed the advice of the CCC. The CCC's advice in 2016 was that the evidence was not sufficient to specify a new carbon target and that it was not necessary to do so at that time (paras 73-74 above). In early 2018 the CCC invited the Government to seek further advice from it after the publication of the IPCC's report (para 79 above). During 2018 the Government's policy in relation to aviation emissions was in a process of development and no established policy had emerged on either the steps to be taken at international level or about which domestic measures would be adopted; it was expected that the forthcoming Aviation Strategy would clarify those matters (paras 83 and 86 above). The Government's consultation in December 2018 confirmed that the development of aviation-related targets was continuing and in 2020 the Government's Aviation Strategy is still awaited (paras 92 and 96 above).

112. Against this background, the section 5(8) challenge fails and HAL's appeal on this ground must succeed. It is conceded that the Paris Agreement itself is not Government policy. The statements by Andrea Leadsom MP and Amber Rudd MP in 2016, on which Plan B Earth principally founds, do not amount to Government policy for the purpose of section 5(8) of the PA 2008. The statements concerning the development of policy which the Government made in 2018 were statements concerning an inchoate and developing policy and not an established policy to which section 5(8) refers. Mr Crosland placed great emphasis on the facts (i) that the Airports Commission had assessed the rival schemes against scenarios, one of which was that overall CO_2 emissions were set at a cap consistent with a worldwide goal to limit global warming to 2ºC, and (ii) that that scenario was an input into Secretary of State's assessment of the ANPS at a time when the UK Government had ratified the Paris Agreement and ministers had made the statements to which we referred above. But those facts are irrelevant to the section 5(8) challenge. It is not in dispute that the internationally agreed temperature targets played a formative role in the development of government policy. But that is not enough for Plan B Earth to succeed in this challenge. What Mr Crosland characterised as a "policy commitment" to the Paris Agreement target did not amount to "Government policy" under that subsection.

113. Finally, Mr Crosland sought to raise an argument under section 3 of the Human Rights Act 1998 that interpreting section 5(8) so as to preclude consideration of the temperature limit in the Paris Agreement would tend to allow major national

projects to be developed and that those projects would create an intolerable risk to life and to people's homes contrary to articles 2 and 8 of the European Convention on Human Rights ("ECHR"). This argument must fail for two reasons. First, as Lord Anderson for HAL submits, the argument was advanced as a separate ground before the Divisional Court and rejected, that finding was not appealed to the Court of Appeal, and is therefore not before this court. Secondly, even if it were to be treated as an aspect of Plan B Earth's section 5(8) submission and thus within the scope of the appeal (as Mr Crosland sought to argue), it is in any event unsound because any effect on the lives and family life of those affected by the climate change consequences of the NWR Scheme would result not from the designation of the ANPS but from the making of a DCO in relation to the scheme. As HAL has conceded and the respondents have agreed, the ANPS requires the NWR Scheme to be assessed against the emissions targets which would be current if and when an application for a DCO were determined.

Ground (ii): the section 10 ground

114. Mr Wolfe for FoE presented the submissions for the respondents on this ground and grounds (iii) and (iv). Mr Crosland for Plan B Earth adopted those submissions.

115. Section 10 of the PA 2008 applies to the Secretary of State's function in promulgating an NPS. In exercising that function the Secretary of State must act with the objective of contributing to the achievement of sustainable development. Sustainable development is a recognised term in the planning context and its meaning is not controversial in these proceedings. As explained in paras 7 and 8 of the National Planning Policy Framework (July 2018), at a very high level the objective of sustainable development involves "meeting the needs of the present without compromising the ability of future generations to meet their own needs"; it has three overarching elements, namely an environmental objective, an economic objective and a social objective. For a major infrastructure project like the development of airport capacity in the South East, which promotes economic development but at the cost of increased greenhouse gases emissions, these elements have to be taken into account and balanced against each other. Section 10(3)(a) provides that the Secretary of State must, in particular, have regard to the desirability of "mitigating, and adapting to, climate change". Unlike in section 5(8) of the PA 2008, this is not a factor which is tied to Government policy.

116. As it transpired, very little divided the parties under this ground. The basic legal approach is agreed. A useful summation of the law was given by Simon Brown LJ in *R v Somerset County Council, Ex p Fewings* [1995] 1 WLR 1037, 1049, in which he identified three categories of consideration, as follows:

> "… [T]he judge speaks of a 'decision-maker who fails to take account of all and only those considerations material to his task'. It is important to bear in mind, however, … that there are in fact three categories of consideration. First, those clearly (whether expressly or impliedly) identified by the statute as considerations to which regard must be had. Second, those clearly identified by the statute as considerations to which regard must not be had. Third, those to which the decision-maker may have regard if in his judgment and discretion he thinks it right to do so. There is, in short, a margin of appreciation within which the decision-maker may decide just what considerations should play a part in his reasoning process."

117. The three categories of consideration were identified by Cooke J in the New Zealand Court of Appeal in *CREEDNZ Inc v Governor General* [1981] NZLR 172, 183:

> "What has to be emphasised is that it is only when the statute expressly or impliedly identifies considerations required to be taken into account by the [relevant public authority] as a matter of legal obligation that the court holds a decision invalid on the ground now invoked. It is not enough that a consideration is one that may properly be taken into account, nor even that it is one which many people, including the court itself, would have taken into account if they had to make the decision."

Cooke J further explained at p 183 in relation to the third category of consideration that, notwithstanding the silence of the statute, "there will be some matters so obviously material to a decision on a particular project that anything short of direct consideration of them by [the public authority] … would not be in accordance with the intention of the Act."

118. These passages were approved as a correct statement of principle by the House of Lords in *In re Findlay* [1985] AC 318, 333-334. See also *R (Hurst) v London Northern District Coroner* [2007] UKHL 13; [2007] 2 AC 189, paras 55-59 (Lord Brown of Eaton-under Heywood, with whom a majority of the Appellate Committee agreed); *R (Corner House Research) v Director of the Serious Fraud Office* [2008] UKHL 60; [2009] 1 AC 756, para 40 (Lord Bingham of Cornhill, with whom a majority of the Appellate Committee agreed); and *R (Samuel Smith Old Brewery (Tadcaster)) v North Yorkshire County Council* [2020] UKSC 3; [2020] PTSR 221, paras 29-32 (Lord Carnwath, with whom the other members of the court agreed). In the *Hurst* case, Lord Brown pointed out that it is usually lawful for a

decision-maker to have regard to unincorporated treaty obligations in the exercise of a discretion (para 55), but that it is not unlawful to omit to do so (para 56).

119. As the Court of Appeal correctly held in *Baroness Cumberlege of Newick v Secretary of State for Communities and Local Government* [2018] EWCA Civ 1305; [2018] PTSR 2063, paras 20-26, in line with these other authorities, the test whether a consideration falling within the third category is "so obviously material" that it must be taken into account is the familiar *Wednesbury* irrationality test (*Associated Provincial Picture Houses Ltd v Wednesbury Corpn* [1948] 1 KB 223; *Council of Civil Service Unions v Minister for the Civil Service* [1985] AC 374, 410-411 per Lord Diplock).

120. It is possible to subdivide the third category of consideration into two types of case. First, a decision-maker may not advert at all to a particular consideration falling within that category. In such a case, unless the consideration is obviously material according to the *Wednesbury* irrationality test, the decision is not affected by any unlawfulness. Lord Bingham deals with such a case in *Corner House Research* at para 40. There is no obligation on a decision-maker to work through every consideration which might conceivably be regarded as potentially relevant to the decision they have to take and positively decide to discount it in the exercise of their discretion.

121. Secondly, a decision-maker may in fact turn their mind to a particular consideration falling within the third category, but decide to give the consideration no weight. As we explain below, this is what happened in the present case. The question again is whether the decision-maker acts rationally in doing so. Lord Brown deals with a case of this sort in *Hurst* (see para 59). This shades into a cognate principle of public law, that in normal circumstances the weight to be given to a particular consideration is a matter for the decision-maker, and this includes that a decision-maker might (subject to the test of rationality) lawfully decide to give a consideration no weight: see, in the planning context, *Tesco Stores Ltd v Secretary of State for the Environment* [1995] 1 WLR 759 (HL), 780 (Lord Hoffmann).

122. The Divisional Court (para 648) and the Court of Appeal (para 237) held that the Paris Agreement fell within the third category identified in *Fewings*. In so far as it is an international treaty which has not been incorporated into domestic law, this is correct. In fact, however, as we explain (para 71 above), the UK's obligations under the Paris Agreement are given effect in domestic law, in that the existing carbon target under section 1 of the CCA 2008 and the carbon budgets under section 4 of that Act already meet (and, indeed, go beyond) the UK's obligations under the Paris Agreement to adhere to the NDCs notified on its behalf under that Agreement. The duties under the CCA 2008 clearly were taken into account when the Secretary of State decided to issue the ANPS.

123. At para 5.69 of the ANPS the Secretary of State stated:

> "The Government has a number of international and domestic obligations to limit carbon emissions. Emissions from both the construction and operational phases of the [NWR Scheme] project will be relevant to meeting these obligations."

This statement covered the Paris Agreement as well as other international treaties. At para 5.71 the ANPS correctly stated that "[t]he UK's obligations on greenhouse gas emissions are set under the [CCA 2008]". As explained above, the relevant NDCs required to be set under the Paris Agreement were covered by the target in the CCA 2008 and the carbon budgets set under that Act. At paras 5.72-5.73 of the ANPS it was explained how aviation emissions were taken into account in setting carbon budgets under the CCA 2008 in accordance with the advice given by the CCC.

124. We have set out the evidence of Ms Low and Ms Stevenson regarding this topic (paras 88 and 89 above) which confirms that, in acting for the Secretary of State in drawing up the ANPS, they followed the advice of the CCC that the existing measures under the CCA 2008 were capable of being compatible with the 2050 target set by the Paris Agreement. The CCC did not recommend adjusting the UK's targets further at that stage. They were to be kept under review and appropriate adjustments could be made to the emissions target and carbon budgets under the CCA 2008 in future as necessary. According to that advice, therefore, sufficient account was taken of the Paris Agreement by ensuring that the relevant emissions target and carbon budgets under the CCA 2008 would be properly taken into account in the construction and operation of the NWR Scheme. The ANPS ensured that this would occur: see para 5.82 (set out at para 87 above).

125. Therefore, on a correct understanding of the ANPS and the Secretary of State's evidence, this is not a case in which the Secretary of State omitted to give any consideration to the Paris Agreement; nor is it one in which no weight was given to the Paris Agreement when the Secretary of State decided to issue the ANPS. On the contrary, the Secretary of State took the Paris Agreement into account and, to the extent that the obligations under it were already covered by the measures under the CCA 2008, he gave weight to it and ensured that those obligations would be brought into account in decisions to be taken under the framework established by the ANPS. On proper analysis the question is whether the Secretary of State acted irrationally in omitting to take the Paris Agreement further into account, or give it greater weight, than in fact he did.

126. In its judgment, the Divisional Court recorded (para 638) that the Secretary of State accepted that, in designating the ANPS, he took into account only the CCA 2008 carbon emission targets and did not take into account either the Paris Agreement or otherwise any post-2050 target or non-CO_2 emissions (these latter points are relevant to ground (iv) below). However, this way of describing the position masks somewhat the way the Paris Agreement did in fact enter into consideration by the Secretary of State. In the same paragraph, the Divisional Court summarised two submissions advanced by counsel for the Secretary of State as to why the Secretary of State's approach was not unlawful: (i) on its proper construction, and having regard to the express reference to the UK's international obligations in section 104(4) of the PA 2008, the PA 2008 requires the Secretary of State to ignore international commitments except where they are expressly referred to in that Act; alternatively, (ii) even if not obliged to ignore such commitments, the Secretary of State had a discretion as to whether to do so and was not obliged to take them into account. The Divisional Court rejected the first argument but accepted the second. It noted that the Secretary of State was bound by the obligations in the CCA 2008, "which … effectively transposed international obligations into domestic law" (para 643). Beyond that, the Secretary of State had a discretion whether to take the Paris Agreement further into account, and had not (even arguably) acted irrationally in deciding not to do so. It therefore refused to give permission for judicial review of the ANPS on this ground. The Court said (para 648):

> "In our view, given the statutory scheme in the CCA 2008 and the work that was being done on if and how to amend the domestic law to take into account the Paris Agreement, the Secretary of State did not arguably act unlawfully in not taking into account that Agreement when preferring the NWR Scheme and in designating the ANPS as he did. As we have described, if scientific circumstances change, it is open to him to review the ANPS; and, in any event, at the DCO stage this issue will be re-visited on the basis of the then up to date scientific position."

127. Mr Wolfe sought to support the judgment of the Court of Appeal in relation to this ground. He argued that the evidence for the Secretary of State had to be read in the light of the first submission made by his counsel in the Divisional Court, and that the true position was that the Secretary of State (acting by his officials and advisers) had been advised that he was not entitled to have regard to the Paris Agreement when deciding whether to designate the ANPS and had proceeded on that basis, with the result that he had not in fact exercised any discretion in deciding not to have further regard to the Paris Agreement. He also submitted that it was obvious that it was a material consideration. Mr Wolfe was successful in persuading the Court of Appeal on these points (paras 203 and 234-238 of its judgment). The Court of Appeal accepted his submissions that there was an error of law in the

approach of the Secretary of State "because he never asked himself the question whether he could take into account the Paris Agreement pursuant to his obligations under section 10" and "[i]f he had asked himself that question … the only answer that would reasonably have been open to him is that the Paris Agreement was so obviously material to the decision he had to make in deciding whether to designate the ANPS that it was irrational not to take it into account".

128. With respect to the Court of Appeal, they were wrong to overturn the judgment of the Divisional Court on this ground. Mr Wolfe's submissions conflated a submission of law (submission (i) above) made by counsel for the Secretary of State as recorded in para 638 of the judgment of the Divisional Court and the evidence of fact given by the relevant witnesses for the Secretary of State. In making his submission of law, counsel was not giving evidence about the factual position. There is a fundamental difference between submissions of law made by counsel and evidence of fact. Clearly, if the Secretary of State had been correct in submission (i) that would have provided an answer to the case against him whatever the position on the facts. This explains why counsel advanced the submission. But it is equally clear that if that submission failed, the Secretary of State made an alternative submission that he had a discretion whether to take the Paris Agreement further into account than was already the case under the CCA 2008 and that there had been no error of law in the exercise of that discretion. That was the submission accepted by the Divisional Court.

129. In our view, both the submissions of Mr Wolfe which the Court of Appeal accepted are unsustainable. The Divisional Court's judgment on this point is correct. On the evidence, the Secretary of State certainly did ask himself the question whether he should take into account the Paris Agreement beyond the extent to which it was already reflected in the obligations under the CCA 2008 and concluded in the exercise of his discretion that it would not be appropriate to do so. As mentioned above, this case is in the class referred to in para 121 above.

130. Mr Wolfe sought to suggest that in deciding the case as it did, the Court of Appeal had acted as a first instance court (since the Divisional Court had refused to give permission for judicial review on this ground) and that it had made factual findings to contrary effect which this court was not entitled to go behind. He also submitted that HAL, in its notice of appeal, had not questioned the factual position as it was taken to be by the Court of Appeal and was therefore not entitled to dispute it on this appeal.

131. Neither of these submissions has any merit. The Divisional Court considered the claims brought against the Secretary of State at a rolled up hearing lasting many days and considered each claim in full and in depth. In respect of all aspects of the Divisional Court's decision, both in relation to those claims on which it granted

permission for judicial review but then dismissed the claim and in relation to those claims (including those relating to grounds (i) to (iv) in this appeal) on which after full consideration it decided they were unarguable and so refused to grant permission for judicial review, the Court of Appeal correctly understood that its role was the conventional role of an appellate court, to examine whether the Divisional Court had erred in its decision. In any event, this court can read the undisputed evidence of Ms Low and Ms Stevenson for itself and has the benefit of an agreed Statement of Facts and Issues which makes it clear what the true factual position was. The Court of Appeal was wrong to proceed on the basis of a different assessment of the facts. On a fair reading of HAL's notice of appeal, it indicated that its case under this ground was to be that the Secretary of State had a discretion whether to have regard to the Paris Agreement, which discretion had been exercised lawfully. In any event, that was put beyond doubt by HAL's written case. FoE and Plan B Earth have been on notice of HAL's case under this ground for a long time and are in no way prejudiced by it being presented in submissions to this court.

132. The view formed by the Secretary of State, that the international obligations of the UK under the Paris Agreement were sufficiently taken into account for the purposes of the designation of the ANPS by having regard to the obligations under the CCA 2008, was in our judgment plainly a rational one. Mr Wolfe barely argued to the contrary. The Secretary of State's assessment was based on the advice of the CCC, as the relevant independent expert body. The assessment cannot be faulted. Further, the ANPS itself indicated at para 5.82 that the up-to-date carbon targets under the CCA 2008, which would reflect developing science and any change in the UK's international obligations under the Paris Agreement, would be taken into account at the stage of considering whether a DCO should be granted. That was a necessary step before the NWR Scheme could proceed. Moreover, as observed by the Divisional Court, there was scope for the Secretary of State to amend the ANPS under section 6 of the PA 2008, should that prove to be necessary if it emerged in the future that there was any inconsistency between the ANPS and the UK's obligations under the Paris Agreement.

133. It should also be observed that the carbon emissions associated with all three of the principal options identified by the Airports Commission (that is, the NWR Scheme, the ENR Scheme and the G2R Scheme) were assessed to be broadly similar. Accordingly, reference to the Paris Agreement does not provide any basis for preferring one scheme rather than another. To the extent the obligations under the Paris Agreement have a bearing on the decision to designate the ANPS, therefore, they are only significant if it is to be argued that there should not be any decision to meet economic needs by increasing airport capacity by one of these schemes. But in light of the extensive work done by the Airports Commission about the need for such an increase in capacity it could not be said that the Secretary of State acted irrationally in considering that the case for airport expansion had been sufficiently made out to allow the designation of the ANPS. The respondents did not

seek to argue that this aspect of his reasoning was irrational. As we have noted above, the concept of sustainability in section 10 of the PA 2008 includes consideration of economic and social factors as well as environmental ones.

134. In light of the factual position, it is not necessary to decide the different question whether, if the Secretary of State had omitted to think about the Paris Agreement at all (so that this was a case of the type described in para 120 above), as an unincorporated treaty, that would have constituted an error of law. That is not a straightforward issue and we have not heard submissions on the point. We say no more about it.

Ground (iii): the SEA Directive ground

135. The SEA Directive operates along with the EIA Directive to ensure that environmental impacts from proposals for major development are properly taken into account before a development takes place. The relationship between the Directives was explained by Lord Reed in *Walton v Scottish Ministers* [2012] UKSC 44; [2013] PTSR 51, paras 10-30. The SEA Directive applies "upstream", at the stage of preparation of strategic development plans or proposals. The EIA Directive requires assessment of environmental impacts "downstream", at the stage when consent for a particular development project is sought. Although the two Directives are engaged at different points in the planning process for large infrastructure projects such as the NWR Scheme, they have similar objects and have to deal with similar issues of principle, including in particular the way in which regard should be had to expert assessment of various factors bearing on that process. These points indicate that a similar approach should apply under the two Directives.

136. The SEA Directive is implemented in domestic law by the SEA Regulations. It is common ground that the SEA Regulations are effective in transposing the Directive into domestic law. Accordingly, it is appropriate to focus the discussion of this ground on the SEA Directive itself.

137. The structure of the SEA Directive appears from its provisions, set out and discussed above. The Directive requires that an environmental assessment of major plans and proposals should be carried out. The ANPS is such a plan, which will have a significant effect in setting the policy framework for later consideration of whether to grant a DCO for implementing the NWR Scheme. Therefore the proposal to designate it under section 5 of the PA 2008 required an "environmental assessment" as defined in article 2(b). The environmental assessment had to include "the preparation of an environmental report" and "the carrying out of consultations". An environmental report for the purposes of the Directive is directed to providing a basis for informed public consultation on the plan.

138. The decision-making framework under the SEA Directive is similar to that under the EIA Directive for environmental assessment of particular projects. Under the EIA Directive, an applicant for planning consent for particular projects has to produce an environmental statement which, among other things, serves as a basis for consultation with the public. Under the SEA Directive, the public authority which proposes the adoption of a strategic plan has to produce an environmental report for the same purpose. In due course, any application by HAL for a DCO will have to go through the process of environmental assessment pursuant to the EIA Directive and the EIA Regulations.

139. FoE and Plan B Earth complain that the environmental report which the Secretary of State was required under the SEA Directive to prepare and publish was defective, in that it did not make reference to the Paris Agreement. Mr Wolfe pointed out that the Secretary of State did not include the Paris Agreement in the long list of legal instruments and other treaties appended to the scoping report produced in March 2016 (ie after the Paris Agreement was adopted in December 2015 but before it was signed by the UK in April 2016 and ratified by it in November 2016) for the purposes of preparing the draft AoS which was to stand as the Secretary of State's environmental report for the purposes of the SEA Directive for the consultation on the draft ANPS. No reference to the Paris Agreement was included in the AoS used for the February 2017 consultation on the draft ANPS, nor in that used for the October 2017 consultation on the draft ANPS.

140. Against this, HAL points out that the carbon target in the CCA 2008 and the carbon budgets set under that Act were referred to in the AoS, as well as in the draft ANPS itself, so to that extent the UK's obligations under the Paris Agreement were covered in the environmental report. Beyond that, the evidence of Ms Stevenson (who led the team who prepared the AoS on behalf of the Secretary of State) makes it clear that the Secretary of State followed the advice of the CCC in deciding that it was not necessary and would not be appropriate to make further reference to the Paris Agreement in the AoS. The existing domestic legal obligations were considered to be the correct basis for assessing the carbon impact of the project, and it would be speculative and unhelpful to guess at what different targets might be recommended by the CCC in the future. Therefore, despite its omission from the scoping report, when the AoS actually came to be drafted the Paris Agreement (which had been ratified by the UK after the scoping report was issued) had been considered and the Secretary of State, acting by Ms Stevenson and her team, had decided in the exercise of his discretion not to make distinct reference to it.

141. As regards the law, the parties are in agreement. Any obligation to make further reference to the Paris Agreement in the environmental report depended on the application of three provisions of the SEA Directive. Under paragraph (e) of Annex I, the AoS had to provide information in the form of "the environmental protection objectives, established at international, Community or member state

level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation". But, as stated in the introduction to Annex I, this was "subject to article 5(2) and (3)" of the Directive, set out at para 58 above.

142. It is common ground that the effect of article 5(2) and (3) is to confer on the Secretary of State a discretion regarding the information to include in an environmental report. It is also common ground that the approach to be followed in deciding whether the Secretary of State has exercised his discretion unlawfully for the purposes of that provision is that established in relation to the adequacy of an environmental statement when applying the EIA Directive, as set out by Sullivan J in *R (Blewett) v Derbyshire County Council* [2003] EWHC 2775 (Admin); [2004] Env LR 29 ("*Blewett*"). *Blewett* has been consistently followed in relation to judicial review of the adequacy of environmental statements produced for the purposes of environmental assessment under the EIA Directive and endorsed at the highest level. In *Shadwell Estates Ltd v Breckland District Council* [2013] EWHC 12 (Admin) Beatson J held that the *Blewett* approach was also applicable in relation to the adequacy of an environmental report under the SEA Directive. The Divisional Court and the Court of Appeal in the present case endorsed this view (at paras 401-435 and paras 126-144 of their respective judgments). The respondents have not challenged this and we see no reason to question the conclusion of the courts below on this issue.

143. As Sullivan J held in *Blewett* (paras 32-33), where a public authority has the function of deciding whether to grant planning permission for a project calling for an environmental impact assessment under the EIA Directive and the EIA Regulations, it is for that authority to decide whether the information contained in the document presented as an environmental statement is sufficient to meet the requirements of the Directive, and its decision is subject to review on normal *Wednesbury* principles. Sullivan J observed (para 39) that the process of requiring that the environmental statement is publicised and of public consultation "gives those persons who consider that the environmental statement is inaccurate or inadequate or incomplete an opportunity to point out its deficiencies". The EIA Directive and Regulations do not impose a standard of perfection in relation to the contents of an environmental statement in order for it to fulfil its function in accordance with the Directive and the Regulations that it should provide an adequate basis for public consultation. At para 41 Sullivan J warned against adoption of an "unduly legalistic approach" in relation to assessment of the adequacy of an environmental statement and said:

> "… The [EIA] Regulations should be interpreted as a whole and in a common-sense way. The requirement that 'an [environmental impact assessment] application' (as defined in the Regulations) must be accompanied by an environmental

> statement is not intended to obstruct such development. As Lord Hoffmann said in *R v North Yorkshire County Council, Ex p Brown* [2000] 1 AC 397, at p 404, the purpose is 'to ensure that planning decisions which may affect the environment are made on the basis of full information'. In an imperfect world it is an unrealistic counsel of perfection to expect that an applicant's environmental statement will always contain the 'full information' about the environmental impact of a project. The Regulations are not based upon such an unrealistic expectation. They recognise that an environmental statement may well be deficient, and make provision through the publicity and consultation processes for any deficiencies to be identified so that the resulting 'environmental information' provides the local planning authority with as full a picture as possible. There will be cases where the document purporting to be an environmental statement is so deficient that it could not reasonably be described as an environmental statement as defined by the Regulations …, but they are likely to be few and far between."

Lord Hoffmann (with whom the other members the Appellate Committee agreed on this issue) approved this statement in *R (Edwards) v Environment Agency* [2008] UKHL 22; [2008] 1 WLR 1587, para 38.

144. As the Divisional Court and the Court of Appeal held in the present case, the discretion of the relevant decision-maker under article 5(2) and (3) of the SEA Directive as to whether the information included in an environmental report is adequate and appropriate for the purposes of providing a sound and sufficient basis for public consultation leading to a final environmental assessment is likewise subject to the conventional *Wednesbury* standard of review. We agree with the Court of Appeal when it said (para 136):

> "The court's role in ensuring that an authority - here the Secretary of State - has complied with the requirements of article 5 and Annex I when preparing an environmental report, must reflect the breadth of the discretion given to it to decide what information 'may reasonably be required' when taking into account the considerations referred to - first, 'current knowledge and methods of assessment'; second, 'the contents and level of detail in the plan or programme'; third, 'its stage in the decision-making process'; and fourth 'the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment'. These requirements leave the authority with a

> wide range of autonomous judgment on the adequacy of the information provided. It is not for the court to fix this range of judgment more tightly than is necessary. The authority must be free to form a reasonable view of its own on the nature and amount of information required, with the specified considerations in mind. This, in our view, indicates a conventional 'Wednesbury' standard of review - as adopted, for example, in *Blewett*. A standard more intense than that would risk the court being invited, in effect, to substitute its own view on the nature and amount of information included in environmental reports for that of the decision-maker itself. This would exceed the proper remit of the court."

145. The EIA Directive and the SEA Directive are, of course, EU legislative instruments and their application is governed by EU law. However, as the Court of Appeal observed (paras 134-135), the type of complex assessment required in compiling an environmental report for the purposes of environmental assessment is an area where domestic public law principles have the same effect as the parallel requirements of EU law. As Advocate General Léger stated in his opinion in *Upjohn Ltd v Licensing Authority Established Under Medicines Act 1968* (Case C-120/97) [1999] 1 WLR 927, para 50, "[the] court has always taken the view that when an authority is required, in the exercise of its functions, to undertake complex assessments, a limited judicial review of the action which that authority alone is entitled to perform must be exercised, since otherwise that authority's freedom of action would be definitively paralysed …".

146. The appropriateness of this approach is reinforced in the present context, having regard to the function which an environmental report is supposed to fulfil under the scheme of the SEA Directive. It is intended that such a report should inform the public by providing an appropriate and comprehensible explanation of the relevant policy context for a proposed strategic plan or project to enable them to provide comments thereon, and in particular to suggest reasonable alternatives by which the public need for development in accordance with the proposed plan or project could be met. As article 6(2) states, the public is to have an early and "effective" opportunity to express their opinion on a proposed plan or programme. It is implicit in this objective that the public authority responsible for promulgating an environmental report should have a significant editorial discretion in compiling the report to ensure that it is properly focused on the key environmental and other factors which might have a bearing on the proposed plan or project. Absent such a discretion, there would be a risk that public authorities would adopt an excessively defensive approach to drafting environmental reports, leading to the reports being excessively burdened with irrelevant or unfocused information which would undermine their utility in informing the general public in such a way that the public is able to understand the key issues and comment on them. In the sort of complex

environmental report required in relation to a major project like the NWR Scheme, there is a real danger that defensive drafting by the Secretary of State to include reference to a wide range of considerations which he did not consider to be helpful or appropriate in the context of the decision to be taken would mean that the public would be drowned in unhelpful detail and would lose sight of the wood for the trees, and their ability to comment effectively during the consultation phase would be undermined.

147. The appositeness of Sullivan J's analysis in *Blewett* at para 41, quoted above, has been borne out in this case. The draft ANPS issued with the AoS for the purposes of consultation included the statement that it was compatible with the UK's international obligations in relation to climate change. Concerns about the impact of the expansion of Heathrow on the UK's ability to meet its climate change commitments were raised in representations made during the consultation. In the Government's response to the consultation published on 5 June 2018 these representations were noted and the Government's position in relation to them was explained (paras 8.18-8.19 and 8.25). The Government's view was that the NWR Scheme was capable of being compatible with the UK's international obligations and that there was no good reason to hold up the designation of the ANPS until future policy in relation to aviation carbon emissions, which was in a state of development internationally and domestically, was completely fixed. Accordingly, it is clear that the public was able to comment on the Paris Agreement in the course of the consultation and that their comments were taken into account in the environmental assessment required by the SEA Directive. It again appears from this material that the Secretary of State did have regard to the Paris Agreement when deciding to designate the ANPS.

148. As we have said, Mr Wolfe did not challenge the legal framework set out above. In particular, he did not challenge the appropriateness of applying the *Wednesbury* standard in relation to the exercise of discretion under article 5(2) and (3). Instead, in line with his submission under ground (ii) above, his submission was that the Secretary of State had decided that the Paris Agreement was not a relevant statement of international policy falling within Annex I, paragraph (e), because he had been advised that it was legally irrelevant to the decision he had to take as to whether to designate the ANPS. Thus, according to Mr Wolfe, the Secretary of State had never reached the stage of exercising his discretion whether to include a distinct reference to the Paris Agreement in the AoS. The Secretary of State's decision that the Paris Agreement was irrelevant as a matter of law was wrong, and therefore the Secretary of State had erred in law because he simply did not turn his mind to whether reference to it should be included in the environmental report (the AoS). This was the argument which the Court of Appeal accepted at paras 242 to 247. The Court of Appeal's reasoning on this point was very short because, as it pointed out, it followed its reasoning in relation to the respondents' submissions in relation to section 10 of the PA 2008 (ground (ii) above).

149. In our view, as with the ground (ii) above, Mr Wolfe's submission and the reasoning of the Court of Appeal cannot be sustained in light of the relevant evidence on the facts. As we have explained, the Secretary of State did not treat the Paris Agreement as legally irrelevant and on that basis refuse to consider whether reference should be made to it. On the contrary, as Ms Stevenson explains in her evidence, in compiling the AoS as the environmental statement required under the SEA Directive the Secretary of State decided to follow the advice of the CCC to the effect that the UK's obligations under the Paris Agreement were sufficiently taken into account in the UK's domestic obligations under the CCA 2008, which were referred to in the ANPS and the AoS. Further reference to the Paris Agreement was not required. As we have already held above, this was an assessment which was plainly rational and lawful.

150. Therefore, we would uphold this ground of appeal as well. Having regard to the evidence regarding the factual position, the Divisional Court was right to reject this complaint by the respondents (paras 650-656). The Secretary of State did not act in breach of any of his obligations under the SEA Directive in drafting the AoS as the relevant environmental report in respect of the ANPS, and in omitting to include any distinct reference in it to the Paris Agreement.

Ground (iv) - the post-2050 and non-CO_2 emissions grounds

151. This ground concerns other matters which it is said that the Secretary of State failed to take into consideration in the performance of his duty under section 10(2) and (3) of the PA 2008. Those provisions, as we have said, obliged the Secretary of State in performing his function of designating the ANPS to do so "with the objective of contributing to sustainable development" and in so doing to "have regard to the desirability of … mitigating, and adapting to, climate change".

152. FoE has argued and the Court of Appeal (paras 248-260) has accepted that the Secretary of State failed in his duty under section 10 to have regard to (i) the effect of emissions created by the NWR Scheme after 2050 and (ii) the effect of non-CO_2 emissions from that scheme. The Divisional Court dealt with this matter together with the matter which has become ground (ii) in this appeal, namely whether the Secretary of State failed to have regard to the Paris Agreement in breach of section 10, as issue 19 in the rolled up hearing (paras 633-648, 659(iv)) and held that that FoE's case was not arguable. The Court of Appeal (para 256) correctly treated this issue as closely bound up with what is now ground (ii) in this appeal. It is not in dispute in this appeal that in assessing whether the Secretary of State was bound to address the effect of the post-2050 emissions and the effect of the non-CO_2 emissions in the ANPS we are dealing with the third category of considerations in Simon Brown LJ's categorisation in *R v Somerset County Council, Ex p Fewings* (para 116 above). The Secretary of State had a margin of appreciation in deciding

what matters he should consider in performing his section 10 duty. It is also not in dispute that it is appropriate to apply the *Wednesbury* irrationality test to that decision (para 119 above). The task for the court therefore is one of applying that legal approach to the facts of this case.

153. We address first the question of post-2050 emissions before turning to the non-CO_2 emissions.

(i) post-2050 emissions

154. FoE's argument on the relevance to the objectives of the Paris Agreement of the impacts of emissions after 2050 was straightforward. An assessment of the impact of the emissions from aircraft using the North West Runway by reference to a greenhouse gas target for 2050 fails to consider whether it would be sustainable for the additional aviation emissions from the use of the North West Runway to occur after 2050 given the goal of the Paris Agreement for global emissions to reach net zero in the second half of the century.

155. HAL submitted that the Secretary of State's approach is entirely rational. Lord Anderson points out, and FoE accepts, that the Airports Commission assessed the carbon emissions of each of the short-listed schemes over a 60-year appraisal period up to 2085/2086 and that the same appraisal period was used in the AoS which accompanied the ANPS. The Secretary of State therefore did take into account the fact that there would be carbon emissions from the use of the North West Runway after 2050 and quantified those emissions. It was not irrational to decide not to attempt to assess post-2050 emissions by reference to future policies which had yet to be formulated. It was rational for him to assume that future policies in relation to the post-2050 period, including new emissions targets, could be enforced by the DCO process and mechanisms such as carbon pricing, improvements to aircraft design, operational efficiency improvements and limitation of demand growth.

156. In our view, HAL is correct in its submission that the Secretary of State did not act irrationally in not attempting in the ANPS to assess post-2050 emissions against policies which had yet to be determined. It is clear from the AoS that the Department for Transport modelled the likely future carbon emissions of both Heathrow and Gatwick airports, covering aircraft and other sources of emissions, to 2085/2086 (paras 6.11.1- 6.11.3, 6.11.13 and Table 6.4). As we have set out in our discussion of ground (i) above, policy in response to the global goals of the Paris Agreement was in the course of development in June 2018 when the Secretary of State designated the ANPS and remains in development.

157. Further, as we have already pointed out (paras 10 and 98 above), the designation of the NWR Scheme in the ANPS did not immunise the scheme from complying with future changes of law and policy. The NWR Scheme would fall to be assessed against the emissions targets which were in force at the date of the determination of the application for a DCO. Under section 120 of the PA 2008 (para 37 above) the DCO may impose requirements corresponding to planning conditions and requirements that the approval of the Secretary of State be obtained. Under section 104 (para 35 above), the Secretary of State is not obliged to decide the application for the DCO in accordance with the ANPS if (i) that would lead the United Kingdom to be in breach of any of its international obligations, (ii) that would lead the Secretary of State be in breach of any duty imposed by or under any other enactment, (iii) the Secretary of State is satisfied that deciding the application in accordance with the ANPS would be unlawful by virtue of any enactment and (iv) the Secretary of State is satisfied that the adverse impact of the proposed development would outweigh its benefits. There are therefore provisions in place to make sure that the NWR Scheme complies with law and policy, including the Government's forthcoming Aviation Strategy, at the date when the DCO application is determined.

158. There are also mechanisms available to the Government, as HAL submits (para 155 above), by which the emissions from the use of the North West Runway can be controlled.

(ii) non-CO_2 emissions

159. To understand FoE's argument in relation to non-CO_2 emissions, it is necessary first to identify what are the principal emissions which give rise to concern. Mr Tim Johnson, of the Aviation Environmental Federation, explained in his first witness statement that aircraft emit nitrogen oxides, water vapour and sulphate and soot aerosols, which combine to have a net warming effect. Depending on atmospheric humidity, the hot air from aircraft exhausts combines with water vapour in the atmosphere to form ice crystals which appear as linear condensation trails and can lead to cirrus-like cloud formation. Using the metric of radiative forcing (RF), which is a measure of changes in the energy balance of the atmosphere in watts per square metre, it is estimated that the overall RF by aircraft is 1.9 times greater than the forcing by aircraft CO_2 emissions alone, but the RF metric is not suitable for forecasting future impacts. He recognised that there is continuing uncertainty about the impacts of non-CO_2 emissions, which tend to be short-lived, but he stated that there is high scientific consensus that the total climate warming effect of aviation is more than that from CO_2 emissions alone. Scientists are exploring metrics to show how non-CO_2 impacts can be reflected in emission forecasts for the purpose of formulating policy.

160. There is substantial agreement between the parties that there is continuing uncertainty in the scientific community about the effects of non-CO_2 emissions. The Department for Transport acknowledged this uncertainty in the AoS (para 6.11.11):

> "The assessment undertaken is based on CO_2 emissions only … There are likely to be highly significant climate change impacts associated with non-CO_2 emissions from aviation, which could be of a similar magnitude to the CO_2 emissions themselves, but which cannot be readily quantified due to the level of scientific uncertainty and have therefore not been assessed. There are also non-CO_2 emissions associated with the operation of the airport infrastructure, such as from refrigerant leaks and organic waste arisings, however, evidence suggests that these are minor and not likely to be material."

The AoS returned to this topic (Appendix A-9, para 9.11.5):

> "In addition, there are non-carbon emissions associated with the combustion of fuels in aircraft engines while in flight, which are also thought to have an impact on climate change. As well as CO_2, combustion of aviation fuel results in emission of water vapour, nitrogen oxides (NO_x) and aerosols. NO_x are indirect greenhouse gases, in that they do not give rise to a radiative effect themselves, but influence the concentration of other direct greenhouse gases … With the exception of sulphate aerosols, all other emissions cause warming. In addition, the flight of aircraft can also cause formation of linear ice clouds (contrails) and can lead to further subsequent aviation-induced cloudiness. These cloud effects cause additional warming. Evidence suggests that the global warming impact of aviation, with these sources included, could be up to two times that of the CO_2 impact by itself, but that the level of scientific uncertainty involved means that no multiplier should be applied to the assessment. For these reasons the [Airports Commission] did not assess the impact of the non-CO_2 effects of aviation and these have not been included in the AoS assessment. This position is kept under review by DfT but it is worth noting that non-CO_2 emissions of this type are not currently included in any domestic or international legislation or emissions targets and so their inclusion in the assessment would not affect its conclusion regarding legal compliance. <u>It is recommended that further work be done on these impacts by the applicant during the detailed scheme design, according to the latest appraisal guidance</u>." (Emphasis added)

161. This approach of addressing the question of capacity by reference to CO_2 emissions targets, keeping the policy in relation to non-CO_2 emissions under review and requiring an applicant for a DCO to address such impacts by reference to the state of knowledge current at the time of the determination of its application was consistent with the advice of the CCC to the Airports Commission and to the Secretary of State. The Airports Commission recorded that advice in its interim report in December 2013: because of the uncertainties in the quantification of the impact of non-CO_2 emissions, the target for constraining CO_2 emissions remained the most appropriate basis for planning future airport capacity. The approach of reconsidering the effect of all significant emissions when determining an application for a DCO is reflected in the ANPS which addressed the CO_2 emissions target and stated (para 5.76):

> "Pursuant to the terms of the Environmental Impact Assessment Regulations, the applicant should undertake an assessment of the project as part of the environmental statement, to include an assessment of any likely significant climate factors. … The applicant should quantify the greenhouse gas impacts before and after mitigation to show the impacts of the proposed mitigation." (Emphasis added)

The approach remains consistent with the CCC's advice since the designation of the ANPS. In its letter of 24 September 2019 to the Secretary of State recommending that international aviation and shipping emissions be included in a net-zero CO_2 emissions target, the CCC stated:

> "Aviation is likely to be the largest emitting sector in the UK by 2050, even with strong progress on technology and limiting demand. Aviation also has climate warming effects beyond CO_2, which it will be important to monitor and consider within future policies." (Emphasis added)

162. The Government in its response to consultations on the ANPS (para 11.50) stated that it will address how policy might make provision for the effects of non-CO_2 aviation emissions in its Aviation Strategy. That strategy is due to be published shortly.

163. The Secretary of State when he designated the ANPS was aware that the applicant for a DCO in relation to the NWR Scheme would have to provide an environmental assessment which addressed, and would be scrutinised against, the then current domestic and international rules and policies on aviation and other emissions. He would have been aware of his power to make requirements under

section 120 of the PA 2008 and to depart from the ANPS in the circumstances set out in section 104 of that Act (para 157 above).

164. The Court of Appeal (para 258) upheld FoE's challenge stating the precautionary principle and common sense suggested that scientific uncertainty was not a reason for not taking something into account at all, even if it could not be precisely quantified at this stage. The Court did not hold in terms that the Secretary of State had acted irrationally in this regard but said (para 261) that, since it was remitting the ANPS to the Secretary of State for reconsideration, the question of non-CO_2 emissions and the effect of post-2050 emissions would need to be taken into account as part of that exercise.

165. We respectfully disagree with that approach. The precautionary principle adds nothing to the argument in this context and we construe the judgment as equating the principle with common sense. But a court's view of common sense is not the same as a finding of irrationality, which is the only relevant basis on which FoE seeks to impugn the designation in its section 10 challenges. In any event we are satisfied that the Secretary of State's decision to address only CO_2 emissions in the ANPS was not irrational.

166. In summary, we agree with the Divisional Court that it is not reasonably arguable that the Secretary of State acted irrationally in not addressing the effect of the non-CO_2 emissions in the ANPS for six reasons. First, his decision reflected the uncertainty over the climate change effects of non-CO_2 emissions and the absence of an agreed metric which could inform policy. Secondly, it was consistent with the advice which he had received from the CCC. Thirdly, it was taken in the context of the Government's inchoate response to the Paris Agreement. Fourthly, the decision was taken in the context in which his department was developing as part of that response its Aviation Strategy, which would seek to address non-CO_2 emissions. Fifthly, the designation of the ANPS was only the first stage in a process by which permission could be given for the NWR Scheme to proceed and the Secretary of State had powers at the DCO stage to address those emissions. Sixthly, it is clear from both the AoS and the ANPS itself that the applicant for a DCO would have to address the environmental rules and policies which were current when its application would be determined.

Conclusion

167. It follows that HAL succeeds on each of grounds (i) to (iv) of its appeal. It is not necessary therefore to address ground (v) which is concerned with the question whether the court should have granted the relief which it did. We would allow the appeal.

Claimant Count - Total Unemployment

Source: NOMIS

Percentage	Jan 07	Feb 07	Mar 07	Apr 07	May 07	Jun 07	Jul 07	Aug 07	Sep 07	Oct 07	Nov 07	Dec 07	Jan 08	Feb 08	Mar 08	Apr 08	May 08	Jun 08	Jul 08	Aug 08	Sep 08	Oct 08	Nov 08	Dec 08
Kent	1.9	1.9	1.9	1.8	1.7	1.6	1.6	1.6	1.5	1.5	1.4	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.6	1.7	1.7	2	2.2
Medway	2.6	2.6	2.5	2.5	2.4	2.2	2.2	2.2	2.1	2.1	2	2	2	2.1	2.2	2.2	2.1	2.1	2.2	2.3	2.3	2.5	2.6	2.9
Ashford	1.4	1.5	1.5	1.5	1.4	1.4	1.2	1.2	1.1	1.1	1.1	1.1	1.1	1.2	1.1	1.1	1.1	1.1	1.2	1.3	1.4	1.4	1.6	1.8
Canterbury	1.6	1.6	1.7	1.6	1.5	1.4	1.3	1.3	1.2	1.2	1.1	1.1	1.3	1.3	1.3	1.3	1.3	1.3	1.2	1.4	1.4	1.5	1.7	1.9
Dartford	1.7	1.7	1.6	1.6	1.5	1.5	1.5	1.5	1.5	1.5	1.4	1.4	1.3	1.4	1.4	1.3	1.4	1.4	1.4	1.5	1.6	1.6	1.8	2
Dover	2.5	2.5	2.5	2.4	2.2	2	2	1.9	1.8	1.8	1.7	1.7	1.9	1.9	1.8	1.8	1.9	1.8	1.8	1.9	2	2.1	2.4	2.7
Folkestone & Hythe	2.9	2.9	2.9	2.8	2.7	2.6	2.5	2.5	2.4	2.3	2.2	2.2	2.2	2.2	2.2	2.2	2.3	2.2	2.2	2.3	2.4	2.5	2.7	3
Gravesham	2.5	2.6	2.5	2.6	2.5	2.4	2.4	2.4	2.3	2.3	2.1	2.2	2.2	2.2	2.3	2.2	2.2	2.2	2.2	2.2	2.3	2.4	2.5	2.9
Maidstone	1.4	1.4	1.3	1.3	1.3	1.2	1.2	1.2	1.1	1.1	1	1	1	1	1.1	1	1	1	1.1	1.2	1.3	1.3	1.4	1.6
Sevenoaks	1	1	0.9	0.9	0.9	0.8	0.8	0.8	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.8	0.9	1	1.1	1.3
Swale	2.5	2.6	2.4	2.3	2.2	2.1	2	2	2	1.9	1.9	1.9	2	2	2	1.9	1.9	1.8	1.9	2	2	2.1	2.5	2.8
Thanet	3.3	3.4	3.4	3.3	3.1	3	2.9	2.9	2.8	2.7	2.6	2.7	2.7	2.8	2.7	2.8	2.9	2.9	3	3.2	3.3	3.3	3.6	4
Tonbridge & Malling	1.1	1.1	1	0.9	0.9	0.9	0.9	0.9	0.9	0.8	0.8	0.8	0.9	0.9	0.9	0.9	0.8	0.9	0.9	1	1	1	1.2	1.4
Tunbridge Wells	0.9	0.9	0.9	0.9	0.9	0.9	0.9	0.9	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.9	0.9	1	1.2	1.3
South East LEP	2	2	2	1.9	1.8	1.7	1.7	1.7	1.6	1.6	1.6	1.6	1.6	1.7	1.6	1.6	1.6	1.6	1.7	1.8	1.8	1.9	2.2	2.4
England	2.4	2.4	2.4	2.3	2.2	2.1	2.1	2.1	2.1	2	2	2	2	2.1	2.1	2.1	2.1	2.1	2.1	2.3	2.3	2.4	2.6	2.8
England and Wales	2.4	2.4	2.4	2.3	2.2	2.1	2.1	2.1	2.1	2	2	2	2.1	2.1	2.1	2.1	2.1	2.1	2.1	2.3	2.3	2.4	2.6	2.9
Great Britain	2.4	2.4	2.4	2.3	2.2	2.1	2.1	2.1	2.1	2	2	2	2.1	2.1	2.1	2.1	2.1	2.1	2.2	2.3	2.3	2.4	2.6	2.9
United Kingdom	2.4	2.4	2.4	2.3	2.2	2.1	2.1	2.1	2.1	2	2	2	2.1	2.1	2.1	2.1	2.1	2.1	2.2	2.3	2.4	2.4	2.6	2.9
South East Region	1.5	1.5	1.5	1.4	1.4	1.3	1.3	1.3	1.3	1.2	1.2	1.2	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.4	1.5	1.5	1.7	1.9
Kent & Medway	2	2	2	1.9	1.8	1.7	1.7	1.7	1.6	1.6	1.5	1.5	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.7	1.8	1.9	2.1	2.3

Claimant Count - Total

Source: NOMIS

Percentage	Jan 09	Feb 09	Mar 09	Apr 09	May 09	Jun 09	Jul 09	Aug 09	Sep 09	Oct 09	Nov 09	Dec 09	Jan 10	Feb 10	Mar 10	Apr 10	May 10	Jun 10	Jul 10	Aug 10	Sep 10	Oct 10	Nov 10	Dec 10
Kent	2.5	2.9	3.1	3.1	3.1	3	3	3.1	3.1	3.1	3.1	3.1	3.3	3.3	3.2	3.1	3	2.8	2.8	2.8	2.7	2.7	2.7	2.7
Medway	3.2	3.7	3.9	4	4.1	4	4.1	4.2	4.2	4.2	4.3	4.3	4.4	4.4	4.3	4.2	4	3.8	3.7	3.7	3.6	3.5	3.5	3.6
Ashford	2	2.5	2.7	2.8	2.8	2.6	2.6	2.7	2.8	2.7	2.7	2.7	2.8	2.8	2.8	2.7	2.5	2.4	2.4	2.4	2.4	2.3	2.3	2.4
Canterbury	2.1	2.4	2.5	2.6	2.5	2.5	2.4	2.5	2.5	2.5	2.5	2.5	2.7	2.7	2.6	2.5	2.3	2.2	2.2	2.2	2.2	2.1	2.1	2.1
Dartford	2.2	2.8	3	3	3.2	3.2	3.2	3.3	3.4	3.4	3.2	3.1	3.4	3.5	3.4	3.4	3.2	3	3	3	2.9	2.8	2.8	2.8
Dover	3	3.3	3.4	3.4	3.4	3.2	3.1	3.2	3.1	3.3	3.5	3.6	3.7	3.8	3.7	3.5	3.3	3.1	3	2.9	2.8	2.9	3	3.1
Folkestone & Hythe	3.3	3.7	3.8	3.8	3.8	3.6	3.5	3.7	3.7	3.7	3.9	4	4.2	4.2	4.2	4	3.9	3.7	3.6	3.7	3.5	3.5	3.6	3.7
Gravesham	3.3	3.9	4	4	4.1	4	4	4.1	4.2	4	4	4	4.2	4.3	4.2	4.1	3.9	3.7	3.5	3.6	3.4	3.4	3.4	3.5
Maidstone	1.8	2.2	2.4	2.5	2.5	2.4	2.5	2.5	2.6	2.6	2.5	2.5	2.7	2.7	2.6	2.5	2.4	2.3	2.2	2.2	2.2	2.2	2.2	2.1
Sevenoaks	1.5	1.9	2.1	2.1	2.1	2	2.1	2.1	2	2	2.1	2	2.1	2.1	2.1	2	1.9	1.7	1.7	1.7	1.7	1.7	1.7	1.7
Swale	3.2	3.7	3.8	3.7	3.8	3.7	3.6	3.6	3.6	3.7	3.8	3.9	4	4	3.9	3.8	3.7	3.5	3.4	3.4	3.4	3.4	3.5	3.5
Thanet	4.3	4.8	5	5.1	5.2	5	5	5.2	5.2	5.1	5.3	5.4	5.5	5.6	5.5	5.4	5.1	4.9	4.9	4.9	4.9	4.9	5	5.1
Tonbridge & Malling	1.6	2.1	2.2	2.2	2.3	2.2	2.3	2.2	2.3	2.2	2.2	2.1	2.2	2.2	2.1	2	1.9	1.8	1.9	1.9	1.8	1.7	1.7	1.6
Tunbridge Wells	1.5	1.8	1.9	2	2	2	2	2	2	1.8	1.8	1.7	1.9	1.9	1.8	1.8	1.7	1.6	1.6	1.6	1.6	1.5	1.4	1.4
South East LEP	2.7	3.2	3.3	3.4	3.4	3.3	3.3	3.4	3.3	3.3	3.3	3.3	3.5	3.5	3.5	3.3	3.2	3	3	3	3	2.9	2.9	3
England	3.1	3.6	3.8	3.8	3.9	3.8	3.9	3.9	3.9	3.9	3.9	3.8	4	4	3.9	3.8	3.6	3.5	3.5	3.5	3.5	3.4	3.4	3.4
England and Wales	3.2	3.6	3.8	3.9	3.9	3.8	3.9	3.9	3.9	3.9	3.9	3.9	4	4	3.9	3.8	3.6	3.5	3.5	3.5	3.5	3.4	3.4	3.4
Great Britain	3.2	3.6	3.8	3.9	3.9	3.8	3.9	3.9	3.9	3.9	3.9	3.9	4	4.1	3.9	3.8	3.7	3.5	3.5	3.5	3.5	3.4	3.4	3.5
United Kingdom	3.2	3.6	3.8	3.9	3.9	3.8	3.9	4	3.9	3.9	3.9	3.9	4.1	4.1	4	3.9	3.7	3.6	3.5	3.6	3.5	3.5	3.5	3.5
South East Region	2.2	2.6	2.8	2.8	2.8	2.8	2.8	2.9	2.8	2.8	2.8	2.8	3	2.9	2.8	2.8	2.6	2.4	2.4	2.4	2.4	2.3	2.3	2.3
Kent & Medway	2.6	3	3.2	3.2	3.3	3.2	3.2	3.3	3.3	3.3	3.3	3.3	3.4	3.5	3.4	3.3	3.1	3	2.9	2.9	2.9	2.8	2.8	2.9

Claimant Count - Total

Source: NOMIS

Percentage	Jan 11	February 2011	March 2011	April 2011	May 2011	June 2011	July 2011	August 2011	Sep 11	October 2011	November 2011	December 2011	Jan 12	February 2012	March 2012	April 2012	May 2012	June 2012	July 2012	August 2012	September 2012	October 2012	November 2012	December 2012
Kent	2.9	3	3	2.9	3	2.9	3	3	3.1	3.1	3.1	3.2	3.3	3.4	3.4	3.3	3.2	3.1	3.1	3.1	3.1	3.1	3	3
Medway	3.7	3.8	3.8	3.9	3.9	3.8	4	4	4.1	4.1	4.1	4.1	4.2	4.4	4.3	4.2	4.2	4.1	4.1	4.1	4	4	3.9	3.8
Ashford	2.6	2.7	2.6	2.6	2.6	2.5	2.6	2.6	2.6	2.5	2.6	2.6	2.8	2.9	2.9	2.8	2.7	2.7	2.7	2.6	2.6	2.7	2.6	2.6
Canterbury	2.2	2.4	2.4	2.4	2.4	2.3	2.4	2.4	2.4	2.5	2.5	2.5	2.6	2.7	2.6	2.6	2.5	2.4	2.4	2.4	2.4	2.3	2.3	2.3
Dartford	3	3.1	3.1	3.1	3.1	3.1	3.1	3	3.1	3	3	3	3.1	3.2	3.2	3.1	3	2.9	2.9	2.9	2.7	2.7	2.7	2.7
Dover	3.3	3.4	3.4	3.2	3.3	3.2	3.3	3.4	3.5	3.5	3.7	3.8	4	4.1	4.1	4.1	4	3.9	3.9	3.8	3.6	3.7	3.7	3.9
Folkestone & Hythe	3.9	3.9	3.7	3.7	3.7	3.7	3.8	3.9	3.9	4	4.1	4.2	4.3	4.4	4.4	4.2	4.2	4.1	4.1	4.1	4	4	4	4.1
Gravesham	3.7	3.9	4	4	4	4	4.1	4.1	4.1	4.1	4.2	4.2	4.4	4.6	4.6	4.4	4.4	4.2	4.2	4.2	4	4	3.8	3.8
Maidstone	2.3	2.3	2.3	2.3	2.4	2.4	2.4	2.4	2.5	2.5	2.5	2.5	2.6	2.7	2.7	2.6	2.5	2.4	2.5	2.5	2.4	2.5	2.5	2.4
Sevenoaks	1.7	1.8	1.8	1.8	1.8	1.7	1.8	1.7	1.8	1.8	1.8	1.8	2	2	2	1.9	1.8	1.8	1.8	1.8	1.7	1.7	1.7	1.7
Swale	3.6	3.7	3.7	3.6	3.6	3.5	3.6	3.7	3.8	3.9	3.9	4	4.2	4.5	4.4	4.2	4.1	4	3.9	3.9	3.9	3.9	3.9	3.9
Thanet	5.3	5.5	5.4	5.5	5.5	5.3	5.4	5.5	5.7	5.7	5.8	6	6.1	6.3	6.2	6.1	6.1	6	6	6.1	6	6	6	6
Tonbridge & Malling	1.8	1.9	1.9	1.9	1.9	1.9	2	2	2	2	2	2	2.1	2.3	2.2	2.2	2.1	2.1	2.1	2	2	2	2	1.9
Tunbridge Wells	1.5	1.5	1.6	1.5	1.5	1.5	1.6	1.6	1.6	1.6	1.6	1.6	1.7	1.7	1.7	1.6	1.6	1.5	1.5	1.5	1.5	1.5	1.4	1.3
South East LEP	3.1	3.2	3.2	3.1	3.1	3.1	3.2	3.2	3.2	3.3	3.3	3.3	3.5	3.6	3.5	3.4	3.3	3.2	3.2	3.2	3.2	3.2	3.2	3.2
England	3.6	3.6	3.6	3.6	3.6	3.6	3.7	3.8	3.8	3.8	3.7	3.8	4	4	4	3.9	3.8	3.7	3.7	3.7	3.7	3.7	3.7	3.6
England and Wales	3.6	3.7	3.6	3.6	3.6	3.6	3.7	3.8	3.8	3.8	3.8	3.8	4	4.1	4	3.9	3.8	3.8	3.8	3.8	3.7	3.7	3.7	3.7
Great Britain	3.6	3.7	3.7	3.7	3.6	3.6	3.7	3.8	3.8	3.8	3.8	3.8	4	4.1	4	3.9	3.9	3.8	3.8	3.8	3.7	3.7	3.7	3.7
United Kingdom	3.7	3.8	3.7	3.7	3.7	3.6	3.8	3.9	3.9	3.8	3.8	3.8	4	4.1	4.1	4	3.9	3.8	3.8	3.8	3.8	3.8	3.8	3.7
South East Region	2.5	2.5	2.5	2.5	2.5	2.4	2.5	2.5	2.5	2.5	2.5	2.5	2.7	2.8	2.7	2.6	2.6	2.5	2.5	2.5	2.4	2.4	2.4	2.4
Kent & Medway	3	3.1	3.1	3.1	3.1	3.1	3.1	3.2	3.2	3.2	3.3	3.3	3.5	3.6	3.5	3.4	3.4	3.3	3.3	3.3	3.2	3.2	3.2	3.2

Claimant Count - Total

Source: NOMIS

Percentage	January 2013	February 2013	March 2013	April 2013	May 2013	June 2013	July 2013	August 2013	September 2013	October 2013	November 2013	December 2013	Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14	Oct-14	Nov-14	Dec-14
Kent	3.1	3.2	3.2	3	2.9	2.8	2.7	2.6	2.5	2.5	2.4	2.4	2.4	2.5	2.4	2.3	2.1	2	1.9	1.8	1.7	1.7	1.6	1.6
Medway	3.9	4	3.9	3.8	3.6	3.5	3.4	3.4	3.2	3.1	3	3	3.1	3.1	3	2.9	2.8	2.6	2.6	2.5	2.4	2.3	2.2	2.1
Ashford	2.6	2.8	2.7	2.6	2.6	2.4	2.4	2.3	2.1	2.1	2	2	2	2	1.9	1.9	1.8	1.7	1.6	1.5	1.4	1.4	1.4	1.3
Canterbury	2.4	2.4	2.4	2.3	2.3	2.2	2.1	2	2	1.9	1.8	1.8	1.8	1.8	1.8	1.6	1.5	1.3	1.3	1.2	1.2	1.2	1.1	1.1
Dartford	2.8	3	2.9	2.8	2.6	2.5	2.5	2.4	2.3	2.2	2.1	2	2.1	2.1	2	1.9	1.9	1.7	1.7	1.6	1.5	1.4	1.3	1.2
Dover	4	4.1	4	3.9	3.7	3.4	3.3	3.1	3	2.9	3	3.1	3.2	3.2	3.2	3.1	2.9	2.6	2.5	2.3	2.2	2.2	2.2	2.2
Folkestone & Hythe	4.3	4.3	4.3	4.1	4	3.8	3.6	3.5	3.3	3.3	3.2	3.3	3.3	3.3	3.1	2.9	2.7	2.5	2.6	2.4	2.4	2.3	2.4	2.4
Gravesham	3.9	4.1	4	3.9	3.7	3.5	3.4	3.3	3.2	3.1	2.9	2.9	3	3.1	3	2.9	2.7	2.5	2.4	2.3	2.3	2.1	2	2
Maidstone	2.6	2.6	2.6	2.5	2.4	2.2	2.1	2.1	2	1.9	1.8	1.8	1.9	1.9	1.8	1.7	1.6	1.5	1.4	1.3	1.3	1.2	1.2	1.2
Sevenoaks	1.8	1.8	1.7	1.7	1.5	1.5	1.4	1.4	1.3	1.3	1.2	1.2	1.3	1.3	1.2	1.2	1.1	1.1	1	1	0.9	0.9	0.9	0.8
Swale	4.1	4.1	4	3.7	3.7	3.5	3.5	3.4	3.2	3.2	3.1	3.2	3.2	3.2	3	2.9	2.7	2.5	2.4	2.3	2.2	2.1	2	2
Thanet	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5
Tonbridge & Malling	2	2.1	2	1.9	1.9	1.8	1.7	1.7	1.6	1.5	1.4	1.4	1.5	1.5	1.4	1.4	1.3	1.2	1.2	1.1	1.1	1.1	1	1
Tunbridge Wells	1.4	1.5	1.4	1.4	1.3	1.2	1.2	1.1	1.1	1	0.9	0.9	1	1.1	1.1	1	1	0.9	0.8	0.8	0.8	0.7	0.7	0.7
South East LEP	3.3	3.4	3.3	3.2	3.1	2.9	2.8	2.8	2.7	2.6	2.5	2.5	2.5	2.5	2.4	2.3	2.2	2	1.9	1.9	1.8	1.7	1.7	1.7
England	3.8	3.8	3.8	3.7	3.6	3.4	3.4	3.3	3.1	3	2.9	2.8	2.9	2.9	2.8	2.7	2.5	2.4	2.3	2.2	2.2	2.1	2	1.9
England and Wales	3.8	3.9	3.8	3.7	3.6	3.4	3.4	3.3	3.2	3	2.9	2.9	2.9	2.9	2.8	2.7	2.6	2.4	2.3	2.3	2.2	2.1	2	2
Great Britain	3.8	3.9	3.8	3.7	3.6	3.5	3.4	3.3	3.2	3	2.9	2.9	3	3	2.9	2.7	2.6	2.4	2.4	2.3	2.2	2.1	2	2
United Kingdom	3.9	3.9	3.9	3.8	3.7	3.5	3.5	3.4	3.2	3.1	3	2.9	3	3	2.9	2.8	2.7	2.5	2.4	2.4	2.3	2.2	2.1	2
South East Region	2.5	2.6	2.5	2.4	2.3	2.2	2.1	2.1	2	1.9	1.8	1.8	1.8	1.8	1.8	1.6	1.6	1.4	1.4	1.3	1.3	1.2	1.2	1.2
Kent & Medway	3.3	3.4	3.3	3.2	3.1	2.9	2.8	2.8	2.6	2.6	2.5	2.5	2.5	2.6	2.5	2.4	2.2	2.1	2	1.9	1.9	1.8	1.7	1.7

Claimant Count - Total

Source: NOMIS

Percentage	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16
Kent	1.7	1.7	1.7	1.6	1.5	1.4	1.4	1.4	1.4	1.4	1.4	1.4	1.5	1.6	1.6	1.6	1.6	1.5	1.5	1.6	1.6	1.6	1.6	1.6
Medway	2.2	2.2	2.2	2.2	2.2	2.1	2.1	2.1	2.1	2.1	2	2	2	2.1	2.1	2.1	2	2	1.9	2	1.9	2	1.9	1.9
Ashford	1.4	1.5	1.4	1.4	1.3	1.2	1.2	1.3	1.3	1.3	1.3	1.3	1.4	1.4	1.5	1.5	1.4	1.4	1.5	1.5	1.5	1.5	1.5	1.5
Canterbury	1.1	1.2	1.2	1.1	1	1	0.9	0.9	0.9	1	1	1	1.1	1.1	1.2	1.2	1.2	1.2	1.2	1.2	1.3	1.3	1.3	1.3
Dartford	1.3	1.4	1.3	1.3	1.2	1.3	1.2	1.1	1.2	1.1	1.1	1	1.1	1.1	1.1	1.1	1.2	1.1	1.1	1.2	1.2	1.1	1.1	1.1
Dover	2.3	2.3	2.2	2.1	1.9	1.8	1.7	1.6	1.6	1.6	1.8	1.8	1.9	2	2	2	2	1.9	1.9	2	2	2	2	2
Folkestone & Hythe	2.4	2.4	2.3	2.2	2	1.8	1.8	1.7	1.7	1.8	1.9	2	2.1	2.1	2.1	2.1	2.1	2	2	2.1	2	2	2.1	2.1
Gravesham	2.1	2.2	2.1	2	2	1.9	1.9	1.9	2	1.9	1.9	1.9	1.9	2.1	2.1	2.1	2.1	2	2	2	2	2	1.9	1.9
Maidstone	1.2	1.3	1.3	1.2	1.2	1.2	1.2	1.2	1.2	1.1	1.1	1.1	1.1	1.2	1.3	1.2	1.2	1.2	1.1	1.2	1.2	1.2	1.2	1.2
Sevenoaks	0.9	0.9	0.9	0.8	0.8	0.8	0.8	0.8	0.7	0.8	0.8	0.7	0.8	0.7	0.8	0.8	0.7	0.7	0.7	0.8	0.8	0.8	0.7	0.7
Swale	2.2	2.1	2.1	2	2	1.9	1.9	1.9	1.9	1.9	2	2	2.1	2.1	2.2	2.2	2.2	2.2	2.1	2.1	2.1	2.2	2.2	2.2
Thanet	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5
Tonbridge & Malling	1	1.1	1.1	1	1	0.9	0.9	0.9	0.9	0.9	0.9	0.9	0.9	1	1	0.9	1	0.9	0.9	0.9	0.9	0.9	0.9	0.9
Tunbridge Wells	0.7	0.7	0.7	0.7	0.7	0.7	0.6	0.6	0.6	0.7	0.7	0.6	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.8	0.8	0.8	0.8	0.7
South East LEP	1.7	1.7	1.7	1.6	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.6	1.6	1.6	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5
England	2	2	2	1.9	1.8	1.8	1.8	1.8	1.8	1.7	1.7	1.7	1.8	1.8	1.8	1.8	1.8	1.8	1.7	1.8	1.8	1.8	1.7	1.7
England and Wales	2	2	2	1.9	1.9	1.8	1.8	1.8	1.8	1.8	1.7	1.7	1.8	1.9	1.9	1.8	1.8	1.8	1.8	1.8	1.8	1.8	1.8	1.7
Great Britain	2.1	2.1	2	2	1.9	1.8	1.9	1.8	1.8	1.8	1.7	1.7	1.8	1.9	1.9	1.9	1.8	1.8	1.8	1.8	1.8	1.8	1.8	1.8
United Kingdom	2.1	2.1	2.1	2	2	1.9	1.9	1.9	1.9	1.8	1.8	1.8	1.9	1.9	1.9	1.9	1.9	1.9	1.8	1.9	1.9	1.8	1.8	1.8
South East Region	1.2	1.2	1.2	1.1	1.1	1	1	1	1	1	1	1	1.1	1.1	1.1	1.1	1.1	1	1	1.1	1.1	1.1	1.1	1.1
Kent & Medway	1.8	1.8	1.8	1.7	1.6	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.6	1.7	1.7	1.7	1.7	1.6	1.6	1.6	1.6	1.6	1.6	1.6

Claimant Count - Total

Source: NOMIS

Percentage	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18
Kent	1.7	1.7	1.7	1.7	1.6	1.6	1.6	1.6	1.7	1.7	1.7	1.8	1.9	1.9	2	1.9	1.9	1.9	1.9	1.9	2	2.1	2.1
Medway	1.9	2	2	2	1.9	1.9	1.9	1.9	1.9	1.8	1.8	1.9	2	2	2	2	1.8	1.9	2	2	2.2	2.2	2.3
Ashford	1.6	1.7	1.7	1.7	1.6	1.6	1.6	1.6	1.6	1.6	1.7	1.7	1.8	1.8	1.8	1.8	1.8	1.7	1.8	1.9	2	2.1	2.2
Canterbury	1.3	1.3	1.2	1.2	1.2	1.2	1.3	1.2	1.2	1.2	1.3	1.3	1.4	1.4	1.4	1.3	1.3	1.2	1.3	1.4	1.5	1.6	1.8
Dartford	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.1	1.1	1.1	1.1	1.2	1.2	1.2	1.1	1.1	1.1	1	1.1	1.2	1.2	1.3
Dover	2.2	2.3	2.2	2.2	2.2	2.2	2.4	2.5	2.6	2.7	2.8	2.9	3.1	3.1	3.4	3.2	3.2	3.2	3.2	3.2	3.2	3.3	3.4
Folkestone & Hythe	2.2	2.3	2.2	2.2	2.1	2.1	2	2	2.1	2.1	2.2	2.3	2.4	2.5	2.4	2.4	2.3	2.2	2.3	2.4	2.7	2.7	2.8
Gravesham	2.1	2.1	2.1	2.1	2.1	2.1	2.1	2.1	2	2	2	2.1	2.2	2.2	2.1	2.1	2.1	2.1	2.2	2.2	2.3	2.4	2.5
Maidstone	1.2	1.3	1.3	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.3	1.3	1.2	1.2	1.2	1.1	1.1	1.1	1.1	1.1	1.1
Sevenoaks	0.7	0.7	0.7	0.7	0.7	0.7	0.8	0.7	0.7	0.7	0.7	0.8	0.8	0.8	0.8	0.8	0.7	0.7	0.7	0.7	0.7	0.7	0.8
Swale	2.2	2.3	2.3	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.3	2.4	2.5	2.8	2.7	2.7	2.8	2.9	2.9	3	3	3
Thanet	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5
Tonbridge & Malling	0.9	0.9	0.9	0.9	0.9	0.9	0.9	0.9	0.9	0.9	1	1	1	1	1	0.9	0.9	0.9	0.9	0.9	0.8	0.8	0.8
Tunbridge Wells	0.8	0.8	0.9	0.9	0.9	0.9	0.9	0.9	0.9	0.9	0.9	0.9	1	0.9	0.9	0.9	0.8	0.8	0.8	0.8	0.8	0.8	0.8
South East LEP	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.6	1.7	1.8	1.8	1.9	1.9	1.8	1.8	1.9	1.9	2	2.1	2.1
England	1.8	1.9	1.9	1.9	1.9	1.8	1.8	1.8	1.8	1.8	1.9	1.9	2	2.1	2.1	2.1	2.1	2.1	2.1	2.2	2.2	2.2	2.3
England and Wales	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.8	1.8	1.9	1.9	2	2.1	2.2	2.1	2.1	2.1	2.1	2.2	2.2	2.2	2.3
Great Britain	1.9	1.9	2	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9	2	2.1	2.1	2.2	2.2	2.1	2.1	2.2	2.2	2.2	2.3	2.3
United Kingdom	1.9	2	2	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9	2	2.1	2.1	2.2	2.2	2.1	2.1	2.2	2.2	2.2	2.3	2.3
South East Region	1.1	1.2	1.2	1.2	1.1	1.1	1.1	1.1	1.2	1.2	1.2	1.2	1.3	1.3	1.4	1.3	1.3	1.3	1.3	1.4	1.4	1.5	1.5
Kent & Medway	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.8	1.8	1.9	1.9	2	1.9	1.9	1.9	1.9	2	2	2.1	2.2

Claimant Count - Total

Source: NOMIS

Percentage	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20
Kent	2.2	2.4	2.4	2.4	2.5	2.5	2.6	2.6	2.6	2.7	2.7	2.7	2.8	2.8	2.9	5.1	6.3	6.0	6.1	6.2	6.1	6.0
Medway	2.4	2.6	2.7	2.8	2.8	2.9	3	3	3	3.1	3.1	3.1	3.2	3.3	3.3	5.3	7.0	6.6	6.8	7.0	6.9	6.7
Ashford	2.3	2.4	2.5	2.4	2.4	2.4	2.5	2.5	2.5	2.6	2.7	2.7	2.7	2.8	2.9	5.2	6.4	6.0	6.1	6.3	6.2	6.0
Canterbury	1.8	1.9	2	2	2	2.1	2.1	2.1	2.1	2.2	2.2	2.2	2.3	2.3	2.3	4.4	5.2	4.9	5.1	5.2	5.1	5.0
Dartford	1.4	1.6	1.7	1.7	1.7	1.9	1.9	2	2.1	2.2	2.1	2.1	2.2	2.3	2.3	4.5	6.0	5.6	5.6	5.7	5.6	5.4
Dover	3.5	3.6	3.6	3.6	3.6	3.5	3.6	3.5	3.6	3.6	3.5	3.5	3.6	3.7	3.7	6.3	7.0	6.7	6.8	6.8	6.8	6.6
Folkestone & Hythe	3	3.1	3.2	3.2	3.3	3.3	3.3	3.3	3.4	3.4	3.5	3.6	3.7	3.7	3.7	6.5	7.4	7.0	7.3	7.5	7.4	7.3
Gravesham	2.5	2.6	2.8	2.9	3	3.1	3.3	3.3	3.3	3.3	3.4	3.4	3.4	3.5	3.5	5.7	7.5	7.3	7.3	7.5	7.5	7.4
Maidstone	1.3	1.4	1.4	1.6	1.6	1.7	1.8	1.8	1.9	1.9	2	2.1	2.1	2.2	2.2	4.1	5.5	5.2	5.2	5.3	5.2	5.0
Sevenoaks	0.9	1	1	1	1.1	1.1	1.2	1.2	1.3	1.3	1.3	1.3	1.3	1.4	1.4	3.1	4.3	4.0	4.1	4.2	4.2	4.1
Swale	3.1	3.3	3.3	3.2	3.2	3.3	3.3	3.3	3.4	3.5	3.5	3.5	3.6	3.6	3.6	6.1	7.1	6.7	6.7	6.8	6.7	6.6
Thanet	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5
Tonbridge & Malling	0.9	1	1.1	1.1	1.2	1.2	1.3	1.4	1.4	1.5	1.5	1.5	1.5	1.6	1.6	3.2	4.5	4.2	4.2	4.3	4.4	4.2
Tunbridge Wells	0.9	1	1.2	1.1	1.2	1.3	1.3	1.3	1.4	1.5	1.5	1.5	1.5	1.6	1.6	3.2	4.6	4.2	4.4	4.6	4.5	4.4
South East LEP	2.2	2.3	2.4	2.4	2.4	2.5	2.5	2.5	2.5	2.6	2.6	2.7	2.7	2.8	2.8	4.9	6.4	6.0	6.1	6.3	6.2	6.0
England	2.4	2.5	2.6	2.6	2.6	2.7	2.7	2.8	2.8	2.8	2.8	2.9	2.9	3.0	3.0	5.0	6.5	6.3	6.4	6.5	6.4	6.3
England and Wales	2.4	2.5	2.6	2.6	2.6	2.7	2.7	2.8	2.8	2.8	2.9	2.9	2.9	3.0	3.0	5.1	6.4	6.3	6.4	6.5	6.4	6.3
Great Britain	2.4	2.6	2.6	2.7	2.7	2.7	2.8	2.8	2.8	2.9	2.9	2.9	2.9	3.0	3.1	5.1	6.4	6.2	6.4	6.5	6.4	6.3
United Kingdom	2.4	2.6	2.6	2.7	2.7	2.7	2.8	2.8	2.8	2.8	2.9	2.9	2.9	3.0	3.0	5.1	6.4	6.2	6.3	6.4	6.4	6.3
South East Region	1.6	1.7	1.7	1.8	1.8	1.8	1.8	1.9	1.9	2	2	2	2.1	2.1	2.2	3.9	5.4	5.1	5.2	5.4	5.3	5.2
Kent & Medway	2.3	2.4	2.4	2.5	2.5	2.6	2.6	2.6	2.7	2.7	2.8	2.8	2.8	2.9	2.9	5.1	6.4	6.1	6.2	6.3	6.2	6.1

Unemployment in Kent

Last updated: 10 November 2020

Related Documents

Welfare Reform Report

Ward unemployment interactive model

Unemployment Measures Bulletin

Universal Credit Claimants

COVID-19 continues to have a significant impact on the number of claimants of unemployment benefits.

The claimant rate in Kent is currently 6.0% below the national average of 6.3%. Unemployment in Kent has fallen by 2.6% over the previous month, a bigger reduction than seen in the UK as a whole (-1.6%).

Youth unemployment (18-24) in Kent is slightly higher than the national average: 9.9% in Kent, 9.2% UK.

Unemployment has fallen for both males and females over last month, although males saw the biggest reduction: -3.1% in Kent.

The latest data for October 2020 was released on the 10th November and is presented below.

This workbook looks at the number of people claiming either Jobseekers Allowance or Universal Credit principally for the reason of being unemployed. It also looks at the age and sex of claimants, in particular at youth unemployment which is defined as those aged 18 to 24.

This workbook uses information from a dataset called The Claimant Count by Sex and Age. This experimental series counts the number of people claiming Jobseeker's Allowance plus those who claim Universal Credit who are out of work.

Under Universal Credit a broader span of claimants are required to look for work than under Jobseeker's Allowance. As Universal Credit Full Service is rolled out in particular areas, the number of people recorded as being on the Claimant Count is therefore likely to rise.

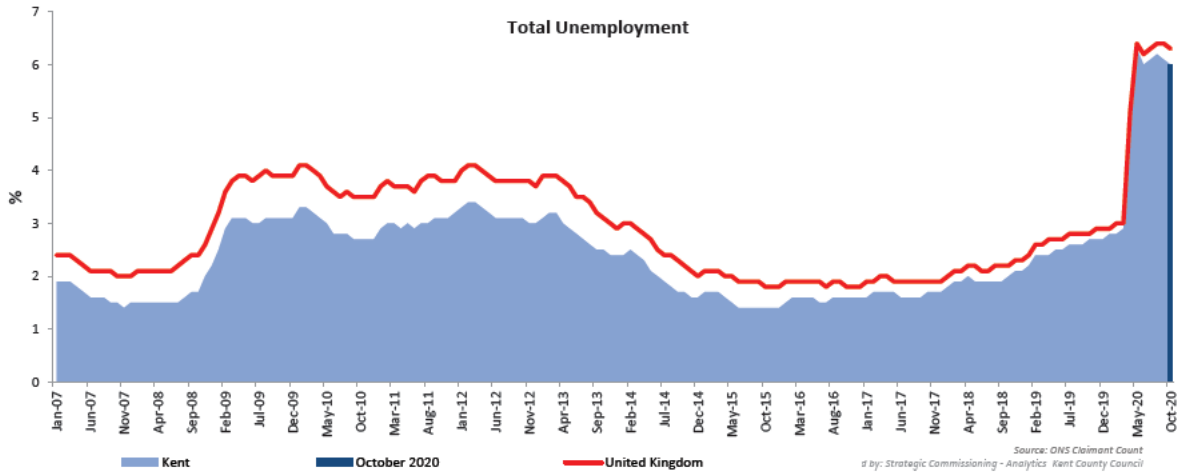
Unemployment rates are calculated using the Office for National Statistics Mid-year Population Estimates 2001-2019. The resident working age population is defined as all males and females aged 16-64. These denominators will be updated annually with the ONS mid-year population estimates.

Further Information

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October 2020	Number	% rate	Number change since September 2020	% change since September 2020	Number change since October 2019	% change since October 2019
Kent	56,910	6.0%	-1,540	-2.6%	+31,500	+124.0%
United Kingdom	2,612,550	6.3%	-43,565	-1.6%	+1,428,655	+120.7%

District unemployment

October 2020	Number	% rate	Number change since September 2020	% change since September 2020	Number change since October 2019	% change since October 2019
Ashford	4,685	6.0%	-145	-3.0%	+2,635	+128.5%
Canterbury	5,230	5.0%	-175	-3.2%	+2,950	+129.4%
Dartford	3,870	5.4%	-115	-2.9%	+2,370	+158.0%
Dover	4,605	6.6%	-115	-2.4%	+2,080	+82.4%
Folkestone & Hythe	4,795	7.3%	-105	-2.1%	+2,525	+111.2%
Gravesham	4,835	7.4%	-45	-0.9%	+2,675	+123.8%
Maidstone	5,245	5.0%	-200	-3.7%	+3,230	+160.3%
Sevenoaks	2,885	4.1%	-75	-2.5%	+1,955	+210.2%
Swale	5,965	6.6%	-105	-1.7%	+2,850	+91.5%
Thanet	8,245	10.1%	-215	-2.5%	+3,890	+89.3%
Tonbridge and Malling	3,405	4.2%	-135	-3.8%	+2,240	+192.3%
Tunbridge Wells	3,140	4.4%	-105	-3.2%	+2,100	+201.9%
Medway	11,755	6.7%	-260	-2.2%	+6,325	+116.5%
Kent	56,910	6.0%	-1,540	-2.6%	+31,500	+124.0%

Kent unemployment headlines October 2020

The unemployment rate in Kent is 6%. This is below the rate for United Kingdom (6.3%).

56,910 people were claiming unemployment benefits in Kent.This has fallen since last month

Thanet has the highest unemployment rate at 10.1%. Sevenoaks has the lowest unemployment rate at 4.1%.

The 18-24 year old unemployment rate in Kent is 9.8%. They account for 21% of all unemployed people in the area

Thanet has the highest 18-24 year old unemployment rate in the South East at 17.2%.

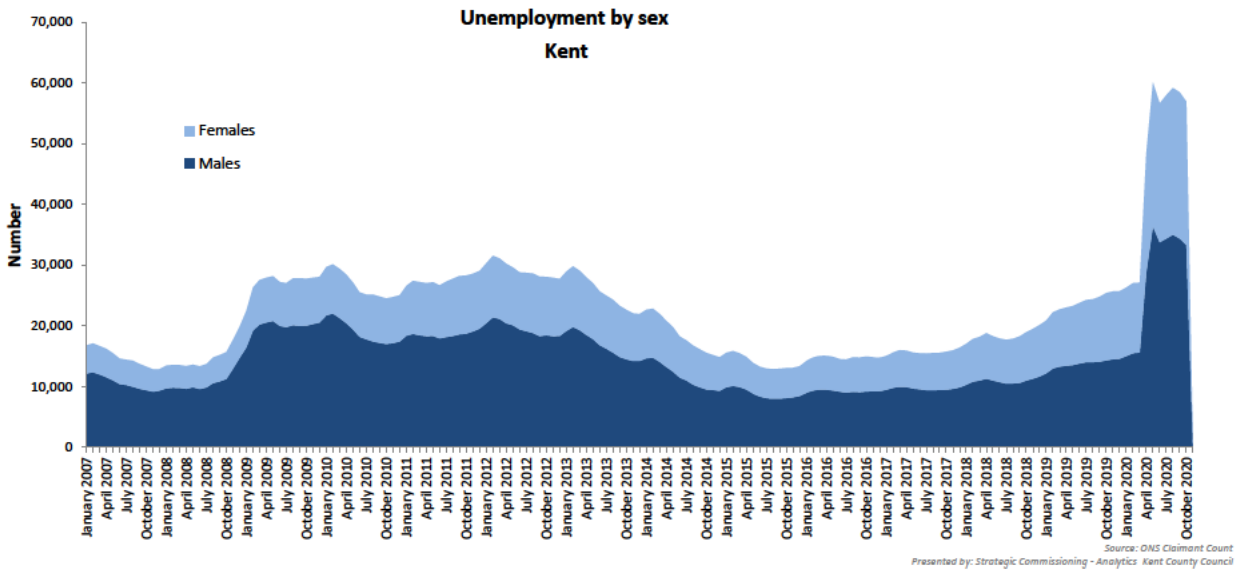
Unemployment by sex

Kent

October 2020	Number	% rate	Number change since September 2020	% change since September 2020	Number change since October 2019	% change since October 2019
Males	33,305	7.1%	-1,060	-3.1%	+18,975	+132.4%
Females	23,605	4.9%	-480	-2.0%	+12,520	+112.9%
Total	56,910	6.0%	-1,540	-2.6%	+31,500	+124.0%

District unemployment by sex

October 2020	Male claimants	Males claimant rate	Female claimants	Female claimant rate
Ashford	2,675	7.0%	2,010	5.0%
Canterbury	3,135	6.0%	2,095	4.0%
Dartford	2,185	6.2%	1,685	4.7%
Dover	2,715	7.8%	1,890	5.4%
Folkestone & Hythe	2,850	8.6%	1,945	5.9%
Gravesham	2,835	8.7%	2,000	6.1%
Maidstone	3,070	5.9%	2,175	4.1%
Sevenoaks	1,610	4.7%	1,280	3.6%
Swale	3,495	7.7%	2,470	5.4%
Thanet	5,020	12.7%	3,225	7.7%
Tonbridge & Malling	1,910	4.9%	1,495	3.6%
Tunbridge Wells	1,815	5.0%	1,330	3.7%
Kent	33,305	7.1%	23,605	4.9%
Medway	6,910	7.9%	4,845	5.5%

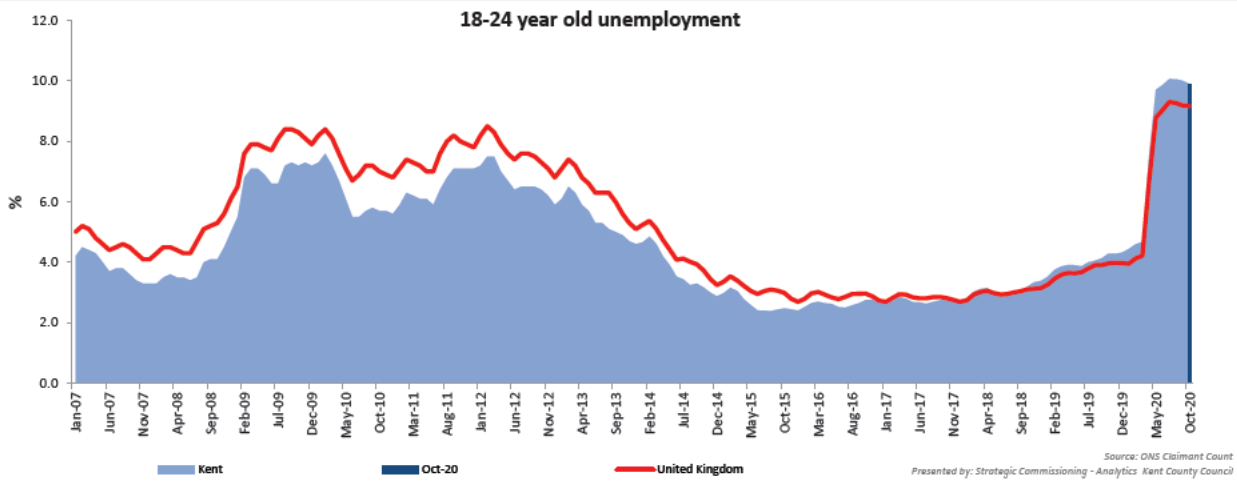


Unemployment by age group in Kent

October 2020	Number	% rate	Number change since September 2020	% change since September 2020	Number change since October 2019	% change since October 2019
18-24	12,005	9.9%	-130	-1.1%	+6,805	+130.9%
25-49	30,860	6.4%	-1,115	-3.5%	+17,245	+126.7%
50-64	13,940	4.5%	-285	-2.0%	+7,405	+113.3%

District unemployment by age group

October 2020	18-24 claimants	25-49 claimants	50-64 claimants	18-24 claimant rate	25-49 claimant rate	50-64 claimant rate
Ashford	1,000	2,505	1,160	11.3%	6.3%	4.5%
Canterbury	1,295	2,715	1,210	5.0%	5.8%	4.2%
Dartford	765	2,310	790	10.1%	5.5%	4.0%
Dover	1,035	2,375	1,185	12.9%	7.1%	4.6%
Folkestone & Hythe	905	2,500	1,380	12.4%	7.8%	5.7%
Gravesham	965	2,715	1,150	12.7%	7.8%	5.6%
Maidstone	1,050	2,975	1,205	8.9%	5.4%	3.6%
Sevenoaks	595	1,540	745	8.3%	4.3%	3.0%
Swale	1,380	3,125	1,445	12.2%	6.8%	4.8%
Thanet	1,710	4,495	2,035	17.2%	11.3%	7.1%
Tonbridge and Malling	730	1,835	835	8.2%	4.4%	3.2%
Tunbridge Wells	570	1,770	795	8.0%	4.7%	3.3%
Kent	12,005	30,860	13,940	9.9%	6.4%	4.5%
Medway	2,545	6,645	2,555	11.3%	7.1%	4.9%

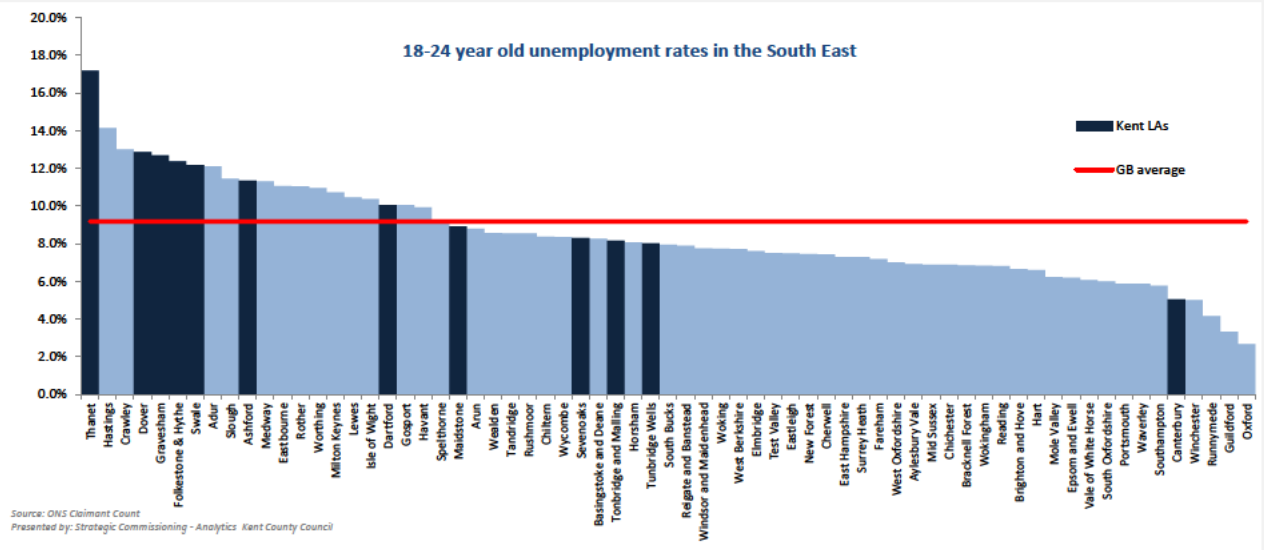


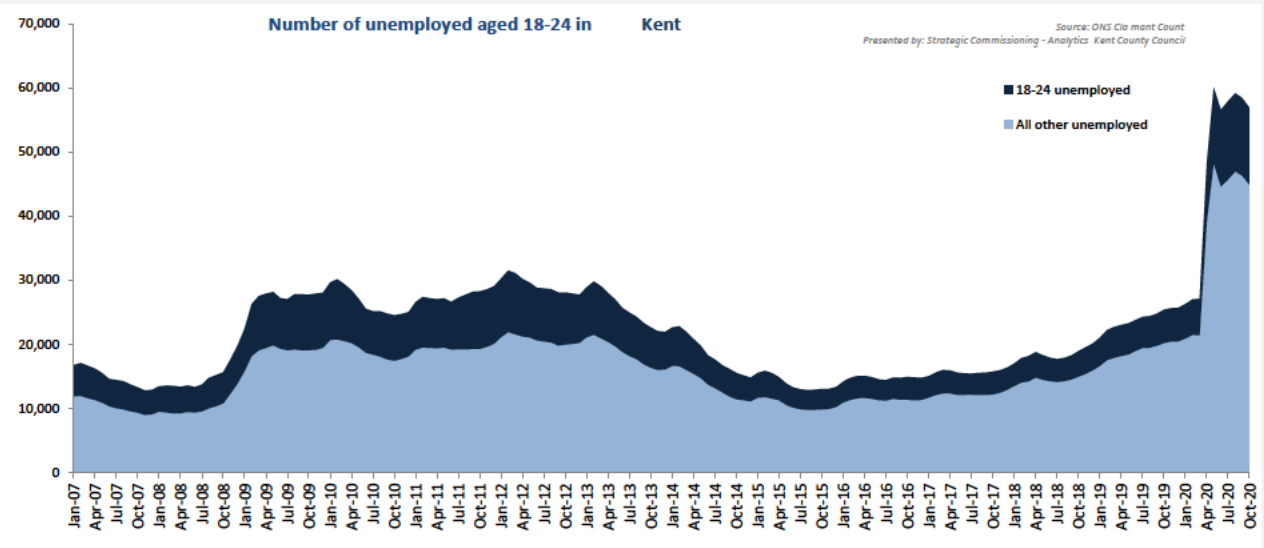
18-24 Unemployment

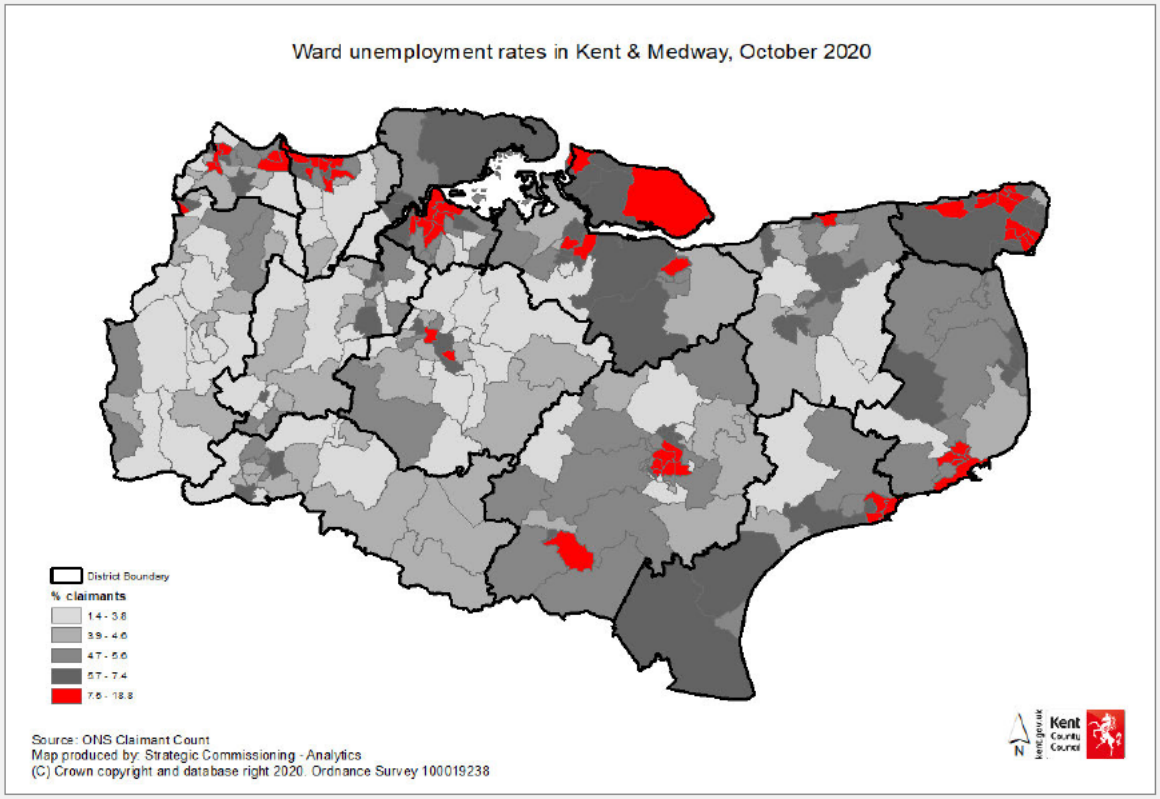
October 2020	Number	% rate	Number change since September 2020	% change since September 2020	Number change since October 2019	% change since October 2019
Kent	12,005	9.9%	-130	-1.1%	+6,805	+130.9%
United Kingdom	517,600	9.2%	-845	-0.2%	+293,875	+131.4%

Unemployment by age group - % of all unemployed

October 2020	Number of claimants in Kent	% of all unemployed in Kent	Number of claimants in United Kingdom	% of all unemployed in United Kingdom
18-24	12,005	21.1%	517,600	19.8%
25-49	30,860	54.2%	1,482,410	56.7%
50-64	13,940	24.5%	606,385	23.2%







This workbook looks at the total number of people claiming either Jobseekers Allowance or Universal Credit principally for the reason of being unemployed. It also looks at the age profile of claimants, in particular at youth unemployment which is defined as those aged 18 to 24.

This workbook uses information from a dataset called The Claimant Count by Sex and Age. This experimental series counts the number of people claiming Jobseeker's Allowance plus those who claim Universal Credit who are out of work. The dataset currently includes some out of work claimants of Universal Credit who are not required to look for work; for example, due to illness or disability. Therefore this dataset is considered experimental and the results should be interpreted with caution.

Unemployment rates are calculated using the Office for National Statistics Mid-year Population Estimates 2001-2018. The resident working age population is defined as all males and females aged 16-64. These denominators will be updated annually with the ONS mid-year population estimates.

Introduction of Universal Credit
Since 2013 the roll out of Universal Credit has progressed across the UK. Universal Credit will replace a number of means-tested benefits including the means-tested element of Jobseeker's Allowance (JSA).

The Universal Credit Live Service roll out in Kent & Medway began in April 2015. This was replaced in 2016 with the Universal Credit Full Service using the DWP bespoke digital system. The full service rollout in Kent was completed in autumn 2018. The table below shows how Universal Credit rolled out within Kent districts.

While initially Universal Credit was only available to single claimants without a partner and without child dependents, the roll out of the full service made Universal Credit available to all new claimant types and to those reporting changes to their personal circumstances.

From July 2019 the government intends to begin a pilot scheme transferring claimants of existing benefits (those that Universal Credit was designed to replace) onto Universal Credit. This managed migration will start initially with 10,000 existing claimants. They won't start moving people over to Universal Credit in great numbers until the pilot scheme has been completed and assessed, however they plan to have completed the full migration process by the end of 2023.

For more information on Universal Credit: https://www.gov.uk/universal-credit

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STRATEGIC COMMISSIONING ANALYTICS

kent.gov.uk Kent County Council

UK Business Counts 2020

Information on businesses in Kent

Related documents

Business Demography – Looking at the counts business activity during the course of the whole of the financial year

Construction Industries in Kent – the number of construction businesses in Kent and the people employed in the sector

Creative Industries in Kent - the number of creative businesses in Kent and the people employed in the sector

Further Information

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The UK Business data is published annually by the Office for National Statistics (ONS) and is based on output from the VAT and PAYE administrative systems.

The information provided by the UK Business dataset gives a snap shot of businesses and is broken down by size band, industry, turnover and age of business.

An additional dataset from ONS is the Business Demography dataset. This is also based on VAT and PAYE data but this information measures any activity during the course of the year, so leads to slightly higher counts of businesses. It provides information on business births, deaths and survival rates.

Information on this dataset can be found in the bulletin "Business Demography".

Kent Summary

- As at March 2020 there were 64,005 enterprises in Kent
- Kent has a significantly higher proportion of enterprises (17.1%) in the construction industry than is seen nationally (12.8%)
- The highest proportion of enterprises in Kent (17.2%) are within the Professional, scientific and technical sector
- The majority of enterprises in Kent (90.2%) are micro enterprises (with 0-9 employees)
- The majority of enterprises in Kent (99.4%) are classed as companies which operate within the private sector.

Introduction

The UK Business data is produced from a snapshot of the Inter Departmental Business Register (IDBR) - usually taken during March - and provides the basis for the Office for National Statistics (ONS) to conduct surveys of businesses.

The main administrative sources for the IDBR are VAT trader and PAYE employer information passed to the ONS by HM Revenue & Customs under the Value Added Tax Act 1994 for VAT traders and the Finance Act 1969 for PAYE employers; details of incorporated businesses are also passed to ONS by Companies House. ONS Survey data and survey information from the Department of Enterprise, Trade and Investment – Northern Ireland (DETINI) and the Department for Environment, Food and Rural Affairs (DEFRA) farms register provide auxiliary information. Construction statistics formerly produced by the Department for Business Innovation & Skills are now produced by ONS.

The IDBR combines the information from the three administrative sources with this survey data in a statistical register comprising over two million enterprises. These comprehensive administrative sources combined with the survey data contribute to the coverage on the IDBR, which is one of its main strengths, representing nearly 99 per cent of UK economic activity.

The latest data is published for 2020 and is based upon the 2007 revision to the Standard Industrial Classification UKSIC (2007). Detailed information about the types of industry which make up each of the industrial sectors is available from the UK Standard Industrial Classification of Economic Activities published by the Office for National Statistics.

This bulletin looks at the main tables available from the UK Business data, which relate to VAT/PAYE enterprises.

This bulletin will be updated in Autumn 2021.

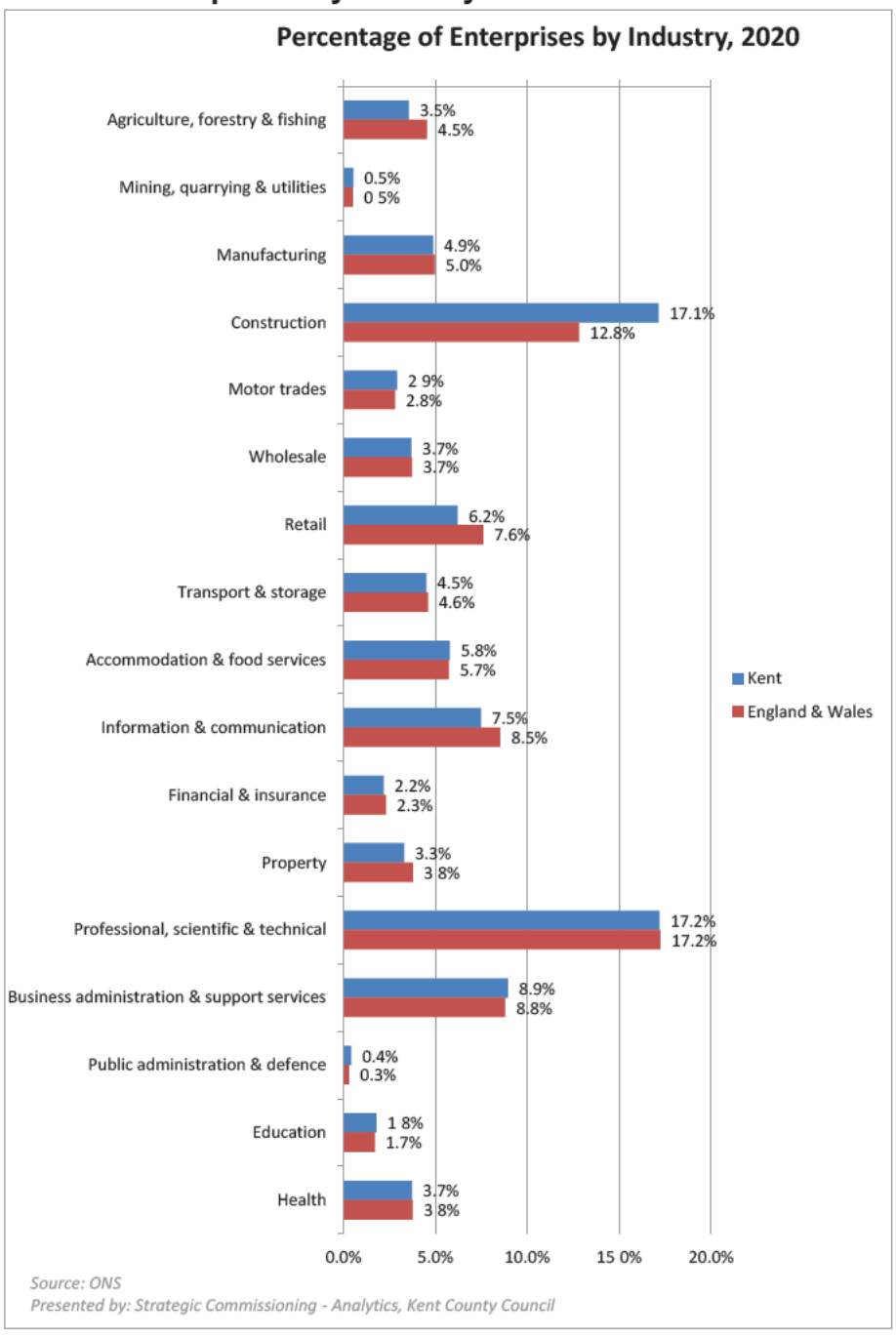
Analysis

Enterprises by Industry

The UK Business data shows us the number of enterprises by broad industrial group.

Overall Kent has a similar profile to England and Wales although does show a noticeably higher proportion of enterprises in the Construction Industry and lower proportions in Agriculture and Fishing, Retail and Information & Communications industries. This is shown in Chart 1.

Chart 1: Enterprises by Industry



Tables 1 and 2 on the following two pages show the number and percentage of businesses by industry in Kent local authority districts and Kent as a whole. Regional and national figures are also presented for comparison.

Table 1: Number of VAT and/or PAYE based enterprises in 2020 by broad industrial group

UK SIC 2007

	Agriculture, forestry & fishing	Mining, quarrying & utilities	Manufacturing	Construction	Motor trades	Wholesale	Retail	Transport & storage	Accommodation & food services	Information & communication	Financial & insurance	Property	Professional, scientific & technical	Business administration & support services	Public administration & defence	Education	Health	Arts, entertainment, recreation & other services	Total
Ashford	420	40	330	965	160	430	345	190	265	430	385	250	1,070	595	40	95	230	335	6,575
Canterbury	170	25	250	805	150	190	425	150	415	370	85	195	945	450	20	110	250	400	5,400
Dartford	25	20	205	1,005	150	165	235	395	270	545	75	175	755	390	10	80	155	200	4,855
Dover	190	25	190	620	115	95	290	155	295	180	45	80	515	295	35	75	150	225	3,570
Folkestone & Hythe	210	15	175	580	130	100	310	135	355	210	40	125	595	295	20	70	145	240	3,750
Gravesham	45	20	195	890	120	105	265	385	250	260	45	100	545	380	5	70	150	215	4,045
Maidstone	305	45	370	1,455	240	300	410	560	345	480	145	250	1,250	645	35	125	290	395	7,650
Sevenoaks	205	30	305	1,090	195	240	365	135	255	615	155	270	1,380	685	25	115	215	425	6,710
Swale	220	45	350	995	185	160	315	310	320	260	55	150	675	405	25	85	175	285	5,020
Thanet	65	20	235	725	125	110	355	135	410	245	55	120	545	330	10	85	165	315	4,050
Tonbridge and Malling	130	40	285	1,065	165	230	265	205	255	545	155	170	1,235	640	30	115	215	315	6,055
Tunbridge Wells	285	15	230	775	125	235	395	120	270	650	155	220	1,480	615	15	110	240	395	6,330
Kent	2,270	335	3,120	10,970	1,860	2,360	3,975	2,880	3,700	4,785	1,395	2,105	11,000	5,725	265	1,145	2,380	3,735	64,005
Medway	75	35	450	2,075	270	300	620	725	495	550	115	225	1,225	730	15	160	365	450	8,885
Kent + Medway	2,345	370	3,570	13,045	2,125	2,665	4,600	3,605	4,200	5,335	1,510	2,330	12,225	6,455	280	1,310	2,745	4,185	72,890
South East LEP	5,990	890	9,050	32,400	5,480	6,505	11,160	8,605	9,475	12,975	3,505	5,865	28,490	15,560	610	3,115	6,430	10,305	176,410
South East Region	11,785	1,780	18,705	57,980	11,155	14,470	31,050	14,910	19,780	45,685	8,560	14,250	81,095	36,995	1,250	7,685	14,865	26,370	418,370
ENGLAND AND WALES	113,185	12,745	123,855	319,750	69,640	93,060	189,745	114,390	143,050	213,185	57,535	94,080	430,690	219,655	7,570	42,285	93,945	158,460	2,496,825

Source: ONS

Presented by: Strategic Commissioning - Analytics, Kent County Council

Table 2: Percentage of VAT and/or PAYE based enterprises in 2020 by broad industrial group

UK SIC 2007

	Agriculture, forestry & fishing	Mining, quarrying & utilities	Manufacturing	Construction	Motor trades	Wholesale	Retail	Transport & storage	Accommodation & food services	Information & communication	Financial & insurance	Property	Professional, scientific & technical	Business administration & support services	Public administration & defence	Education	Health	Arts, entertainment, recreation & other services
Ashford	6.4	0.6	5.0	14.7	2.4	6.5	5.2	2.9	4.0	6.5	5.9	3.8	16.3	9.0	0.6	1.4	3.5	5.1
Canterbury	3.1	0.5	4.6	14.9	2.8	3.5	7.9	2.8	7.7	6.9	1.6	3.6	17.5	8.3	0.4	2.0	4.6	7.4
Dartford	0.5	0.4	4.2	20.7	3.1	3.4	4.8	8.1	5.6	11.2	1.5	3.6	15.6	8.0	0.2	1.6	3.2	4.1
Dover	5.3	0.7	5.3	17.4	3.2	2.7	8.1	4.3	8.3	5.0	1.3	2.2	14.4	8.3	1.0	2.1	4.2	6.3
Gravesham	5.6	0.4	4.7	15.5	3.5	2.7	8.3	3.6	9.5	5.6	1.1	3.3	15.9	7.9	0.5	1.9	3.9	6.4
Maidstone	1.1	0.5	4.8	22.0	3.0	2.6	6.6	9.5	6.2	6.4	1.1	2.5	13.5	9.4	0.1	1.7	3.7	5.3
Sevenoaks	4.0	0.6	4.8	19.0	3.1	3.9	5.4	7.3	4.5	6.3	1.9	3.3	16.3	8.4	0.5	1.6	3.8	5.2
Shepway	3.1	0.4	4.5	16.2	2.9	3.6	5.4	2.0	3.8	9.2	2.3	4.0	20.6	10.2	0.4	1.7	3.2	6.3
Swale	4.4	0.9	7.0	19.8	3.7	3.2	6.3	6.2	6.4	5.2	1.1	3.0	13.4	8.1	0.5	1.7	3.5	5.7
Thanet	1.6	0.5	5.8	17.9	3.1	2.7	8.8	3.3	10.1	6.0	1.4	3.0	13.5	8.1	0.2	2.1	4.1	7.8
Tonbridge and Malling	2.1	0.7	4.7	17.6	2.7	3.8	4.4	3.4	4.2	9.0	2.6	2.8	20.4	10.6	0.5	1.9	3.6	5.2
Tunbridge Wells	4.5	0.2	3.6	12.2	2.0	3.7	6.2	1.9	4.3	10.3	2.4	3.5	23.4	9.7	0.2	1.7	3.8	6.2
Kent	3.5	0.5	4.9	17.1	2.9	3.7	6.2	4.5	5.8	7.5	2.2	3.3	17.2	8.9	0.4	1.8	3.7	5.8
Medway	0.8	0.4	5.1	23.4	3.0	3.4	7.0	8.2	5.6	6.2	1.3	2.5	13.8	8.2	0.2	1.8	4.1	5.1
Kent + Medway	3.2	0.5	4.9	17.9	2.9	3.7	6.3	4.9	5.8	7.3	2.1	3.2	16.8	8.9	0.4	1.8	3.8	5.7
South East LEP	3.4	0.5	5.1	18.4	3.1	3.7	6.3	4.9	5.4	7.4	2.0	3.3	16.1	8.8	0.3	1.8	3.6	5.8
South East Region	2.8	0.4	4.5	13.9	2.7	3.5	7.4	3.6	4.7	10.9	2.0	3.4	19.4	8.8	0.3	1.8	3.6	6.3
ENGLAND AND WALES	4.5	0.5	5.0	12.8	2.8	3.7	7.6	4.6	5.7	8.5	2.3	3.8	17.2	8.8	0.3	1.7	3.8	6.3

Source: ONS

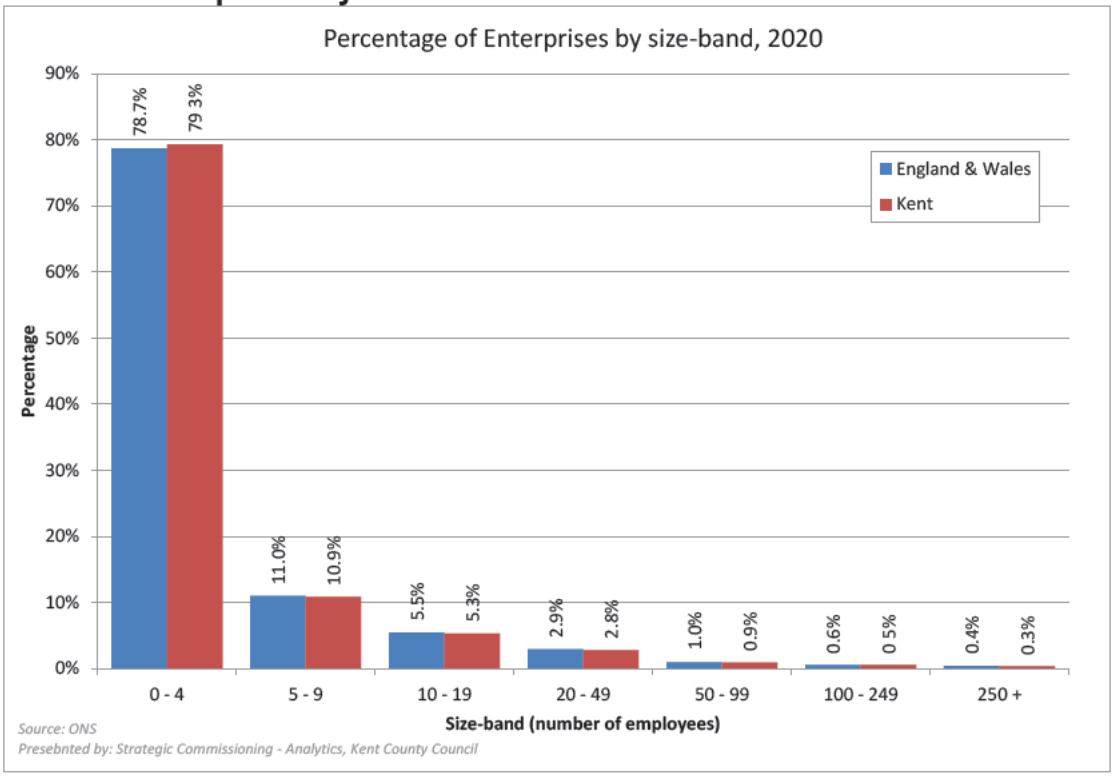
Presented by: Strategic Commissioning - Analytics, Kent County Council

Enterprises by employee size

The majority of enterprises are classed as micro businesses i.e. they have 0 - 9 employees. In Kent 90.2% of enterprises are classed as micro, 89.7% in England and Wales.

Chart 2 shows the proportion of enterprises in Kent and England and Wales by employment size.

Chart 2: Enterprises by sizeband



Tables 3 and 4 show an even greater breakdown of the number and percentage of enterprises by the number of employees.

The data shows that while the majority of enterprises are micro businesses employing up to 9 people, most of these actually have 0 - 4 employees (88.0% of micro businesses in Kent).

Kent has a slightly higher proportion of enterprises with 0 – 4 employees and slightly lower proportion with 5 – 9 employees than is seen nationally.

Table 3: Number of VAT and/or PAYE based enterprises by employment sizeband

	Employment size							
2020	0 - 4	5 - 9	10 - 19	20 - 49	50 - 99	100 - 249	250 +	TOTAL
Ashford	5,355	650	315	165	50	30	20	6,575
Canterbury	4,120	680	330	160	60	25	25	5,400
Dartford	3,995	420	200	135	50	30	20	4,855
Dover	2,740	445	215	95	40	25	5	3,570
Folkestone & Hythe	2,905	460	205	130	30	15	10	3,750
Gravesham	3,300	420	165	100	25	20	10	4,045
Maidstone	6,095	785	430	190	70	55	30	7,650
Sevenoaks	5,380	715	345	165	60	30	20	6,710
Swale	3,875	620	285	140	50	35	15	5,020
Thanet	3,140	490	235	120	30	30	5	4,050
Tonbridge and Malling	4,780	625	325	200	65	35	25	6,055
Tunbridge Wells	5,085	655	330	175	50	30	10	6,330
Kent	50,765	6,955	3,385	1,775	575	350	210	64,005
Medway	7,155	935	445	205	60	50	35	8,885
Kent + Medway	57,920	7,890	3,825	1,980	635	400	240	72,890
South East LEP	140,350	19,125	9,235	4,750	1,535	890	520	176,410
South East Region	334,935	42,650	21,560	11,590	3,735	2,285	1,620	418,370
ENGLAND AND WALES	1,964,640	274,145	136,585	73,320	24,585	13,770	9,785	2,496,825

Source: ONS
Presented by: Strategic Commissioning - Analytics, Kent County Council

Table 4: Percentage of VAT and/or PAYE based enterprises by sizeband

	Employment size							
2020	0 - 4	5 - 9	10 - 19	20 - 49	50 - 99	100 - 249	250 +	TOTAL
Ashford	81.4	9.9	4.8	2.5	0.8	0.5	0.3	100
Canterbury	76.3	12.6	6.1	3.0	1.1	0.5	0.5	100
Dartford	82.3	8.7	4.1	2.8	1.0	0.6	0.4	100
Dover	76.8	12.5	6.0	2.7	1.1	0.7	0.1	100
Gravesham	77.5	12.3	5.5	3.5	0.8	0.4	0.3	100
Maidstone	81.6	10.4	4.1	2.5	0.6	0.5	0.2	100
Sevenoaks	79.7	10.3	5.6	2.5	0.9	0.7	0.4	100
Shepway	80.2	10.7	5.1	2.5	0.9	0.4	0.3	100
Swale	77.2	12.4	5.7	2.8	1.0	0.7	0.3	100
Thanet	77.5	12.1	5.8	3.0	0.7	0.7	0.1	100
Tonbridge and Malling	78.9	10.3	5.4	3.3	1.1	0.6	0.4	100
Tunbridge Wells	80.3	10.3	5.2	2.8	0.8	0.5	0.2	100
Kent	79.3	10.9	5.3	2.8	0.9	0.5	0.3	100
Medway	80.5	10.5	5.0	2.3	0.7	0.6	0.4	100
Kent + Medway	79.5	10.8	5.2	2.7	0.9	0.5	0.3	100
South East LEP	79.6	10.8	5.2	2.7	0.9	0.5	0.3	100
South East Region	80.1	10.2	5.2	2.8	0.9	0.5	0.4	100
ENGLAND AND WALES	78.7	11.0	5.5	2.9	1.0	0.6	0.4	100

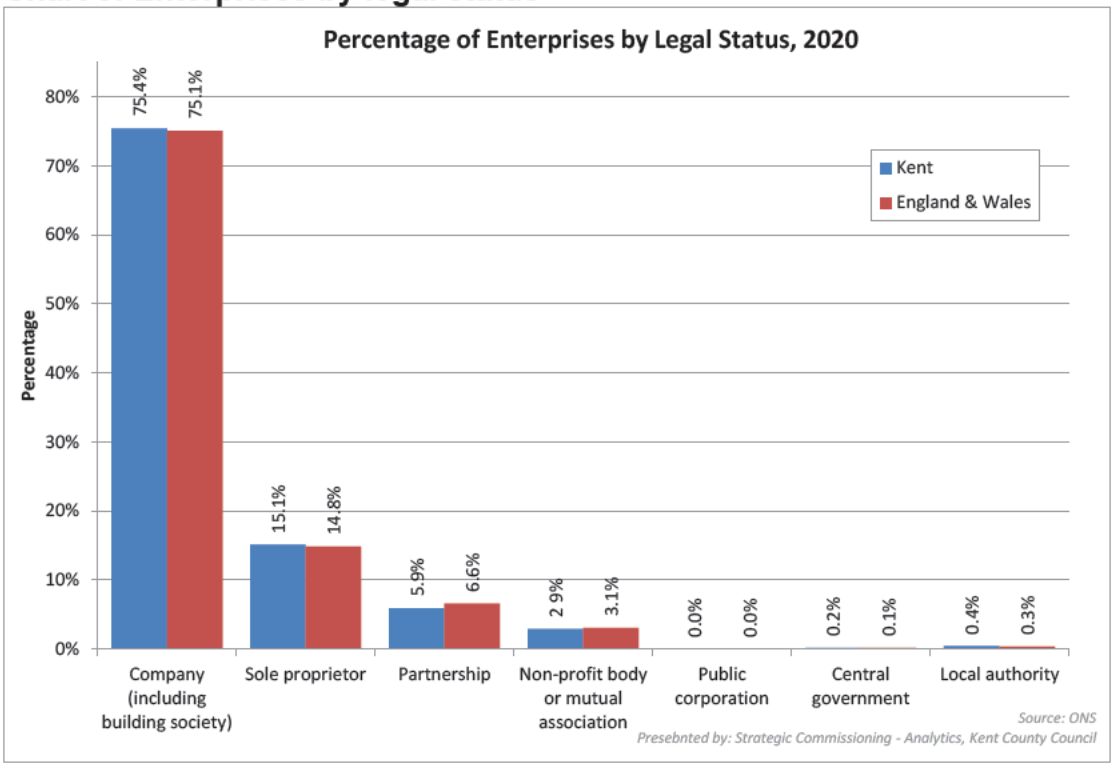
Source: ONS
Presented by: Strategic Commissioning - Analytics, Kent County Council

Enterprise by status

The data also shows the number of enterprises by legal status. The legal status of units is classified by ONS in accordance with National Accounts Sector Classifications. All enterprises engage in financial transactions, paying out and receiving money for reasons such as buying and selling goods and services, paying taxes, or collecting tax revenues. Using information received from Companies House and the administrative sources from HM Revenue & Customs, the National Accounts Sector Classification determines whether a body or enterprise is in the private or public sector, and if public, whether they are government bodies or public corporations, and whether certain transactions count as taxes or service fees.

Chart 3 shows the proportion of enterprises by legal status in Kent compared to England and Wales in 2020.

Chart 3: Enterprises by legal status



The majority of enterprises are private sector companies. In Kent they account for 97.7% of all enterprises, just below England and Wales as a whole (98.3%).

Kent has a slightly higher proportion of sole proprietor enterprises (15.1%) than is seen nationally and a slightly lower proportion of partnerships (5.9%).

Tables 5 and 6 show the legal status of enterprises in Kent local authority districts and Kent as a whole. They also present information at regional and national level for comparison.

Table 5: Number of VAT and/or PAYE based enterprises by legal status

	Private sector				Public sector			
2020	Company (including building society)	Sole proprietor	Partnership	Non-profit body or mutual association	Public corporation	Central government	Local authority	TOTAL
Ashford	4,630	935	505	455	0	10	40	6,575
Canterbury	3,855	935	400	180	0	10	20	5,400
Dartford	4,095	520	120	95	0	15	10	4,855
Dover	2,285	785	345	105	5	10	35	3,570
Folkestone & Hythe	2,605	715	305	95	0	10	20	3,750
Gravesham	3,290	520	145	75	0	5	5	4,045
Maidstone	5,910	1,095	415	180	0	10	35	7,650
Sevenoaks	5,320	875	320	160	0	5	25	6,710
Swale	3,665	875	325	110	0	15	25	5,020
Thanet	2,890	760	285	95	0	10	10	4,050
Tonbridge and Malling	4,835	770	260	150	0	5	30	6,055
Tunbridge Wells	4,890	885	365	170	0	5	15	6,330
Kent	48,270	9,670	3,795	1,875	5	110	280	64,005
Medway	6,975	1,295	360	215	0	20	20	8,885
Kent + Medway	55,245	10,960	4,155	2,095	5	135	300	72,890
South East LEP	135,715	25,230	10,135	4,340	10	340	640	176,410
South East Region	326,790	56,450	21,610	11,635	20	475	1,390	418,370
ENGLAND AND WALES	1,874,040	370,275	163,965	76,240	145	3,560	8,595	2,496,825

Source: ONS

Presented by: Strategic Commissioning - Analytics, Kent County Council

Table 6: Percentage of VAT and/or PAYE based enterprises by legal status

	Employment status							
2020	Company (including building society)	Sole proprietor	Partnership	Non-profit body or mutual association	Public corporation	Central government	Local authority	TOTAL
Ashford	70.4	14.2	7.7	6.9	0.0	0.2	0.6	100
Canterbury	71.4	17.3	7.4	3.3	0.0	0.2	0.4	100
Dartford	84.3	10.7	2.5	2.0	0.0	0.3	0.2	100
Dover	64.0	22.0	9.7	2.9	0.1	0.3	1.0	100
Folkestone & Hythe	69.5	19.1	8.1	2.5	0.0	0.3	0.5	100
Gravesham	81.3	12.9	3.6	1.9	0.0	0.1	0.1	100
Maidstone	77.3	14.3	5.4	2.4	0.0	0.1	0.5	100
Sevenoaks	79.3	13.0	4.8	2.4	0.0	0.1	0.4	100
Swale	73.0	17.4	6.5	2.2	0.0	0.3	0.5	100
Thanet	71.4	18.8	7.0	2.3	0.0	0.2	0.2	100
Tonbridge and Malling	79.9	12.7	4.3	2.5	0.0	0.1	0.5	100
Tunbridge Wells	77.3	14.0	5.8	2.7	0.0	0.1	0.2	100
Kent	75.4	15.1	5.9	2.9	0.0	0.2	0.4	100
Medway	78.5	14.6	4.1	2.4	0.0	0.2	0.2	100
Kent + Medway	75.8	15.0	5.7	2.9	0.0	0.2	0.4	100
South East LEP	76.9	14.3	5.7	2.5	0.0	0.2	0.4	100
South East Region	78.1	13.5	5.2	2.8	0.0	0.1	0.3	100
ENGLAND AND WALES	75.1	14.8	6.6	3.1	0.0	0.1	0.3	100

Source: ONS

Presented by: Strategic Commissioning - Analytics, Kent County Council

Turnover

Turnover figures provided to ONS for the majority of traders is based on VAT returns for a 12 month period. For 2020 this relates to a 12 month period covering the financial year 2019/2020. For other records, in particular members of VAT group registrations, turnover may relate to an earlier period or survey data.

For traders who have registered more recently, turnover represents the estimate made by traders at the time of registration.

The turnover figures on the register generally exclude VAT but include other taxes, such as the revenue duties on alcoholic drinks and tobacco. They represent total UK turnover, including exempt and zero-rated supplies.

Turnover bands shown in the analyses relate to the latest year for which information is available. Traders may be registered below the VAT threshold or may choose not to de-register should their turnover fall below the threshold.

Table 7 shows the VAT registration thresholds since 2004/05.

Table 7 - VAT registration thresholds

Operative dates	VAT Registration Threshold
1 Apr 2004 - 31 Mar 2005	£58,000
1 Apr 2005 - 31 Mar 2006	£60,000
1 Apr 2006 - 31 Mar 2007	£61,000
1 Apr 2007 - 31 Mar 2008	£64,000
1 Apr 2008 - 31 Mar 2009	£67,000
1 Apr 2009 - 31 Mar 2010	£68,000
1 Apr 2010 - 31 Mar 2011	£70,000
1 Apr 2011 - 31 Mar 2012	£73,000
1 Apr 2012 - 31 Mar 2013	£77,000
1 Apr 2013 - 31 Mar 2014	£79,000
1 Apr 2014 - 31 Mar 2015	£81,000
1 Apr 2015 - 31 March 2016	£82,000
1 Apr 2016 - 31 March 2017	£83,000
1 Apr 2017 - 31 March 2018	£85,000
1 Apr 2018 - 31 March 2019	£85,000
1 Apr 2019 onwards	£85,000

Source: HMRC

A higher proportion of enterprises in Kent (64.0%) have a turnover of £100k and above than is seen nationally (62.5%).

Tables 8 and 9 present the turnover data for Kent local authority districts and Kent as a whole. Regional and national figures are also presented for comparison.

Chart 4: Percentage of VAT and/or PAYE enterprises by turnover

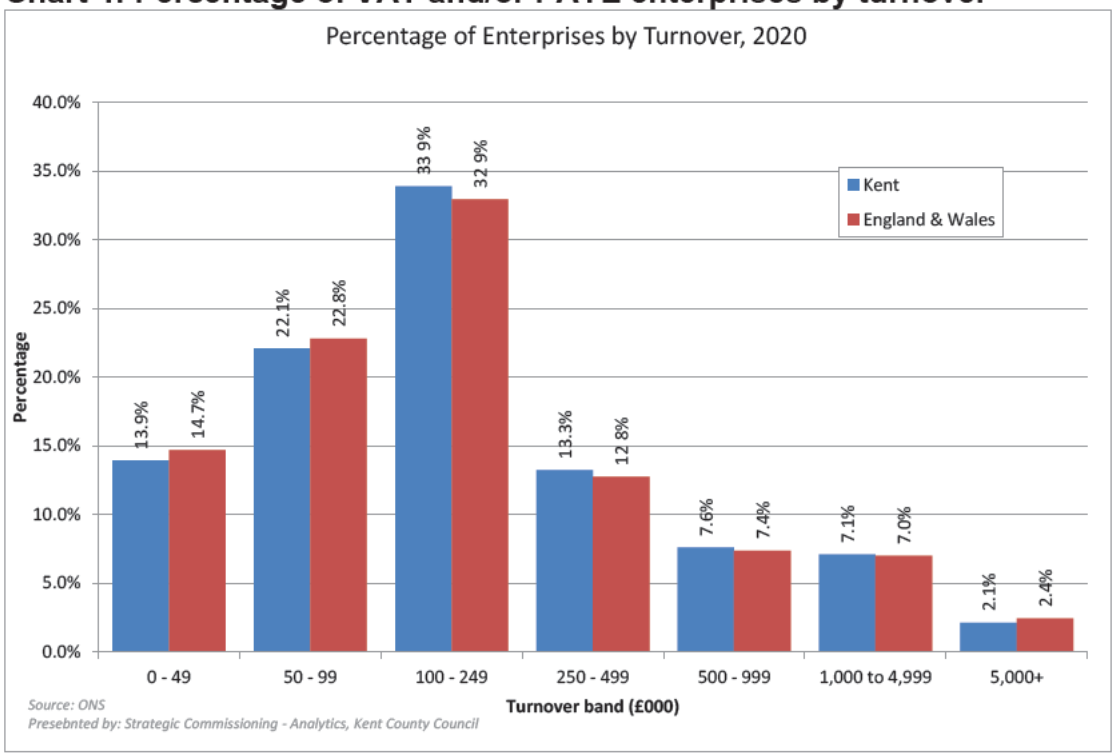


Table 8: Number of VAT and/or PAYE enterprises by turnover

	Turnover size (£ thousand)							
2020	0 to 49	50 to 99	100 to 199	200 to 499	500 to 999	1,000 to 4,999	5,000+	TOTAL
Ashford	1,265	1,310	1,995	790	650	460	100	6,575
Canterbury	700	1,210	1,865	720	430	380	95	5,400
Dartford	580	1,355	1,630	545	265	365	115	4,855
Dover	505	750	1,205	495	290	245	75	3,570
Folkestone & Hythe	550	845	1,285	520	255	250	50	3,750
Gravesham	535	1,055	1,325	550	265	255	60	4,045
Maidstone	1,110	1,695	2,515	1,025	570	550	185	7,650
Sevenoaks	850	1,365	2,360	915	550	480	190	6,710
Swale	685	1,110	1,645	705	390	390	100	5,020
Thanet	465	915	1,475	590	305	240	55	4,050
Tonbridge and Malling	775	1,240	2,090	800	455	485	215	6,055
Tunbridge Wells	905	1,290	2,305	835	440	430	120	6,330
Kent	8,920	14,140	21,695	8,485	4,870	4,535	1,360	64,005
Medway	1,110	2,425	2,820	1,135	665	570	165	8,885
Kent + Medway	10,030	16,565	24,515	9,620	5,530	5,105	1,525	72,890
South East LEP	22,975	40,695	60,340	23,035	13,315	12,385	3,660	176,410
South East Region	60,645	93,400	144,580	51,765	29,655	28,575	9,750	418,370
ENGLAND AND WALES	367,095	569,300	822,570	318,560	183,715	174,965	60,615	2,496,825

Source: ONS
Presented by: Strategic Commissioning - Analytics, Kent County Council

Table 9: Percentage of VAT and/or PAYE enterprises by turnover

	Turnover size (£ thousand)							
2020	0 to 49	50 to 99	100 to 199	200 to 499	500 to 999	1,000 to 4,999	5,000+	TOTAL
Ashford	19.2	19.9	30.3	12.0	9.9	7.0	1.5	100
Canterbury	13.0	22.4	34.5	13.3	8.0	7.0	1.8	100
Dartford	11.9	27.9	33.6	11.2	5.5	7.5	2.4	100
Dover	14.1	21.0	33.8	13.9	8.1	6.9	2.1	100
Gravesham	14.7	22.5	34.3	13.9	6.8	6.7	1.3	100
Maidstone	13.2	26.1	32.8	13.6	6.6	6.3	1.5	100
Sevenoaks	14.5	22.2	32.9	13.4	7.5	7.2	2.4	100
Shepway	12.7	20.3	35.2	13.6	8.2	7.2	2.8	100
Swale	13.6	22.1	32.8	14.0	7.8	7.8	2.0	100
Thanet	11.5	22.6	36.4	14.6	7.5	5.9	1.4	100
Tonbridge and Malling	12.8	20.5	34.5	13.2	7.5	8.0	3.6	100
Tunbridge Wells	14.3	20.4	36.4	13.2	7.0	6.8	1.9	100
Kent	13.9	22.1	33.9	13.3	7.6	7.1	2.1	100
Medway	12.5	27.3	31.7	12.8	7.5	6.4	1.9	100
Kent + Medway	13.8	22.7	33.6	13.2	7.6	7.0	2.1	100
South East LEP	13.0	23.1	34.2	13.1	7.5	7.0	2.1	100
South East Region	14.5	22.3	34.6	12.4	7.1	6.8	2.3	100
ENGLAND AND WALES	14.7	22.8	32.9	12.8	7.4	7.0	2.4	100

Source: ONS

Presented by: Strategic Commissioning - Analytics, Kent County Council

The Index of Multiple Deprivation (IMD2019): Headline findings for Kent

Related Documents

The Deprivation and Poverty web page contains more information which you may find useful.

- *Children in Poverty*
- *Homelessness*
- *Unemployment and benefits claimants*
- *Rough Sleepers*

***NOTE**: within this bulletin "Kent" refers to the Kent County Council (KCC) area which excludes Medway Unitary Authority*

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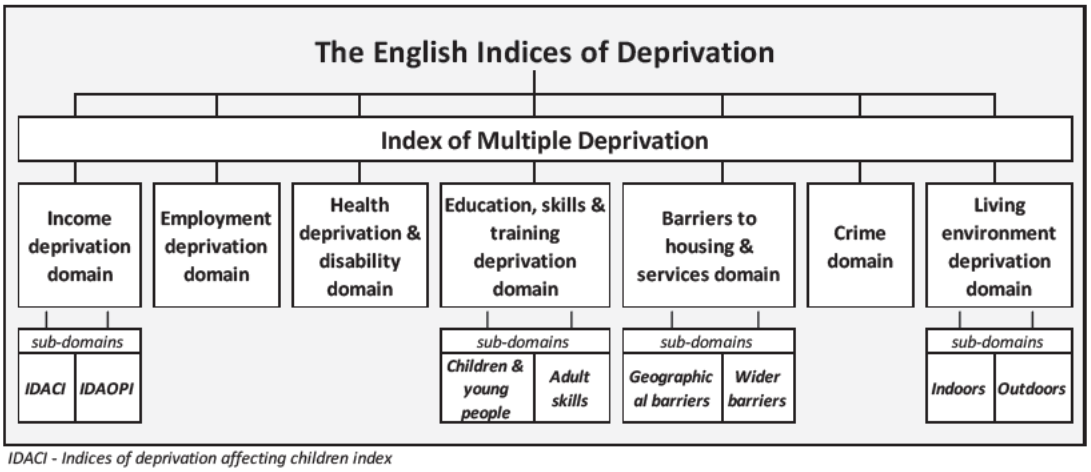
The Index of Multiple Deprivation (IMD2019) is the official measure of relative deprivation in England and is part of a suite of outputs that form the English Indices of Deprivation 2019 (IoD2019). This bulletin presents the findings for Kent.

- There are 901 Lower Super Output Areas (LSOAs) in Kent. A total of 555 remained within the same decile for IMD2019 as they were in IMD2015. This accounts for 62% of all Kent LSOAs.
- The number of Kent LSOAs that are within the 10% most deprived LSOAs in England between the IMD2019 and the previous IMD2015 remains at 51.
- The level of deprivation in nine out of 12 Kent local authority districts has increased since IMD2015 relative to other areas in England.
- Thanet continues to rank as the most deprived local authority in Kent.
- Tunbridge Wells continues to rank as the least deprived local authority in Kent.
- Tonbridge & Malling has experienced the largest increase in deprivation relative to other areas.
- Gravesham has experienced the largest decrease in deprivation relative to other areas.

Overview of the Indices of Deprivation 2019

The Indices of Deprivation 2019 (IoD2019) Is produced by the Ministry of Housing, Communities and Local Government (MHCLG) and provides a set of relative measures of deprivation for neighbourhoods or small areas called Lower-layer Super Output Areas (LSOAs) across England.

The IoD2019 is based on 39 separate indicators, organised across seven distinct domains and 4 sub-domains of deprivation. These are combined and weighted to calculate the overall Index of Multiple Deprivation 2019 (IMD2019). The IMD2019 is the most widely used of these indices.



IDACI - Indices of deprivation affecting children index
IDAOPI - Indices of deprivation affecting older people index

The IMD2019, domain indices and the supplementary indices, together with the higher area summaries, are collectively referred to as the IoD2019.

Geography and spatial scale

The IoD2019 provides a measure of deprivation experienced by people living in each neighbourhood or LSOA. LSOAs were developed by the Office for National Statistics (ONS) before the 2011 Census. There are 32,844 LSOAs in England with an average of 1,500 residents each and are a standard way of dividing up the country. They do not have descriptive place names like local electoral wards or parishes do but are named in a format beginning with the name of the local authority district followed by a 4-character code e.g. Ashford 001A.

All LSOAs in England are ranked according to their level of deprivation relative to that of other areas. A rank of 1 being the most deprived and a rank of 32,844 being the least deprived.

High ranking LSOAs or neighbourhoods can be referred to as the 'most deprived' or as being 'highly deprived' to aid interpretation. However, there is no definitive threshold above which an area is described as 'deprived'. The

IoD2019 measure deprivation on a *relative* rather than an *absolute* scale, so an LSOA ranked 100th is more deprived then an LSOA ranked 200th, but this does not mean it is twice as deprived.

It is common to describe how relatively deprived a small area is by saying whether it falls among the most deprived 10 per cent, 20 per cent or 30 per cent of small areas in England (although there is no definitive cut-off at which an area is described as 'deprived').

To help with this, deprivation 'deciles' are published alongside ranks. Deciles are calculated by ranking the 32,844 small areas in England from most deprived to least deprived and dividing them into 10 equal groups. These range from the most deprived 10 per cent of small areas nationally to the least deprived 10 per cent of small areas nationally.

Summary measures have been produced for the following higher-level geographies:

- lower tier local authority districts – Local Authority
- upper-tier local authorities – Counties, Metropolitan counties, & Unitary Authorities
- local enterprise partnerships
- clinical commissioning groups.

The Data

As far as is possible, each indicator is based on data from the most recent time point available. Using the latest available data in this way means that there is not a single consistent time point for all indicators. However, in practice most indicators in the IoD2019 relate to a 2015/16 timepoint.
As a result, the indicators do not take into consideration any changes to policy since the time point of the data used. For example, the 2015/16 benefits data used do not include the impact of the roll out of Universal Credit, which only began to replace certain income and health related benefits from April 2016.

Uses of the IMD and IoD

Since their original publication in 2000 the Indices have been used widely for a variety of purposes, including the following:

- Targeting resources, services and interventions
- Policy and strategy
- As an analytical resource to support commissioning by local authorities and health services, and in exploring inequalities.
- Funding bids

This bulletin presents the IMD2019 in comparison with IMD2015 at LSOA level in Kent and Medway. Summary measures for IMD2015 and IMD2019 at local authority and county level are also presented.

Due to the large number of LSOAs in Kent (902) the tables in this bulletin show only the most deprived 10% LSOAs in Kent. Full lists of all LSOAs in Kent & Medway with scores and ranks for all the domains are available in Excel format on request from Strategic Commissioning – Analytics.

e:-mail research@kent.gov.uk or telephone 03000 417444

The 2019IMD has not been made available at ward level. However following guidance from MHCLG we have produced a separate ward level IMD2019 summary that is available in a separate document.

Further information

Further information about the Indices of Deprivation 2019 is available from The Ministry of Housing, Communities and Local Government via their website.

www.gov.uk/government/statistics/english-indices-of-deprivation-2019

Deprivation at small area level in Kent's Lower Super Output Areas

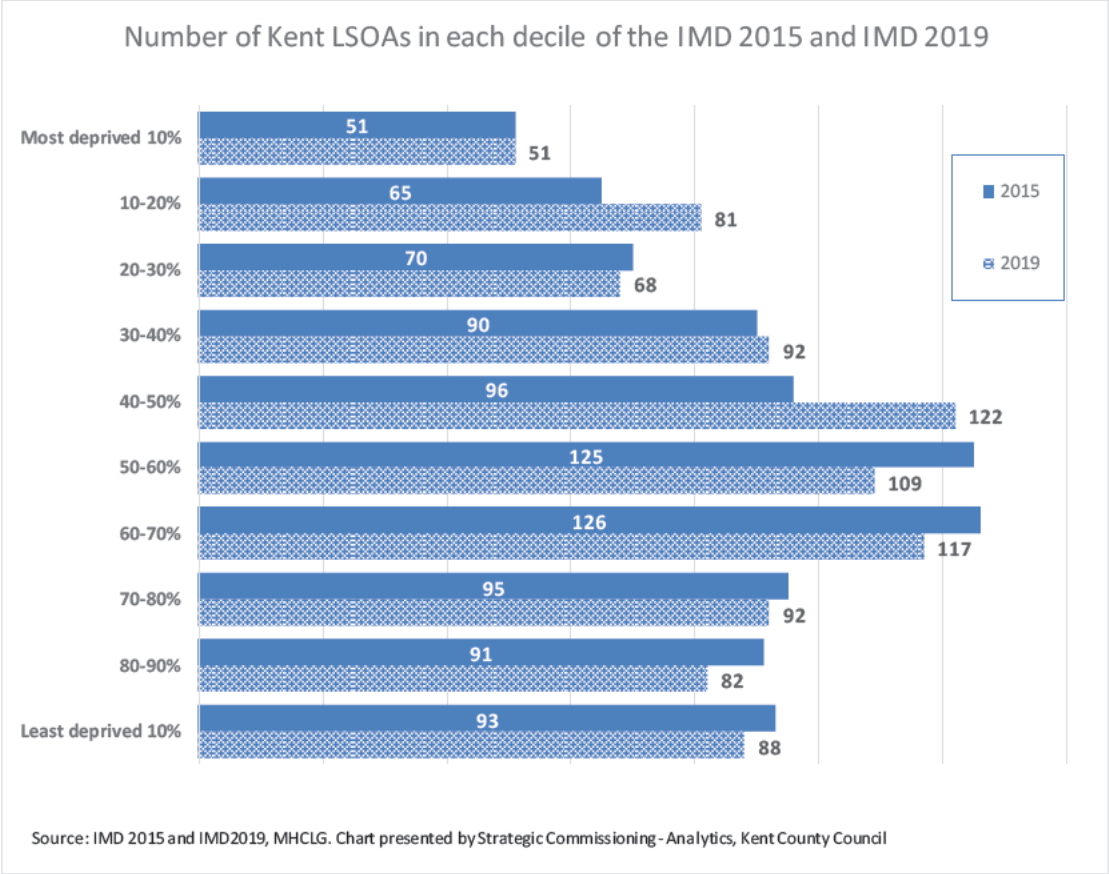
The number of Kent LSOAs that are within the 10% most deprived LSOAs in England between the IMD2015 and the IMD2019 remains at 51. Although there has been no direct increase in the number of the most deprived areas within Kent there have been changes within the lesser deprived areas

The number of Kent LSOAs within the 10 to 20% most deprived LSOAs in England has increased from 65 in 2015 to 81 in 2019. The number within the 40-50% most deprived have also increased from 96 to 122.

At the other end of the spectrum, the numbers of LSOAs within the 10% least deprived LSOAs in England has decreased from 93 in 2015 to 88 in 2019.

Chart 1 shows the changes in of Kent LSOAs within all of the deciles of the IMD2015 and IMD2019.

Chart 1: Number of Kent LSOAs in each decile of the IMD2015 and IMD2019



Thanet has the most LSOAs within the most deprived decile with 18. This figure has also remained the same since the IMD2015.

The number of Folkestone & Hythe LSOAs within the 10% most deprived has also remained the same between the IMD2015 and IMD2019.

Four local authorities have experienced an increase in the number of LSOAs within the most deprived decile. These are Swale (+2), Ashford and Dover (both with +1) and Canterbury which now has 2 LSOAs within the 10% most deprived LSOAs for IMD2019 when there were none in the IMD2015.

There has been a reduction in the number of LSOAs within the 10% most deprived within Dartford (-2) and Gravesham (-4). Sevenoaks, Tonbridge & Malling and Tunbridge Wells do not have any LSOAs within the 10% most deprived

Medway Unitary authority has also seen an increase in the number of LSOAs in the 10% most deprived LSOAs between IMD2015 and IMD2019.

Table 1: IMD2019 and IMD2015: Kent & Medway LSOAs within the top 10% most deprived in England

Authority	Total LSOAs in each Local Authority	Within the top 10% most deprived: IMD 2015		Within the top 10% most deprived: IMD 2019		2015 - 2019 Change
		Number	%	Number	%	Number of LSOAs
Kent	902	51	*6%*	51	*6%*	0
Thanet	84	18	*35%*	18	*35%*	0
Swale	85	14	*27%*	16	*31%*	2
Dover	67	4	*8%*	5	*10%*	1
Folkestone & Hythe	67	4	*8%*	4	*8%*	0
Canterbury	90	0	*0%*	2	*4%*	2
Gravesham	64	6	*12%*	2	*4%*	-4
Maidstone	95	2	*4%*	2	*4%*	0
Ashford	78	0	*0%*	1	*2%*	1
Dartford	58	3	*6%*	1	*2%*	-2
Sevenoaks	74	0	*0%*	0	*0%*	0
Tonbridge & Malling	72	0	*0%*	0	*0%*	0
Tunbridge Wells	68	0	*0%*	0	*0%*	0
Medway U.A.	163	12	*24%*	14	*27%*	2

Table ranked by highest number of LSOAs in top 10% most deprived by IMD2019 Score

* A minus change illustrates a reduction in the number of LSOAs within the 10% most deprived areas in England.

* A positive change illustrates an increase in the number of LSOAs within the 10% most deprived areas in England.

Source: The English Indices of Deprivation 2015 and 2019, Ministry of Housing, Communities and Local Government
Table presented by Strategic Commissioning - Analytics, Kent county Council

The change in numbers of LSOAs within each of the deciles does not identify which areas have improved or declined. Chart 2 presents the proportion of LSOAs that have remained within the same decile in IMD2019 as IMD2015.

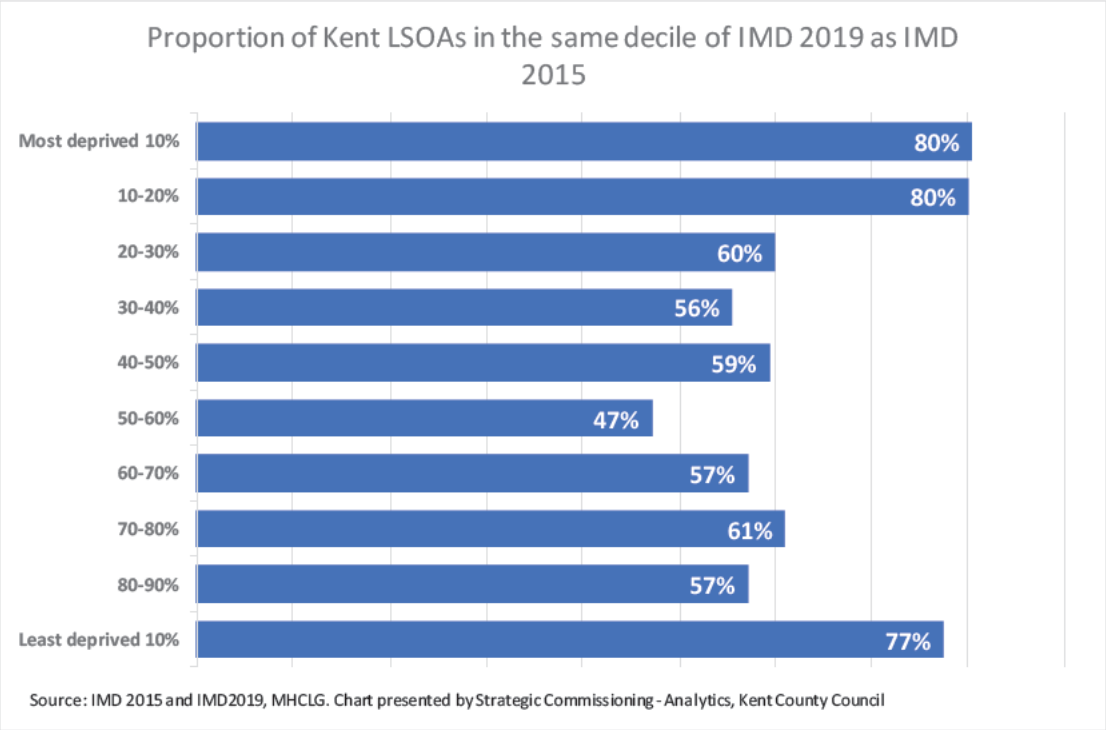
There are 901 LSOAs in Kent. A total of 555 LSOAs remained within the same decile for IMD2019 as they were in IMD2015. This accounts for 62% of all Kent LSOAs.

Of the 51 Kent LSOAs that were within the 10% most deprived LSOAs in England in 2019, 80% or 41 LSOAs remained in the 10% most deprived LSOAs for 2015. The same proportion of LSOAs were in the 10-20% most deprived in IMD2019 and IMD2015.

In contrast, only 77% of LSOAs within the least deprived 10% of LSOAs in 2019 were in the least deprived decile in 2015. This accounts for 72 LSOAs.

Only 57% of LSOAs within the 80-80% least deprived were in this decile for IMD2019 and IMD2015.

Chart 2: Proportion of Kent LSOAs in the same decile of the IMD 2019 and IMD2015



Maidstone has the highest number of LSOAs to remain in the same decile in IMD2019 as in IMD2015 with 62. This accounts for 65% of all LSOAs in Maidstone and is a higher percentage than for Kent as a whole.

Dartford has the lowest number and percentage of LSOAs to remain in the same decile in IMD2019 as in IMD2015 with 29. This accounts for 50% of all LSOAs in Dartford. Gravesham has the highest percentage of LSOAs to remain in the same decile in IMD2019 as in IMD2015 at 75%. This accounts for 48 LSOAs in Gravesham.

Table 2: LSOAs within the same deciles for IMD2015 as IMD2019

Authority	Total LSOAs in each Local Authority	LSOAs within the same decile in 2015 and 2019	
		Number	%
Kent	902	555	*62%*
Ashford	78	51	*65%*
Canterbury	90	51	*57%*
Dartford	58	29	*50%*
Dover	67	42	*63%*
Folkestone & Hythe	67	37	*55%*
Gravesham	64	48	*75%*
Maidstone	95	62	*65%*
Sevenoaks	74	48	*65%*
Swale	85	50	*59%*
Thanet	84	53	*63%*
Tonbridge & Malling	72	39	*54%*
Tunbridge Wells	68	45	*66%*
Medway U.A.	163	108	*66%*

Source: IMD2015 and IMD2019, MHCLG

Table presented by Strategic Commissioning - Analytics, Kent county Council

Of the 41 Kent LSOAs that remained in the 10% most deprived LSOAs for the IMD2015 and the IMD2019 the majority are in Thanet and Swale.

Thanet has the highest number of LSOAs to remain within the 10% most deprived decile in the IMD2015 and the IMD2015 with 16. This accounts for 19% of all LSOAs in Thanet.

Swale has the second highest number of LSOAs to remain within the 10% most deprived LSOAs for the IMD2015 and the IMD2019 with 14. This accounts for 16% of all LSOAs in Swale.

Ashford and Canterbury are the only local authorities to have LSOAs within the 10% most deprived decile of the IMD2019 when they had none in the IMD2015.

Sevenoaks, Tonbridge & Malling and Tunbridge Wells have no LSOAs within the 10% most deprived deciles of either the IMD2015 or the IMD2019.

Table 3: LSOAs within 10% most deprived deciles for IMD2015 and IMD2019

Authority	Total LSOAs in each Local Authority	LSOAs within 10% most deprived decile: IMD2015		LSOAs within 10% most deprived decile: IMD2019		LSOAs within 10% most deprived decile for both 2015 and 2019	
		Number	%	Number	%	Number	%
Kent	902	51	*6%*	51	*6%*	41	*5%*
Thanet	84	18	*21%*	18	*21%*	16	*19%*
Swale	85	14	*16%*	16	*19%*	14	*16%*
Dover	67	4	*6%*	5	*7%*	4	*6%*
Folkestone & Hythe	67	4	*6%*	4	*6%*	3	*4%*
Canterbury	90	0	*0%*	2	*2%*	0	*0%*
Gravesham	64	6	*9%*	2	*3%*	2	*3%*
Maidstone	95	2	*2%*	2	*2%*	1	*1%*
Ashford	78	0	*0%*	1	*1%*	0	*0%*
Dartford	58	3	*5%*	1	*2%*	1	*2%*
Sevenoaks	74	0	*0%*	0	*0%*	0	*0%*
Tonbridge & Malling	72	0	*0%*	0	*0%*	0	*0%*
Tunbridge Wells	68	0	*0%*	0	*0%*	0	*0%*
Medway U.A.	163	12	*7%*	14	*9%*	12	*7%*

Source: IMD2015 and IMD2019, MHCLG
Table presented by Strategic Commissioning - Analytics, Kent county Council

The 2019IMD has not been made available at ward level. However following guidance from MHCLG we have produced a separate ward level IMD2019 summary that is available in a separate document.

Table 4 and 4a indicates the wards in which the top 10% most deprived LSOAs in Kent are situated. This table also shows the national rank and Kent rank.

Table 4: The 10% most deprived LSOAs by IMD2019 in Kent: (Rank 1 to 45 out of 90)

2011 LSOA Name	2019 Ward Name	National rank			Kent Rank	
		position out of 32,844 LSOAs	Within top 10% most deprived 2019	Within top 10% most deprived 2015	Position out of 902 LSOAs	Within top 10% most deprived
Swale 001A	Sheerness	48	Yes	Yes	1	Yes
Thanet 003A	Margate Central	67	Yes	Yes	2	Yes
Thanet 001A	Cliftonville West	117	Yes	Yes	3	Yes
Thanet 001E	Margate Central	139	Yes	Yes	4	Yes
Thanet 013B	Newington	284	Yes	Yes	5	Yes
Swale 006A	Sheppey East	322	Yes	Yes	6	Yes
Swale 010C	Murston	337	Yes	Yes	7	Yes
Thanet 006D	Dane Valley	423	Yes	Yes	8	Yes
Swale 002C	Sheerness	457	Yes	Yes	9	Yes
Swale 006D	Sheppey East	591	Yes	Yes	10	Yes
Shepway 014A	Folkestone Harbour	614	Yes	Yes	11	Yes
Swale 002A	Sheerness	708	Yes	Yes	12	Yes
Swale 002B	Sheerness	771	Yes	Yes	13	Yes
Thanet 006E	Dane Valley	932	Yes	Yes	14	Yes
Thanet 013E	Northwood	933	Yes	Yes	15	Yes
Dover 011F	St Radigunds	994	Yes	Yes	16	Yes
Thanet 001B	Cliftonville West	1,033	Yes	Yes	17	Yes
Thanet 016D	Eastcliff	1,038	Yes	Yes	18	Yes
Swale 005C	Queenborough & Halfway	1,159	Yes	Yes	19	Yes
Swale 001B	Sheerness	1,205	Yes	Yes	20	Yes
Swale 004E	Sheppey Central	1,309	Yes	Yes	21	Yes
Thanet 001D	Cliftonville West	1,326	Yes	Yes	22	Yes
Shepway 003C	East Folkestone	1,356	Yes	Yes	23	Yes
Thanet 003E	Westbrook	1,563	Yes	Yes	24	Yes
Thanet 016E	Eastcliff	1,597	Yes	Yes	25	Yes
Swale 015D	Priory	1,639	Yes	Yes	26	Yes
Shepway 014B	Folkestone Central	1,761	Yes	Yes	27	Yes
Swale 001C	Sheerness	1,878	Yes	Yes	28	Yes
Dover 013B	Town & Castle	2,105	Yes	Yes	29	Yes
Dartford 001A	Temple Hill	2,133	Yes	Yes	30	Yes
Thanet 013A	Newington	2,242	Yes	Yes	31	Yes
Gravesham 001C	Northfleet North	2,278	Yes	Yes	32	Yes
Thanet 003D	Salmestone	2,342	Yes	Yes	33	Yes
Swale 002D	Sheerness	2,383	Yes	No	34	Yes
Swale 001D	Sheerness	2,411	Yes	Yes	35	Yes
Dover 011A	Buckland	2,450	Yes	No	36	Yes
Dover 012F	Town & Castle	2,473	Yes	Yes	37	Yes
Ashford 008C	Stanhope	2,474	Yes	No	38	Yes
Dover 011D	Whitfield	2,545	Yes	Yes	39	Yes
Thanet 005A	Garlinge	2,616	Yes	No	40	Yes
Thanet 004A	Cliftonville West	2,620	Yes	Yes	41	Yes
Gravesham 007A	Westcourt	2,760	Yes	Yes	42	Yes
Canterbury 001C	Heron	2,768	Yes	No	43	Yes
Maidstone 013A	Park Wood	2,915	Yes	Yes	44	Yes
Thanet 016C	Central Harbour	2,976	Yes	Yes	45	Yes

LSOAs were created in 2011 so LSOAs in Folkestone & Hythe Local Authority are still named Shepway
Source: English Indices of Deprivation 2019, Ministry of Housing, Communities and Local Government
A rank of 1 is the most deprived
Table presented by Strategic Commissioning - Analytics, Kent county Council

Table 4a: The 10% most deprived LSOAs by IMD2019 in Kent: (Rank 46 to 90 out of 90)

2011 LSOA Name	2019 Ward Name	National rank			Kent Rank	
		position out of 32,844 LSOAs	Within top 10% most deprived 2019	Within top 10% most deprived 2015	Position out of 902 LSOAs	Within top 10% most deprived
Shepway 003A	East Folkestone	3,047	Yes	No	46	Yes
Swale 010B	Milton Regis	3,069	Yes	No	47	Yes
Maidstone 013D	Shepway South	3,092	Yes	No	48	Yes
Canterbury 014B	Barton	3,152	Yes	No	49	Yes
Swale 006B	Sheppey East	3,175	Yes	Yes	50	Yes
Thanet 006C	Dane Valley	3,259	Yes	No	51	Yes
Thanet 015D	Eastcliff	3,342	No	Yes	52	Yes
Gravesham 002E	Riverside	3,550	No	Yes	53	Yes
Gravesham 011C	Singlewell	3,588	No	Yes	54	Yes
Maidstone 013E	Shepway South	3,643	No	No	55	Yes
Dover 013A	Town & Castle	3,655	No	No	56	Yes
Dartford 009A	Princes	3,657	No	No	57	Yes
Ashford 008B	Stanhope	3,686	No	No	58	Yes
Thanet 012C	Sir Moses Montefiore	3,690	No	No	59	Yes
Ashford 007F	Victoria	3,697	No	No	60	Yes
Thanet 003B	Margate Central	3,729	No	No	61	Yes
Canterbury 007B	Gorrell	3,794	No	No	62	Yes
Thanet 001C	Cliftonville West	3,804	No	Yes	63	Yes
Gravesham 002A	Central	3,918	No	Yes	64	Yes
Canterbury 009D	Seasalter	3,935	No	No	65	Yes
Canterbury 001B	Heron	3,976	No	No	66	Yes
Dartford 004C	Swanscombe	3,996	No	Yes	67	Yes
Canterbury 019A	Wincheap	4,014	No	No	68	Yes
Thanet 004B	Dane Valley	4,057	No	No	69	Yes
Maidstone 009C	High Street	4,066	No	No	70	Yes
Swale 014C	St Ann's	4,072	No	No	71	Yes
Shepway 014D	Folkestone Central	4,097	No	Yes	72	Yes
Shepway 004E	Folkestone Harbour	4,100	No	No	73	Yes
Gravesham 011D	Singlewell	4,102	No	Yes	74	Yes
Thanet 016B	Central Harbour	4,134	No	No	75	Yes
Dartford 001D	Temple Hill	4,208	No	Yes	76	Yes
Tonbridge & Malling 003A	East Malling	4,333	No	No	77	Yes
Maidstone 013B	Park Wood	4,406	No	Yes	78	Yes
Ashford 008A	Beaver	4,412	No	No	79	Yes
Sevenoaks 002A	Swanley St Mary's	4,465	No	No	80	Yes
Gravesham 003D	Riverside	4,535	No	No	81	Yes
Shepway 004B	East Folkestone	4,540	No	No	82	Yes
Swale 011D	Roman	4,579	No	No	83	Yes
Dover 006C	Aylesham, Eythorne & Shepherdswell	4,622	No	No	84	Yes
Shepway 014C	Folkestone Central	4,635	No	No	85	Yes
Swale 005B	Queenborough & Halfway	4,662	No	No	86	Yes
Dover 013E	Town & Castle	4,692	No	No	87	Yes
Thanet 013D	Northwood	4,709	No	No	88	Yes
Swale 003A	Minster Cliffs	4,759	No	No	89	Yes
Ashford 007B	Beaver	4,761	No	No	90	Yes

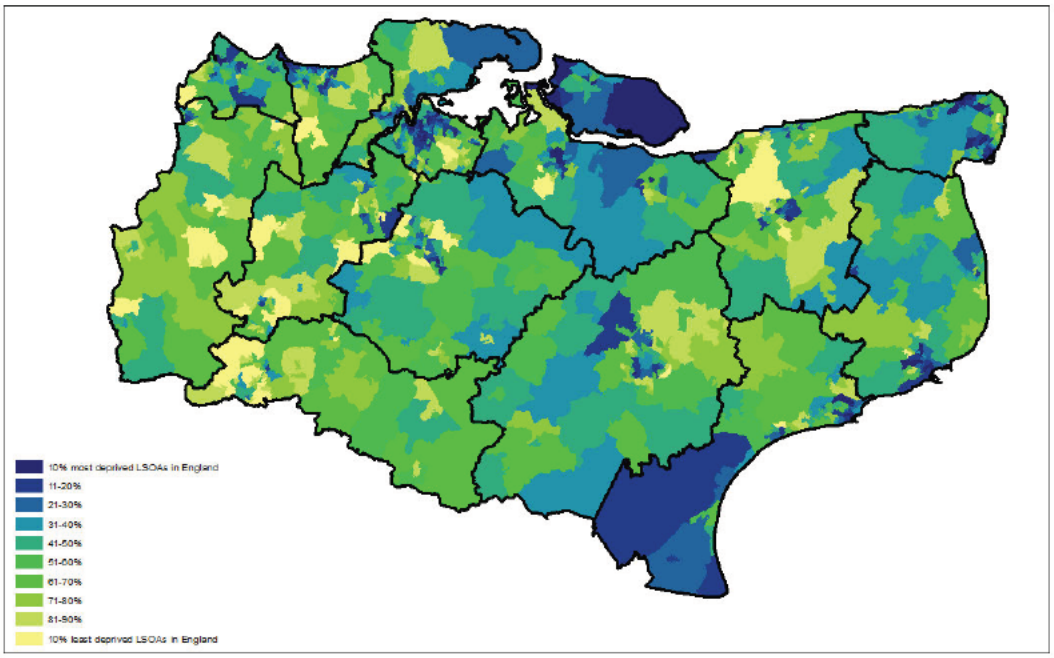
LSOAs were created in 2011 so LSOAs in Folkestone & Hythe Local Authority are still named Shepway
Source: English Indices of Deprivation 2019, Ministry of Housing, Communities and Local Government
A rank of 1 is the most deprived
Table presented by Strategic Commissioning - Analytics, Kent county Council

Map 1 illustrates the pattern of deprivation across Kent and Medway at LSOA level. the darker areas are the most deprived areas and lighter ones are the least deprived areas.

The map shows there is an east west divide with the east of the county having higher levels of deprivation than the west.

The highest levels of deprivation can be seen in both coastal regions and urban areas.

Indices of Deprivation 2019 (IoD2019): Overall IMD2019
National rank of Lower Super Output Areas in Kent & Medway



Source: The English Indices of Deprivation 2019 (IoD2019): The Ministry of Housing, Communities & Local Government (MHCLG)
Map produced by Strategic Commissioning - Analytics, Kent County Council © Crown Copyright and database right 2019, Ordnance Survey 100019238

IMD2019 Summary measures for areas larger than LSOAs

The pattern of deprivation across large areas can be complex. In some areas, deprivation is concentrated in pockets of LSOAs, rather than evenly spread throughout. In some other areas the opposite picture is seen, with deprivation spread relatively evenly throughout the area, and with no highly deprived areas.

The set of summary measures have been published to help understand deprivation patterns for local authorities. No single summary measure is the 'best' measure. Each one highlights different aspects of deprivation, and each lead to a different ranking of areas. Comparison of the different measures is needed to give a fuller description of deprivation in a large area. In addition, it is important to remember that the higher-area measures are summaries; the Lower-layer Super Output Area level data provides more detail than is available through the summaries.

- **Average rank:** Population weighted average of the combined ranks for the LSOAs in a local authority. The nature of this measure means that a highly polarised larger area would not tend to score highly, because extremely deprived and less deprived LSOAs will 'average out'. Conversely, a larger area that is more uniformly deprived will tend to score highly on the measure.

- **Average score:** Population weighted average of the combined scores for the LSOAs in a local authority. The main difference from the average rank measure described above is that more deprived LSOAs tend to have more 'extreme' scores than ranks. So highly deprived areas will not tend to average out to the same extent as when using ranks; highly polarised areas will therefore tend to score higher on the average score measure than on the average rank.

- **Proportion of Lower-layer Super Output Areas (LSOAs) in most deprived 10% nationally**. By contrast to the average rank and average score measures, this measure focuses only on the most deprived LSOAs.

- **Extent:** Proportion of a local authority's population living in the most deprived LSOAs in the country. The extent measure is a more sophisticated version of the proportion of LSOAs in the most deprived 10 per cent nationally measure, and is designed to avoid the sharp cut-off seen in that measure, whereby areas ranked only a single place outside the most deprived 10 per cent are not counted at all.

- **Local concentration:** Population weighted average of the ranks of local authority's most deprived LSOAs that contain exactly 10% of the larger area's population. Similar to the proportion of LSOAs in the most deprived 10 per cent nationally and extent measures, the local concentration measure is based on only the most deprived LSOAs in the larger area, rather than on all areas. By contrast to these measures however, the local concentration measure gives additional weight to very highly deprived areas.

IMD2019 Summary measures for Kent Local Authorities

Recent boundary changes in England mean that the number of lower-tier (district, borough and unitary) authorities reduced from 326 in 2015 to 317 in 2019. The MHCLG have released the IMD2015 summary measures for local authorities cast to 2019 boundaries which enables us to provide a comparison with IMD2019 summary measures at local authority level.

Six out of twelve local authorities in Kent saw an improvement in at least one of the summary measures for local authorities in the IMD2019.

There were no improvements in any of the summary measures in Ashford, Dover, Folkestone & Hythe, Maidstone, Swale and Tonbridge & Malling for IMD2019.

Even though Thanet has seen improvements in the national rankings in three of the five summary measures, Thanet remains ranked as the most deprived local authority in Kent in all of the summary measures for local authorities in the IMD2019.

Swale is ranked as the second most deprived local authority in Kent across all summary measures. Sevenoaks and Tunbridge Wells rank as the two least deprived local authorities.

It is important to remember that any change in ranking is relative to changes in all local authorities in England between IMD2015 and IMD 2019.

Table 5: Kent local authorities by national rank of IMD2019 and IMD2015 summary measures for local authorities

Local Authorities	IMD - Rank of average rank (National)			IMD - Rank of average score (National)			IMD - Rank of proportion of LSOAs in most deprived 10% nationally			IMD - Rank of extent (National)			IMD - Rank of Local concentration (National)		
	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change
Thanet	34	35	-1	30	28	2	37	35	2	42	44	-2	15	6	9
Swale	69	87	-18	56	77	-21	45	52	-7	81	91	-10	29	31	-2
Folkestone and Hythe	84	101	-17	90	110	-20	113	125	-12	99	123	-24	99	101	-2
Dover	107	113	-6	113	122	-9	102	125	-23	116	124	-8	109	124	-15
Gravesham	119	120	-1	123	120	3	146	89	57	112	116	-4	121	107	14
Dartford	145	167	-22	154	168	-14	170	131	39	163	168	-5	146	157	-11
Ashford	152	171	-19	158	174	-16	177	200	-23	155	167	-12	149	167	-18
Canterbury	185	182	3	179	181	-2	159	200	-41	158	165	-7	157	165	-8
Maidstone	188	203	-15	185	196	-11	161	168	-7	170	179	-9	166	171	-5
Tonbridge and Malling	236	269	-33	234	266	-32	195	200	-5	212	244	-32	210	244	-34
Sevenoaks	253	264	-11	251	260	-9	195	200	-5	228	222	6	244	234	10
Tunbridge Wells	273	271	2	274	274	0	195	200	-5	257	251	6	263	265	-2
Medway	98	117	-19	93	115	-22	93	109	-16	86	108	-22	86	104	-18

A negative change between 2015 and 2019 shows a rise in the rank therefore an increase in level of deprivation in relation to all other LAs

Kent Local Authorities ranked on 2019 rank of average rank

Source: English Indices of Deprivation 2019, MHCLG, Table presented by Strategic Commissioning - Analytics, Kent County Council

A rank of 1 is the most deprived

National rank is out of 317 local authorities

IMD2019 Summary measures for upper tier local authorities

Recent boundary changes in England mean that the number of upper-tier local authorities (counties and unitary authorities) reduced from 152 in 2015 to 151 in 2019. The MHCLG have not released the IMD2015 summary measures for upper-tier local authorities cast to 2019 boundaries. As a result, we cannot provide a direct comparison of Kent by national rank between IMD2015 and 2019IMD.

However, as with the LSOAs, we can compare the deprivation 'deciles' for upper-tier local authorities. Deciles have been calculated by ranking the summary measure scores of the 152 upper tier local authorities in IMD2015 and the 151 upper tier local authorities in IMD2019 areas in England from most deprived to least deprived and dividing them into 10 equal groups. These range from the most deprived 10 per cent of small areas nationally (decile 1) to the least deprived 10 per cent of small areas nationally (decile 10).

Table 6: Ranks and deciles of summary measures for Kent: IMD2019 and IMD2015

	IMD2019		IMD2015	
IMD2019 Summary measure for upper-tier lcoal authority	National Rank (out of 151 areas)	National Decile	National Rank (out of 152 areas)	National Decile
Rank of Average rank	95	7	104	7
Rank of Average score	93	7	100	7
Rank of proportion of LSOAs in most deprived 10% nationally	79	6	89	6
Extent	93	5	98	6
Local concentration	74	6	83	6

Source: English Indices of Deprivation 2019 MHCLG

Table presented by Strategic Commissioning - Analytics, Kent county Council

Kent has remained within the same national decile for IMD2019 as for IMD2015 for 4 of the 5 summary measures. Kent has moved up one decile on the extent measure which indicates that Kent is more deprived in this measure in 2019 than it was in 2015.

The number of local authorities within the South East region was not affected by the recent boundary changes therefore we are able to provide a comparison between the IMD2015 and IMD2019 based on the rankings of the 19 upper-tier local authorities within the South East region.

Kent is ranked within the least deprived 50% of upper-tier local authorities in England for 4 out of 5 summary measures of the IMD2019. A rank of 74 for the local concentration measure which puts Kent within the most deprived

50% of local authorities in England for this measure. Kent is ranked within the 50% most deprived areas within the South East on all summary measures.

Table 7: Kent local authorities by South East rank of IMD2019 and IMD2015 summary measures for upper-tier localauthorities

County / Unitary Authority	IMD - Rank of average rank (South East)			IMD - Rank of average score (South East)			IMD - Rank of proportion of LSOAs in most deprived 10% (South East)			IMD - Rank of extent (South East)			IMD - Rank of Local concentration (South East)		
	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change
Southampton	1	1	0	27	27	-0	1	1	0	1	1	0	2	2	0
Portsmouth	2	2	0	27	27	-0	2	2	0	2	2	0	1	1	0
Slough	3	3	0	23	23	0	13	13	0	10	10	0	10	5	5
Isle of Wight	4	4	0	23	23	0	9	8	1	5	5	0	8	4	4
Medway	**5**	**6**	**-1**	**24**	**22**	**2**	**4**	**4**	**0**	**3**	**4**	**-1**	**4**	**6**	**-2**
Brighton & Hove	6	5	1	21	23	-3	3	3	0	4	3	1	3	3	0
Reading	7	7	0	20	19	0	8	9	-1	8	9	-1	9	7	2
East Sussex	8	8	0	20	19	1	5	6	-1	6	8	-2	5	8	-3
Kent	**9**	**9**	**0**	**20**	**19**	**1**	**6**	**7**	**-1**	**7**	**7**	**0**	**6**	**9**	**-3**
Milton Keynes	10	10	0	18	18	-0	7	5	2	9	6	3	7	10	-3
West Sussex	11	11	0	14	14	0	10	11	-1	12	11	1	12	11	1
Hampshire	12	12	0	13	12	1	11	10	1	11	12	-1	11	12	-1
Oxfordshire	13	13	0	12	12	0	12	12	0	13	13	0	13	13	0
Bracknell Forest	14	14	0	10	10	-0	14	14	0	17	17	0	16	14	2
Buckinghamshire	15	16	-1	10	10	0	15	16	-1	16	14	2	15	16	-1
West Berkshire	16	15	1	10	10	-0	16	15	1	15	15	0	18	15	3
Surrey	17	17	0	10	9	1	17	17	0	14	16	-2	14	17	-3
Windsor & Maidenhead	18	18	0	8	9	-0	18	18	0	18	18	0	17	18	-1
Wokingham	19	19	0	6	6	0	19	19	0	19	19	0	19	19	0

A negative change between 2015 and 2019 shows a rise in the rank therefore an increase in level of deprivation in relation to all other LAs

Table sorted by rank of average rank

Source: English Indices of Deprivation 2019 MHCLG

Table presented by Strategic Commissioning - Analytics, Kent county Council

A rank of 1 is the most deprived (out of 19 counties and unitary authorities in the South East)

Conclusion

The IoD2019 have been produced using the same approach, structure and methodology used to create the previous IoD2015 (and the 2010, 2007 and 2004 versions). This allows some comparisons to be made over time between the IoD2019 and previous versions, but only in terms of comparing the **rankings** and **deciles** as determined at the relevant time point by each of the versions.

Just because the overall rank may or may not have changed between the Indices, it does not mean that there have been no changes to the level of deprivation in the area. For example, if the absolute levels of deprivation in all areas were increasing or decreasing at the same rate, the ranks would show no change.

Equally, when comparing the overall IMD, if improvements in one domain are offset by a decline in another domain, the overall IMD position may be about the same even if significant changes have occurred in these two underlying domains.

Public Health England

UCL Institute of Health Equity

Local action on health inequalities:

Increasing employment opportunities and improving workplace health



Health Equity Evidence Review 5: September 2014

About PHE

Public Health England's mission is to protect and improve the nation's health and to address inequalities through working with national and local government, the NHS, industry and the voluntary and community sector. PHE is an operationally autonomous executive agency of the Department of Health.

About the UCL Institute of Health Equity

The UCL Institute of Health Equity (IHE) is led by Professor Sir Michael Marmot and seeks to increase health equity through action on the social determinants of health, specifically in four areas: influencing global, national and local policies; advising on and learning from practice; building the evidence base; and capacity building. The Institute builds on previous work to tackle inequalities in health led by Professor Sir Michael Marmot and his team, including the 'Commission on Social Determinants of Health', 'Fair Society Healthy Lives' (The Marmot Review) and the 'Review of Social Determinants of Health and the Health Divide for the WHO European Region'. www.instituteofhealthequity.org

About this evidence review

This evidence review was commissioned by PHE and researched, analysed and written by the IHE. There are related evidence reviews available in this series. There is a companion summary briefing note available on this and other related topics from the same series. This review is intended primarily for directors of public health, public health teams and local authorities. This review and the accompanying briefing are part of a series commissioned by PHE to describe and demonstrate effective, practical local action on a range of social determinants of health.

This evidence review was written for IHE by Ellen Bloomer.

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Key messages

1. There is a social gradient in unemployment, with those in more disadvantaged socioeconomic positions more likely to be unemployed than those in more advantaged positions. Unemployed people have a greater risk of poor health than those in employment, contributing to health inequalities.[1 2]
2. The way work is organised and the work climate are contributory factors to the social gradient in health.[3] Lower paid workers with fewer skills or qualifications are more likely to experience poor psychosocial working conditions and worse health.[4-6]
3. There is evidence that psychosocial working conditions can be improved in a variety of ways, for example by increasing employee control over their work and allowing participation in decision-making, ensuring effective leadership and line management training, adoption of flexible working practices, and with interventions to reduce stress and improve mental health at work – leading causes of sickness absence. Measures to improve the quality of work and working conditions that focus more attention on workers in lower grade occupations may help to reduce inequalities in work-related health problems.
4. There is clear evidence that local authorities can work with employers to promote good work with many examples of good practice. Local authorities have a number of levers including provision of advice, enforcement of employer legal obligations, partnership working, incentivisation and accreditation, and contractual levers of procurement using the Social Value Act 2012.
5. Personalised, tailored support has been shown to be effective in supporting people with disabilities and long-term conditions into work or training. Local authorities can play a role in promoting and increasing employer awareness of national programmes, guidance and legislation on employment of disabled people and those with long-term or fluctuating health conditions. They may be able to influence provision of employment services by ensuring that employment service providers are members of health and wellbeing boards and take part in joint strategic needs assessments.
6. Poor working conditions are among the determinants of early retirement. Therefore, measures to improve working conditions, including those that aim to make conditions more suitable for older workers, are likely to increase the chances of retaining older staff. Approaches to consider include promotion of fair recruitment practices that encourage applications from older people, flexible working, phased retirement and flexible retirement options and training for managers on issues of age.

Introduction

The Marmot Review recognised the important role of good employment in improving health and reducing health inequalities: "Being without work is rarely good for one's health, but while 'good work' is linked to positive health outcomes, jobs that are insecure, low-paid and that fail to protect employees from stress and danger make people ill".[1]

This paper builds on that position and provides a summary of evidence on the effects of unemployment and poor working conditions on health and the unequal distribution of these effects. It then outlines the potential actions that can be taken in local areas around four specific topics:

- workplace interventions to improve health and wellbeing
- work with local employers to encourage, incentivise and enforce good quality work
- interventions to increase employment opportunities and retention for people with a long-term health condition or disability
- interventions to increase employment opportunities and retention for older people

Each section will explain how and why such interventions will contribute to reducing unemployment, improving working conditions and reducing health inequalities. Examples of effective interventions are provided and briefly assessed in each area. A large number of interventions have been implemented by employers and local and national government on these topic areas but the there is a lack of strong evaluation evidence on intervention impacts. Recommendations for further research are made in section 5.

This paper takes a 'social determinants' approach. People's health and social position are seen as shaped by, and related to, inequities in power, money and resources, and the conditions in which they are born, grow, live, work and age[7] – these are the sources of health inequalities that are seen in society. The purpose of this document is to show that taking action to increase employment opportunities and improve working conditions is possible and necessary – both for the benefits achieved by employers and business, and also as an important way to improve public health and reduce health inequalities.

This document is part of a collection of evidence reviews commissioned by Public Health England (PHE) and written by the UCL Institute of Health Equity. A corresponding short briefing on this topic is also available, as are additional evidence reviews: the reviews on young people not in employment, education and training (NEET), and on the increasing the number of people receiving a living wage are particularly complementary to this evidence review on employment.

Throughout the paper, we have highlighted certain evidence and resources in boxes such as this one. These are labelled in the following ways:

Intervention – an example of a strategy, programme or initiative, taken by a local area, organisation or national government, that it is felt may contribute to reducing health inequalities by acting on the social determinants of health. It has either been evaluated and shown to be effective, or is considered to be an example of promising action.

Key message(s) – summaries of the key findings or action proposed in this paper.

Key literature – summaries of academic studies or other reports which provide key information relevant to the chapter, often taking into account a range of different programmes or projects.

1. Key concepts used in this paper

In this report, we use several key concepts related to employment or an individual's position in the labour market.

1. People in **employment** are in paid work, whereas those who are **unemployed** are jobless but available to work, and are actively seeking employment.[8]
2. **Long-term unemployment** is defined as referring to people who have been unemployed for 12 months or more.[9]
3. **Economically inactive** people are out of work and not actively looking for work (for example, because they are a student or looking after the family/home).[10]
4. **Good work** is characterised by a living wage, having control over work, in-work development, flexibility, protection from adverse working conditions, ill health prevention and stress management strategies and support for sick and disabled people that facilitates a return to work.[1] Both the psychosocial and physical environments at work are important. The psychosocial work environment includes the organisation of work and the organisational culture; the attitudes, values, beliefs and practices that are demonstrated on a daily basis in the enterprise, and which affect the mental and physical wellbeing of employees. These are sometimes generally referred to as workplace stressors, which may cause emotional or mental stress to workers.[11]
5. **Disabled people** have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do day-to-day activities. The Equality Act 2010 defines 'long-term' as 12 months or more.[12]
6. A **long-term health condition** is a condition that cannot, at present, be cured but is controlled by medication and/or other treatment/therapies.[13]
7. **'Older people'** for the purposes of this report, refers to people aged over 65. However, some of the evidence presented in this report uses a different definition, and we specify where this is the case.

All of these concepts are related to and have a role in improving health and reducing health inequalities. Unemployed people and those experiencing poor working conditions have a greater risk of poor health than people not in those situations.[1 14] There is a social gradient in employment status and working conditions in England, with those in lower socio-economic groups at higher risk of unemployment and, if employed, of poor working conditions.[15] This will, in turn, result in a greater risk of poor physical and mental health for those lower on the social gradien.[16]

2. Employment and health inequalities

2.1: Unemployment and health inequalities

There is a social gradient in unemployment, with those in more disadvantaged socio-economic positions more likely to be unemployed. Unemployed people have a greater risk of poor health than those in employment, contributing to health inequalities.[1 2] Unemployment has been associated with an increased risk of mortality for all socio-economic groups and increased morbidity, including higher risks of limiting illness, cardiovascular disease, poor mental health, suicide and health damaging behaviours such as smoking (box 1).[14 15 17-23]

Research has shown that there are immediate health impacts as well as longer-term effects that progressively damage health over time.[1] Those who experience long-term unemployment experience the greatest health-adverse effects.[14] Re-employment can often improve health, though the health effects sometimes continue beyond the period of unemployment.[14 24]

Being in employment has health benefits:

- employment is generally the most important means of obtaining adequate economic resources, which are essential for material wellbeing and full participation in today's society
- work meets important psychosocial needs in societies where employment is the norm
- work is central to individual identity, social roles and social status
- employment and socio-economic status are the main drivers of social gradients in health[25]

Unemployment causes the loss of regular income. The material and psychosocial impacts of low income, outlined in the complementary evidence review on the living wage, may contribute to the link between unemployment and poor health. However, unemployment can cause additional psychological stressors related to status and self-esteem, identity and the loss of a core role in life, which impact on health.[26 27] Unemployment is also associated with unhealthy behaviours, including increased smoking and alcohol consumption and decreased physical exercise.[28]

Unemployment early in life can impact negatively on later employment opportunities and wages, while resultant health impacts such as depression may similarly increase chances of subsequent unemployment.[29 30] Further, unemployment can have effects beyond the individual directly affected, with evidence suggesting that financial difficulties or associated stress can increase the risk of poor mental health among the families of those unemployed.[31 32]

Box 1. Key literature: how much impact does unemployment have on health inequalities?

Individual studies have quantified the increased risk of unemployment on health and the increased health risks for those lower on the social gradient. These can help to provide a better understanding of the overall contribution of unemployment to health inequalities in England.

- unemployed people have a 20–25% higher mortality rate over the ten years following unemployment than employed people in the equivalent occupational group (UK Census)[14]
- unemployment was associated with a greater likelihood of limiting illness (hazard ratio [HR] = 2.41/2.06 for men/women) in the following year compared with those in employment, among a sample of people in good health at the beginning of the period, controlling for marital status, social class, employment status, income, and educational qualifications (British Household Panel Survey)[17]
- acute myocardial infarction (AMI) risks were significantly higher among the unemployed (HR = 1.35) and risks increased incrementally from one job loss (HR = 1.22) to four or more cumulative job losses (HR = 1.63) compared with no job loss. Risks for AMI were particularly elevated within the first year of unemployment (HR = 1.27) but not thereafter. Results were adjusted for multiple clinical, socio-economic and behavioural risk factors (US Health & Retirement Survey)[18]
- workers who had experienced involuntary job loss had a more than twofold increase in the risk of subsequent AMI (HR = 2.48) and stroke (HR = 2.43) relative to working persons, after controlling for established predictors of the outcomes (US Health & Retirement Survey)[19]
- unemployment[i] was associated on a 24-year follow-up, with a higher relative risk of mortality (relative risk [RR] = 1.3/1.4 for men/women), suicide (RR = 1/2.7 for men/women) and mortality by external undetermined causes (RR = 5.8/10.7 for men/women), adjusted for age, marital status, smoking status, alcohol consumption, use of tranquilizers/ sleeping pills, unstable/ extroverted personality, and long-lasting serious illness (Swedish Twin Registry)[21]
- unemployed people showed more distress than employed people (average overall effect size of d=0.51). The average number of people with psychological problems among the unemployed was 34%, compared with 16% among employed individuals (meta-analysis of 324 research studies)[20]

Economic activity among people with a disability or long-term condition

Studies show that workless individuals are more likely to have health problems compared with the general population, and this is likely to be attributable partly to the health effects of unemployment and partly to the reduced likelihood of people with a disability or long-term illness being in employment.[33 34] People with a disability or long-term health condition have far lower employment rates than other people and the numbers on economically inactive health-related benefits have risen considerably over the past 35 years (see section 3.2). It is estimated that the difference between the proportion of disabled people in work, and what that proportion would have been if those same people were not disabled after adjusting for qualifications and other demographic characteristics (the 'employment penalty') is around 40%.[34]

[i] In that study, unemployment was measured by asking a sample of people if they had ever been unemployed.

The negative impacts of long-term health conditions on employment are greater among those in more disadvantaged socio-economic groups compared with those in more advantaged groups. One research study found that those in non-manual occupations are more likely than manual workers to remain in work if they have a limiting illness.[35] This is likely to contribute further to the social gradient in health.

Those with a long-term health condition or disability already experience worse health than the general population, and being unemployed can cause further health deterioration, as it takes away the protective health effects of good employment. Many of these mechanisms through which unemployment negatively impacts on health may also hold true for those people with a disability or long-term health condition who are economically inactive. Individuals in families with disabled members are more likely to be in poverty: 19% of individuals in families with at least one disabled member live in relative income poverty before housing costs, compared with 15% of individuals in families with no disabled member.[36]

There are many people living with a disability or long-term condition who are unable to work and it is important that they continue to receive the necessary support to live a healthy life. Dame Carol Black's report, 'Working for a healthier tomorrow', highlighted the need for changing perspectives on health and work: that it is not necessary to be 100% fit to be at work, and that for many, work can be beneficial for recovery from illness.[37] Section 4.3 discusses how local areas can support these people into employment.

2.2: Working conditions and health inequalities

Working conditions can impact health in a number of ways. Physical, chemical or ergonomic hazards in the workplace, such as solvents, pesticides, asbestos, noise, radiation, vibration, repetition and heavy lifting, can result in a range of diseases and injuries including lung fibrosis, neuropathy, deafness, organ damage, and cancers, among those who are exposed.[38]

The psychosocial working environment includes "the organisation of work and the organisational culture; the attitudes, values, beliefs and practices that are demonstrated on a daily basis in the enterprise, and which affect the mental and physical wellbeing of employees [… and] which may cause emotional or mental stress to workers".[11]

The link between a poor psychosocial work environment and health has been explained primarily by two models: the 'demand-control model' and 'effort–reward imbalance'.[15] The former explains that stress is caused in jobs with high employer demands combined with low employee control over their work because they limit control while generating continued pressure.[16 39 40] Having a low level of social support at work has been suggested to further increase this work stress.[41] The second model suggests that if employee effort is not matched by reward by the employer (such as money, esteem and career opportunities), this can cause stress and increase the risk of poor employee health if the employee has no alternative choice in the labour market.[15]

High demand combined with low control and/or effort–reward imbalance at work are associated with higher risks of fatal or non-fatal cardiovascular events and cardiovascular risk factors such as metabolic syndrome, type 2 diabetes, hypertension and obesity, health-damaging behaviours, depression, reduced physical and mental functioning, musculoskeletal disorders and sickness absence.[15] In jobs which combine the two models, with low control, low reward and high demand, the likelihood of poor health increases to an even greater extent.[42]

'Organisational injustice', whereby decision-making processes and treatment of employees are perceived to be unfair, may provide a further explanation of the link between psychosocial working conditions and employee health.[15] Organisational injustice is associated with several prevalent chronic diseases, including an increased cardiovascular risk.[43 44]

The level of job security afforded by an employment contract can affect health. A study of manual workers in Spain showed that mental health was better among those with a permanent contract compared with those on a temporary contract, with both groups experiencing better mental health than workers with no contract.[45] Temporary and other non-standard contracts can create significant insecurity for those who would prefer a permanent work arrangement. Temporary work arrangements have been associated with health problems including poor self-perceived health, liver disease, mental disorders, absenteeism, stress and alcohol- and smoking-related deaths.[45-54]

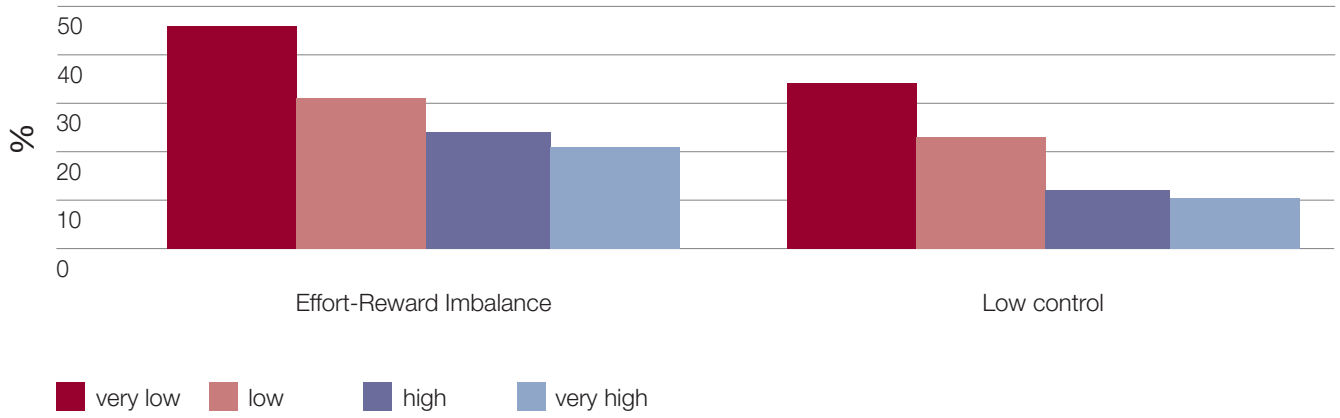
In one study, temporary workers who were dissatisfied with the insecure work situation or who took on temporary work involuntarily were found to have a much higher risk of mortality compared with permanent employees.[55]

Long or irregular working hours or shift work can affect health. Working more than 11 hours a day is associated with an increased risk of myocardial infarction and type 2 diabetes.[56-58] Shift workers have a higher risk of cardiovascular disease, metabolic syndrome and accidents than daytime workers, particularly for those who have been shift workers for longer.[59-66] Night shifts have been linked with more work accidents, cardiovascular and gastro-intestinal problems and eventually cancer.[67]

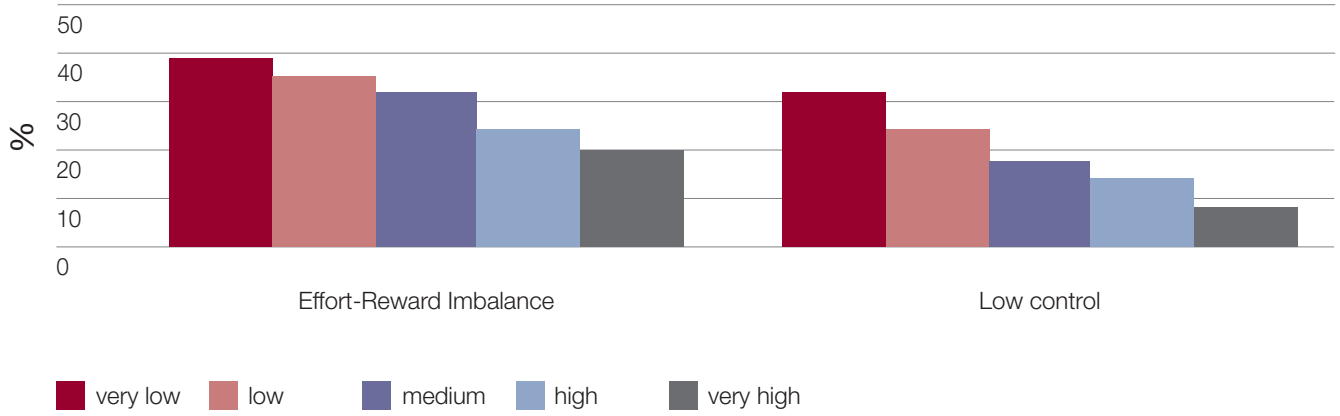
Inequalities are evident in poor working conditions. Research has shown that workers with fewer skills and qualifications are more likely to experience hazardous physical, chemical, ergonomic and psychosocial working conditions, as well as worse self-reported health and a large number of health outcomes than people who are more skilled/qualified.[4-6] There is a social gradient in psychosocial working conditions, as shown in figure 1. Those lower on the socio-economic scale are more likely to work in 'precarious' jobs, defined by a lack of safety at work, and exposure to multiple stressors including strenuous tasks with low control, low wage and high job instability.[68 69]

The Whitehall Studies compared health data of people employed at different levels in the British Civil Service and found that there was a social gradient in mortality and a range of diseases, including heart disease, some cancers, chronic lung disease, gastrointestinal disease, depression, suicide, sickness absence, back pain and general feelings of ill-health.[70] The Whitehall II study showed that the way work is organised and the work climate (eg, monotonous work characterised by low control and low satisfaction) are contributing factors to the social gradient in health.[3]

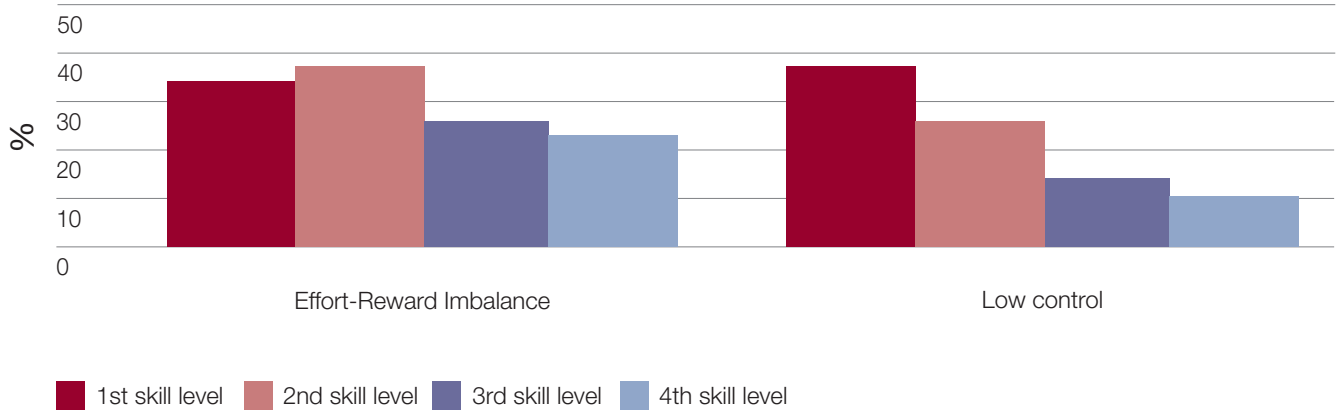
Occupational Class



Occupational Status



Skill Level



Source:71

Box 2. Key literature: how much impact do working conditions have on health and health inequalities?

1. Individual studies have quantified the increased risk of poor working conditions on health and the increased risks for those lower on the social gradient. These can help to gain a better understanding of the overall contribution of poor working conditions to health inequalities in England
2. One survey found that the most consistent predictors of back pain[ii] were decision control (lowest odds ratio [OR] = 0.68), empowering leadership (lowest OR = 0.59) and fair leadership (lowest OR = 0.54), after adjustment for age, sex, skill level, back pain severity and other potential confounders (survey of employees from 28 organisations in Norway)[72]
3. Temporary employees who felt their insecure situation was unsatisfactory had a 1.95-fold higher risk of mortality than permanent employees after adjusting for background, health- and work-related factors. Employees with a temporary job on an involuntarily basis had a 2.59-fold higher risk of mortality than permanent employees (survey of Finnish employees and register-based follow-up data)[55]
4. A greater proportion of those of a lower occupational class experienced poor psychosocial working conditions:
    - the proportion experiencing effort–reward imbalance was 21.1% among those with 'very high' occupational class, 23.0% among those with 'high' occupational class, 29.2% among those with 'low' occupational class and 44.5% among those with 'very low' occupational class
    - the proportion experiencing low control was 9.3% of those with 'very high' occupational class, 12.0% of those with 'high' occupational class, 19.6% of those with 'low' occupational class and 32.3% of those with 'very low' occupational class (Survey of Health, Ageing and Retirement in Europe)[71]

[i] Out of 14 psychological/social and two mechanical exposures measured.

3. Scale of the problem

3.1 Employment and unemployment

Unemployment has been high in recent years during and in the aftermath of the 2008-09 and 2011-12 recessions, as shown in figure 2. Increasing employment is a key priority for local areas.

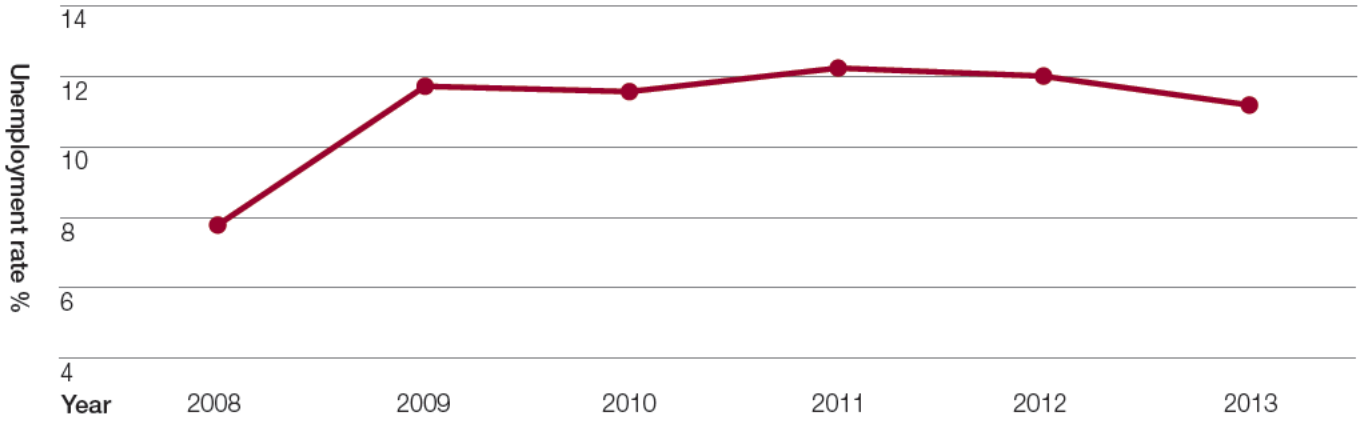


Figure 2. Working-age unemployment rate in England, 2008–13
Source:73

There are many others in employment not working sufficient hours for an adequate income. In 2012, 10.5% of adult workers in the UK (3.05 million people) wanted to work more hours, rising to around a quarter of part-time workers.[74] From 2008–12 the number of all workers who wanted to work more hours increased by one million (or 47.3%).[74]

Changes to the welfare system aim to make work pay for the majority, and if successful may move people from benefits into employment. However, as yet these changes have not been fully implemented and there is no satisfactory evidence of success.

There are particular challenges facing different age groups, notably young adults, who are discussed in the complementary evidence review on NEETs. There are also demographic changes in the UK resulting in an ageing population, with impacts on the make-up of the working population. The proportion of older workers aged 55 and above planning to work beyond the state pension age is 54%, according to a recent survey.[75] By 2020, 36% of the working population will be over 50.[76] This is causing the government to give greater consideration to how to retain these older people in the workforce, particularly given the increasing likelihood of disability and long-term illness in older age groups.

3.2 Employment and disability or long-term health conditions

There are 11.5 million working-age people in Britain with a long-term health condition, with 6.5 million classified as disabled.[77] Around one-quarter of the 28 million workers in Britain have a long-term health condition or impairment but people with a disability or long-term health condition have far lower employment rates than other people, as shown in figure 3.[77 78]

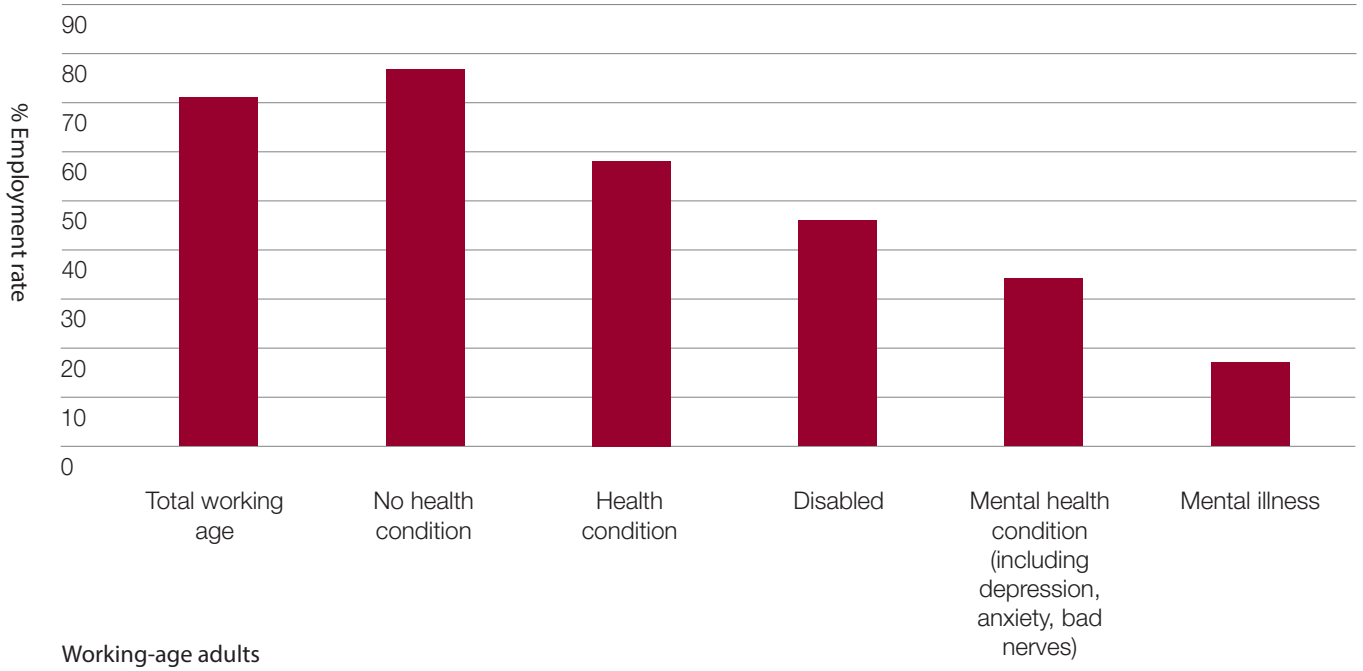


Figure 3. Employment rates of people in the working-age population, Great Britain, Q2 2013
Source:78

This graph reflects the exceptionally low rates of employment among those with mental health problems, also leading causes of sickness absence in the UK. The employment rate for all people with mental health problems is 37%, compared with 45% of disabled people, 58% of the population with a long-term health condition and 71% of the working-age population as a whole.[77] The estimated cost of mental health problems to the economy is £30-£40 billion, arising from lost production from people with mental health problems, the costs of informal care, and NHS costs.[77]

It is estimated that the difference between the proportion of disabled people in work, and what that proportion would have been if those same people were not disabled after adjusting for qualifications and other demographic characteristics (the 'employment penalty'), is around 40%.[34] Further, mean hourly wages for British working-age adults were £12.30 for disabled people compared with £13.49 for non-disabled people in Q2 2013.[79]

Figure 4 shows that around half of the population develop a disability before the age of 65. Disability at a younger age is more common among those living in more disadvantaged neighbourhoods reflecting the impact of social disadvantage on health and disability.

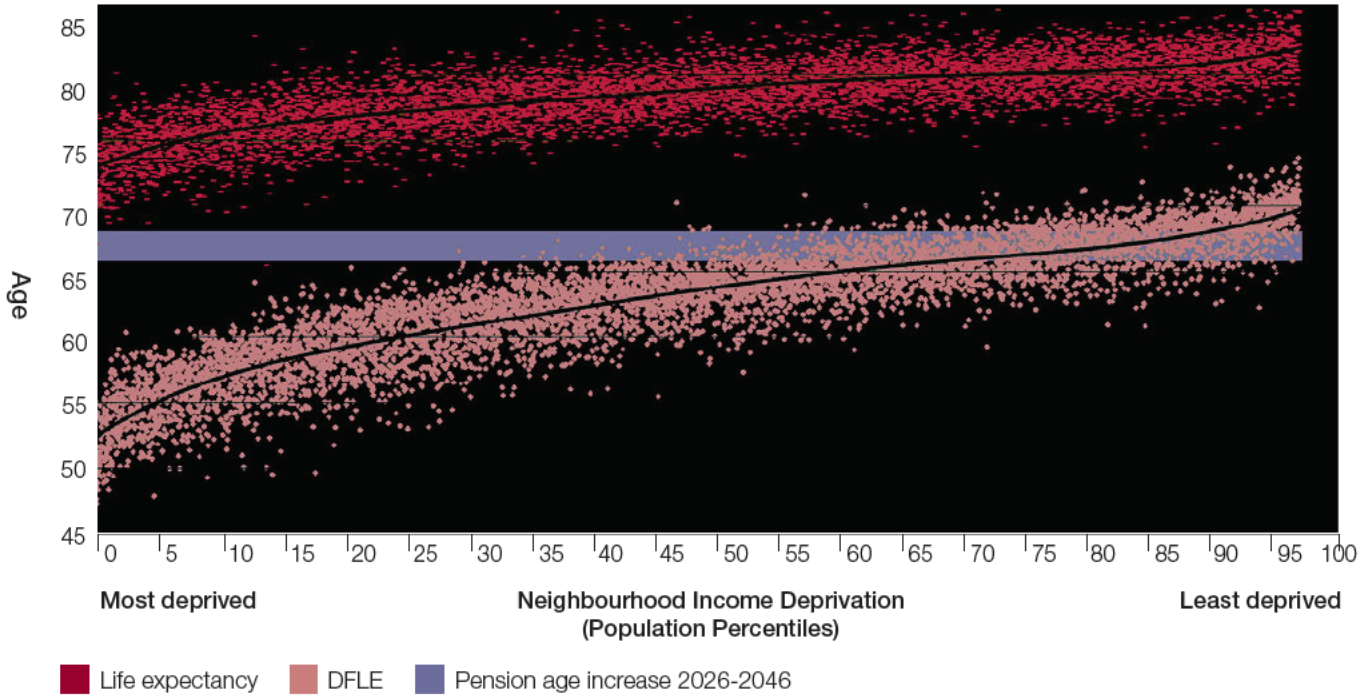


Figure 4. Life expectancy and disability-free life expectancy (DFLE) at birth, persons by neighbourhood income level, England, 1999–2003
Source:[1]

Aside from the disadvantages experienced by disabled people and people with health conditions on out-of-work benefits, the large numbers of people in this position place a large burden on the social welfare system. In August 2013 there were 2.4 million people of working-age in England claiming incapacity-related benefits, representing 6.1% of the working-age population.[80] Figure 5 shows that there was a considerable increase in the late 1980s and early 1990s.

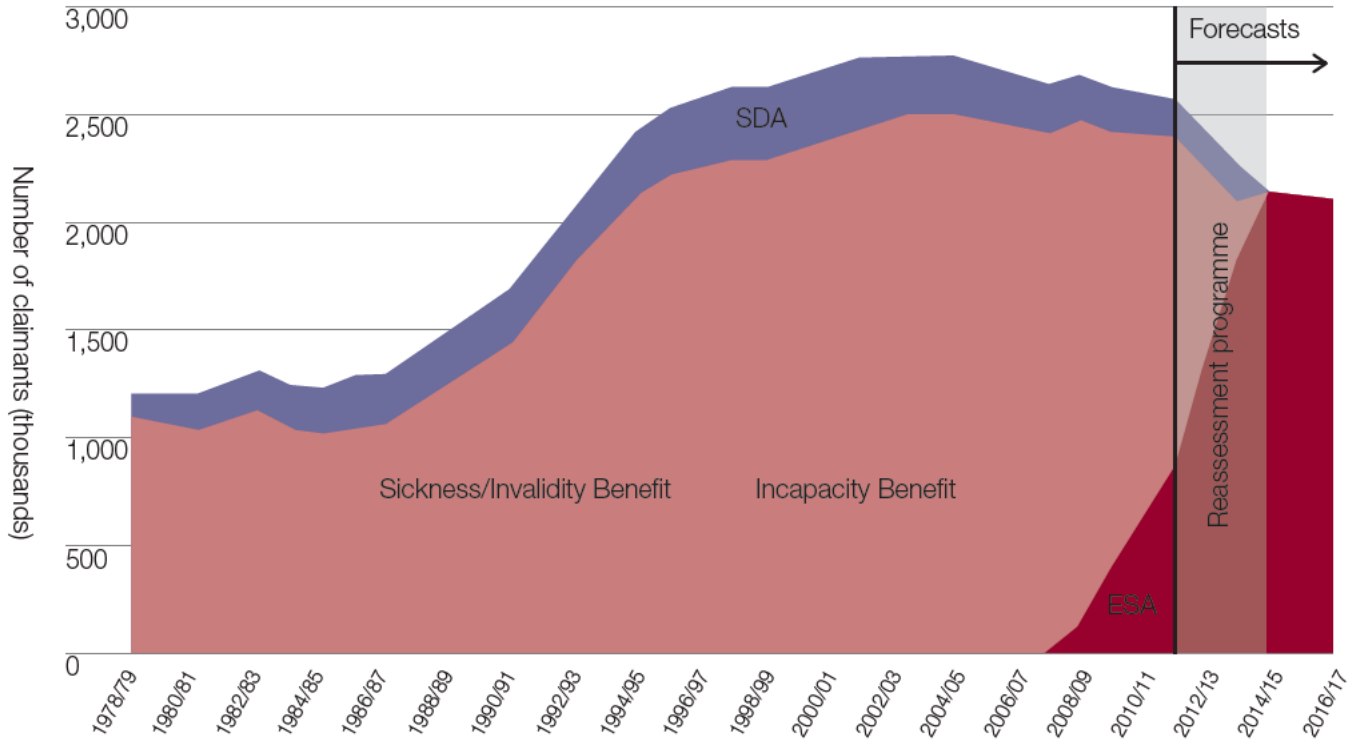


Figure 5. Working-age claimants of Employment and Support Allowance (ESA) and predecessor incapacity benefits, Great Britain, 1978 to present day
Source:81

The government predicts that the reassessment of those receiving incapacity-related benefits, due to recent national policy changes, will move more people into employment and reduce the numbers receiving incapacity benefits, as shown in figure 5.

3.3 Job security

Around a third of temporary employees reported in 2011 that they were working as a temporary employee because they could not find a permanent job.[82] Between December 2010 and December 2012 the number of involuntary temporary workers had more than doubled to 655,000.[83]

The Skills and Employment Survey, 2012, found that 52% of employees reported anxiety about loss of job status, while 11% were very insecure, believing their chances of losing their job were evens or worse, and this proportion had risen from 7% in 2006; 31% of employees were anxious about unfair treatment at work and this had increased since 2000, particularly in relation to fear of arbitrary dismissal.[84]

The Office for National Statistics (ONS) has estimated that there were 583,000 people on zero-hours contracts[iii] in Great Britain from October-December 2013.[85] This is more than twice the number of people who reported in the same period in 2012 (250,000), and almost four times the number in 2008 (143,000).[85 86] Just over a third of these people want more hours, with most

[iii] As Section 2 of the government's consultation on zero-hours contracts sets out: "In general terms, a zero-hours contract is an employment contract in which an employer does not guarantee the individual any work and the individual is not obliged to accept any work offered."

wanting them in their current job.[85] The Chartered Institute of Personnel and Development (CIPD) collected information from 1,000 businesses in 2013 and estimated that around one million people, or about 3% of the workforce, were on zero-hours contracts, almost double the ONS estimate, though the CIPD used a slightly different definition.[85]

3.4 Workplace health

Across Britain, around 646,000 workers had an accident at work in 2012-13.[87] This included 19,707 major injuries to employees, while 148 were fatally injured.[87] There were 428,000 cases of work-related stress in 2011-12.[88] Though the number of self-reported workplace injuries has fallen substantially over the last decade, work-related stress has remained broadly similar.[87 88]

Every year, around 140 million working days are lost to sickness absence (this equates to 2.2% of all working time, or 4.9 days for each worker each year) and over 300,000 people fall out of work onto health-related benefits.[89] Around 27 million of the days lost to sickness absence in 2011-12 were work-related, with 10.4 million days lost to work-related stress, depression or anxiety.[90]

Common mental health problems are a leading cause of sickness absence and claims to health-related benefits. 44% of individuals claiming Employment and Support Allowance (ESA) report a mental health problem and 23% of Jobseeker's Allowance (JSA) claimants have a common mental health problem.[77]

There are considerable economic costs to employers, employees, the state and healthcare system of unemployment and ill-health. An independent review of health and work in 2008 estimated that the total economic costs of sickness absence and worklessness associated with working-age ill health, to industries, employers, NHS, government and the economy as a whole, is over £100 billion a year.[37] A national review of sickness absence calculated that employers pay £9 billion a year in sick pay and associated costs, while the state spends £13 billion a year on health-related benefits.[89]

4. What works to increase employment and improve working conditions

Employment is a priority area for local authority action following the economic downturn which began in 2008. Local authorities play several roles, including employer and service commissioner. There are around 2.4 million people employed by local government across the UK,[91] and they involve large numbers of people through procurement and have a further role in supporting and regulating local employment.

Section 3 identified that unemployment and poor working conditions have negative health impacts and increase health inequalities, whereas good quality, secure employment can have positive health effects and can reduce health inequalities if implemented effectively.

The remainder of this report is organised in four sections, each of which looks specifically at one of the following areas for local authority intervention:

- workplace interventions to improve health and wellbeing
- working with local employers to encourage, incentivise and enforce good quality work
- interventions to increase employment opportunities and retention for those with a long-term illness or disability
- interventions to increase employment opportunities and retention for older people

In each section we present information about effectiveness of interventions with the particular aim in mind of improving health and reducing health inequalities in general. We then identify a range of specific interventions, primarily from across the UK, that have been effective in improving employment, health and health equity outcomes. Four separate briefings have been provided on these topics.

There is activity in these areas at national level, in terms of policy, legislation, guidance, programmes and interventions to improve health and wellbeing at work. This includes the cross-government health, work and wellbeing Initiative, which aims to improve the general health and wellbeing of the working-age population and support more people with health conditions to stay in work or enter employment; Dame Carol Black's review of the health and the working age population 'Working for a healthier tomorrow'; her subsequent work with David Frost on an independent review of sickness absence; and the resultant implementation of recommendations arising from each review.[37 89 92] This national government activity, which is wider than the subjects covered by this report, provides valuable evidence, guidance and recommendations for developing workplace health interventions and good employment practices.

It should be noted that this is not an exhaustive list of areas for intervention within the topic of employment. Other areas for future review include interventions to get long-term unemployed people into work, attracting employers and creating good quality jobs for local people, and improving job security.

4.1: Workplace interventions to improve health and wellbeing

Box 3. Key messages: what works to improve psychosocial working conditions?

Psychosocial working conditions can be improved in a variety of ways, including through:

- greater employee control over their work
- greater employee participation in decision-making
- line management training
- effective leadership and good relationships between leaders and their employees
- engaging employees, ensuring they are committed to the organisation's goals and motivated to contribute to its success
- providing employees with the in-work training and development they need to develop job satisfaction
- providing greater flexibility within a role to increase an employee's sense of control and allow them to improve their work–life balance
- reducing stress and improving mental health at work as these are leading causes of sickness absence
- addressing the effort–reward imbalance

Local authorities and other local employers can adapt many of the existing actions identified in this section for implementation.

It is important that employers ensure interventions are available to everyone, that all employees are made aware of the opportunities through effective communications and that all employees are considered during the design of the intervention. This is particularly true for those in semi-skilled and unskilled manual jobs and temporary or fixed-term workers.

Why implement workplace interventions to improve health and wellbeing?

There are many examples of successful workplace health and wellbeing interventions that also report business benefits, including reduced sickness absence, improved staff wellbeing and morale and increased productivity and performance, to varying degrees of reliability.[93 94] A majority of these programmes encourage behaviour change, implementing programmes to encourage healthy eating, physical exercise, smoking cessation and stress management (for examples, see[95]). Such programmes have been found to return £2–£10 for every £1 spent.[96] Others address physical, chemical and ergonomic hazards in the workplace, either through implementing legislation and guidance in this area, or interventions to address musculoskeletal problems.

However, to reduce health inequalities and effectively improve health and wellbeing in the workplace, health and wellbeing programmes should extend beyond improving healthy behaviours and physical hazards to improving the psychosocial work environment. Both the physical and the psychosocial aspects of the work environment are critical, yet this report focuses on the psychosocial environment as there is less understanding in this area. Section 2.2 explains the mechanisms through which a good psychosocial work environment can improve health and reduce health inequalities.

At a practical level, there are many ways through which to tap into these mechanisms and improve health and wellbeing among employees, reduce health inequalities and improve the psychosocial work environment. As reflected in the Marmot Review's definition of good work, increasing employee control over work, in-work development opportunities, flexible working arrangements, and protection from adverse working conditions, are also important features, alongside ill-health prevention and stress management strategies.[1] Local authorities might choose to implement interventions such as those in the next section to improve the health and wellbeing of their own staff, or work to increase their uptake among other local employers (suggestions of how the latter can be achieved can be found in section 4.2).

Interventions to improve psychosocial working conditions, health and wellbeing

Job control and employee participation

Control and autonomy over work and life outside of work contribute to good health. Those lower on the socio-economic scale are more likely to lack autonomy in both their work and home life, and this impacts on their health and wellbeing. Systematic reviews of the health effects of improvements to the psychosocial work environment have found that interventions increasing participants' job control and degree of autonomy at work produced fairly consistent results showing positive effects on mental health and sickness absence.[97] Box 4 illustrates that allowing employees of an engineering consultancy autonomy over their work and involving employees in company decision-making can have business benefits.

Box 4. Intervention: staff participation and control – Expedition Engineering[98]

Who? Expedition Engineering is an engineering and design consultancy.

Description: staff were involved in company decision-making, encouraged to manage their own workload, work from home and produce new ideas for the company in dedicated 'thinking' space. Staff were offered a menu of benefits to choose from to suit their needs, such as travel card or bicycle loans, private health insurance or gym membership. They introduced the 'Tenth Day' scheme, whereby staff had every tenth working day off. A welfare policy, stress policy and parental policy embed these practical benefits in the business strategy of the company.

Impact: the company enjoys minimal staff turnover and strong loyalty from customers, which it ascribes to its high levels of staff wellbeing. The company has seen clear business benefits.

Increasing staff participation and involvement in an organisation are likely to have a positive impact on health and wellbeing: a systematic review found workplace interventions characterised by a participatory approach involving employee representatives and management personnel worked well, with 'health circles' (staff meetings to discuss ways to improve the work environment) appearing to improve workers' health and wellbeing and reduce sickness absence.[99] Interventions in Middlesbrough (box 5) and by Axiom Housing Association (box 6) also take a participatory approach, involving staff and gaining positive health and business results.

Box 5. Intervention: a participatory approach to staff wellbeing – Middlesbrough Environment City[100]

Who and why? Middlesbrough Environment City (MEC) is a small charity with 18 employees who were given advice and support by their local authority to implement a health and wellbeing programme.

Description: to identify issues to be addressed, MEC used health assessment questionnaires, involving staff in the formation of the programme. Initiatives included family days, health walks, team-building days, free fresh fruit, supplying bicycles, health assessments, discounted gym schemes, men's health activities and tackling depression.
Each staff member received a personal health budget of £100 to improve health and wellbeing at work, giving them a sense of control. Managers visited staff at home when they were ill and, if possible, took them out for lunch. One manager completed the mental health first aid certificate to help deal with any future mental health issues. MEC has accommodated the needs of a staff member with multiple caring responsibilities to take additional ad hoc time off without her losing holiday entitlement, to ensure it is as stress-free as possible. The team-building exercises improved morale and developed closer working relationships. The family days enabled staff to understand the effect of work pressures on colleagues' home life.

Impact: the annual sickness rate per employee reduced from 4.25 days to 2.4 days. The charity achieved the gold standard of the better health at work award in November 2011 and their health and wellbeing programme has been used as a case study by the Department for Work and Pensions.

Effective leadership and line management training

Effective leadership and line management were further features of the MEC intervention (box 5). Line management training has been emphasised as an important intervention to improve workplace health and wellbeing. Line managers have a key role in improving workplace health and wellbeing. Good line management focuses on effective and open communication with employees, ability to identify and support people with health conditions and recognise early signs of mental health problems, an understanding that the health and wellbeing of employees is their responsibility, and adapting working practices or job roles where necessary.[37] Effective line management can lead to improved health, wellbeing and improved performance, and the reverse can be true of bad management.[37]

Senior management support and leadership are important for the success of interventions. A 2010 systematic review of empirical research found that leader behaviours (such as support or empowerment), the relationship between leaders and their employees and specific leadership styles were all associated with employee stress and wellbeing.[101] However, the processes linking leaders with employee stress remain unclear and more research is needed for a better understanding.[101] Axiom Housing Association is an example of an organisation that has used a participatory approach to leadership and management, empowering a staff consultative group as part of its overall strategy to improve health and wellbeing (box 6).

Box 6. Intervention: effective management in health and wellbeing – Axiom[102-104]

Who? Axiom Housing Association is a not-for-profit organisation that provides affordable mixed-tenure housing to over 5,000 people and employs around 170 staff.

Description: the organisation has a health and wellbeing programme involving staff-led team building days, an annual family sports day, training sessions, health checks and a reward and recognition programme. It has corporate targets and clear policies for managing sickness absence, with a focus on working with the employees to get them back to work as quickly as possible.

The staff consultative group is empowered to manage health and wellbeing programme initiatives, rather than taking a top-down approach of managing through corporate leadership. However, it still has the crucial leadership buy-in. Axiom found that the initiatives have more success if led by middle management, where staff engage 'horizontally' across 24 locations. Peer-to-peer management of projects and activities have been successful and are more likely to be sustained. Axiom has invested considerable time and resources into the staff consultative group and as a result it is a powerful body, with the position of chair now seen as a prestigious role within the organisation. Any HR matter is taken to the group first and they have representatives at the personnel committee. Here, they have the right to ask the executive to leave the room at any time if they wish to speak to the employee alone.

Impact: this management approach and health and wellbeing programme have had positive results. Annual sickness levels fell from around 13 days to 6.2 days per person between 2010 and March 2014. Axiom was awarded the Investors in People gold award (which looks at how employers work with, reward and develop their staff) and was listed as a Sunday Times Top 100 Employer in the not-for-profit sector in 2013.

Cost-benefit: the small budget for health and wellbeing is more than covered by the savings from reduced sickness absence.

Employee engagement

Employee engagement is, "a workplace approach designed to ensure that employees are committed to their organisation's goals and values, motivated to contribute to organisational success, and are able at the same time to enhance their own sense of wellbeing".[105] Employee engagement has been associated with business benefits including reduced sickness absence, and there are indications that work is more effective at improving health and wellbeing among more engaged employees. Evidence from the Sunday Times' 'Best Companies to work for in the UK' shows that companies who have higher levels of staff engagement (as measured by looking at parameters such as employee wellbeing, line management and team-working) have 13% lower staff turnover, less than half the sickness absence of the UK average, and on the stock market they have consistently out-performed the FTSE 100.[37] One estimate cited by Engaging for Success (box 7) suggests that engaged employees in the UK take an average of 2.69 sick days per year, whereas the disengaged take 6.19.[105] The Gallup Management Journal Employee Engagement Index survey of American employees found that among engaged employees, 62% feel their work lives positively affect their physical health, falling to 39% among not-engaged employees and 22%

among actively disengaged employees. In terms of mental health, 78% of engaged employees, 48% of not-engaged employees and 15% of actively disengaged employees feel their work lives benefit them psychologically.[106]

Engage for Success is a movement supported by organisations and individuals in the public, private and third sectors, committed to growing awareness about the power and potential of employee engagement, inspiring action among individuals and organisations. In 2008, the then Secretary of State for Business asked Engage for Success to report on the potential benefits of employee engagement for companies, organisations and individual employees. The report, Engaging for Success (the MacLeod Report), found extensive evidence of business benefits including reduced sickness absence, lower staff turnover and increased productivity and performance.[105] The report identified a number of drivers behind a successful engagement approach, outlined in box 7.

Box 7. Key literature: Engaging for Success: the drivers behind a successful engagement approach[105]

Engaging for Success (the MacLeod Report) was published in 2009. The report identified a number of drivers behind a successful engagement approach, and these were found to include:

- leadership which ensures a strong, transparent and explicit organisational culture which gives employees a line of sight between their job and the vision of the organisation
- engaging managers who offer clarity, appreciation of employees' effort and contribution, who treat their people as individuals and who ensure that work is organised effectively so that employees feel they are valued, and equipped and supported to do their job
- employees feeling they are able to voice their ideas and be listened to, both about how they do their job and in decision-making in their own department, with joint sharing of problems and challenges and a commitment to arrive at joint solutions
- a belief among employees that the organisation lives its values, and that espoused behavioural norms are adhered to, resulting in trust and a sense of integrity

Employee engagement is linked to many other identified features of a psychosocial work environment, including staff participation and control, effective leadership and line management and balance of effort and reward. Digital Outlook Communications and Artizian are examples of workplaces that have integrated a number of those 'drivers' described above, to implement a health and wellbeing programme, and both have experienced reduced staff turnover and sickness absence (boxes 8 and 9). Digital Outlook Communications implemented a programme in their workplace that included increasing employee control (flexible working), reward (promoting employee benefits), development (mentoring and development scheme) and reducing demand (reducing reliance on long working hours).

Box 8. Intervention: addressing the long hours culture – Digital Outlook Communications[93]

Who and why? Digital Outlook Communications is a London-based digital marketing and creative agency. The company sought to ensure that the intense, long hours culture of its industry did not become a barrier to sound health and wellbeing principles.

Description: the company conducted a best companies survey to obtain employees' feedback on their wellbeing and the perceived quality of leadership and management. A wellbeing team, supported by senior management, was established to gather suggestions for, and implement, initiatives which included: the introduction of flexible working; promotion of the employee benefits system; revamping the agency's charging system to enable employees to reduce working hours while still meeting financial targets; a mentoring and development scheme; improving the ergonomic working environment; and establishing health and wellbeing as a key performance indicator for all senior managers.

Impact: health and wellbeing survey scores improved 11%, better than for all other small media companies surveyed in 2008. Sickness absence rates improved 95% from four days per person in 2006 to 0.22 days per person in 2008. Staff turnover was reduced from 34% in 2007 to 9% in 2008, resulting in savings in recruitment, training and induction costs.

Box 9. Intervention: engagement through a shared company vision – Artizian[1]

Who and why? Artizian is a medium sized catering company which maintains a strong focus on the health and wellbeing of its staff.

Description: Artizian has a strong belief in a shared company vision, integrating employees' views into its work strategy, and making all senior management are known to all workers, keeping them visible and seen to work. The company offers yearly health and safety training for all staff, rather than the statutory requirement of training every three years. Artizian has highly visible policies on stress at work and seeks to ensure that staff are aware that their health will be a priority. The company employs a consultant and a nutritionist to monitor sickness and provide advice to staff. Its sickness benefits are comparable to similar companies, though staff do not often use these benefits, instead depending on other forms of support offered.

Artizian attributes the main elements of its success to:

- providing learning and development opportunities for staff at all levels
- committing to its values, even when times are difficult, including looking after redundancies and not cutting the training budget
- with permission, liaising with GPs to provide support to get employees back to work
- consulting with staff beyond formal statutory requirements
- rewarding the 'employee of the month' with a day off
- recruiting staff who hold similar values to the company and training managers to understand the company's values and its benefits

Impact: Artizian won the 2009 health, work and wellbeing award at the National Business Awards, for improving the health and wellbeing of the workforce in a way that also benefits the organisation. The company and its employees benefit from low levels of accidents, low staff turnover at all levels and low levels of sickness absence. This demonstrates that there are inexpensive methods to meet employees' psychosocial needs and provide a healthy workplace.

In-work development and training

The National Institute for Health and Care Excellence (NICE) recommends that employers promote mental wellbeing among employees through "motivate[ing] employees and provid[ing] them with the training and support they need to develop their performance and job satisfaction".[107] Developing staff through in-work training and development is featured in the interventions by Artizian and Digital Outlook Communications. This is likely to contribute to increased engagement among employees.

Flexible working

Flexible working is a way of working that suits an employee's needs, e.g. having flexible start and finish times, or working from home.[108] Greater flexibility within a role can increase the sense of control that an individual feels at work and give them an opportunity to improve their work–life balance, which is an important feature of good health that is less evident among those on lower job grades. Flexible employment can reduce barriers to employment for people with caring responsibilities and health conditions. However, flexibility should not come at the expense of job security (for example, via zero-hours contracts).

Where flexible working is part of a wider health and wellbeing strategy, there has appeared to be some positive results, though further and more robust research is needed. The pharmaceutical company GSK has understood the importance of flexible working arrangements, as well as other support for individuals in their life outside of work, such as family support services, stress management and resilience training (box 10). It has reported very good outcomes from its health and wellbeing programme and has exported the model to other organisations, showing that it is a transferable approach.

Box 10. Intervention: resilience, flexible working and health and wellbeing – GSK[93]

Who and why? GSK is a large, global company based in Brentford, London, that produces medicines, vaccines and healthcare products. It wanted to ensure employees remained physically energised, mentally focussed, emotionally connected and spiritually aligned to the mission of the company: to improve the quality of human life by enabling people to do more, feel better and live longer.

Description: a company-wide personal and team resilience programme was created, incorporating health and wellbeing initiatives which focussed on expertise, execution, behaviours and self-awareness. The range of initiatives supporting and enhancing employee wellbeing included on-site health and fitness centres, flexible working arrangements and family support services. Healthcare benefits focussed on prevention and access to innovative and proven treatments, including musculoskeletal and ergonomic improvement programmes, smoking cessation support, walking programmes, weight management programmes, blood pressure machines, health promotion and sleep road shows.

Impact: the company reports that its global work-related mental ill-health levels fell by 60%, working days lost fell by 29%, staff satisfaction increased by 21% and performance and productivity increased by 7-13%.

Reducing stress at work

The key feature of the GSK approach is its positive impact on mental health. This is particularly significant to employers, employees and health services, given that mental health is a leading cause of sickness absence.[90] Work-related stress and mental health problems in general, are more common among those of lower socio-economic status. Section 4.3 considers interventions that increase employment opportunities and retention for people with mental health problems; workplace stress management programmes and adapting working practices can contribute to these outcomes. Work by Transport for London (box 11) provides a further example of a workplace stress reduction programme that has shown positive impacts on mental health and sickness absence in the short and medium term.

Box 11 Intervention: stress reduction programme – Transport for London[109]

Who? Transport for London (TfL) is a public sector organisation responsible for managing and implementing most aspects of London's transport system. TfL employs almost 23,000 permanent employees, and around 60% of them work in operational roles.

Description: the organisation runs a stress reduction programme for employees that incorporates cognitive behavioural therapy, mindfulness and other techniques. It guides employees to master their symptoms of stress and develop a healthier approach to life. It is a very practical programme. Monthly follow-up sessions are offered and people can return at any time if they run into difficulty in the future.

Impact: the programme has been internally evaluated. Since 2009 around 600 employees have participated in the programme. Immediately following participation in the programme, nearly all participants said they made changes to their life as a result. The number of days off for stress, anxiety and depression among participants fell by 71% over the following three years, and continued to fall for up to five years. Absences for all conditions dropped by 50% over the three years following the programme. 80% participants reported improvement in their relationships; 79% reported improvements in their ability to relax; 64% improvement in sleep patterns; 53% improvements in happiness at work.

Addressing the effort–reward imbalance

Many of these interventions also address the effort–reward imbalance mechanism through which employees may experience poor health, identified in section 2.2. For example, Artizian achieves this by rewarding the employee of the month with a day off, Digital Outlook Communications and Expedition Engineering both offer practical employee benefits, and many of the interventions provide development opportunities. A study of health centre workers in the USA found that providing workers with rewards such as personal recognition, career promotion, and skill development opportunities, was associated with improvements in staff morale and reduced likelihood of staff burnout.[110]

Implementing a strategy to improve the psychosocial work environment

A review of staff health and wellbeing in the NHS by Dr Steve Boorman was published in 2009. It includes a number of recommendations to improve the psychosocial work environment, including health and wellbeing training for managers and engagement with staff (box 12). This shows how public sector employers can lead by example and it may be useful to local authorities and other local employers in setting up their own workplace health and wellbeing interventions.

Box 12. Intervention: the Boorman review and NHS workplace health and wellbeing[111]

Who and why? The 2009 NHS Health and Wellbeing report (the Boorman Review) made a number of recommendations to improve workplace health and wellbeing in the NHS.

Description: the recommendations included:

1. Develop and implement strategies for improving workforce health and wellbeing that provide services focussed on prevention and have a focus on the health issues that affect their staff and the wider population. This should include an assessment of key health priorities and risk factors, and an assessment of staff needs (to inform both the range of services and the way they are provided) through engagement with staff. As well as core services, strategies should include a range of properly resourced additional health and wellbeing services targeted at the needs of their organisation. All services should be available to all staff on an equitable basis.
2. Ensure leaders and managers are developed and trained in health and wellbeing (and the link between staff health and wellbeing and organisational performance) and have the skills and tools to support staff with mental health problems.
3. Clearly identify board-level champion and senior managerial support.
4. Implement NICE guidance on promoting mental health and wellbeing at work and National Mental Health and Employment Strategy guidance.
5. Provide consistent access to early and effective interventions for common musculoskeletal and mental health problems.
6. Develop the approach to improving support for staff health and wellbeing in consultation and partnership with staff and trade unions.
7. Routinely monitor, assess and review the implementation and delivery of staff health and wellbeing services, including discussion with staff and their representatives.
8. Embed staff health and wellbeing into NHS systems and infrastructure – including the NHS Operating Framework, the Care Quality Commission and Monitor.

Impact: an audit of workplace health and wellbeing services for NHS staff published in 2013 suggests that the recommendations have not been effectively implemented in many NHS Trusts, with 37% of trusts that responded admitting to not having a health and wellbeing strategy in place and sickness absence rates still high.[112]

However, the lack of success in implementing this strategy suggests that there are still questions around how best to implement workplace interventions to improve health and wellbeing.[112] A 2008 review of workplace stress and wellbeing interventions found that a lack of sustained management support was one of the most cited obstacles to successful intervention at the organisational level.[113]

Reducing health inequalities

People in lower paid jobs are more likely to experience poor working conditions, therefore general improvements in the quality of work and working conditions may help to reduce inequalities in work-related health problems.[114] Lack of control and lack of reward at work have been shown to

be critical determinants of a variety of stress-related disorders and to be more prevalent among lower occupational status groups. Focusing interventions around these dimensions and targeting less privileged groups within the workforce is a high priority.[1]

With health problems in organisations generally greater in lower employment grades, employers might gain the most benefit in terms of better employee health and reduced sickness absence by addressing the gradient in ill health and improving workplace practices in a proportionate way: that is, by focusing attention and effort increasingly down the social scale.[115]

It is particularly important that employers with a large number of low paid staff are engaged and encouraged to improve employment and working conditions, if health inequalities are to be reduced. Within individual organisations efforts should be made to ensure that interventions intended to improve health and wellbeing are available to everyone, and that those on lower job grades are considered during the design of the intervention and made aware of the opportunities available to them. Those working long or irregular hours or on non-permanent contracts are more likely to experience poor health (see section 2.2), so a focus on these employees may also contribute to reducing health inequalities.

4.2: Working with local employers to encourage, incentivise and enforce good quality work

Box 13. Key messages: how to work with local employers

There is clear evidence that local authorities can work with local employers to encourage, enforce and incentivise good work with many examples of good practice.

Local authorities have a number of levers: i) advice, ii) enforcement, iii) partnership, iv) incentives and accreditation, and v) procurement.

Local authorities can promote a considerable amount of guidance to local employers. Evidence-based sources of guidance include NICE guidance on promoting wellbeing at work, and Health and Safety Executive (HSE) guidelines on stress management and other aspects of work. They can also provide evidence on business benefits and the impact on sickness absence rates.

Local authorities can work in partnership with the HSE and others to ensure that local employers abide by their legal obligations, particularly around health and safety and non-discrimination.

There is evidence of programmes to incentivise employers to take action on workplace health and wellbeing. The incentives are provided through one or more of the following mechanisms:

- support and advice around how to implement effective policies and interventions, facilitating partnership working and promoting best practice
- provision of funding
- accreditation and rewards, providing the organisation with reputational benefits, making them more attractive to potential employees, customers and other stakeholders

Local authorities can encourage improvement in employee health and working conditions through the contractual levers of procurement.

There is also value in using the Social Value Act. Good working practices and providing employment opportunities for local disadvantaged people might be considered to bring social value and improve wellbeing locally.

Section 2.2 provides evidence of the link between good quality work and health inequalities. Local authorities can work with employers, to ensure that physical and psychological working conditions are to the best possible standard. Possible ways of doing this are discussed below, illustrated with existing interventions.

The figures on reductions in sickness absence and staff turnover found in many of the interventions in the previous section indicate that workplace health, wellbeing and engagement programmes are likely to have financial benefits for the employer. They can be used as part of a business case to inform engagement with local employers.

Promoting available evidence and guidance

There is a considerable amount of guidance available that local authorities can promote to local employers and use to inform their efforts. Evidence-based sources of guidance include Acas and NICE guidance on promoting wellbeing at work, Health and Safety Executive (HSE) guidelines on stress management and other aspects of work, and a range of charitable organisations. Some examples of the best evidence-based sources of guidance are provided in boxes 14 and 15.

Box 14. Key literature: Health and Safety Executive (HSE) stress management standards[116]

The HSE stress management standards provide a preventative approach to reduce work-related stress by targeting six main working conditions that, if not properly managed, are associated with poor health and wellbeing, lower productivity and increased sickness absence. It specifies management practices that help to ensure that these potential sources of stress do not act as stressors for employees.

The management standards are:

- demands – this includes issues such as workload, work patterns and the work environment
- control – how much say the person has in the way they do their work
- support – this includes the encouragement, sponsorship and resources provided by the organisation, line management and colleagues
- relationships – this includes promoting positive working to avoid conflict and dealing with unacceptable behaviour
- role – whether people understand their role within the organisation and whether the organisation ensures that they do not have conflicting roles
- change – how organisational change (large or small) is managed and communicated in the organisation

A report prepared by the University of London for the HSE in 2006 reviewed existing literature to determine the extent that effectively managing these stressors is associated with beneficial business outcomes. It found evidence that each of the six working conditions led to some improved business outcome(s), such as better performance, less absenteeism, less turnover intention and/or less withdrawal behaviours.[117]

An example of a local authority adopting the stress management standards is Doncaster Metropolitan Borough Council. More detail on how they implemented the standards, what they found and the challenges they faced, can be found on the HSE website.[118] The number of stress-related sickness days lost fell by 13,194 from 39,699 days for 2008-09 to 26,505 days for 2009-10.[118]

The standards were designed to help employers meet their general obligation to assess and manage physical and mental health risks but are not legally enforceable, and employers are free to take other action.[119]

The HSE provides further guidance on safety and preventing physical injuries and accidents in the workplace.

Box 15. Key literature: NICE – promoting mental wellbeing at work

NICE guidance is particularly helpful, given that it is based on the most robust available evidence and takes into account the cost-effectiveness of a range of interventions. Relevant NICE guidance includes 'Workplace interventions to promote smoking cessation' and 'Promoting physical activity in the workplace', both of which provide guidelines and recommendations on why and how to intervene effectively to improve healthy behaviours.

Guidance on 'Promoting mental wellbeing at work' makes recommendations in the following areas:

1. taking a strategic and coordinated approach to promoting employees' mental wellbeing
2. assessing opportunities for promoting employees' mental wellbeing and managing risks
3. flexible working
4. the role of line managers
5. supporting micro, small and medium-sized businesses

Enforcing legal obligations

Employers have legal obligations to abide by a number of Acts and statutory instruments relevant to the working environment.

The Health and Safety at Work etc. Act 1974 covers occupational safety in Great Britain, and it is the responsibility of the HSE and local authorities to enforce this as well as a number of other Acts and statutory instruments. Local authorities are responsible for regulating health and safety in over a million workplaces, employing about half the British workforce, and the HSE is responsible for the rest.[120] There are examples of local authorities working in partnership with the HSE to enforce health and safety regulations in the workplace, to prevent accidents and injuries – several interventions are discussed in box 16. These partnerships are likely to be equally valuable if they are used to encourage good psychosocial working conditions, for example to encourage the adoption of the HSE stress management standards.

Box 16. Interventions: local authorities working in partnership with the HSE to enforce health and safety legislation[120]

Improving workplace safety and reducing crime: an innovative idea saw one council's health and safety regulatory officers working with police crime prevention staff to use health and safety powers to reduce crime at retail premises where staff had been violently assaulted during the course of a robbery. Modifying the counter and repositioning door signs have improved the safety of the workplace and brought about a reduction in crime.

HSE and council regulatory officers working together to improve standards among aerial installers: in anticipation of increased activity among aerial installers prior to the switchover of UK TV signal from analogue to digital, the six North Wales local councils and HSE worked together to target health and safety in the industry. In order to ensure that both HSE inspectors and council regulatory officers had appropriate knowledge of the safe systems of work for work at height during domestic aerial installations, they attended the industry training course on work at height and became familiar with the industry-developed code of practice. Council officers were given flexible warrants so that they could take enforcement action across the board on behalf of the HSE. This meant that council officers were not limited to dealing with issues at retail shops but could also challenge and inspect installers during installation of aerials and satellite dishes in domestic premises. The initiative has led to a significant number of improvement notices requiring installers to undergo training in safe work at heights.

Improving manual handling in licensed premises: following a successful joint HSE/council pilot in Blaenau Gwent and Cardiff, all 22 local authorities in Wales participated in a project to improve manual handling practices in pubs and other licensed premises. During the pilot, a training DVD was developed to assist landlords in providing suitable manual handling training for what is sometimes a transient workforce. Approximately 600 premises were visited by council regulatory officers using an inspection toolkit including benchmark standards, ensuring a consistent enforcement approach across Wales. Initial evaluation indicates substantial improvement within both the drinks delivery sector and the licensed trade, and further visits are planned.

Partnership to reduce radon exposure for employees: in Cornwall, Penwith and Kerrier District Councils joined forces to tackle radon exposure in local workplaces. Located in high-risk radon areas, the local councils' health and safety regulation teams provided practical advice to businesses on how to reduce radon exposure to their employees. Actions included a letter drop, visits and an evening seminar for business managers, supported by an HSE specialist and the National Radiological Protection Board. The key message delivered to business was that doing a risk assessment and introducing control measures could minimise exposure to radon, and therefore reduce the risk of cancer incidence in local workers.

Preventive action with leisure workers: health and safety regulatory officers from five Scottish councils worked with HSE to inform and advise employers who work at leisure venues ranging from golf courses to sports grounds and hotels undertaking outside maintenance jobs such as grass cutting, hedge trimming and weed control. Safety awareness days gave employers and employees the opportunity to see a number of health and safety scenarios relevant to their industry and learn how to control the risks to themselves and others. At the end, delegates were asked to identify areas in which they could improve.

Reducing employee exposure to asbestos: a campaign to highlight the 'Asbestos: Duty to Manage' requirements took place in Suffolk. All seven councils within the county participated, together with HSE inspectors, targeting premises across a range of sectors. The project was organised by councils and delivered by 35 regulatory officers and HSE inspectors. Over 1000 duty-holders were contacted by mail. Press notices resulted in three radio interviews and two press articles, which helped to increase awareness and impact. This project enabled council regulatory officers and HSE inspectors to work together on a proactive campaign across sectors and geographical boundaries, testing the use of their flexible warrants – breaking down barriers to enforcement. Over 450 visits took place in seven days, 24 enforcement notices were served and action resulted in significant improvements in over 200 premises.

Other legislation contributes towards a positive psychosocial work environment. The government will extend the right to request flexible working to all employees from April 2014. The Equality Act 2010 makes it more difficult for specified 'equality groups' including disabled people, those of a particular age or gender or minority ethnic groups, to be discriminated against at work or in recruitment processes. Given that local authorities have a duty to consider how their activities as employers affect people from these different equality groups, and how the decisions they make and the services they deliver affect these groups,[121] they might also consider how other local employers consider these groups, particularly those employers with which they have contractual agreements. We were unable to find evidence of how local authorities might engage with employers in this area, and we would welcome further research.

Enforcing legal obligations will prevent injuries and accidents associated with physical, chemical and ergonomic workplace hazards, and improve the psychosocial work environment. Given the greater likelihood of poor working conditions among those lower on the socio-economic scale, enforcement is likely to have resulting health and health equity impacts.

Incentivising action through support, funding and/or accreditation

There is evidence of programmes to incentivise employers to take action on workplace health and wellbeing. At a national level, the occupational health advice lines provide free support to small and medium sized businesses that face challenges in accessing occupational health; 92% of users found the service useful in an evaluation (box 17).

Box 17. Intervention: occupational health advice services[122]

Who? The Department for Work and Pensions piloted the occupational health advice lines from 2009–14.

Description: The advice lines provided British small and medium sized enterprises (SMEs) with access to high quality, professional advice in response to individual employee health issues. Occupational health advice services were provided free of charge to SMEs and their employees who faced challenges accessing occupational health advice.

Impact: The service was evaluated and an employer survey found that 92% of users found the service useful, and around the same proportion said they would recommend it to others. The majority of questions from employers were about sickness absence, attendance management issues or advice on the fit note, and sometimes the service was a gateway to other services such as legal advice. The pilot was extended to 2014 and developed an interactive web resource. The service was also made available to GPs following the launch of the fit note in 2010. (See 'Supporting employees on long-term sick leave back into work', section 4.3 below, for more on the fit note.)

Two initiatives ran from 2009 to 2012, the health, work and wellbeing coordinators and Challenge Fund (box 18). The coordinators' role was aimed at developing partnerships between employment and health networks, coordinating health, work and wellbeing strategies and activities within and between regions, promoting best practice and innovation in firms (including via the Challenge Fund). The Challenge Fund was aimed at small and medium sized enterprises (SMEs) and local partnerships to encourage initiatives to improve workplace health and wellbeing through innovative approach which ensured employee engagement.

Box 18. Intervention: Health, Work and Wellbeing Challenge Fund[123]

Who? The Health, Work and Wellbeing Challenge Fund was funded by the Department for Work and Pensions and ran from October 2009 to April 2012.

Description: it was established to encourage SMEs and local partnerships to implement initiatives to improve workplace health and wellbeing through innovative approaches that ensured worker engagement. The fund of £4 million invited applications for grants of between £1,000 and £50,000. Research found that helpful aspects of project implementation included good project design, flexibility, availability and reliability of local providers. Employees' participation in activities was influenced by their timing, location, content, format and cost, and by people's personal motivation.

Impact: 86% of fund winners surveyed thought the fund had been necessary for implementing activities, either by supplying money or by providing the idea about putting measures in place. Over 60% of fund initiatives were expected to continue beyond the funding period.

Factors with a positive effect on sustainability included activities perceived to be successful, management commitment, initiatives that had become established within workplace practices, positive employee motivation, and external factors such as government promotion and local accreditation schemes. Whether and how activities would be funded was also important – a lack of funding was cited in over 50% of the instances where an initiative would not continue.

The most immediate impacts of the fund reported by those managing projects were on workplace culture and increased knowledge about work and health. The greatest impact reported on employee health was on mental wellbeing.

The research concluded that grants provided by the fund for a specific agenda can kick-start new activity, though not necessarily guarantee sustainable change. Sustainability was more likely when there was a permanent change in the physical environment, where the benefits were clear and considered worthy of investment of time and money, and where local supportive schemes were in place.

The North East Better Health at Work Award also provided support for workplace health programmes and similarly was found to be a success at engaging employers, though at a regional level. The focus of this intervention was accrediting successful employers, according to set criteria, providing the organisation with reputational benefits, making them more attractive to potential employees, customers and other stakeholders.

Box 19. Intervention: North East Better Health at Work Award[124]

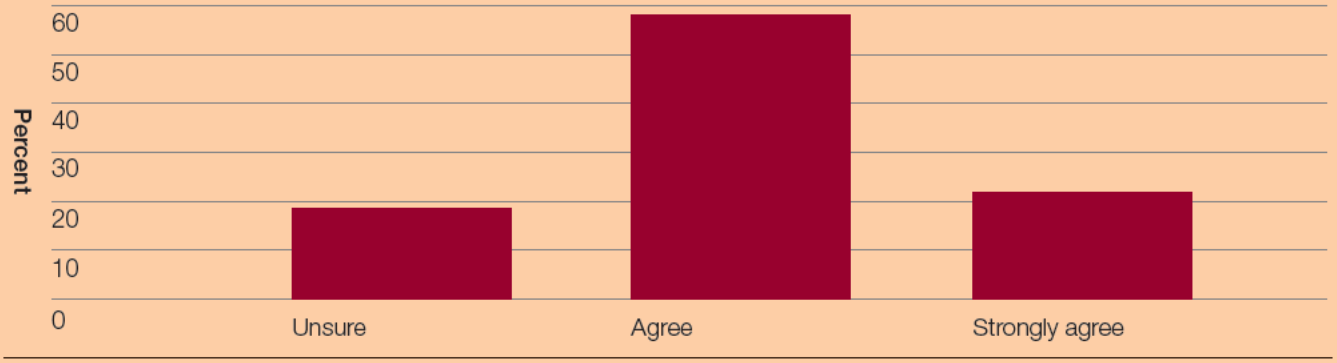
Who? The North East Better Health at Work Award (BHWA) is a structured and evidence-based workplace health programme coordinated regionally by the Northern Trades Union Congress (TUC), in partnership with the 12 local authorities in the region, the Association of North East Councils and the NHS and delivered locally through workplace health specialists.

Description: each stage of the BHWA (bronze, silver, gold, continuous excellence) is usually completed within a year and is characterised by a set of outcomes and distinct assessment criteria. Participation in the BHWA is free of charge but requires investment from workplaces in the form of staff time, training and resources. All organisations joining the BHWA sign up to the Better Health at Work Charter, in which they agree to work to improve the health of their employees.

Impact: an evaluation found that:

- 232 businesses and organisations with 209,319 employees actively participated in the BHWA from 2009–12 and covered 21.4% of the working-age population in the North East
- 232 bronze, 116 silver, 56 gold and 19 continuous excellence awards were achieved. 86 businesses and organisations withdrew without receiving an award
- there was a high level of organisational agreement (81%) that the BHWA improved staff health (see figure 6), while 66% agreed or strongly agreed that the scheme improved staff morale

Figure 6. Bar chart indicating levels of organisational agreement (%) that the BHWA improved staff health



Source:124

- mean reductions in sickness absence were between 0.26 and 2.0 days per employee depending on the length and level of participation in the BHWA and sector of employment. Public service organisations seemed to benefit most
- generally it was felt that the programme and the award criteria for each level were appropriate for larger businesses and organisations, though there was no consensus about the minimum size of organisation that would benefit

Cost-benefit: the cost of the regional coordination was £80,000 per annum and the overall cost to the NHS was estimated at £615,000 per annum. The estimated cost of the BHWA to the NHS (PCTs and public health) which funded the programme was £3 per sickness-absence day saved. Employers saw a reduction of 0.007–1.1 days of sickness-absence for every pound they invested, depending on the level of the award (suggesting bronze offered best value for money). The evaluation concludes that the BHWA is an efficient and cost-effective workplace health improvement programme.

National standards for the Workplace Health and Wellbeing Charter will be published shortly by PHE. This is a local accreditation scheme for businesses engaging in improvement actions for staff wellbeing, led by local government for local businesses. It builds on the 2009 Liverpool Workplace Wellbeing Charter.

The Public Health Responsibility Deal is a national intervention offering a set of pledges for organisations, including a section on health at work. As yet, there has been no evaluation to ascertain how effective this programme has been in incentivising employers to improve health at work or in improving the health and wellbeing of employees. Plymouth Better Together demonstrates how local areas can work in partnership to encourage employers to sign up to these pledges, though again this has not been evaluated.

Box 20. Intervention: Public Health Responsibility Deal[125]

Who? The Department of Health

Description: the Public Health Responsibility Deal has a section on health at work, and has a set of collective pledges to which organisations can sign up, and a health at work network which can be beneficial both by allowing organisations to share good practice in improving workplace health and wellbeing, and by providing the incentive of a business network for those who participate. A further benefit is, similar to a form of accreditation, that they will gain reputational benefits among employees, potential employees and the public.

The Public Health Responsibility Deal includes a set of Health at Work Pledges, which support the workforce to lead healthier lives. Annual progress on delivering the pledges will be reported and published on the Responsibility Deal website. The collective pledges are as follows:

1. Chronic conditions guide[168]
2. Occupational health standards[218]
3. Board reporting on health and wellbeing[238]
4. Healthier staff restaurants[166]
5. Smoking cessation/respiratory health[106]
6. Staff health checks[120]
7. Mental health in the workplace[86]
8. Young person's health at work[21]
9. Domestic violence[37]
10. A pledge specific to the construction industry[58]

Impact: there has been no evaluation of this programme, though the number of signatories for each pledge (in brackets after each pledge in the list above) indicates that it has successfully engaged some employers to some extent.

Box 21. Intervention: Plymouth Better Together partnership[126]

Who and why? Plymouth Better Together is an ongoing partnership initiative between Plymouth Chamber of Commerce and Industry, Plymouth 2020 (Local Strategic Partnership) and Business in the Community.

Description: it aims to promote the economic, social and environmental wellbeing of the city through active engagement with the local business community. It encourages businesses to sign up to pledges including those to encourage staff to exercise, stop smoking and eat healthily, offer staff health advice, have and publicise a stress reduction policy, consider personal issues affecting people at work and help them cope, and win a health at work award. It also identifies local partners that have the facilities to help companies deliver their pledges. The project is run by a project manager working two days a week.

The partnership holds better business breakfast workshops, giving advice and guidance on a variety of health at work-related topics, including how a healthier workforce can make a healthy and sustainable business and further extend to the wider community, and how organisations have used these principles and applied them to the workplace.

Impact: 187 companies had signed up by April 2013, representing over 23,000 employees.

Encouraging action through procurement using the Social Value Act

The Public Services (Social Value) Act 2012 requires local authorities to consider how what is being procured through contracts might improve the economic, social and environmental wellbeing of the local area. Good working practices and providing employment opportunities for local disadvantaged people might be considered to bring social value and improve wellbeing locally. Box 22 shows how the Social Value Act has been used to provide training for long-term unemployed people.

Box 22. Intervention: Waltham Forest procurement of transport services[127]

Who and why? The London Borough of Waltham Forest re-tendered a seven year contract for the provision of transport services in September 2011.

Description: the procurement officers included a scored question in the tender, asking bidders to demonstrate how they could contribute to efficiencies and give added value to the service, encouraging bidders to think about how they could achieve a wider impact from their services for the local community.

Impact: the contract was won by HCT Group, a social enterprise group with a focus on creating employment opportunities for those furthest from the labour market. There was also space on the contract to set out the additional social impact of the approach, explaining that any profits it made on the contract would be reinvested into a learning centre that would provide training for long-term unemployed local people. This demonstrates how procurement can be used to act on employment in the local area.

Action through procurement, improving working conditions and the health of outsourced and contracted staff, might help to reduce health inequalities. This is because those staff are less likely to enjoy certain benefits given to directly employed staff. A recent report of an audit of NHS Trusts in England found that their knowledge of contract workers and outsourced services, often on low pay, was poor, despite the fact that they often worked alongside NHS staff. They found that only 52% of trusts allow outsourced staff access to their services to promote mental wellbeing, 66% required the contractor to provide flexible working and 68% required contractors to be paid the living wage, though a higher proportion (83%) report that fair terms and conditions are included in procurement conditions.[128]

4.3: Interventions to increase employment opportunities and retention for people with a long-term health condition or disability

Box 23. Key messages: long-term health condition and disability interventions

There is a role for local government to promote and increase awareness of national programmes (such as Access to Work), guidance (such as the Line Manager's Resource) and legislation (such as the Equality Act 2010 and the right to request flexible working) among local employers. Local authorities may be able to influence provision of employment services by ensuring that employment service providers are members of health and wellbeing boards and take part in joint strategic needs assessments.

Barriers to employment faced by people with a disability or long-term health condition include a health-related inability to do some jobs, employer discrimination, disruption to education and individual motivation.

Campaigns such as Time to Change help to break down stigma and discrimination around mental health problems.

Some workplace barriers can be overcome through physical adaptations to the workplace and help with travel arrangements. Greater awareness of Access to Work can support this.

Personalised, tailored support has been shown to be effective in supporting disabled people and people with long-term health conditions into work or training. This requires action across a range of services, employment and health services in particular, to address a range of needs.

Local areas can work with and support both employees and employers to increase employment opportunities and retention for disabled people. There are examples of effective supported employment programmes and employment support services for local people with mental health problems.

While a 'work first' approach has generally been adopted that prioritises job goals and work activity to help people with long-term health conditions into employment, an alternative 'health first' service has the objective of improving the health of participants as a way of improving employability. It is recommended by NICE, and a local pilot in County Durham had some promising results.

There is good evidence that individual placement and support programmes are effective for unemployed people with severe mental health problems.

Supporting employees on long-term sick leave back into work might be facilitated by the fit note and the new health and work service. Interventions by companies such as Tate & Lyle to support long-term ill people back into work have reported reduced staff absence.

Why implement interventions to increase employment opportunities and retention for those with a long-term illness or disability?

In addition to the detrimental impacts of unemployment on health, being in poor health may limit opportunities for employment. This suggests that action on unemployment is likely to have health benefits, and that unemployment cannot be addressed without considering the additional health needs of many of those who are out of work.

There are a number of barriers to employment for people with a disability or long-term health condition that can be addressed by a combination of working with the individual and implementing or encouraging actions which break down these barriers. Barriers include a health-related inability to do some jobs, employer discrimination, disruption to education and individual motivation.[129]

The Work Foundation carried out some research of young people with chronic conditions and found that negative employer attitudes (and fear of these attitudes) meant almost all participants continued to go to work even when experiencing negative side effects of their condition. The research found that 'self-stigma' was also a significant barrier to employment, and affected career aspirations, job-seeking activities and help-seeking behaviours.[130]

This research also found that many of the participants had experienced disruption to their education and training in earlier life because of their conditions, and one of the main reported reasons for this was educational establishments being unable or unwilling to make adjustments. Many participants felt that they had not reached their full education potential, which is likely to have inhibited their later employment opportunities.[130]

The symptoms of impairment and long-term health conditions can affect an individual's capability for work, and therefore unemployment cannot be addressed without considering health. Reasonable workplace adjustments, as required by law, should help to accommodate people with health problems at work: for example, flexible working opportunities are likely to facilitate the employment or retention of someone with an unpredictable chronic condition that may require frequent visits to the doctor. For others, however, more personalised assistance which addresses their health and employment needs will be required.

Examples of existing interventions

There have been some reviews of interventions for people with a long-term illness or disability to stay in or return to work, though it is noted that robust evaluation and cost-benefit analyses are rare. Key messages from two of these reviews are given in boxes 24 and 25. They highlight the importance of an individualised approach, a change of perception of their abilities among disabled people, physical adaptations in the workplace and help with travel arrangements, specialist rather than generalist personal advisers and additional support for long-term unemployed. There is reasonably strong evidence for workplace interventions for those with musculoskeletal disorders; cognitive behavioural therapy (CBT), vocational rehabilitation and workplace rehabilitation for low back pain; supported employment for people with severe mental health conditions; and psychological interventions for depression.

Box 24. Key literature: local initiatives to help workless people with a long-term health condition or disability find and keep work[129]

A study of local initiatives to help workless people find and keep work concluded that the key messages arising from all the evaluations concerning long-term illness and disability are:

- an individualised approach is essential
- participants need help to change their perception of themselves and to shift their focus from what they cannot do to what they can
- physical adaptations in the workplace and help with travel arrangements can have a marked impact for those with physical disabilities
- personal advisers who have developed expertise in the needs of particular types of client and the requirements of particular employers are more effective for long-term sick and disabled people than generalists are
- those who have not worked for a long time need help in adapting to the workplace

Box 25. Key literature: quantifying the effectiveness of interventions for employees with common health conditions in enabling them to stay in or return to work – a rapid evidence assessment[131]

A review of interventions for people with common health conditions in enabling them to stay in or return to work considered evidence from 2008-11. It found the following results:

- studies generally lack robust quantification of employment outcomes and cost-benefit analyses of interventions; relatively little quantitative evidence is apparent for interventions carried out in the UK
- areas for which there is a reasonably strong body of evidence with positive effects include:
  - workplace-based interventions for those with musculoskeletal disorders particularly for low back pain
  - CBT, vocational rehabilitation and workplace rehabilitation for low back pain
  - supported employment for people with severe mental health conditions and psychological interventions for depression
- there is some evidence of the benefits gained for coordination between rehabilitation professionals and the value of a case management approach among studies examining interventions for people with general health conditions
- little evidence exists on the effectiveness of interventions for employment outcomes among people with mental health problems
- there are very few studies on cardio-respiratory conditions, and none for respiratory illness
- it is difficult to assess employment outcomes even when they are available, as many studies do not include mention of whether return to work is sustained

See appendix 1 for a table summary of health conditions, interventions, evidence base and effects, based on this literature.

National level programmes to increase employment opportunities and retention
Several nationwide programmes exist to help people with a long-term illness or disability, to find and keep a job. Local authorities can engage with these programmes for their own employees and work to ensure that local employers are aware of them.

People with health conditions have been less likely to leave benefits and enter employment than those without.[77] The Work Programme is an integrated welfare-to-work measure introduced nationally in June 2011, targeted at people who have been out of work longer-term, including long-term sick or disabled people, and providing support for up to two years to help them into sustainable work. It gives 'prime' providers and specialist subcontractors considerable freedom to develop innovative provision for the individuals they support.[132] Funding is provided through staged payments at engagement, sustained job outcomes of three or six months, and further sustainment in work thereafter with the aim of ensuring there is a focus on sustaining people in work as well as getting them a job in the first place.[133] Early evaluations of the Work Programme have identified some challenges with ensuring personalised appropriate support generally, and in particular for people with health conditions, addictions or more complex needs – full outcomes remain to be seen.[132 134]

Work Choice is a voluntary, specialist national programme providing support for disabled people in finding and sustaining a job or becoming self-employed. Evaluations showed that Work Choice had some success, though less so for people with mental health problems.

Box 26. Intervention: Work Choice[77 133 135]

Who? Work Choice is a government-funded national programme, introduced in 2010.

Description: the scheme is a specialist, voluntary employment programme for disabled people, providing help through all stages of finding and getting a job, help to stay in work, and help for those who want to become self-employed.

Impact: an evaluation of the 2011 and 2012 phases identified areas for improvement, such as with access to the programme and the commissioning strategy. However overall, participants and providers reported that the programme had a positive impact in terms of participants' ability to secure and maintain employment. Its performance appears to have improved over time.

From October 2010 to March 2013, Work Choice supported 16,840 people into paid employment, representing 31.2% of programme users. However, only 2,060 job starts were recorded for people with mild to moderate mental health conditions and only 130 for people with severe mental health problems.

Aside from Work Choice, we were unable to find evidence of successful interventions to support people with a disability or long-term health condition into self-employment. This is particularly relevant to some groups such as gypsy and traveller communities where there is a preference for self-employed work. Further, it is a potential area where future action could be developed.

Access to Work is a DWP programme for disabled employees or those with a firm job offer, that provides money towards the extra costs that will help a disabled person do their job, beyond what is reasonable for their employer to meet (box 27). It is accessed by the employee contacting the scheme directly. The programme evaluation found that levels of awareness of the scheme were low among employers, and there was widespread support for increasing awareness. Therefore, local authorities raising awareness of the programme among local employers and employees is likely to be welcome and valuable.

Box 27. Intervention: Access to Work[136]

Who? Access to Work is a national programme funded by DWP.

Description: the programme is designed for people with long-term health conditions or disabilities who need additional practical support to gain or remain in work, in addition to the 'reasonable adjustment' made by employers in accordance with the Equality Act 2010. The types of support provided includes special aids and equipment, adaptations to premises and equipment, travel to work grants, support workers and communicator support at interview.

Impact: a qualitative evaluation including in-depth interviews with a range of stakeholders found the following results:

1. Fairly low levels of awareness of Access to Work among employers.
2. Customers and employers were generally very happy with the amount and quality of support that had been put in place, and received a broad range of support.
3. Customers who received ongoing support were most likely to report high levels of satisfaction. Customers who received one-off types of help were most likely to experience some difficulties, although these cases were still in the minority.
4. Customers reported positive impacts of the programme including:
    - reduced levels of sickness and absenteeism
    - provided a level playing field in employment
    - allowed them to stay in work
    - saved them significant work-related expense
    - improved their general feelings of wellbeing
    - being more in control at work and more autonomous
5. employers reported that Access to Work had:
    - helped them to understand the needs of their disabled employees
    - improved employee wellbeing
    - increased productivity
    - improved their staff retention rates
    - enabled them to recruit disabled people (in a few cases)

National legislation and guidance may be of use for local authorities in efforts to increase employment opportunities and retention of people with a disability or long-term illness, among their own existing and potential employees, and other local employees. The Equality Act 2010 requires that long-term ill and disabled people are not discriminated against at the recruitment stage or during their period of employment. The right to request flexible working, according to a DWP report, "reflects the fact that greater access to flexible and part-time working opportunities can help employees of all ages to stay in employment while managing a health condition or other pressures, such as caring".[77] Guidance, such as the line managers' resource, a practical guide to managing and supporting people with mental health problems in the workplace (box 28), are available for staff at all levels.[137]

Box 28. Key literature: line manager's resource – managing and supporting people with mental health problems in the workplace[137]

This resource aims to provide line managers with advice and information on how best to promote the mental wellbeing of employees, practical guidance on how best to manage situations that can arise at work when staff experience mental health problems, and to reduce the fear and lack of understanding around engaging with someone experiencing mental health problems. The areas for action are:

- the recruitment process
- promoting wellbeing
- identifying the early warning signs and talking at an early stage
- keeping in touch during sickness absence
- returning to work and reasonable adjustments
- managing an ongoing illness while at work

Action by private organisations to increase employment opportunities or retention
Interventions to increase employment opportunities and retention of people with a long-term illness or disability have been delivered by individual private companies, as shown in box 29. These illustrate how companies can be supported by national programmes (eg, Remploy and Access to Work) and how such action can be positive for both employees and employers.

Box 29. Interventions: companies that have increased employment opportunities and retention of people with a disability or long-term condition[77]

Sainsbury's has recruited over 2,000 disabled people in four years by working with Remploy Employment Services to encourage and support greater numbers of applications from disabled people. The company has reported a positive impact on business, both from the reaction of non-disabled people in their workforce – due to the positive feelings of inclusion from working in a more diverse environment, and from customers – due to the experience of encountering a more representative workforce.

E.ON has developed its recruitment supply chain to ensure that all employment agencies supplying staff to them demonstrate their commitment to fair and inclusive practices.

BT has developed passports for members of staff that reflect individuals' requirements, facilitating easier moves between teams and jobs. This approach helps to overcome anxieties which otherwise can reduce the possibilities of progression, resulting in more confident employees and increased overall morale and productivity.

Lloyds Banking Group has developed a comprehensive reasonable adjustments programme. This has included using Access to Work to finance necessary adjustments and support. The result has been an environment in which disabled people are given the necessary tools and assistance to work effectively. Reasonable adjustments can be key to retaining valuable employees who may otherwise be unable to continue working.

Local authority action to get people into employment

There are many examples of councils that have had success with programmes providing support for people with a disability to find employment. Innovative approaches can help to remove the barriers to employment – examples from Kent and Sheffield are provided in boxes 30 and 31. In Kent, tailored support is provided to the unemployed individual, and support is also offered to employers looking to recruit. In Sheffield, a plan brings together actors from different sectors, particularly health and employment, to overcome the barriers to employment for disabled people.

Box 30. Intervention: Kent Supported Employment Programme[138]

Who? Kent local authority funds the Kent Supported Employment Programme.

Description: the programme provides support for disabled people who are looking for a job, to enable them to have the same opportunities for employment as non-disabled people. An employment adviser meets with the jobseeker on a regular basis and provides tailored help to prepare them for work. The ongoing support helps them to retain a job and progress and develop in that job role. The council also provides employers who are looking to recruit to a role with the right help and support so that both the employer and the employee have a positive experience of employment.

Impact: a study of this programme in the period March 2009–February 2010 found that 118 people were supported in paid jobs (57 were employees with learning difficulties; the remainder were people with mostly mental health problems, severe physical disabilities and autism), all of whom had been identified as requiring specialist employment provision.

Cost-benefit: using the whole client group and the total budget of the programme, a cost-benefit analysis was carried out. The cost of the programme was estimated to be £9,910 per person, 88% of the cost of a day service place or a potential saving of £1,290 to the local authority. From the taxpayer's perspective, the programme has a net saving of £3,564 per person per year compared with a day service alternative.

Box 31. Intervention: Sheffield Health, Disability and Employment Plan[139]

Who and why? The Sheffield Employment Strategy was agreed by Sheffield Executive Board in 2010 and established five priority areas for action, one of which was around removing and managing health barriers to work. This priority was reflected in the city's health and wellbeing strategy, which recognised specific areas where the health and wellbeing board could make a difference by creating 'work programmes'. It was agreed that one of these work programmes should be 'health and disability and employment', overseen by the leader of the council and the chair of the clinical commissioning group (CCG).

Description: the Health, Disability and Employment Plan is based around overcoming disability and health barriers to employment. It is based on a premise that good work is generally good for health for disabled people and non-disabled people, that there are barriers to employment for disabled people that are possible to overcome and that the employment and health worlds are insufficiently joined up.

The plan has been developed through engaging expertise from a range of stakeholders, including Sheffield City Council, Sheffield Health and Social Care Trust, Sheffield Occupational Health Advisory Service, the Department for Work and Pensions, Sheffield and Sheffield Hallam Universities and Sheffield CCG. At a practical level, the plan outlines actions for individuals at different stages of employment (those in work and at work, those in work but struggling, those in work but not currently working, and those who are unemployed), to ensure that it supports people to both obtain and maintain work. An example of action is the proposal for the development of a referral pathway from primary care (GP surgeries) into employment support. This is still at development stage but has secured funding support from public health and has been agreed in principle by the Cities Employment Task Force and the health and wellbeing board.

One particular approach, recommended by NICE, is the 'health first' approach. This focuses on improving and managing the ill health of Incapacity Benefit recipients before addressing any employability issues. This approach was piloted in County Durham (Box 32) and had some promising results, including improvements in both the general and mental health of participants. A review states: "It was a small scale pilot, and while its success may not be replicable in different contexts, it does offer a potential model for local public health partnership working. It is one example of how local CCGs, local Work Programme providers and local authorities could work together in the future."[140] Further work to confirm these pilot findings would be helpful.

Box 32. Intervention: County Durham Worklessness and Health Model[140 141]

Who and why? County Durham and Darlington Primary Care Trust piloted a 'health first' approach to reducing worklessness in partnership with Durham County Council and the South of Tyne and Wear Jobcentre Plus. In 2009 they commissioned a 'health first' case management service for those in receipt of Incapacity Benefit (IB).

Description: the programme used telephone and face-to-face case management to identify individual health needs and any other related barriers to employment an individual may be experiencing, such as around debt or housing. The scheme complemented mainstream services with case-managers, signposting patients to relevant NHS, DWP and third sector health and welfare services such as Citizens Advice. Patients were referred onto the programme by other NHS services, their GPs, or they could self-refer. The intervention lasted an average of six months and involved around 500 patients on a voluntary basis. The objective of the service was to improve the health of participants as a way of improving employability and reducing health inequalities for those in and out of work for three years or more.

Impact: the evaluation of the pilot programme found that, within six months, both the general health and mental health of participants improved. For example, general health scores (measured on a scale of 0 (low) to 1 (high)) almost doubled from 0.3 before the intervention to 0.5 after six months.

There was less improvement in terms of physical or musculoskeletal health. This may have been because the service was not intensive enough, of sufficient duration, or because the point of intervention (ie, after three years of receiving IB) was too late. There is evidence to suggest that musculoskeletal conditions require early intervention and that longer absence from work diminishes intervention effectiveness.

The pilot suggested that 'health first' initiatives can be successful, but:
Must be targeted carefully at those with the greatest health needs and with mental health problems as a primary condition; and
Require an awareness of the local context, including other services and the levels of social support in the locality.

Cost-benefit: Overall, the intervention cost £2,530 per participant – meeting NICE cost guidance for case management interventions. Tentative estimates of cost-utility suggest an intervention cost in the region of £16,700–£23,500 per quality-adjusted life year (QALY).[iv]

[iv] For more information about QALYs, see accompanying evidence review on "measures of economic impact".

Local authorities may be able to influence provision of employment services by ensuring that employment service providers are members of health and wellbeing boards and take part in joint strategic needs assessments.

Interventions for people with mental health problems

Around one in six people of working age has a common mental health problem like anxiety or depression at any point in time,[142] and this becomes a disability if it has a long-term effect on normal day-to-day activity[143] although often mental health problems will not be diagnosed. People with mental health problems face many of the same barriers to employment as those with a physical disability, including experience of stigma and discrimination, a need for employers to adjust their normal working practices to accommodate their disability, and low expectations from employers, health professionals and themselves. They will also face additional challenges to overcome in gaining and maintaining employment, which will require different solutions. Though there are programmes available to support people to find and keep a job, adequate support is not available to all: a 2012 survey of community mental health service users found that 43% of the 2,780 respondents said they would have liked support to find or keep a job but did not receive any.[133]

Box 33 summarises a recent report by the Work Foundation, which provides a review of the evidence around getting people with schizophrenia into employment. It highlights ways in which working with people who are excluded from the labour market because of a severe mental health condition can be successful in terms of health and employment outcomes.

The national Time to Change programme has been addressing mental health stigma and discrimination since 2007 and an evaluation has found some positive results including improved employer recognition of mental health problems and likely financial benefits (box 34).

Box 33. Key literature: working with schizophrenia – pathways to employment, recovery and inclusion[144]

This report by the Work Foundation is based on a review of previous studies, in-depth interviews with people with lived experience of schizophrenia and telephone interviews with experts.

People with schizophrenia encounter one of the lowest employment rates among all vocationally disadvantaged groups – around 8% in the UK.

The research provides evaluative evidence that, in the right circumstances and when delivered effectively, the following interventions can deliver improved clinical and employment outcomes for people with schizophrenia who wish to play a more active role in the labour market:

- psychosocial interventions
- pharmaceutical interventions
- individual placement and support (IPS) vocational interventions
- other community mental health interventions

However, these interventions are often poorly implemented, and the report attributes this to the following reasons:

- individual differences – because no one with schizophrenia is the same, it is challenging to develop an employment support service strategy that would work for all
- attitudes and expectations – many employers have low expectations; other have stigma, which often leads to self-stigma
- timeliness of interventions – efforts tend to focus on getting those who are unemployed into work, rather than supporting those already in education or employment to remain

The report concludes that better coordinated support and increased understanding of the condition and the importance of work for recovery, could lead to considerably larger numbers of people with schizophrenia both gaining access to, and remaining within, the labour market.

Increasing employment opportunities and retention for people with mental health problems

Boxes 35-38 provide examples of other local interventions to increase employment opportunities for people with mental health problems, particularly those with more complex needs. These have shown some positive results and highlight the importance of supporting people with mental health problems to find work or enter education or training. They show that charities and other organisations that offer employment and training opportunities for people with mental health problems can be successful and highlight the value of a partnership approach.

Box 34. Intervention: Time to Change – let's end mental health discrimination

Who and why? The Time to Change campaign is a national programme run by mental health charities Mind and Rethink Mental Illness.

Description: it aims to challenge and reduce mental health stigma and discrimination in the general population and among specific groups such as employers, through a range of methods.

Impact: a telephone survey of British employers found an increased awareness of common mental health problems, and formal policies on mental health and the use of workplace accommodations became increasingly common. Employers continued to believe that job candidates should disclose a mental health problem, but became less likely to view colleagues' attitudes as a barrier to employing someone with such a problem. These results are consistent with those of the Time to Change national public attitudes and the Viewpoint survey of service users between 2008 and 2010, which showed improved public attitudes to mental illness and a reduction in experiences of discrimination in employment.[145] Evaluations of other measures such as improved knowledge and behaviour among the general public, or user reports of discrimination by mental health professionals, did not identify change.[146]

Cost-benefit: the programme was funded close to £321 million for the four years to 2011.[146] An economic evaluation suggests a likely benefit from the programme, though variations in the assumptions used leaves a wide range of uncertainty: from a net cost to a benefit of £223 million.[146]

Box 35. Intervention: User Employment Programme at South West London and St George's Mental Health NHS Trust[147]

Who and why? South West London and St George's Mental Health NHS Trust commissioned the programme to support people with mental health problems across the trust.

Description: the User Employment Programme helps people with mental health problems to retain or find new paid employment or voluntary work, or enter mainstream education or training. Established in 1995, the key aims of the programme are to provide support for people who have experienced mental health problems in existing posts in the Trust and help reduce employment discrimination against people who have experienced mental health difficulties throughout the trust.

Impact: in 1995–2009, the programme supported people with mental health problems in 223 jobs within all clinical professions across the Trust. Of those who no longer need support from the programme, 86% have continued employment in the trust, or moved into professional education such as nursing or clinical psychology training. The programme is recognised as a model of good practice. It has also become a full partner in the Sainsbury Centre for Mental Health's Centre of Excellence in Employment programme.

Since 1995, the programme has:

- helped people to gain or retain employment in other health and social care organisations
- ensured that, since 1999, at least 15% of all employees recruited to the trust have personal experience of mental health problems (this figure rose to 17% in 2007)
- provided short-term work preparation for 113 people, 47% of whom have moved into employment within or outside the trust

Box 36. Intervention: Socially Minded and Responsible Trading (SMaRT) project[148]

Who and why? The First Step Trust is a registered charity that provides work schemes to people who are long-term unemployed and not yet ready for work because of mental health problems or other disadvantages.

Description: the trust manages SMaRT – a small business enterprise based in Salford, operating a range of garage services and an end of life vehicles de-pollution and recycling facility. SMaRT provides real work in a demanding, commercial environment that challenges the workforce to learn to handle the everyday stresses and pressures of work. It also provides formal work-based training and access to a range of qualifications.

Impact: in the first approximately 18 months, SMaRT provided 250 work experience places. 82% had previously been unemployed for more than one year, and 45% had been unemployed for more than five years or had never worked. Following the placement, 27 people have moved on to open employment.

Box 37. Intervention: Employment Support for Camden and Islingtonmental health service users[149]

Who and why? Mental Health Working is funded by health and social care budgets in the London Boroughs of Camden and Islington, and delivered by Remploy in partnership with local organisations.

Description: Mental Health Working is an employment support service for people in Camden and Islington with mental health needs which began in August 2012. The service uses a pathway-based approach ranging from providing support for individuals to become job ready, to supporting someone already in employment to retain their job. Participants are supported to acquire the necessary skills to access employment, training, education and volunteering opportunities.

Impact: by September 2013, over 448 Islington residents with mental health needs enrolled in the service. Of these, 58 people gained or retained paid employment or became self-employed, 67 people were supported to undertake a mainstream education or training course and 115 people started a work experience or volunteering placement. Over the same period in Camden, 421 people with mental health needs registered and enrolled with the service. Of these, 41 people were helped to gain or retain paid employment, 41 people were supported to begin a mainstream education or training course and 98 people were helped to access work experience or volunteering opportunities.

In addition to providing employment opportunities through work placements, shown to be cost-effective, the NHS Tower Hamlets intervention (box 38) provides support to people with mental health problems while they are in work through training, which it is hoped will support them to remain in employment.

Box 38. Intervention: NHS Tower Hamlets[94]

Who and why? NHS Tower Hamlets, East London, has taken action to address low rates of working and poor health, through its health and work strategy. It claims it has reduced levels of sickness absence among staff. The strategy includes:

'Work It Out' – description: a scheme offering work placements to service users with a history of poor health conditions (mainly mental health). The placements are office based, two to three days per week for six to 13 weeks, and travel, lunch and childcare costs are included.

Impact: 19 people took part in the project and seven of them have succeeded in finding a job.

Cost-benefit: this policy was found to generate £17.07 of social return for every £1 spent in employment support, with the main returns coming from increased work, volunteering, reduced demand on health services and increased taxation.[94]

Mental health model employer project – Description: staff and managers were interviewed to find out their knowledge of, and attitudes to, mental health, and provided with training.

Impact: this led to a reported average of 50% increase in mental health awareness among staff and managers. Mental health awareness is now embedded in induction and management training, and a mental health policy has been introduced.

Workplace interventions to reduce stress and improve mental health, highlighted in section 4.1, further contribute to supporting people with mental health problems while they are in work.

Individual placement and support (IPS) is a well-established 'place then train' method and is considered to be the most effective and efficient way to support unemployed people with severe mental illness into work.[150 151] IPS is an approach to employment support that is tailored to each individual's needs and consists of intensive support to search quickly for a paid job, followed by time-unlimited support for both employer and employee. Time-unlimited support helps individuals maintain employment and promotes career development.[151]

A 'fidelity review' is a way of checking the extent to which a service is faithful to the IPS approach, and those programmes that have high levels of fidelity to the IPS principles have been shown to have higher competitive employment rates than low fidelity programmes.[152] These principles are:

- it aims to get people into competitive employment
- it is open to all those who want to work
- it tries to find jobs consistent with people's preferences
- it works quickly
- it brings employment specialists into clinical teams
- employment specialists develop relationships with employers based on a person's work preferences
- it provides time-unlimited, individualised support for the person and their employer
- benefits counselling is included[150]

Box 39. Key literature: individual placement and support (IPS) for severe mental illness

The Cochrane Review of vocational rehabilitation for people with severe mental illness
Eighteen randomised controlled trials were identified. The main finding was that IPS was significantly more effective than pre-vocational training (a period of preparation before entering the job market) in getting people into competitive employment (34 and 12% respectively at 18 months). Clients in supported employment earned more and worked more hours per month than those in pre-vocational training. There was no evidence that pre-vocational training was more effective than standard community care in helping clients to obtain competitive employment.[153]

EQOLISE Project
A randomised controlled trial (the EQOLISE project) compared 'place-then-train' IPS with high-quality 'train-and-place' vocational rehabilitation services, which addressed deficits deriving directly from the illness plus provided skills training to enhance competitiveness in the job market, in six European countries.[154] It found that, after 18 months IPS clients were twice as likely to gain employment (55% compared with 28%) and sustained employment for significantly longer.
The total costs for IPS were generally lower than standard services over the first six months.
Clients who had worked for at least one month in the previous five years had better outcomes.
Individuals who gained employment had reduced hospitalisation rates.[150]

Long-term employment effects
Most published studies of IPS report only short-term employment outcomes, at around 12-24 months, and less is known about outcomes over the longer term.[155] However, a small number of studies which do provide this information report positive findings. For example, one study which followed up a sample of IPS participants 8-12 years after enrolment found that all did some work during the follow-up period, 82% in competitive jobs, and 71% worked for more than half of all months in the follow-up period.[156]

Cost-benefit analysis
The Centre for Mental Health has carried out a cost-benefit analysis of IPS programmes. Employment support for people with mental health problems will bring cost savings to the health system and DWP. The total cost of the service is about £50,000 per IPS worker[155] and evidence suggest that each IPS worker would support at least 14 people into employment per year and maintain them in work, giving a cost per job outcome of £3,600. Payments to Work Programme providers for sustained work outcomes are set at £4,395 for jobseekers aged 25 or over who have been claiming Jobseeker's Allowance for a year, £6,600 for jobseekers with significant disadvantage and £13,720 for Employment Support Allowance claimants who had previously claimed Incapacity Benefit and who volunteer for the Work Programme. The Centre for Mental Health recommends an innovative local arrangement of pooling current budget allocations from health, social care and DWP to fund IPS workers for people with severe mental health problems.[133]

Boxes 40 and 41 provide examples of local IPS programmes that had positive and cost-effective employment outcomes.

Box 40. Intervention: individual placement and support (IPS) Programme, South West London[148 157]

Who? South West London and St George's NHS Mental Health Trust introduced an IPS programme for people with severe mental illness.

Description: employment specialists were integrated into each of the Community Mental Health Teams and collaborated with the mental health professionals to provide optimal support to address the service users' vocational needs. The employment specialists were not clinicians, but people with experience of mental health and employment and were trained in both the IPS approach and welfare benefits (in relation to work/education). The IPS service also provided supported education services.

Impact: the IPS service shows advantages over a neighbouring borough that has well-established pre-vocational services that are not integrated, and operated a step-wise 'train and place' approach: during the first 12 months of the IPS programme, 37% of service users were supported to open employment compared with only 17% in the pre-vocational service. More people were placed in mainstream education or training or voluntary work in the IPS service compared with the pre-vocational service.

Cost-benefit: the costs of getting someone into open employment in the IPS service were 6.7 times lower than in the pre-vocational service.

Box 41. Intervention: IPS regional trainer in Sussex[151]

Who and why? The Sussex Partnership NHS Foundation Trust and Southdown Supported Employment, a not-for-profit sector provider of employment services, piloted a project based on the state trainer project that has produced successful results in the US for over ten years.

Description: a 12-month pilot project began in 2010, using a 'regional trainer' to speed up implementation of IPS across mental health services in Sussex.

The role of the regional trainer:

- external person 'on hand' to support the planning and preparation for fidelity reviews, conduct fidelity reviews and assist with the development of action plans.
- demonstrates a learning culture. Explains why fidelity is important to the clinical team and employment specialist and trains vocational champions.
- provides reports to Trust executive team and designs employment-related key indicators for the mental health services and employment targets for clinical teams.
- demonstrates field-mentoring in practice and supports supervisors to adopt this approach with employment specialists.
- acts as a 'culture carrier', ie, an individual representing evidence-based practice, who actively works to implement that practice.

Impact: after a year in post, awareness of employment issues among practitioners, team leaders and senior managers in the trust had increased; 284 people were supported into employment in a job that anyone can apply for, far exceeding the 200 target and more than doubling the standard annual target of 125.

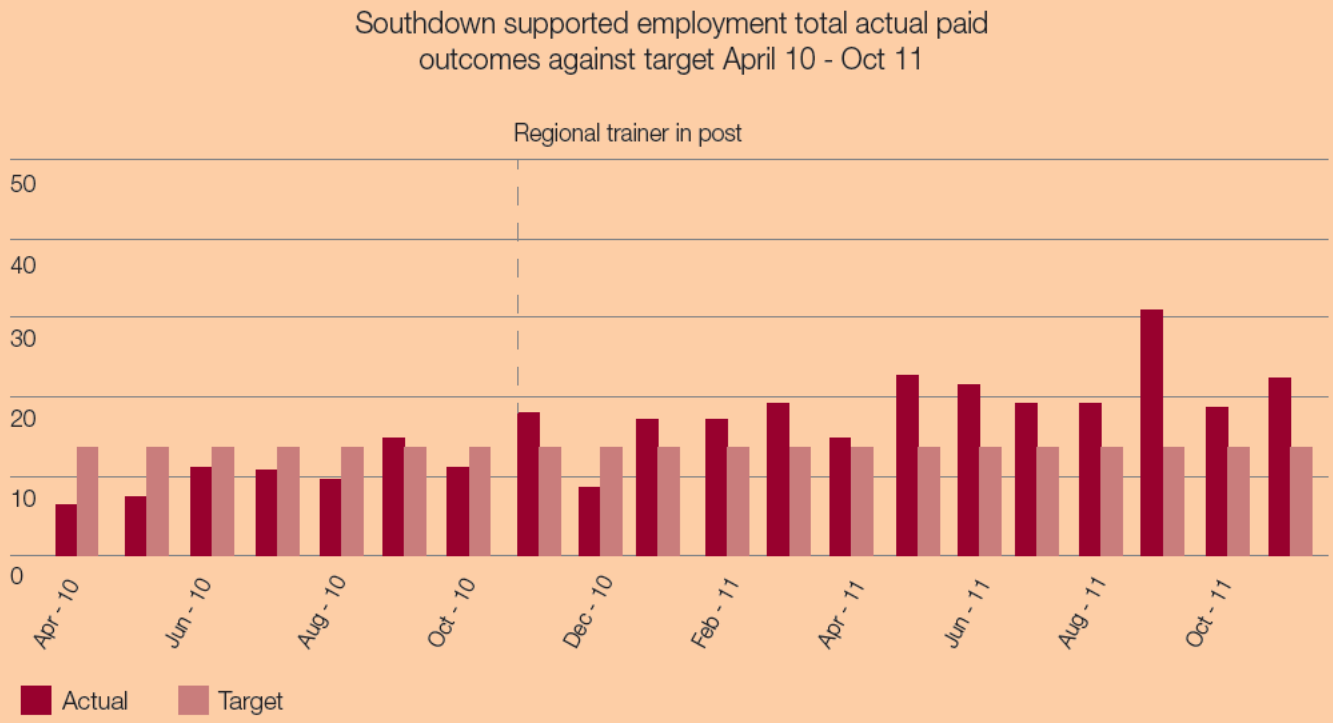


Figure 7: Employment outcomes following introduction of the regional trainer in November, 2010
Source:151

The Centre for Mental Health has highlighted some promising examples of the success of aligning IPS with Improving Access to Psychological Therapy (IAPT) services (eg, Wolverhampton Healthy Minds and Wellbeing Service), and using IPS with ex-offenders (eg, a new study being undertaken by the Centre for Mental Health and Enable, Shropshire).[133]

There is good evidence for IPS for people with severe mental health problems. However, there is no robust evidence that it is effective for people with common mental health problems such as anxiety and depression, which affect the overwhelming majority of the people receiving illness-related benefits.

In its report 'Psychological wellbeing and work: improving service provision and outcomes', RAND Europe proposed testing whether an IPS-type model would be successful in improving the employment outcomes for people with common mental health conditions in a primary care setting (like improving access to psychological therapies (IAPT)).[158] DWP and the Department of Health are taking forward a pilot to test whether offering IAPT treatment, plus a specified model of employment support based on the IPS model, can result in better benefit off flows for ESA claimants with common mental health problem than usual Jobcentre support or usual IAPT support.

Supporting employees on long-term sick leave back into work

Retaining staff on long-term sick leave and getting them back into work has been a focus of national government policy in recent years. Working for a Tomorrow highlighted a number of factors that can speed up the reintegration of employees into work following a period of sickness absence, including: early, regular and sensitive contact with employees during sickness absence; training for line managers on sickness absence policies; cross-sector working between employers, employees and healthcare professionals; and access to occupational health resources.[37]

Early intervention is important. Fit for Work service pilots ran from 2010-13 and were established to provide employees in the early stages of sickness absence with case-managed personalised support to help them return to and stay in work (box 42). Following a recommendation in the 2011 independent review of sickness absence, the new health and work service will be introduced in late 2014. The service will provide a return to work plan for employees who have reached or are expected to reach four weeks sickness absence, and general health and work advices for GPs, employers and employees to help individuals with health conditions to stay in or return to work.[92]

Box 42. Intervention: Fit for Work service pilots[159]

Who and why? The pilots were commissioned by the government following the recommendations of Dame Carol Black's 2008 review of the health of Britain's working age population.[37]

Description: the Fit for Work service pilots ran from 2010-13 and were established to provide employees (particularly those working in small and medium sized enterprises) in the early stages of sickness absence with case-managed, multidisciplinary and personalised support to enable return to work and support job retention.

Impact: an evaluation for the first year of the programme found:

- the services were well liked by clients and stakeholders and appeared to be meeting a genuine need for this type of service
- 6,700 clients took up the service – significantly less than expected; they were much more likely to be people struggling at work with a health condition rather than the primary target of people on sickness absence
- most clients had multiple and wide-ranging needs, confirming the need for multidisciplinary support

There is some qualitative evidence that most clients would not have received the interventions they had without the support of the service and that it had helped people get back to work more quickly or more easily than they would otherwise have done.

The evidence from service providers and clients suggests that a successful approach to helping sickness absentees back to work includes:

- quick access to an holistic initial assessment
- ongoing case management to identify latent concerns (often non-medical) and maintain momentum towards a return to work goal
- fast access to physiotherapy if required
- facilitating better communication between employee and employer and providing advice for return to work options
- advice to improve and manage longer-term health conditions

The ‘fit note’ was introduced in 2010 to help change perceptions of being fit for work, to reflect that it was not always necessary to be 100% fit to attend work and that steps can be taken to quicken an employee’s return to work.

Box 43. Intervention: fit note

Who and why? The fit note was introduced by the government in 2010 to replace the sick note.

Description: the fit note is a form issued by doctors and provides advice about the individual’s fitness for work, and details the functional effects of the patient’s condition. It provides more details about the individual’s functional capacities than the previous sick note, so that individuals and employers can consider ways to help the individual return to work.

Impact: an evaluation of the fit note compared sick note data from seven practices in the North West of England in 2002 with fit note data from the same practices in 2011-13. The evaluation found the following results:

- at five of the practices, the likelihood of a long-term sickness certificate being issued in the fit note evaluation was significantly reduced, compared with the sick note study, after controlling for patient and diagnostic factors
- at three of the practices, the use of the fit note was independently associated with a reduction in sickness absence episodes of longer than 12 weeks
- the proportion of long-term (over four weeks) medical statements issued to patients decreased between studies, from 42% to 36%. A higher proportion of fit notes suggested absence from work for less than a week (10%, compared with 7% of sick notes)
- it is evident that the introduction of the fit note has facilitated greater communication between GPs, patients and employers[160]

This evaluation suggests that the fit note has brought business benefits in the form of reduced employee absence.

Some organisations have made a conscious effort to give extra support to employees on long-term sick leave, with some positive results reported (boxes 44 and 45).

Box 44 Intervention: Tate & Lyle – vocational rehabilitation[161]

Who and why? In partnership with Neylon OH Ltd, Tate & Lyle has implemented a programme to support those on long-term sick leave back into work.

Description: the organisation provides a programme of clinical and occupational services that reduce or prevent illness or injury, and, in the case of absence, support the employee's prompt return to work through a rehabilitation programme. It has adopted a number of new principles where early return to work in a well-managed workplace improves both mental and physical recovery and is a treatment for people recovering from sickness.

Tate & Lyle has developed communication programmes with employees and GPs to broaden understanding that a sick certificate does not preclude working in a different role tailored to individual ability. Also provided are discussion, counselling, focus groups and employee assistance programmes in order to support employees suffering from stress to remain at work.

Impact: since the programme was implemented in 2002, there has been a 75% reduction in ill-health early retirement, 69% reduction in back injuries, 60% reduction in long-term sickness absence and 50% reduction in physiotherapy provided. However, the programme was much wider than the element supporting employees return to work. Tate & Lyle has won a number of awards, notably gold in the FDF Community Partnership Awards 2008 in the 'workplace community' category, and the company was winner of the Vocational Rehabilitation Award 2007 from Occupational Health magazine.

Box 45. Intervention: ClinPhone – supporting staff on sickness absence back into work[37]

Who? ClinPhone is a company that uses internet and telecommunications technology to accelerate the drug development process for the pharmaceutical industry. It employs 726 staff and has an annual turnover of £33.9 million.

Description: as soon as a member of staff is signed off work with a sick note, the line manager and HR team proactively work with their occupational health adviser, the employee and the GP to formulate a tailored return to work.

Impact: as a result of this, and their other health and wellbeing strategies, ClinPhone has a low staff absence rate, averaging 3.2 days per employee per year.

4.4: Interventions to increase employment opportunities and retention for older people

Box 46. Key messages: employment for older people

Being in good work is protective of health and wellbeing for people of all age groups, whereas not being in work is associated with poor physical and mental health and wellbeing.[25]

Research has found that poor working conditions are among the determinants of early retirement.[71 162-164] Therefore, improving working conditions is likely to increase the chances of retaining older staff. This can entail both improving physical and psychosocial working conditions and specific interventions that make the conditions of working suitable for older people.

Based on DWP suggestions[165] and the interventions highlighted in this section, specific areas to be considered in an organisation's efforts to attract, recruit and retain older workers include:

- improvements to the physical and psychosocial work environment
- fair recruitment practices that encourage applications from older people
- encouraging and making accessible training opportunities for workers regardless of age
- flexible working
- phased retirement and flexible retirement options
- performance discussions for employees of all ages to alleviate concerns that managing the performance of older workers is more difficult than younger workers
- succession management
- training for managers on issues of age
- regularly seeking workforce feedback
- risk assessment for workers with additional health/mobility needs

Why implement interventions to increase employment opportunities and retention for older people?

It is well known that the English population is ageing – people are living longer and face the prospect of spending longer periods of life in retirement and years spent in poor health, with likely increased costs for taxpayers. The state pension age is increasing to 68 years and the default retirement age has been phased out, allowing people to work for longer. Many people may wish to work longer for financial, health or social reasons.

A 2013 review found that being retired decreases physical, mental and self-assessed health, with the adverse effects increasing as the number of years spent in retirement increases.[166] Being in good work is protective of health and wellbeing for people of all age groups, whereas not being in work is associated with poor physical and mental health and wellbeing.[25] Therefore, effective actions to remove the barriers preventing older people from finding and staying in work should help to improve health and wellbeing within this demographic.

Anecdotal evidence from the company B&Q in its 1995 survey of older staff (aged over 50) found that these staff thought the main benefits of being in work were financial security, friendship, teamwork and lively atmosphere, and being able to use their life experience to meet and help customers.[167] A UK study found that being isolated from family and friends was associated with a 26% higher risk of death over seven years among older people (aged over 52), suggesting that the social aspects of staying in employment are beneficial for older people's health.

Older people in more disadvantaged socio-economic positions are more likely to face difficulties in finding and retaining employment, as they are less likely to have built up skills over the life course and they are more likely to have a disability at an earlier stage in life – both of which are factors that reduce the likelihood of being in employment. Further, they are more likely to face problems if they become unemployed as they are less likely to have savings or other means to buffer a sudden drop in income than older people higher on the socio-economic scale. Therefore, reducing the barriers faced by older people in the workforce should improve health and wellbeing and reduce socio-economic inequalities among older people.

Research has found that poor working conditions are determinants of early retirement.[71 162-164] Therefore, improving working conditions is likely to increase the chances of retaining older staff. This can entail both improving physical and psychosocial working conditions (see section 4.1) and specific interventions that make the conditions of working suitable for older people.

Older people may face barriers to accessing and returning to the labour market, as well as to remaining or progressing within employment.[168] Many organisations that have implemented interventions to increase employment and retention of older workers report initial fears about their performance, yet in the interventions below this was not found to be any more of a problem than at other ages. Research by B&Q of its Macclesfield store, which is staffed entirely by over-50s, compared with its other stores, reported that profits were 18% higher, staff turnover six times lower, there was 39% less absenteeism and 58% less shrinkage. Further, there was an improved perception of customer service and an overall increase in the skills base.[167]

There is an additional chance of health or mobility problems among older workers and self-reported illnesses are most prevalent among workers closest to retirement age.[169] However, this is not inevitable, can be compensated for by greater experience, and aspects such as physical strength and cognitive ability are specific to the individual more than a factor of the ageing process.[169] Even so, employers should assess how to facilitate work for older people who may have additional health or mobility needs.

Other problems faced by older people in the workplace include a lack of training because of perceptions that they will leave before the organisation reaps the benefits of their new skills. This can impact on their motivation, productivity and ongoing job options.[170 171] Besides, this logic is flawed, as most training returns an investment within a year[172] and the risk of an employee leaving the company after receiving training is the same across all age groups.[173]

Examples of existing interventions to promote employment opportunities and retention among older people

Local authorities have a role as both an employer and as a strong local influence to improve employment opportunities for and retention of older people. National legislation can be enforced and guidance disseminated by local authorities. It is against the law to discriminate directly or indirectly on grounds of age in the workplace, and in recruitment and dismissal, except where it is objectively justified.[173] The Department for Work and Pensions' Age Positive initiative brings together research and information from employers on effectively managing an ageing workforce and can be helpful for providing information and solutions to recruiting, employing and getting the best out of workers of all ages.

Boxes 47-49 provide examples of local authorities that have taken action to improve the employment and retention of older workers, in Falkirk, Hertfordshire and North Warwickshire.

Box 47. Intervention: Falkirk Council – flexible working and phased retirement[165]

Who? Falkirk Council is a unitary authority and a large employer. It has a workforce of around 8,000 and serves a population of around 152,000.

Description: the council implemented a flexible working policy in 2005. It applies to all council employees, and there is a parallel scheme for teachers. One of the objectives was to broaden options for staff who wished to continue working after 65. There are a range of options available, including: phased retirement with a staggered reduction of hours approaching planned retirement; a raft of flexible working options (part-time, job share, reduced time, compressed hours, term-time working, home-working); continuation as per current working arrangements.

Implementation of the policy was relatively straightforward once the decision was made. The only resistance came from some managers concerned about their ability to deal with performance issues arising with older employees. The council's existing performance management policy was fit for employees at any age and required no significant alteration and initial concerns were quickly allayed. There was also that concern apprenticeship numbers could be affected, but they were not.

Impact: since 2005 the council has seen a modest but steadily growing uptake for working beyond 65 among a wide range of employees, all taking advantage of the flexible retirement arrangements. In 2010, there were 193 employees aged 65 or over, in a variety of roles.

The greatest benefits to the council as an employer were where jobs had typically been hard to fill. By allowing valued workers to continue in their roles longer, the council was able to benefit from a larger potential labour market, without incurring additional recruitment costs. Added to this was the opportunity to benefit from the experience and knowledge held by such staff, through inter-employee mentoring.

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Box 48. Intervention: Hertfordshire County Council (HCC) – management training and flexible retirement[165]

Who and why? HCC employs around 35,000 people (including school staff). 34% employees are aged over 50; 48% are 40-54; and more than 60% of the workforce is over 40 years old. Therefore there were concerns that a wealth of experience and knowledge could be lost if the council did not manage the career aspirations of its older workers.

Description: HCC removed the mandatory retirement age in 2006 and implemented a flexible retirement scheme. With their employer's agreement, employees can gain access to all or some of their pension benefits while continuing to work. The council allows all staff to work flexibly and highlights the options available to them if they want to ease into retirement by reducing their hours. The council also offers a one-day pre-retirement course, focusing on the transition from employment to retirement.

The council has built the concept of 'age neutrality' into its management training programme, so that issues of age discrimination are specifically discussed when managers attend short courses on other topics. It has developed its performance management guidance to include tips for managers around issues of age. The council requires all its managers to proactively deal with the issues of negative attitudes and stereotypes including age. It trains employees in the behaviours and language required for a diverse working environment. Typically there can be a tendency for managers to apply a 'hands-off' approach to management of employees who are approaching retirement age; this is no longer acceptable at HCC which requires a shift in perception and management style.

Impact: the council reports that this has led to reduced staff turnover and recruitment costs (turnover is currently 13.3%), and positive employee feedback (eg, in the latest staff survey, 65 year old respondents were the most engaged staff group). The council suggests that the intervention has benefitted it as it is able to retain key skills, and because its public face reflects the diversity of its clients. It found that, rather than restrict opportunities for younger workers, encouraging flexible retirement models can actually support and enable a better transfer of skills and organisational knowledge to younger staff. Further, HCC has seen an increase in take-up of flexible working options over the last year with 94% of requests being granted.

A clear communications strategy to cascade messages about the council's expectations of its staff, together with management training, has helped to make this approach work well.

Box 49. Intervention: North Warwickshire Borough Council – phased retirement and succession planning[165]

Who and why? The council serves a population of around 62,000 in a predominantly rural area. 31% of staff are aged 51-plus, with 9% aged 60 and over.

Description: the phased retirement policy applies to all employees and includes:

- no prior assumptions made about whether staff will wish to retire at a certain age
- flexible retirement options as part of the local government pension scheme
- informal but structured conversations, at least six-monthly, between all staff and their managers on their future plans and expectations as part of the regular appraisal process
- effective approach to workforce and succession planning, including a regular review and risk assessment of each staffing role as part of divisional team planning where the potential impact of loss of each staff member is assessed alongside corresponding mitigation plans. This takes much of the uncertainty out of sudden loss of staff, at any age, and allows teams to better plan around the unexpected
- a flexible approach to re-deployment and re-training
- briefing of all senior managers and team leaders on the new policy by the HR manager
- all staff have access to the policy either as part of their induction, via the intranet or in hard copy in locations where staff do not have easy network access

The council's criteria for accepting phased retirement are if there will be no detrimental effect on delivery; it will be economically beneficial, and be fair to other team members.

Impact: since October 2006, 52% of workers reaching age 65 chose to leave; a further 9% stayed for less than a year; 18% chose to leave within three years; and 15% stayed longer on reduced hours.

The interventions above provide examples of policies and practices that local authorities can implement to bring positive benefits including reduced turnover and recruitment costs, positive employee feedback and retaining and transferring key skills and experience. These include flexible retirement options including phased retirement and flexible working, management training on age-related issues, inter-employee mentoring and succession planning. It is also emphasised that many of the policies and practices, such as conversations on future plans and expectations and flexible working options, should be available to all staff, rather than age-specific.

Boxes 50-52 provide examples of other organisations that have taken action to improve the employment and retention of older workers.

Box 50. Intervention: B&Q – removing the barriers to employing older workers[167]

Who and why? B&Q employs over 39,000 members of staff. B&Q's approach to employment is "based on a philosophy of attitude, not age".

In 1989, B&Q opened two stores staffed entirely by over-50s. It also removed its retirement age to allow employees to continue to work beyond 60 and undertook an audit to remove all other age barriers. A 1991 survey of one of these stores (in Macclesfield), benchmarking it against four other B&Q supercentres, provided the following results:

- profits were 18% higher
- staff turnover was six times lower
- there was 39% less absenteeism and 58% less shrinkage
- improved perception of customer service and an overall increase in the skills base

Description: B&Q has identified a number of benefits in employing older workers and has made deliberate efforts to remove any barriers that might restrict who it recruits, retains or promotes. It has removed the retirement age and provides flexible retirement options. It has a range of contract types which offer hours to suit all individuals, and age-related criteria have been removed from its rewards and benefits. There is a learning and development framework for all customer advisers that offers them choice and flexibility around how and when they learn. Flexible working is offered to everyone, irrespective of age, length of service or caring responsibilities. Currently over 62% of B&Q's employees work flexibly.

B&Q regularly seeks feedback and views from the workforce. Diversity Insights reporting is used to regularly review the company's attraction and workforce statistics. All stores are encouraged to employ a diversity champion, and a diversity e-learning programme has been developed and forms part of the induction programme for every new employee and manager. Age positive case studies and media are used in all internal and external communications. Each store has been audited for disability.

Box 51. Intervention: South West Forgemasters – succession planning, recruitment and retention, and training[165]

Who and why? South West Forgemasters is a medium-sized engineering company which supplies forgings to the automotive industry. Most of the company's older workers started with the company as young people and have seen no reason to leave. Their practical knowledge is seen to be an asset.

Description: the company removed the retirement age years ago and some workers choose to work beyond retirement age. To reduce the risk of sudden loss of skills and expertise, the company examines its age profile to determine when people are likely to retire and makes the necessary contingency plans. An example of this was where a skilled toolmaker, thinking of retiring, was involved in the development of a new trainee who worked with him to learn all aspects of the job. Another previously retired individual had been asked to return to work to develop designs for a new project.

The company factors age out of all of its recruitment and retention policies. All employees undergo a formal induction period, after which the company and employee agree any necessary training and draw up a training plan. The company assesses the abilities of all employees annually, matching these to the work within the plant and arranging any necessary training.

When the company found that some older workers felt reluctant to undertake training, they made the style in which it was delivered more flexible. This makes the workers feel more comfortable within a learning environment, andappreciate the benefits training can bring. An older worker who was recently trained in basic computer literacy has continued to learn more about computers and software. He has been instrumental in helping to install some preventative maintenance software into the organisation's computer system.

Impact: South West Forgemasters reported that its approach to age diversity has helped to recruit and retain skills in a business where it is hard to attract workers into heavy-duty metal processing. It reports a very low turnover of staff (in the last four years only two people have left), and finds that older workers support new workers from a practical and personal perspective.

Box 52. Intervention: British Gas – recruitment and apprenticeships[165]

Who and why? British Gas in a UK energy and home services provider of more than 12,000 call centre staff and over 8,000 engineers.

Description: When age discrimination legislation was introduced, British Gas positively ensured all its recruitment policies and practices were free from age bias.

Impact: Opening up apprenticeships to older people was a real culture change in the organisation and resulted in reduced apprenticeships grant funding, but the impact of the initiative was extremely positive: the oldest apprentice taken on was 56. The greater age diversity in the training groups improved the behaviour and maturity of the group as a whole, and older trainees often acted as life mentors for less experienced team members.

A bigger target recruitment market has meant reduced costs and a wider diversity in the applicant pool. The company's reputation has been enhanced as an employer of choice.

B&Q focuses on removing barriers to older people, including removing the retirement age, carrying out disability audits (addressing the additional health needs of some older workers) and removing age criteria from rewards and benefits. It also highlights the importance of employee feedback, conducting research in the 1990s and regularly seeking workforce views and feedback. South West Forgemasters also emphasises the importance of making training available to all and ensuring that it was sufficiently flexible to encourage older people to take it up, while British Gas opened up its apprenticeships to older people. Ensuring recruitment practices were free from age bias was highlighted in all three interventions.

5. Areas for further research

The evidence linking employment and working conditions with health and health inequalities is well established and robust. We have also identified what factors make up a good working environment. There are a number of national and local programmes that have been evaluated and provide employment outcomes. Similarly, many workplace health and wellbeing programmes (particularly those with a focus on behaviour change) provide information about business benefits that have occurred as a result of the programme (such as reduced sickness absence, reduced turnover, increased productivity), though these vary with regard to their robustness and often include many methodological weaknesses.

However, there is little methodologically sound research indicating which interventions are effective in improving health and reducing health inequalities. This is partly because health and equity are often not the main focus of an employment or workplace intervention, particularly among employers, who are usually the ones evaluating a workplace programme. Methodological weaknesses often include: a failure to include control groups; small sample sizes; measuring impacts only for a short timeframe; using 'take-up' as the only measure of a programme's success; too much reliance on self-reported measures of success; not accounting for other factors that could have caused the reported business/health benefits. Another major problem is that usually only the immediate benefits of an intervention are measured, meaning that longer-term outcomes are not known. More and better-quality research is needed to identify which interventions are effective, particularly in terms of improving health and reducing health inequalities. Future research should ensure that it takes into account the short- and long-term benefits, and identifies which aspects of an intervention make it more effective. Further, research looking at the effects of workplace wellness programmes on physical diseases such as coronary heart disease, in addition to mental health and wellbeing and sickness absence, would be a valuable addition to the evidence base.

There is a need for information regarding what approaches are effective and cost-effective for particular groups of employees – for example, employees of different age, gender, race/ethnicity, socio-economic status, disability, sexual orientation, or for part-time, shift workers and migrant workers. Which approaches are effective among employees in lower grade jobs? Ensuring that their health and wellbeing is addressed will contribute to reducing health inequalities.

There is a lack of information available in the literature around how local authorities have successfully worked with local employers to encourage, incentivise and enforce good quality work. It is unclear who has responsibility for good quality work at a national or local level, which makes it difficult to establish where partnerships have existed, so more research to establish where responsibility does or should exist, or where local areas have worked effectively with local employers to implement good quality work, would be welcome. Further, evaluations are needed of schemes and programmes that may incentivise employers to implement good quality work – such as the Public Health Responsibility Deal.

There is a lack of economic evaluation of the interventions identified. Cost-benefit analyses have been carried out for many health and wellbeing initiatives in the workplace, though these are for those that focus on behaviour change rather than working conditions and the social determinants. However, they do show that improving the health of the workforce has financial benefits for organisations. More research is needed on the cost-effectiveness of interventions to improve the psychosocial work environment and interventions to increase employment opportunities and retention for people with a disability or a long-term condition, and for older people.

In relation to increasing employment opportunities for people with a disability or long-term condition, more work is needed to identify the features of different programmes that have led to successful outcomes, and greater clarity and consistency of outcome measures across programmes would be valuable in order to improve evaluations and make comparisons. Aside from Work Choice, we were unable to find evidence of successful interventions to support people with a disability or long-term condition into self-employment, and this is a potential area for future action. Further work to confirm the pilot findings of the 'health first' approach would be valuable.

This report does not exhaustively cover areas for intervention on employment. Other areas for future review include interventions to get long-term unemployed people into work, attracting employers and creating good quality jobs for local people, and improving job security.

Conclusion

The evidence is clear that unemployment, particularly long-term unemployment, and poor working conditions, are bad for health and contribute to health inequalities. This evidence review has highlighted that these are important issues to be addressed by public health in local areas, and has identified a number of interventions, specifically in the following areas: workplace interventions to improve health and wellbeing; working with local employers to encourage, incentivise and enforce good quality work; interventions to increase employment opportunities and retention for people with a long-term illness or disability; and interventions to increase employment opportunities and retention for older people. Many of these interventions have shown successful health, employment and business outcomes. Further research is needed to develop the evidence base, particularly to the key elements of success.

Appendix 1. Evidence base on employment outcomes of interventions for employees with common health conditions

Table of health conditions, interventions, evidence base and effects for employees with health conditions to enable them to stay in or return to work (from DWP rapid evidence assessment, 2012)

Health condition	Intervention type	Quantity of evidence	Quality of evidence	Evidence of effectiveness
Musculoskeletal disorder (MSDs)	Cognitive behavioural therapy (CBT)	Reasonable	Reasonable	Mixed
	Workplace based	Reasonable	Reasonable	Positive
Low back pain	Graded activity/ excercise	Reasonable	Weak	Mixed/no effect
	CBT	Reasonable	Reasonable	Positive
	Patient education	Quite weak	Quite weak	Positive
	Vocational rehabilitation	Reasonable	Reasonable	Positive
	Workplace based	Reasonable	Reasonable	Positive
Other MSDs		Weak		
Cardiorespitory	Workplace based	Weak	Reasonable	Positive
Mental health conditions (MHCs)	Psychological/ CBT	Weak – very mixed	Reasonable	Positive
	Workplace based	Weak	Quite weak	Inconclusive
Depression	Psychological/ work- based	Mixed types	Reasonable	Positive
Severe MHCs	Vocational rehabilitation	Weak	Reasonable	Positive/mixed
Supported employment		Reasonable	Reasonable	Positive
Stress/distress and burnout	Psychological/ stress management	Reasonable	Weak	Mixed/no effect

Source:131

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The Index of Multiple Deprivation (IMD2019): Headline findings for Kent

Related Documents

The Deprivation and Poverty web page contains more information which you may find useful.

- *Children in Poverty*
- *Homelessness*
- *Unemployment and benefits claimants*
- *Rough Sleepers*

***NOTE**: within this bulletin "Kent" refers to the Kent County Council (KCC) area which excludes Medway Unitary Authority*

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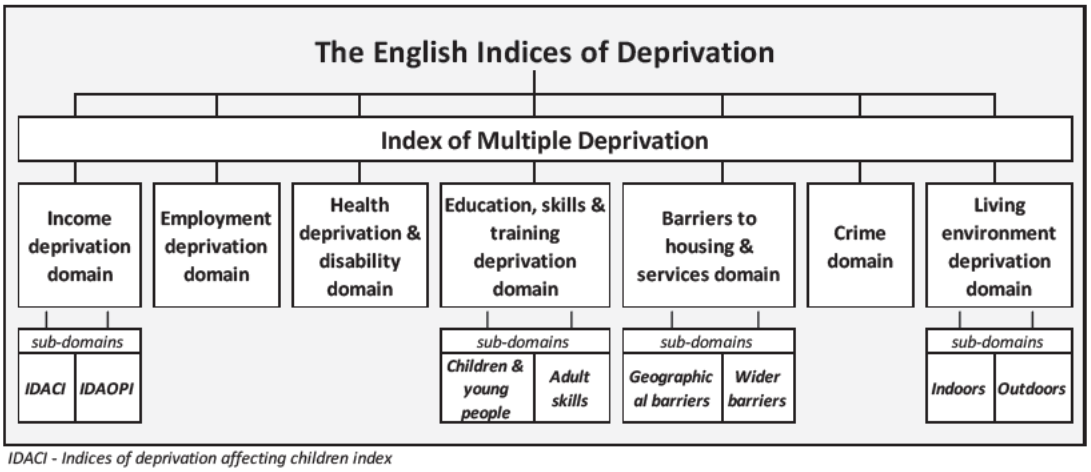
The Index of Multiple Deprivation (IMD2019) is the official measure of relative deprivation in England and is part of a suite of outputs that form the English Indices of Deprivation 2019 (IoD2019). This bulletin presents the findings for Kent.

- There are 901 Lower Super Output Areas (LSOAs) in Kent. A total of 555 remained within the same decile for IMD2019 as they were in IMD2015. This accounts for 62% of all Kent LSOAs.
- The number of Kent LSOAs that are within the 10% most deprived LSOAs in England between the IMD2019 and the previous IMD2015 remains at 51.
- The level of deprivation in nine out of 12 Kent local authority districts has increased since IMD2015 relative to other areas in England.
- Thanet continues to rank as the most deprived local authority in Kent.
- Tunbridge Wells continues to rank as the least deprived local authority in Kent.
- Tonbridge & Malling has experienced the largest increase in deprivation relative to other areas.
- Gravesham has experienced the largest decrease in deprivation relative to other areas.

Overview of the Indices of Deprivation 2019

The Indices of Deprivation 2019 (IoD2019) Is produced by the Ministry of Housing, Communities and Local Government (MHCLG) and provides a set of relative measures of deprivation for neighbourhoods or small areas called Lower-layer Super Output Areas (LSOAs) across England.

The IoD2019 is based on 39 separate indicators, organised across seven distinct domains and 4 sub-domains of deprivation. These are combined and weighted to calculate the overall Index of Multiple Deprivation 2019 (IMD2019). The IMD2019 is the most widely used of these indices.



IDACI - Indices of deprivation affecting children index
IDAOPI - Indices of deprivation affecting older people index

The IMD2019, domain indices and the supplementary indices, together with the higher area summaries, are collectively referred to as the IoD2019.

Geography and spatial scale

The IoD2019 provides a measure of deprivation experienced by people living in each neighbourhood or LSOA. LSOAs were developed by the Office for National Statistics (ONS) before the 2011 Census. There are 32,844 LSOAs in England with an average of 1,500 residents each and are a standard way of dividing up the country. They do not have descriptive place names like local electoral wards or parishes do but are named in a format beginning with the name of the local authority district followed by a 4-character code e.g. Ashford 001A.

All LSOAs in England are ranked according to their level of deprivation relative to that of other areas. A rank of 1 being the most deprived and a rank of 32,844 being the least deprived.

High ranking LSOAs or neighbourhoods can be referred to as the 'most deprived' or as being 'highly deprived' to aid interpretation. However, there is no definitive threshold above which an area is described as 'deprived'. The

IoD2019 measure deprivation on a *relative* rather than an *absolute* scale, so an LSOA ranked 100th is more deprived then an LSOA ranked 200th, but this does not mean it is twice as deprived.

It is common to describe how relatively deprived a small area is by saying whether it falls among the most deprived 10 per cent, 20 per cent or 30 per cent of small areas in England (although there is no definitive cut-off at which an area is described as 'deprived').

To help with this, deprivation 'deciles' are published alongside ranks. Deciles are calculated by ranking the 32,844 small areas in England from most deprived to least deprived and dividing them into 10 equal groups. These range from the most deprived 10 per cent of small areas nationally to the least deprived 10 per cent of small areas nationally.

Summary measures have been produced for the following higher-level geographies:

- lower tier local authority districts – Local Authority
- upper-tier local authorities – Counties, Metropolitan counties, & Unitary Authorities
- local enterprise partnerships
- clinical commissioning groups.

The Data

As far as is possible, each indicator is based on data from the most recent time point available. Using the latest available data in this way means that there is not a single consistent time point for all indicators. However, in practice most indicators in the IoD2019 relate to a 2015/16 timepoint.
As a result, the indicators do not take into consideration any changes to policy since the time point of the data used. For example, the 2015/16 benefits data used do not include the impact of the roll out of Universal Credit, which only began to replace certain income and health related benefits from April 2016.

Uses of the IMD and IoD

Since their original publication in 2000 the Indices have been used widely for a variety of purposes, including the following:

- Targeting resources, services and interventions
- Policy and strategy
- As an analytical resource to support commissioning by local authorities and health services, and in exploring inequalities.
- Funding bids

This bulletin presents the IMD2019 in comparison with IMD2015 at LSOA level in Kent and Medway. Summary measures for IMD2015 and IMD2019 at local authority and county level are also presented.

Due to the large number of LSOAs in Kent (902) the tables in this bulletin show only the most deprived 10% LSOAs in Kent. Full lists of all LSOAs in Kent & Medway with scores and ranks for all the domains are available in Excel format on request from Strategic Commissioning – Analytics.

e:-mail research@kent.gov.uk or telephone 03000 417444

The 2019IMD has not been made available at ward level. However following guidance from MHCLG we have produced a separate ward level IMD2019 summary that is available in a separate document.

Further information

Further information about the Indices of Deprivation 2019 is available from The Ministry of Housing, Communities and Local Government via their website.

www.gov.uk/government/statistics/english-indices-of-deprivation-2019

Deprivation at small area level in Kent's Lower Super Output Areas

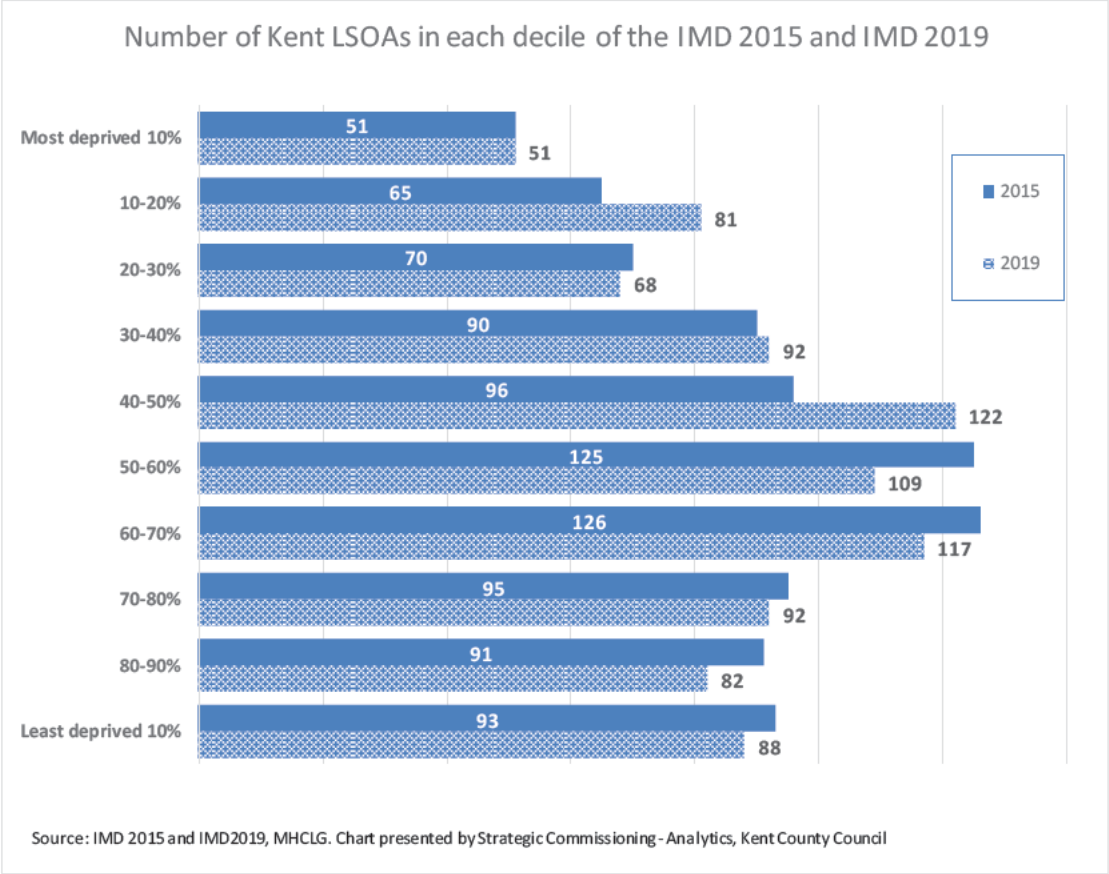
The number of Kent LSOAs that are within the 10% most deprived LSOAs in England between the IMD2015 and the IMD2019 remains at 51. Although there has been no direct increase in the number of the most deprived areas within Kent there have been changes within the lesser deprived areas

The number of Kent LSOAs within the 10 to 20% most deprived LSOAs in England has increased from 65 in 2015 to 81 in 2019. The number within the 40-50% most deprived have also increased from 96 to 122.

At the other end of the spectrum, the numbers of LSOAs within the 10% least deprived LSOAs in England has decreased from 93 in 2015 to 88 in 2019.

Chart 1 shows the changes in of Kent LSOAs within all of the deciles of the IMD2015 and IMD2019.

Chart 1: Number of Kent LSOAs in each decile of the IMD2015 and IMD2019



Thanet has the most LSOAs within the most deprived decile with 18. This figure has also remained the same since the IMD2015.

The number of Folkestone & Hythe LSOAs within the 10% most deprived has also remained the same between the IMD2015 and IMD2019.

Four local authorities have experienced an increase in the number of LSOAs within the most deprived decile. These are Swale (+2), Ashford and Dover (both with +1) and Canterbury which now has 2 LSOAs within the 10% most deprived LSOAs for IMD2019 when there were none in the IMD2015.

There has been a reduction in the number of LSOAs within the 10% most deprived within Dartford (-2) and Gravesham (-4). Sevenoaks, Tonbridge & Malling and Tunbridge Wells do not have any LSOAs within the 10% most deprived

Medway Unitary authority has also seen an increase in the number of LSOAs in the 10% most deprived LSOAs between IMD2015 and IMD2019.

Table 1: IMD2019 and IMD2015: Kent & Medway LSOAs within the top 10% most deprived in England

Authority	Total LSOAs in each Local Authority	Within the top 10% most deprived: IMD 2015		Within the top 10% most deprived: IMD 2019		2015 - 2019 Change
		Number	%	Number	%	Number of LSOAs
Kent	902	51	*6%*	51	*6%*	0
Thanet	84	18	*35%*	18	*35%*	0
Swale	85	14	*27%*	16	*31%*	2
Dover	67	4	*8%*	5	*10%*	1
Folkestone & Hythe	67	4	*8%*	4	*8%*	0
Canterbury	90	0	*0%*	2	*4%*	2
Gravesham	64	6	*12%*	2	*4%*	-4
Maidstone	95	2	*4%*	2	*4%*	0
Ashford	78	0	*0%*	1	*2%*	1
Dartford	58	3	*6%*	1	*2%*	-2
Sevenoaks	74	0	*0%*	0	*0%*	0
Tonbridge & Malling	72	0	*0%*	0	*0%*	0
Tunbridge Wells	68	0	*0%*	0	*0%*	0
Medway U.A.	163	12	*24%*	14	*27%*	2

Table ranked by highest number of LSOAs in top 10% most deprived by IMD2019 Score

* A minus change illustrates a reduction in the number of LSOAs within the 10% most deprived areas in England.

* A positive change illustrates an increase in the number of LSOAs within the 10% most deprived areas in England.

Source: The English Indices of Deprivation 2015 and 2019, Ministry of Housing, Communities and Local Government
Table presented by Strategic Commissioning - Analytics, Kent county Council

The change in numbers of LSOAs within each of the deciles does not identify which areas have improved or declined. Chart 2 presents the proportion of LSOAs that have remained within the same decile in IMD2019 as IMD2015.

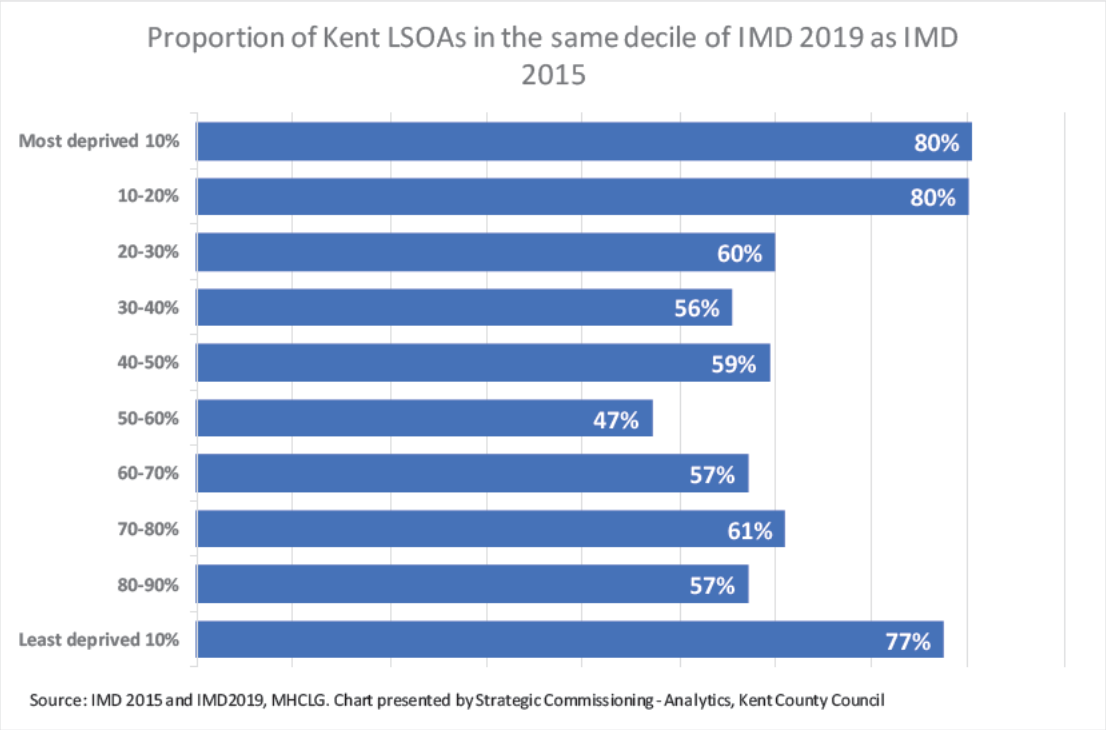
There are 901 LSOAs in Kent. A total of 555 LSOAs remained within the same decile for IMD2019 as they were in IMD2015. This accounts for 62% of all Kent LSOAs.

Of the 51 Kent LSOAs that were within the 10% most deprived LSOAs in England in 2019, 80% or 41 LSOAs remained in the 10% most deprived LSOAs for 2015. The same proportion of LSOAs were in the 10-20% most deprived in IMD2019 and IMD2015.

In contrast, only 77% of LSOAs within the least deprived 10% of LSOAs in 2019 were in the least deprived decile in 2015. This accounts for 72 LSOAs.

Only 57% of LSOAs within the 80-80% least deprived were in this decile for IMD2019 and IMD2015.

Chart 2: Proportion of Kent LSOAs in the same decile of the IMD 2019 and IMD2015



Maidstone has the highest number of LSOAs to remain in the same decile in IMD2019 as in IMD2015 with 62. This accounts for 65% of all LSOAs in Maidstone and is a higher percentage than for Kent as a whole.

Dartford has the lowest number and percentage of LSOAs to remain in the same decile in IMD2019 as in IMD2015 with 29. This accounts for 50% of all LSOAs in Dartford. Gravesham has the highest percentage of LSOAs to remain in the same decile in IMD2019 as in IMD2015 at 75%. This accounts for 48 LSOAs in Gravesham.

Table 2: LSOAs within the same deciles for IMD2015 as IMD2019

Authority	Total LSOAs in each Local Authority	LSOAs within the same decile in 2015 and 2019	
		Number	%
Kent	902	555	*62%*
Ashford	78	51	*65%*
Canterbury	90	51	*57%*
Dartford	58	29	*50%*
Dover	67	42	*63%*
Folkestone & Hythe	67	37	*55%*
Gravesham	64	48	*75%*
Maidstone	95	62	*65%*
Sevenoaks	74	48	*65%*
Swale	85	50	*59%*
Thanet	84	53	*63%*
Tonbridge & Malling	72	39	*54%*
Tunbridge Wells	68	45	*66%*
Medway U.A.	163	108	*66%*

Source: IMD2015 and IMD2019, MHCLG

Table presented by Strategic Commissioning - Analytics, Kent county Council

Of the 41 Kent LSOAs that remained in the 10% most deprived LSOAs for the IMD2015 and the IMD2019 the majority are in Thanet and Swale.

Thanet has the highest number of LSOAs to remain within the 10% most deprived decile in the IMD2015 and the IMD2015 with 16. This accounts for 19% of all LSOAs in Thanet.

Swale has the second highest number of LSOAs to remain within the 10% most deprived LSOAs for the IMD2015 and the IMD2019 with 14. This accounts for 16% of all LSOAs in Swale.

Ashford and Canterbury are the only local authorities to have LSOAs within the 10% most deprived decile of the IMD2019 when they had none in the IMD2015.

Sevenoaks, Tonbridge & Malling and Tunbridge Wells have no LSOAs within the 10% most deprived deciles of either the IMD2015 or the IMD2019.

Table 3: LSOAs within 10% most deprived deciles for IMD2015 and IMD2019

Authority	Total LSOAs in each Local Authority	LSOAs within 10% most deprived decile: IMD2015		LSOAs within 10% most deprived decile: IMD2019		LSOAs within 10% most deprived decile for both 2015 and 2019	
		Number	%	Number	%	Number	%
Kent	902	51	*6%*	51	*6%*	41	*5%*
Thanet	84	18	*21%*	18	*21%*	16	*19%*
Swale	85	14	*16%*	16	*19%*	14	*16%*
Dover	67	4	*6%*	5	*7%*	4	*6%*
Folkestone & Hythe	67	4	*6%*	4	*6%*	3	*4%*
Canterbury	90	0	*0%*	2	*2%*	0	*0%*
Gravesham	64	6	*9%*	2	*3%*	2	*3%*
Maidstone	95	2	*2%*	2	*2%*	1	*1%*
Ashford	78	0	*0%*	1	*1%*	0	*0%*
Dartford	58	3	*5%*	1	*2%*	1	*2%*
Sevenoaks	74	0	*0%*	0	*0%*	0	*0%*
Tonbridge & Malling	72	0	*0%*	0	*0%*	0	*0%*
Tunbridge Wells	68	0	*0%*	0	*0%*	0	*0%*
Medway U.A.	163	12	*7%*	14	*9%*	12	*7%*

Source: IMD2015 and IMD2019, MHCLG
Table presented by Strategic Commissioning - Analytics, Kent county Council

The 2019IMD has not been made available at ward level. However following guidance from MHCLG we have produced a separate ward level IMD2019 summary that is available in a separate document.

Table 4 and 4a indicates the wards in which the top 10% most deprived LSOAs in Kent are situated. This table also shows the national rank and Kent rank.

Table 4: The 10% most deprived LSOAs by IMD2019 in Kent: (Rank 1 to 45 out of 90)

2011 LSOA Name	2019 Ward Name	National rank			Kent Rank	
		position out of 32,844 LSOAs	Within top 10% most deprived 2019	Within top 10% most deprived 2015	Position out of 902 LSOAs	Within top 10% most deprived
Swale 001A	Sheerness	48	Yes	Yes	1	Yes
Thanet 003A	Margate Central	67	Yes	Yes	2	Yes
Thanet 001A	Cliftonville West	117	Yes	Yes	3	Yes
Thanet 001E	Margate Central	139	Yes	Yes	4	Yes
Thanet 013B	Newington	284	Yes	Yes	5	Yes
Swale 006A	Sheppey East	322	Yes	Yes	6	Yes
Swale 010C	Murston	337	Yes	Yes	7	Yes
Thanet 006D	Dane Valley	423	Yes	Yes	8	Yes
Swale 002C	Sheerness	457	Yes	Yes	9	Yes
Swale 006D	Sheppey East	591	Yes	Yes	10	Yes
Shepway 014A	Folkestone Harbour	614	Yes	Yes	11	Yes
Swale 002A	Sheerness	708	Yes	Yes	12	Yes
Swale 002B	Sheerness	771	Yes	Yes	13	Yes
Thanet 006E	Dane Valley	932	Yes	Yes	14	Yes
Thanet 013E	Northwood	933	Yes	Yes	15	Yes
Dover 011F	St Radigunds	994	Yes	Yes	16	Yes
Thanet 001B	Cliftonville West	1,033	Yes	Yes	17	Yes
Thanet 016D	Eastcliff	1,038	Yes	Yes	18	Yes
Swale 005C	Queenborough & Halfway	1,159	Yes	Yes	19	Yes
Swale 001B	Sheerness	1,205	Yes	Yes	20	Yes
Swale 004E	Sheppey Central	1,309	Yes	Yes	21	Yes
Thanet 001D	Cliftonville West	1,326	Yes	Yes	22	Yes
Shepway 003C	East Folkestone	1,356	Yes	Yes	23	Yes
Thanet 003E	Westbrook	1,563	Yes	Yes	24	Yes
Thanet 016E	Eastcliff	1,597	Yes	Yes	25	Yes
Swale 015D	Priory	1,639	Yes	Yes	26	Yes
Shepway 014B	Folkestone Central	1,761	Yes	Yes	27	Yes
Swale 001C	Sheerness	1,878	Yes	Yes	28	Yes
Dover 013B	Town & Castle	2,105	Yes	Yes	29	Yes
Dartford 001A	Temple Hill	2,133	Yes	Yes	30	Yes
Thanet 013A	Newington	2,242	Yes	Yes	31	Yes
Gravesham 001C	Northfleet North	2,278	Yes	Yes	32	Yes
Thanet 003D	Salmestone	2,342	Yes	Yes	33	Yes
Swale 002D	Sheerness	2,383	Yes	No	34	Yes
Swale 001D	Sheerness	2,411	Yes	Yes	35	Yes
Dover 011A	Buckland	2,450	Yes	No	36	Yes
Dover 012F	Town & Castle	2,473	Yes	Yes	37	Yes
Ashford 008C	Stanhope	2,474	Yes	No	38	Yes
Dover 011D	Whitfield	2,545	Yes	Yes	39	Yes
Thanet 005A	Garlinge	2,616	Yes	No	40	Yes
Thanet 004A	Cliftonville West	2,620	Yes	Yes	41	Yes
Gravesham 007A	Westcourt	2,760	Yes	Yes	42	Yes
Canterbury 001C	Heron	2,768	Yes	No	43	Yes
Maidstone 013A	Park Wood	2,915	Yes	Yes	44	Yes
Thanet 016C	Central Harbour	2,976	Yes	Yes	45	Yes

LSOAs were created in 2011 so LSOAs in Folkestone & Hythe Local Authority are still named Shepway
Source: English Indices of Deprivation 2019, Ministry of Housing, Communities and Local Government
A rank of 1 is the most deprived
Table presented by Strategic Commissioning - Analytics, Kent county Council

Table 4a: The 10% most deprived LSOAs by IMD2019 in Kent: (Rank 46 to 90 out of 90)

2011 LSOA Name	2019 Ward Name	National rank			Kent Rank	
		position out of 32,844 LSOAs	Within top 10% most deprived 2019	Within top 10% most deprived 2015	Position out of 902 LSOAs	Within top 10% most deprived
Shepway 003A	East Folkestone	3,047	Yes	No	46	Yes
Swale 010B	Milton Regis	3,069	Yes	No	47	Yes
Maidstone 013D	Shepway South	3,092	Yes	No	48	Yes
Canterbury 014B	Barton	3,152	Yes	No	49	Yes
Swale 006B	Sheppey East	3,175	Yes	Yes	50	Yes
Thanet 006C	Dane Valley	3,259	Yes	No	51	Yes
Thanet 015D	Eastcliff	3,342	No	Yes	52	Yes
Gravesham 002E	Riverside	3,550	No	Yes	53	Yes
Gravesham 011C	Singlewell	3,588	No	Yes	54	Yes
Maidstone 013E	Shepway South	3,643	No	No	55	Yes
Dover 013A	Town & Castle	3,655	No	No	56	Yes
Dartford 009A	Princes	3,657	No	No	57	Yes
Ashford 008B	Stanhope	3,686	No	No	58	Yes
Thanet 012C	Sir Moses Montefiore	3,690	No	No	59	Yes
Ashford 007F	Victoria	3,697	No	No	60	Yes
Thanet 003B	Margate Central	3,729	No	No	61	Yes
Canterbury 007B	Gorrell	3,794	No	No	62	Yes
Thanet 001C	Cliftonville West	3,804	No	Yes	63	Yes
Gravesham 002A	Central	3,918	No	Yes	64	Yes
Canterbury 009D	Seasalter	3,935	No	No	65	Yes
Canterbury 001B	Heron	3,976	No	No	66	Yes
Dartford 004C	Swanscombe	3,996	No	Yes	67	Yes
Canterbury 019A	Wincheap	4,014	No	No	68	Yes
Thanet 004B	Dane Valley	4,057	No	No	69	Yes
Maidstone 009C	High Street	4,066	No	No	70	Yes
Swale 014C	St Ann's	4,072	No	No	71	Yes
Shepway 014D	Folkestone Central	4,097	No	Yes	72	Yes
Shepway 004E	Folkestone Harbour	4,100	No	No	73	Yes
Gravesham 011D	Singlewell	4,102	No	Yes	74	Yes
Thanet 016B	Central Harbour	4,134	No	No	75	Yes
Dartford 001D	Temple Hill	4,208	No	Yes	76	Yes
Tonbridge & Malling 003A	East Malling	4,333	No	No	77	Yes
Maidstone 013B	Park Wood	4,406	No	Yes	78	Yes
Ashford 008A	Beaver	4,412	No	No	79	Yes
Sevenoaks 002A	Swanley St Mary's	4,465	No	No	80	Yes
Gravesham 003D	Riverside	4,535	No	No	81	Yes
Shepway 004B	East Folkestone	4,540	No	No	82	Yes
Swale 011D	Roman	4,579	No	No	83	Yes
Dover 006C	Aylesham, Eythorne & Shepherdswell	4,622	No	No	84	Yes
Shepway 014C	Folkestone Central	4,635	No	No	85	Yes
Swale 005B	Queenborough & Halfway	4,662	No	No	86	Yes
Dover 013E	Town & Castle	4,692	No	No	87	Yes
Thanet 013D	Northwood	4,709	No	No	88	Yes
Swale 003A	Minster Cliffs	4,759	No	No	89	Yes
Ashford 007B	Beaver	4,761	No	No	90	Yes

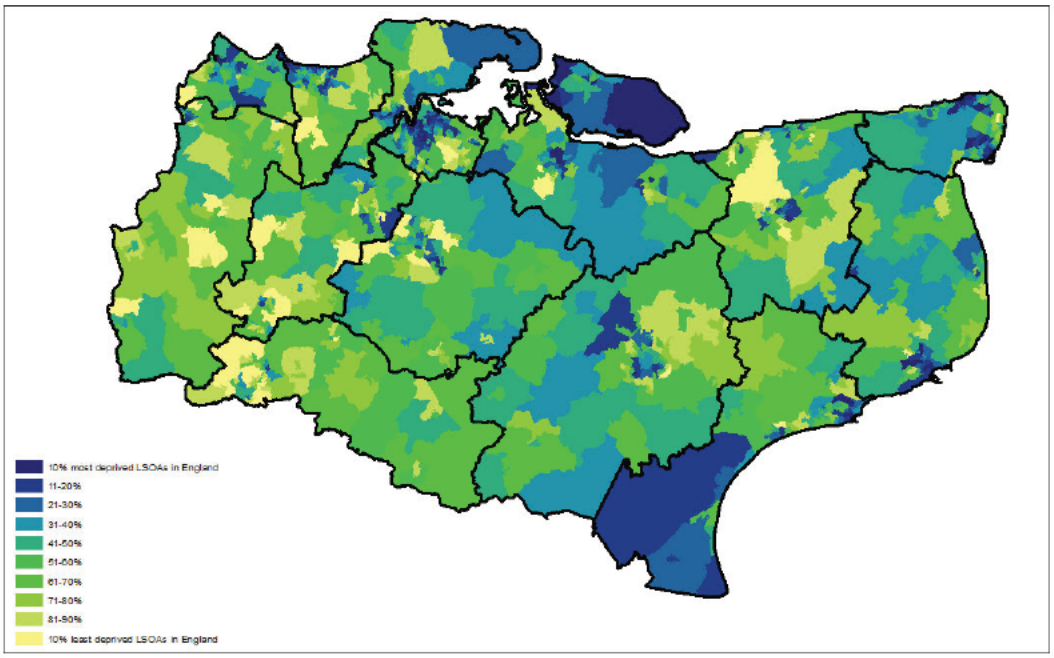
LSOAs were created in 2011 so LSOAs in Folkestone & Hythe Local Authority are still named Shepway
Source: English Indices of Deprivation 2019, Ministry of Housing, Communities and Local Government
A rank of 1 is the most deprived
Table presented by Strategic Commissioning - Analytics, Kent county Council

Map 1 illustrates the pattern of deprivation across Kent and Medway at LSOA level. the darker areas are the most deprived areas and lighter ones are the least deprived areas.

The map shows there is an east west divide with the east of the county having higher levels of deprivation than the west.

The highest levels of deprivation can be seen in both coastal regions and urban areas.

Indices of Deprivation 2019 (IoD2019): Overall IMD2019
National rank of Lower Super Output Areas in Kent & Medway



Source: The English Indices of Deprivation 2019 (IoD2019): The Ministry of Housing, Communities & Local Government (MHCLG)
Map produced by Strategic Commissioning - Analytics, Kent County Council © Crown Copyright and database right 2019, Ordnance Survey 100019238

IMD2019 Summary measures for areas larger than LSOAs

The pattern of deprivation across large areas can be complex. In some areas, deprivation is concentrated in pockets of LSOAs, rather than evenly spread throughout. In some other areas the opposite picture is seen, with deprivation spread relatively evenly throughout the area, and with no highly deprived areas.

The set of summary measures have been published to help understand deprivation patterns for local authorities. No single summary measure is the 'best' measure. Each one highlights different aspects of deprivation, and each lead to a different ranking of areas. Comparison of the different measures is needed to give a fuller description of deprivation in a large area. In addition, it is important to remember that the higher-area measures are summaries; the Lower-layer Super Output Area level data provides more detail than is available through the summaries.

- **Average rank:** Population weighted average of the combined ranks for the LSOAs in a local authority. The nature of this measure means that a highly polarised larger area would not tend to score highly, because extremely deprived and less deprived LSOAs will 'average out'. Conversely, a larger area that is more uniformly deprived will tend to score highly on the measure.

- **Average score:** Population weighted average of the combined scores for the LSOAs in a local authority. The main difference from the average rank measure described above is that more deprived LSOAs tend to have more 'extreme' scores than ranks. So highly deprived areas will not tend to average out to the same extent as when using ranks; highly polarised areas will therefore tend to score higher on the average score measure than on the average rank.

- **Proportion of Lower-layer Super Output Areas (LSOAs) in most deprived 10% nationally**. By contrast to the average rank and average score measures, this measure focuses only on the most deprived LSOAs.

- **Extent:** Proportion of a local authority's population living in the most deprived LSOAs in the country. The extent measure is a more sophisticated version of the proportion of LSOAs in the most deprived 10 per cent nationally measure, and is designed to avoid the sharp cut-off seen in that measure, whereby areas ranked only a single place outside the most deprived 10 per cent are not counted at all.

- **Local concentration:** Population weighted average of the ranks of local authority's most deprived LSOAs that contain exactly 10% of the larger area's population. Similar to the proportion of LSOAs in the most deprived 10 per cent nationally and extent measures, the local concentration measure is based on only the most deprived LSOAs in the larger area, rather than on all areas. By contrast to these measures however, the local concentration measure gives additional weight to very highly deprived areas.

IMD2019 Summary measures for Kent Local Authorities

Recent boundary changes in England mean that the number of lower-tier (district, borough and unitary) authorities reduced from 326 in 2015 to 317 in 2019. The MHCLG have released the IMD2015 summary measures for local authorities cast to 2019 boundaries which enables us to provide a comparison with IMD2019 summary measures at local authority level.

Six out of twelve local authorities in Kent saw an improvement in at least one of the summary measures for local authorities in the IMD2019.

There were no improvements in any of the summary measures in Ashford, Dover, Folkestone & Hythe, Maidstone, Swale and Tonbridge & Malling for IMD2019.

Even though Thanet has seen improvements in the national rankings in three of the five summary measures, Thanet remains ranked as the most deprived local authority in Kent in all of the summary measures for local authorities in the IMD2019.

Swale is ranked as the second most deprived local authority in Kent across all summary measures. Sevenoaks and Tunbridge Wells rank as the two least deprived local authorities.

It is important to remember that any change in ranking is relative to changes in all local authorities in England between IMD2015 and IMD 2019.

Table 5: Kent local authorities by national rank of IMD2019 and IMD2015 summary measures for local authorities

Local Authorities	IMD - Rank of average rank (National)			IMD - Rank of average score (National)			IMD - Rank of proportion of LSOAs in most deprived 10% nationally			IMD - Rank of extent (National)			IMD - Rank of Local concentration (National)		
	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change
Thanet	34	35	-1	30	28	2	37	35	2	42	44	-2	15	6	9
Swale	69	87	-18	56	77	-21	45	52	-7	81	91	-10	29	31	-2
Folkestone and Hythe	84	101	-17	90	110	-20	113	125	-12	99	123	-24	99	101	-2
Dover	107	113	-6	113	122	-9	102	125	-23	116	124	-8	109	124	-15
Gravesham	119	120	-1	123	120	3	146	89	57	112	116	-4	121	107	14
Dartford	145	167	-22	154	168	-14	170	131	39	163	168	-5	146	157	-11
Ashford	152	171	-19	158	174	-16	177	200	-23	155	167	-12	149	167	-18
Canterbury	185	182	3	179	181	-2	159	200	-41	158	165	-7	157	165	-8
Maidstone	188	203	-15	185	196	-11	161	168	-7	170	179	-9	166	171	-5
Tonbridge and Malling	236	269	-33	234	266	-32	195	200	-5	212	244	-32	210	244	-34
Sevenoaks	253	264	-11	251	260	-9	195	200	-5	228	222	6	244	234	10
Tunbridge Wells	273	271	2	274	274	0	195	200	-5	257	251	6	263	265	-2
Medway	98	117	-19	93	115	-22	93	109	-16	86	108	-22	86	104	-18

A negative change between 2015 and 2019 shows a rise in the rank therefore an increase in level of deprivation in relation to all other LAs

Kent Local Authorities ranked on 2019 rank of average rank

Source: English Indices of Deprivation 2019, MHCLG, Table presented by Strategic Commissioning - Analytics, Kent County Council

A rank of 1 is the most deprived

National rank is out of 317 local authorities

IMD2019 Summary measures for upper tier local authorities

Recent boundary changes in England mean that the number of upper-tier local authorities (counties and unitary authorities) reduced from 152 in 2015 to 151 in 2019. The MHCLG have not released the IMD2015 summary measures for upper-tier local authorities cast to 2019 boundaries. As a result, we cannot provide a direct comparison of Kent by national rank between IMD2015 and 2019IMD.

However, as with the LSOAs, we can compare the deprivation 'deciles' for upper-tier local authorities. Deciles have been calculated by ranking the summary measure scores of the 152 upper tier local authorities in IMD2015 and the 151 upper tier local authorities in IMD2019 areas in England from most deprived to least deprived and dividing them into 10 equal groups. These range from the most deprived 10 per cent of small areas nationally (decile 1) to the least deprived 10 per cent of small areas nationally (decile 10).

Table 6: Ranks and deciles of summary measures for Kent: IMD2019 and IMD2015

	IMD2019		IMD2015	
IMD2019 Summary measure for upper-tier lcoal authority	National Rank (out of 151 areas)	National Decile	National Rank (out of 152 areas)	National Decile
Rank of Average rank	95	7	104	7
Rank of Average score	93	7	100	7
Rank of proportion of LSOAs in most deprived 10% nationally	79	6	89	6
Extent	93	5	98	6
Local concentration	74	6	83	6

Source: English Indices of Deprivation 2019 MHCLG

Table presented by Strategic Commissioning - Analytics, Kent county Council

Kent has remained within the same national decile for IMD2019 as for IMD2015 for 4 of the 5 summary measures. Kent has moved up one decile on the extent measure which indicates that Kent is more deprived in this measure in 2019 than it was in 2015.

The number of local authorities within the South East region was not affected by the recent boundary changes therefore we are able to provide a comparison between the IMD2015 and IMD2019 based on the rankings of the 19 upper-tier local authorities within the South East region.

Kent is ranked within the least deprived 50% of upper-tier local authorities in England for 4 out of 5 summary measures of the IMD2019. A rank of 74 for the local concentration measure which puts Kent within the most deprived

50% of local authorities in England for this measure. Kent is ranked within the 50% most deprived areas within the South East on all summary measures.

Table 7: Kent local authorities by South East rank of IMD2019 and IMD2015 summary measures for upper-tier localauthorities

County / Unitary Authority	IMD - Rank of average rank (South East)			IMD - Rank of average score (South East)			IMD - Rank of proportion of LSOAs in most deprived 10% (South East)			IMD - Rank of extent (South East)			IMD - Rank of Local concentration (South East)		
	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change	2019	2015	change
Southampton	1	1	0	27	27	-0	1	1	0	1	1	0	2	2	0
Portsmouth	2	2	0	27	27	-0	2	2	0	2	2	0	1	1	0
Slough	3	3	0	23	23	0	13	13	0	10	10	0	10	5	5
Isle of Wight	4	4	0	23	23	0	9	8	1	5	5	0	8	4	4
Medway	**5**	**6**	**-1**	**24**	**22**	**2**	**4**	**4**	**0**	**3**	**4**	**-1**	**4**	**6**	**-2**
Brighton & Hove	6	5	1	21	23	-3	3	3	0	4	3	1	3	3	0
Reading	7	7	0	20	19	0	8	9	-1	8	9	-1	9	7	2
East Sussex	8	8	0	20	19	1	5	6	-1	6	8	-2	5	8	-3
Kent	**9**	**9**	**0**	**20**	**19**	**1**	**6**	**7**	**-1**	**7**	**7**	**0**	**6**	**9**	**-3**
Milton Keynes	10	10	0	18	18	-0	7	5	2	9	6	3	7	10	-3
West Sussex	11	11	0	14	14	0	10	11	-1	12	11	1	12	11	1
Hampshire	12	12	0	13	12	1	11	10	1	11	12	-1	11	12	-1
Oxfordshire	13	13	0	12	12	0	12	12	0	13	13	0	13	13	0
Bracknell Forest	14	14	0	10	10	-0	14	14	0	17	17	0	16	14	2
Buckinghamshire	15	16	-1	10	10	0	15	16	-1	16	14	2	15	16	-1
West Berkshire	16	15	1	10	10	-0	16	15	1	15	15	0	18	15	3
Surrey	17	17	0	10	9	1	17	17	0	14	16	-2	14	17	-3
Windsor & Maidenhead	18	18	0	8	9	-0	18	18	0	18	18	0	17	18	-1
Wokingham	19	19	0	6	6	0	19	19	0	19	19	0	19	19	0

A negative change between 2015 and 2019 shows a rise in the rank therefore an increase in level of deprivation in relation to all other LAs

Table sorted by rank of average rank

Source: English Indices of Deprivation 2019 MHCLG

Table presented by Strategic Commissioning - Analytics, Kent county Council

A rank of 1 is the most deprived (out of 19 counties and unitary authorities in the South East)

Conclusion

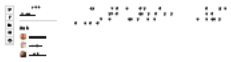
The IoD2019 have been produced using the same approach, structure and methodology used to create the previous IoD2015 (and the 2010, 2007 and 2004 versions). This allows some comparisons to be made over time between the IoD2019 and previous versions, but only in terms of comparing the **rankings** and **deciles** as determined at the relevant time point by each of the versions.

Just because the overall rank may or may not have changed between the Indices, it does not mean that there have been no changes to the level of deprivation in the area. For example, if the absolute levels of deprivation in all areas were increasing or decreasing at the same rate, the ranks would show no change.

Equally, when comparing the overall IMD, if improvements in one domain are offset by a decline in another domain, the overall IMD position may be about the same even if significant changes have occurred in these two underlying domains.



What is mental health inequalities



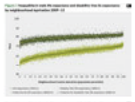


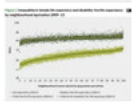
Where should I begin

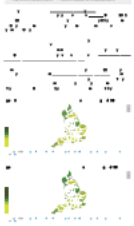


Inequalities in the UK

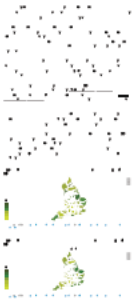








Inequalities in England



Inequalities in mental illness by age



Inequalities in long-term health conditions



Inequalities in the number of hours of unpaid care

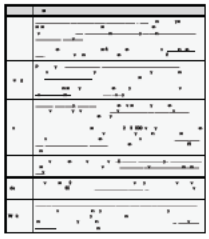


Inequalities in work and unemployment by ethnic group



If things are going to help





Inte actions between the facto s o living health inequa ities

Ou health is shaped by a complex inte action be ween many se s o . Three include the qual ty o hea th and ca e we view individual behaviou s they a ess and command be th which peop e ‘a ward write de e mines such as educat on housing and access to g een space Was th inequal t ies a t exis ed by forward ea th ines e fa e e ec o s a s o s a ega ou ation

Inequal ties in these ac o s a e cla sified a behaviou s a economic and e pe ti e pe ti o he people a on and can be mutually e e c ding over socio e onomic g oups e examp e tend to have a highe p evalence of key health behaviou s wo e conomic o s and ea ages on ap o and bad hip l ves

The inte actions between di e ent mode s of inequal ty and he se s o held we thee s o an comp ex and mu t-l ed bond explo ation find s ows a ffect s ocial away an underlay between so ci theo ies and s tis ics a ange o wide de e mined a h Access to g een on healthy food seems to weaken the effect s of poverty income and hea th s tus e xamp e very

Conclusion

Based on exis ing an aly s of the ef ect s and c ost s of peop e in England expe ienc systems fo un d and ove bidd ed h e ences v hol health how a they are wo ked the appo t unit ies they have to ead hed hy lives

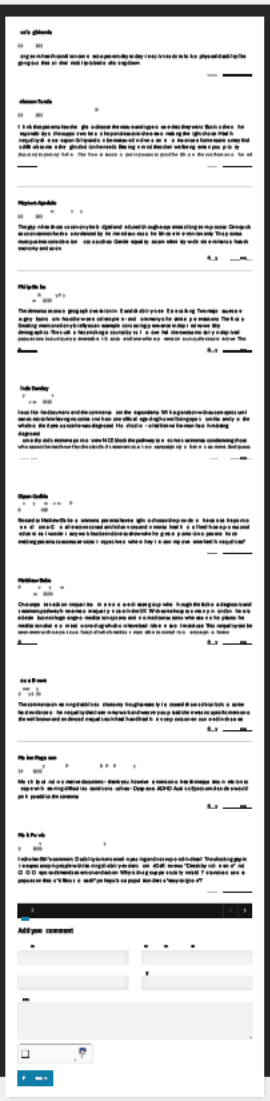
Into ventions v t a th e h inequal ty need to ac ress the complexity o how health inequal ties a e c eated and pe petuated ithe what they could be ne ative e ewe counte p olicy ine e xamp le o s is to e ablish equit ies in health status a sess ments at th beginning of l fe (such as pre- ding d ath ra te s and ea ly ch ldhood de velo ment) and then ev a luate the ef ect s of p olicy and p og am me s on th ese ineq ual ities. It is also im po tant to ensure that these inte ventions a e not ha mful (unintended con sequences) and that they improve health outcomes (such as access to h ca e we view)

Heal h inequal ti es a e not ine itable and the gaps a e not fixed. Evidence shows that a comp ehensive app roach a tack ing them can make a d ff e ence Conce ted systems to action b ased on ac ess ment s pe on s ide and cas the causes o health inequal ities This includes tack ing ear ly exposure to health and ea ly-life adv ers ities. We n eed out mo ove th s n ew pa ti cu lar ly on how th inequal ties in the ses s o

Related content



Comments



You may also be inte ested in





UK Business Counts 2020

Information on businesses in Kent

Related documents

Business Demography – Looking at the counts business activity during the course of the whole of the financial year

Construction Industries in Kent – the number of construction businesses in Kent and the people employed in the sector

Creative Industries in Kent - the number of creative businesses in Kent and the people employed in the sector

Further Information

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The UK Business data is published annually by the Office for National Statistics (ONS) and is based on output from the VAT and PAYE administrative systems.

The information provided by the UK Business dataset gives a snap shot of businesses and is broken down by size band, industry, turnover and age of business.

An additional dataset from ONS is the Business Demography dataset. This is also based on VAT and PAYE data but this information measures any activity during the course of the year, so leads to slightly higher counts of businesses. It provides information on business births, deaths and survival rates.

Information on this dataset can be found in the bulletin "Business Demography".

Kent Summary

- As at March 2020 there were 64,005 enterprises in Kent
- Kent has a significantly higher proportion of enterprises (17.1%) in the construction industry than is seen nationally (12.8%)
- The highest proportion of enterprises in Kent (17.2%) are within the Professional, scientific and technical sector
- The majority of enterprises in Kent (90.2%) are micro enterprises (with 0-9 employees)
- The majority of enterprises in Kent (99.4%) are classed as companies which operate within the private sector.

Introduction

The UK Business data is produced from a snapshot of the Inter Departmental Business Register (IDBR) - usually taken during March - and provides the basis for the Office for National Statistics (ONS) to conduct surveys of businesses.

The main administrative sources for the IDBR are VAT trader and PAYE employer information passed to the ONS by HM Revenue & Customs under the Value Added Tax Act 1994 for VAT traders and the Finance Act 1969 for PAYE employers; details of incorporated businesses are also passed to ONS by Companies House. ONS Survey data and survey information from the Department of Enterprise, Trade and Investment – Northern Ireland (DETINI) and the Department for Environment, Food and Rural Affairs (DEFRA) farms register provide auxiliary information. Construction statistics formerly produced by the Department for Business Innovation & Skills are now produced by ONS.

The IDBR combines the information from the three administrative sources with this survey data in a statistical register comprising over two million enterprises. These comprehensive administrative sources combined with the survey data contribute to the coverage on the IDBR, which is one of its main strengths, representing nearly 99 per cent of UK economic activity.

The latest data is published for 2020 and is based upon the 2007 revision to the Standard Industrial Classification UKSIC (2007). Detailed information about the types of industry which make up each of the industrial sectors is available from the UK Standard Industrial Classification of Economic Activities published by the Office for National Statistics.

This bulletin looks at the main tables available from the UK Business data, which relate to VAT/PAYE enterprises.

This bulletin will be updated in Autumn 2021.

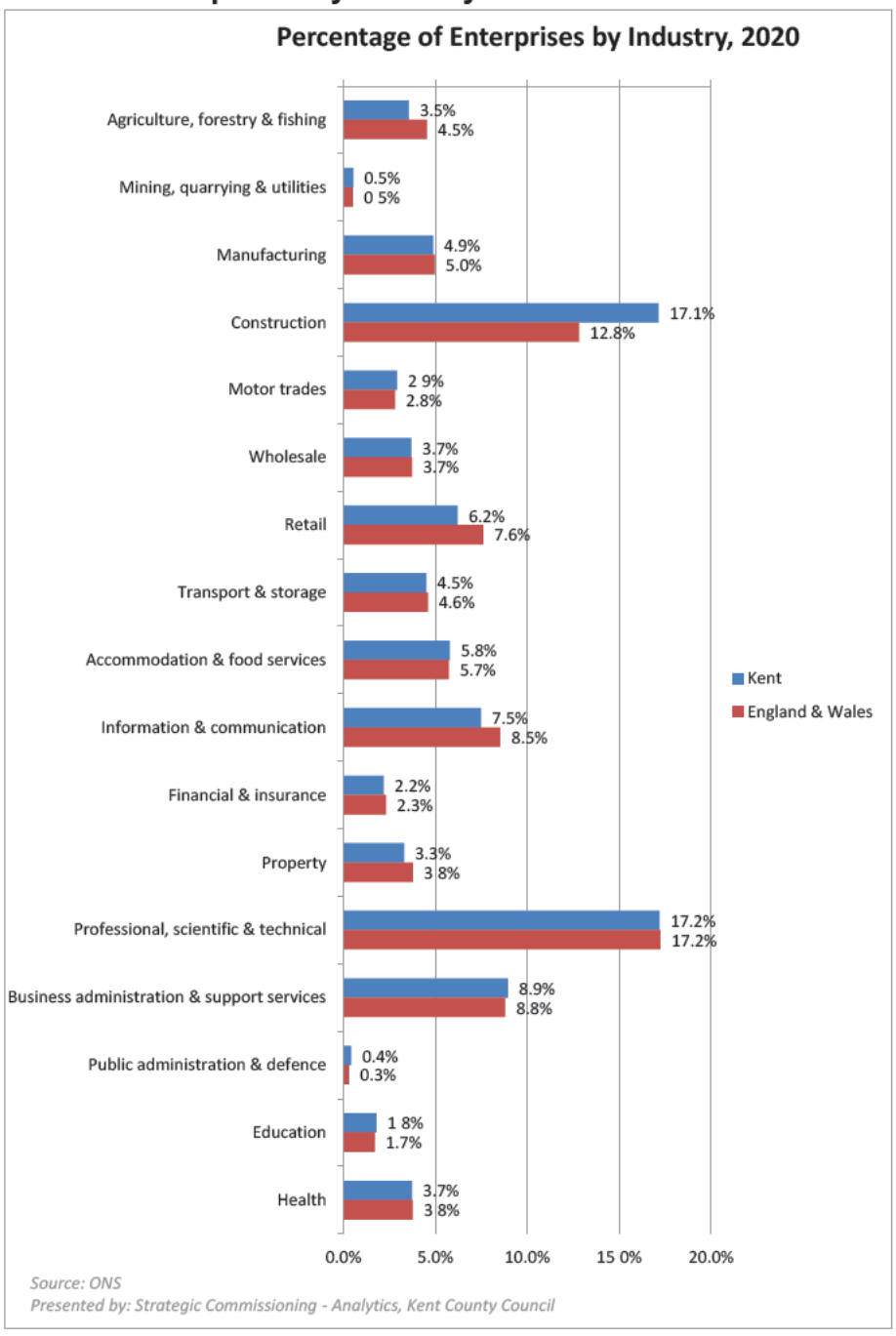
Analysis

Enterprises by Industry

The UK Business data shows us the number of enterprises by broad industrial group.

Overall Kent has a similar profile to England and Wales although does show a noticeably higher proportion of enterprises in the Construction Industry and lower proportions in Agriculture and Fishing, Retail and Information & Communications industries. This is shown in Chart 1.

Chart 1: Enterprises by Industry



Tables 1 and 2 on the following two pages show the number and percentage of businesses by industry in Kent local authority districts and Kent as a whole. Regional and national figures are also presented for comparison.

Table 1: Number of VAT and/or PAYE based enterprises in 2020 by broad industrial group

UK SIC 2007

	Agriculture, forestry & fishing	Mining, quarrying & utilities	Manufacturing	Construction	Motor trades	Wholesale	Retail	Transport & storage	Accommodation & food services	Information & communication	Financial & insurance	Property	Professional, scientific & technical	Business administration & support services	Public administration & defence	Education	Health	Arts, entertainment, recreation & other services	Total
Ashford	420	40	330	965	160	430	345	190	265	430	385	250	1,070	595	40	95	230	335	6,575
Canterbury	170	25	250	805	150	190	425	150	415	370	85	195	945	450	20	110	250	400	5,400
Dartford	25	20	205	1,005	150	165	235	395	270	545	75	175	755	390	10	80	155	200	4,855
Dover	190	25	190	620	115	95	290	155	295	180	45	80	515	295	35	75	150	225	3,570
Folkestone & Hythe	210	15	175	580	130	100	310	135	355	210	40	125	595	295	20	70	145	240	3,750
Gravesham	45	20	195	890	120	105	265	385	250	260	45	100	545	380	5	70	150	215	4,045
Maidstone	305	45	370	1,455	240	300	410	560	345	480	145	250	1,250	645	35	125	290	395	7,650
Sevenoaks	205	30	305	1,090	195	240	365	135	255	615	155	270	1,380	685	25	115	215	425	6,710
Swale	220	45	350	995	185	160	315	310	320	260	55	150	675	405	25	85	175	285	5,020
Thanet	65	20	235	725	125	110	355	135	410	245	55	120	545	330	10	85	165	315	4,050
Tonbridge and Malling	130	40	285	1,065	165	230	265	205	255	545	155	170	1,235	640	30	115	215	315	6,055
Tunbridge Wells	285	15	230	775	125	235	395	120	270	650	155	220	1,480	615	15	110	240	395	6,330
Kent	2,270	335	3,120	10,970	1,860	2,360	3,975	2,880	3,700	4,785	1,395	2,105	11,000	5,725	265	1,145	2,380	3,735	64,005
Medway	75	35	450	2,075	270	300	620	725	495	550	115	225	1,225	730	15	160	365	450	8,885
Kent + Medway	2,345	370	3,570	13,045	2,125	2,665	4,600	3,605	4,200	5,335	1,510	2,330	12,225	6,455	280	1,310	2,745	4,185	72,890
South East LEP	5,990	890	9,050	32,400	5,480	6,505	11,160	8,605	9,475	12,975	3,505	5,865	28,490	15,560	610	3,115	6,430	10,305	176,410
South East Region	11,785	1,780	18,705	57,980	11,155	14,470	31,050	14,910	19,780	45,685	8,560	14,250	81,095	36,995	1,250	7,685	14,865	26,370	418,370
ENGLAND AND WALES	113,185	12,745	123,855	319,750	69,640	93,060	189,745	114,390	143,050	213,185	57,535	94,080	430,690	219,655	7,570	42,285	93,945	158,460	2,496,825

Source: ONS

Presented by: Strategic Commissioning - Analytics, Kent County Council

Table 2: Percentage of VAT and/or PAYE based enterprises in 2020 by broad industrial group

UK SIC 2007

	Agriculture, forestry & fishing	Mining, quarrying & utilities	Manufacturing	Construction	Motor trades	Wholesale	Retail	Transport & storage	Accommodation & food services	Information & communication	Financial & insurance	Property	Professional, scientific & technical	Business administration & support services	Public administration & defence	Education	Health	Arts, entertainment, recreation & other services
Ashford	6.4	0.6	5.0	14.7	2.4	6.5	5.2	2.9	4.0	6.5	5.9	3.8	16.3	9.0	0.6	1.4	3.5	5.1
Canterbury	3.1	0.5	4.6	14.9	2.8	3.5	7.9	2.8	7.7	6.9	1.6	3.6	17.5	8.3	0.4	2.0	4.6	7.4
Dartford	0.5	0.4	4.2	20.7	3.1	3.4	4.8	8.1	5.6	11.2	1.5	3.6	15.6	8.0	0.2	1.6	3.2	4.1
Dover	5.3	0.7	5.3	17.4	3.2	2.7	8.1	4.3	8.3	5.0	1.3	2.2	14.4	8.3	1.0	2.1	4.2	6.3
Gravesham	5.6	0.4	4.7	15.5	3.5	2.7	8.3	3.6	9.5	5.6	1.1	3.3	15.9	7.9	0.5	1.9	3.9	6.4
Maidstone	1.1	0.5	4.8	22.0	3.0	2.6	6.6	9.5	6.2	6.4	1.1	2.5	13.5	9.4	0.1	1.7	3.7	5.3
Sevenoaks	4.0	0.6	4.8	19.0	3.1	3.9	5.4	7.3	4.5	6.3	1.9	3.3	16.3	8.4	0.5	1.6	3.8	5.2
Shepway	3.1	0.4	4.5	16.2	2.9	3.6	5.4	2.0	3.8	9.2	2.3	4.0	20.6	10.2	0.4	1.7	3.2	6.3
Swale	4.4	0.9	7.0	19.8	3.7	3.2	6.3	6.2	6.4	5.2	1.1	3.0	13.4	8.1	0.5	1.7	3.5	5.7
Thanet	1.6	0.5	5.8	17.9	3.1	2.7	8.8	3.3	10.1	6.0	1.4	3.0	13.5	8.1	0.2	2.1	4.1	7.8
Tonbridge and Malling	2.1	0.7	4.7	17.6	2.7	3.8	4.4	3.4	4.2	9.0	2.6	2.8	20.4	10.6	0.5	1.9	3.6	5.2
Tunbridge Wells	4.5	0.2	3.6	12.2	2.0	3.7	6.2	1.9	4.3	10.3	2.4	3.5	23.4	9.7	0.2	1.7	3.8	6.2
Kent	3.5	0.5	4.9	17.1	2.9	3.7	6.2	4.5	5.8	7.5	2.2	3.3	17.2	8.9	0.4	1.8	3.7	5.8
Medway	0.8	0.4	5.1	23.4	3.0	3.4	7.0	8.2	5.6	6.2	1.3	2.5	13.8	8.2	0.2	1.8	4.1	5.1
Kent + Medway	3.2	0.5	4.9	17.9	2.9	3.7	6.3	4.9	5.8	7.3	2.1	3.2	16.8	8.9	0.4	1.8	3.8	5.7
South East LEP	3.4	0.5	5.1	18.4	3.1	3.7	6.3	4.9	5.4	7.4	2.0	3.3	16.1	8.8	0.3	1.8	3.6	5.8
South East Region	2.8	0.4	4.5	13.9	2.7	3.5	7.4	3.6	4.7	10.9	2.0	3.4	19.4	8.8	0.3	1.8	3.6	6.3
ENGLAND AND WALES	4.5	0.5	5.0	12.8	2.8	3.7	7.6	4.6	5.7	8.5	2.3	3.8	17.2	8.8	0.3	1.7	3.8	6.3

Source: ONS

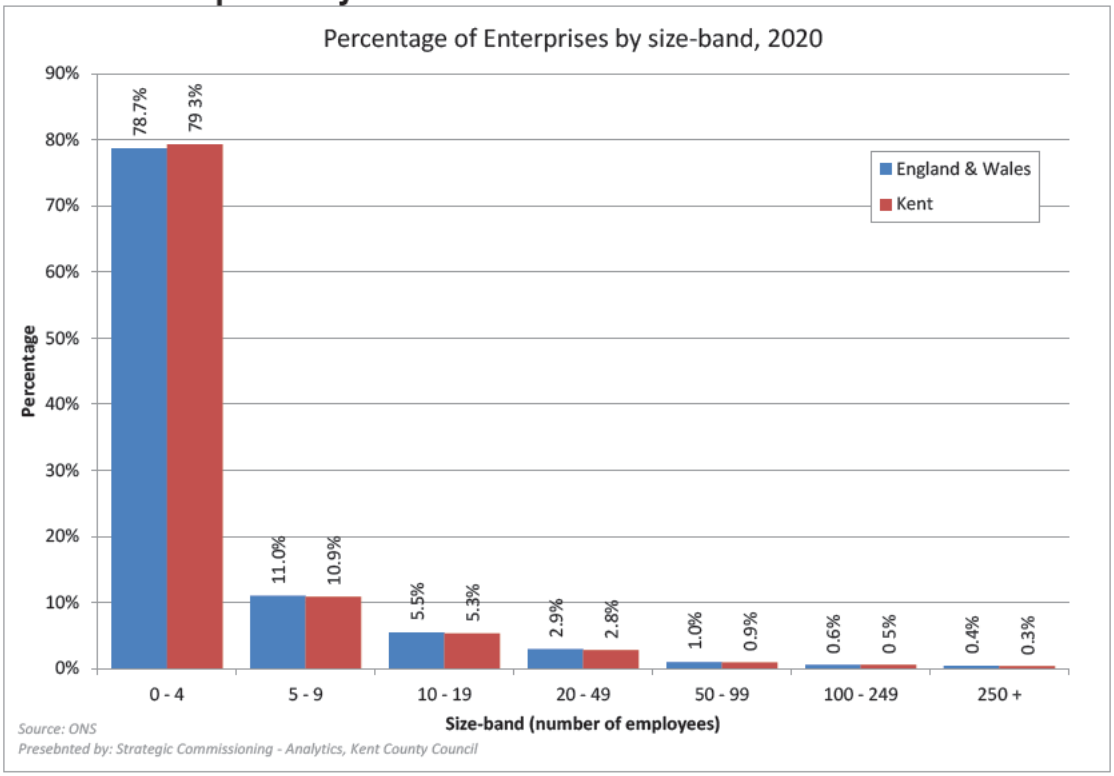
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Enterprises by employee size

The majority of enterprises are classed as micro businesses i.e. they have 0 - 9 employees. In Kent 90.2% of enterprises are classed as micro, 89.7% in England and Wales.

Chart 2 shows the proportion of enterprises in Kent and England and Wales by employment size.

Chart 2: Enterprises by sizeband



Tables 3 and 4 show an even greater breakdown of the number and percentage of enterprises by the number of employees.

The data shows that while the majority of enterprises are micro businesses employing up to 9 people, most of these actually have 0 - 4 employees (88.0% of micro businesses in Kent).

Kent has a slightly higher proportion of enterprises with 0 – 4 employees and slightly lower proportion with 5 – 9 employees than is seen nationally.

Table 3: Number of VAT and/or PAYE based enterprises by employment sizeband

	Employment size							
2020	0 - 4	5 - 9	10 - 19	20 - 49	50 - 99	100 - 249	250 +	TOTAL
Ashford	5,355	650	315	165	50	30	20	6,575
Canterbury	4,120	680	330	160	60	25	25	5,400
Dartford	3,995	420	200	135	50	30	20	4,855
Dover	2,740	445	215	95	40	25	5	3,570
Folkestone & Hythe	2,905	460	205	130	30	15	10	3,750
Gravesham	3,300	420	165	100	25	20	10	4,045
Maidstone	6,095	785	430	190	70	55	30	7,650
Sevenoaks	5,380	715	345	165	60	30	20	6,710
Swale	3,875	620	285	140	50	35	15	5,020
Thanet	3,140	490	235	120	30	30	5	4,050
Tonbridge and Malling	4,780	625	325	200	65	35	25	6,055
Tunbridge Wells	5,085	655	330	175	50	30	10	6,330
Kent	50,765	6,955	3,385	1,775	575	350	210	64,005
Medway	7,155	935	445	205	60	50	35	8,885
Kent + Medway	57,920	7,890	3,825	1,980	635	400	240	72,890
South East LEP	140,350	19,125	9,235	4,750	1,535	890	520	176,410
South East Region	334,935	42,650	21,560	11,590	3,735	2,285	1,620	418,370
ENGLAND AND WALES	1,964,640	274,145	136,585	73,320	24,585	13,770	9,785	2,496,825

Source: ONS
Presented by: Strategic Commissioning - Analytics, Kent County Council

Table 4: Percentage of VAT and/or PAYE based enterprises by sizeband

	Employment size							
2020	0 - 4	5 - 9	10 - 19	20 - 49	50 - 99	100 - 249	250 +	TOTAL
Ashford	81.4	9.9	4.8	2.5	0.8	0.5	0.3	100
Canterbury	76.3	12.6	6.1	3.0	1.1	0.5	0.5	100
Dartford	82.3	8.7	4.1	2.8	1.0	0.6	0.4	100
Dover	76.8	12.5	6.0	2.7	1.1	0.7	0.1	100
Gravesham	77.5	12.3	5.5	3.5	0.8	0.4	0.3	100
Maidstone	81.6	10.4	4.1	2.5	0.6	0.5	0.2	100
Sevenoaks	79.7	10.3	5.6	2.5	0.9	0.7	0.4	100
Shepway	80.2	10.7	5.1	2.5	0.9	0.4	0.3	100
Swale	77.2	12.4	5.7	2.8	1.0	0.7	0.3	100
Thanet	77.5	12.1	5.8	3.0	0.7	0.7	0.1	100
Tonbridge and Malling	78.9	10.3	5.4	3.3	1.1	0.6	0.4	100
Tunbridge Wells	80.3	10.3	5.2	2.8	0.8	0.5	0.2	100
Kent	79.3	10.9	5.3	2.8	0.9	0.5	0.3	100
Medway	80.5	10.5	5.0	2.3	0.7	0.6	0.4	100
Kent + Medway	79.5	10.8	5.2	2.7	0.9	0.5	0.3	100
South East LEP	79.6	10.8	5.2	2.7	0.9	0.5	0.3	100
South East Region	80.1	10.2	5.2	2.8	0.9	0.5	0.4	100
ENGLAND AND WALES	78.7	11.0	5.5	2.9	1.0	0.6	0.4	100

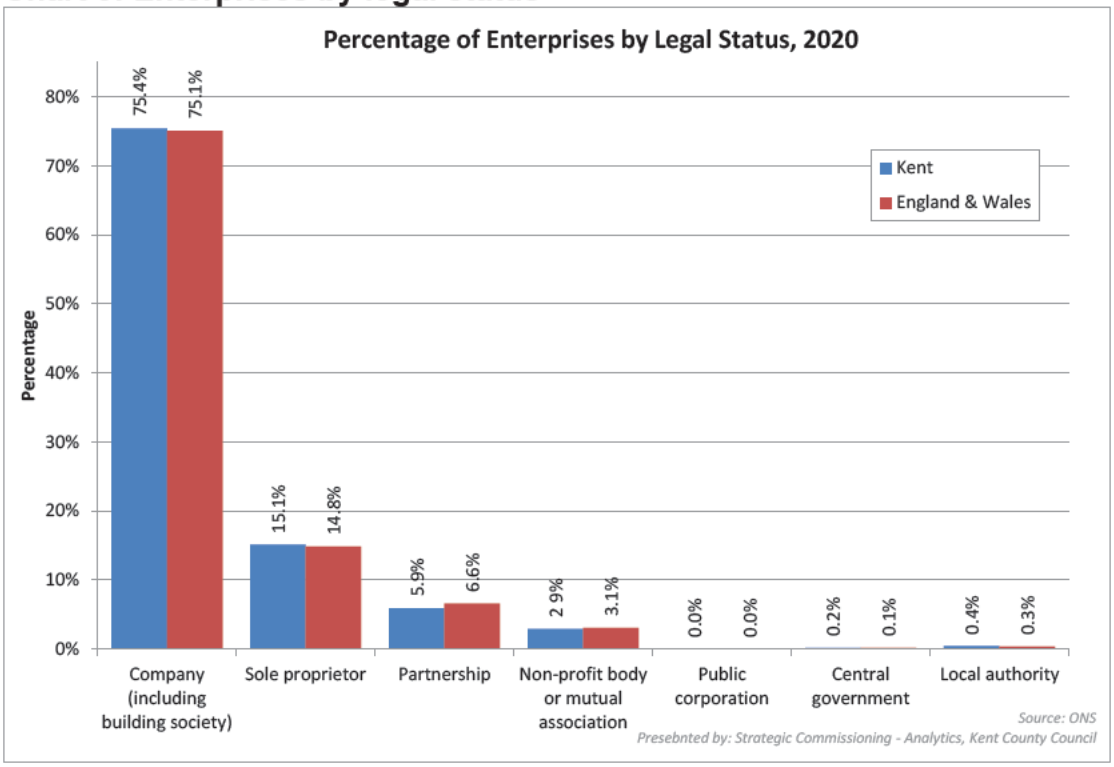
Source: ONS
Presented by: Strategic Commissioning - Analytics, Kent County Council

Enterprise by status

The data also shows the number of enterprises by legal status. The legal status of units is classified by ONS in accordance with National Accounts Sector Classifications. All enterprises engage in financial transactions, paying out and receiving money for reasons such as buying and selling goods and services, paying taxes, or collecting tax revenues. Using information received from Companies House and the administrative sources from HM Revenue & Customs, the National Accounts Sector Classification determines whether a body or enterprise is in the private or public sector, and if public, whether they are government bodies or public corporations, and whether certain transactions count as taxes or service fees.

Chart 3 shows the proportion of enterprises by legal status in Kent compared to England and Wales in 2020.

Chart 3: Enterprises by legal status



The majority of enterprises are private sector companies. In Kent they account for 97.7% of all enterprises, just below England and Wales as a whole (98.3%).

Kent has a slightly higher proportion of sole proprietor enterprises (15.1%) than is seen nationally and a slightly lower proportion of partnerships (5.9%).

Tables 5 and 6 show the legal status of enterprises in Kent local authority districts and Kent as a whole. They also present information at regional and national level for comparison.

Table 5: Number of VAT and/or PAYE based enterprises by legal status

	Private sector				Public sector			
2020	Company (including building society)	Sole proprietor	Partnership	Non-profit body or mutual association	Public corporation	Central government	Local authority	TOTAL
Ashford	4,630	935	505	455	0	10	40	6,575
Canterbury	3,855	935	400	180	0	10	20	5,400
Dartford	4,095	520	120	95	0	15	10	4,855
Dover	2,285	785	345	105	5	10	35	3,570
Folkestone & Hythe	2,605	715	305	95	0	10	20	3,750
Gravesham	3,290	520	145	75	0	5	5	4,045
Maidstone	5,910	1,095	415	180	0	10	35	7,650
Sevenoaks	5,320	875	320	160	0	5	25	6,710
Swale	3,665	875	325	110	0	15	25	5,020
Thanet	2,890	760	285	95	0	10	10	4,050
Tonbridge and Malling	4,835	770	260	150	0	5	30	6,055
Tunbridge Wells	4,890	885	365	170	0	5	15	6,330
Kent	48,270	9,670	3,795	1,875	5	110	280	64,005
Medway	6,975	1,295	360	215	0	20	20	8,885
Kent + Medway	55,245	10,960	4,155	2,095	5	135	300	72,890
South East LEP	135,715	25,230	10,135	4,340	10	340	640	176,410
South East Region	326,790	56,450	21,610	11,635	20	475	1,390	418,370
ENGLAND AND WALES	1,874,040	370,275	163,965	76,240	145	3,560	8,595	2,496,825

Source: ONS

Presented by: Strategic Commissioning - Analytics, Kent County Council

Table 6: Percentage of VAT and/or PAYE based enterprises by legal status

	Employment status							
2020	Company (including building society)	Sole proprietor	Partnership	Non-profit body or mutual association	Public corporation	Central government	Local authority	TOTAL
Ashford	70.4	14.2	7.7	6.9	0.0	0.2	0.6	100
Canterbury	71.4	17.3	7.4	3.3	0.0	0.2	0.4	100
Dartford	84.3	10.7	2.5	2.0	0.0	0.3	0.2	100
Dover	64.0	22.0	9.7	2.9	0.1	0.3	1.0	100
Folkestone & Hythe	69.5	19.1	8.1	2.5	0.0	0.3	0.5	100
Gravesham	81.3	12.9	3.6	1.9	0.0	0.1	0.1	100
Maidstone	77.3	14.3	5.4	2.4	0.0	0.1	0.5	100
Sevenoaks	79.3	13.0	4.8	2.4	0.0	0.1	0.4	100
Swale	73.0	17.4	6.5	2.2	0.0	0.3	0.5	100
Thanet	71.4	18.8	7.0	2.3	0.0	0.2	0.2	100
Tonbridge and Malling	79.9	12.7	4.3	2.5	0.0	0.1	0.5	100
Tunbridge Wells	77.3	14.0	5.8	2.7	0.0	0.1	0.2	100
Kent	75.4	15.1	5.9	2.9	0.0	0.2	0.4	100
Medway	78.5	14.6	4.1	2.4	0.0	0.2	0.2	100
Kent + Medway	75.8	15.0	5.7	2.9	0.0	0.2	0.4	100
South East LEP	76.9	14.3	5.7	2.5	0.0	0.2	0.4	100
South East Region	78.1	13.5	5.2	2.8	0.0	0.1	0.3	100
ENGLAND AND WALES	75.1	14.8	6.6	3.1	0.0	0.1	0.3	100

Source: ONS

Presented by: Strategic Commissioning - Analytics, Kent County Council

Turnover

Turnover figures provided to ONS for the majority of traders is based on VAT returns for a 12 month period. For 2020 this relates to a 12 month period covering the financial year 2019/2020. For other records, in particular members of VAT group registrations, turnover may relate to an earlier period or survey data.

For traders who have registered more recently, turnover represents the estimate made by traders at the time of registration.

The turnover figures on the register generally exclude VAT but include other taxes, such as the revenue duties on alcoholic drinks and tobacco. They represent total UK turnover, including exempt and zero-rated supplies.

Turnover bands shown in the analyses relate to the latest year for which information is available. Traders may be registered below the VAT threshold or may choose not to de-register should their turnover fall below the threshold.

Table 7 shows the VAT registration thresholds since 2004/05.

Table 7 - VAT registration thresholds

Operative dates	VAT Registration Threshold
1 Apr 2004 - 31 Mar 2005	£58,000
1 Apr 2005 - 31 Mar 2006	£60,000
1 Apr 2006 - 31 Mar 2007	£61,000
1 Apr 2007 - 31 Mar 2008	£64,000
1 Apr 2008 - 31 Mar 2009	£67,000
1 Apr 2009 - 31 Mar 2010	£68,000
1 Apr 2010 - 31 Mar 2011	£70,000
1 Apr 2011 - 31 Mar 2012	£73,000
1 Apr 2012 - 31 Mar 2013	£77,000
1 Apr 2013 - 31 Mar 2014	£79,000
1 Apr 2014 - 31 Mar 2015	£81,000
1 Apr 2015 - 31 March 2016	£82,000
1 Apr 2016 - 31 March 2017	£83,000
1 Apr 2017 - 31 March 2018	£85,000
1 Apr 2018 - 31 March 2019	£85,000
1 Apr 2019 onwards	£85,000

Source: HMRC

A higher proportion of enterprises in Kent (64.0%) have a turnover of £100k and above than is seen nationally (62.5%).

Tables 8 and 9 present the turnover data for Kent local authority districts and Kent as a whole. Regional and national figures are also presented for comparison.

Chart 4: Percentage of VAT and/or PAYE enterprises by turnover

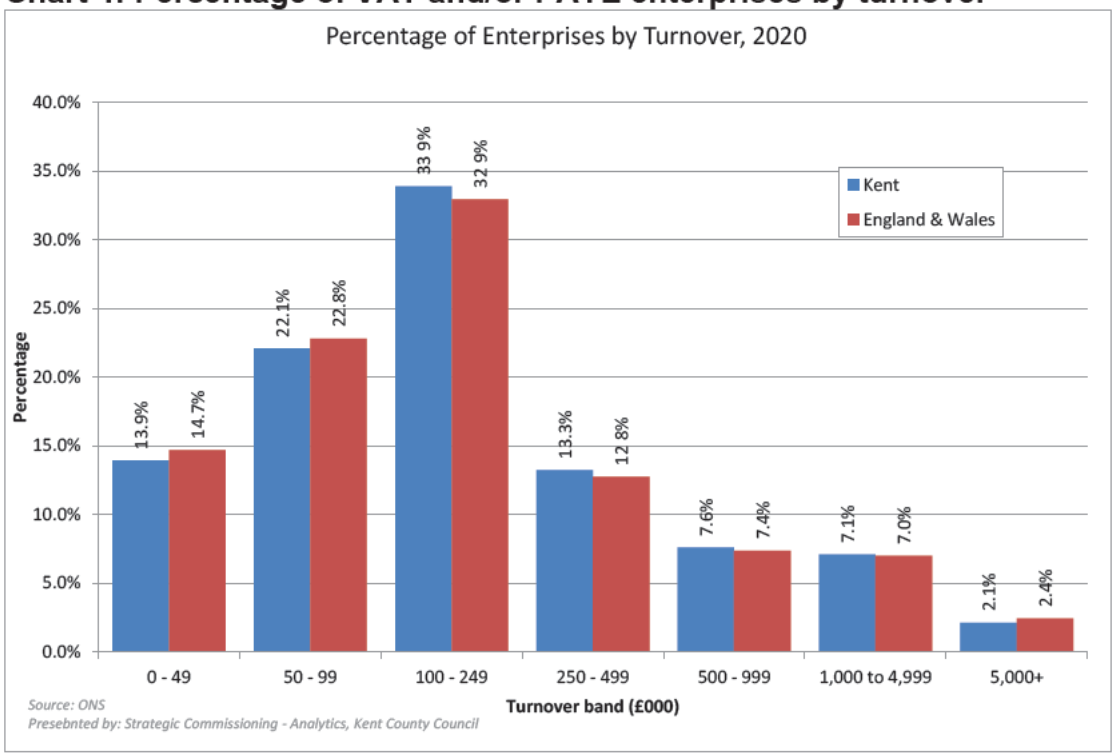


Table 8: Number of VAT and/or PAYE enterprises by turnover

	Turnover size (£ thousand)							
2020	0 to 49	50 to 99	100 to 199	200 to 499	500 to 999	1,000 to 4,999	5,000+	TOTAL
Ashford	1,265	1,310	1,995	790	650	460	100	6,575
Canterbury	700	1,210	1,865	720	430	380	95	5,400
Dartford	580	1,355	1,630	545	265	365	115	4,855
Dover	505	750	1,205	495	290	245	75	3,570
Folkestone & Hythe	550	845	1,285	520	255	250	50	3,750
Gravesham	535	1,055	1,325	550	265	255	60	4,045
Maidstone	1,110	1,695	2,515	1,025	570	550	185	7,650
Sevenoaks	850	1,365	2,360	915	550	480	190	6,710
Swale	685	1,110	1,645	705	390	390	100	5,020
Thanet	465	915	1,475	590	305	240	55	4,050
Tonbridge and Malling	775	1,240	2,090	800	455	485	215	6,055
Tunbridge Wells	905	1,290	2,305	835	440	430	120	6,330
Kent	8,920	14,140	21,695	8,485	4,870	4,535	1,360	64,005
Medway	1,110	2,425	2,820	1,135	665	570	165	8,885
Kent + Medway	10,030	16,565	24,515	9,620	5,530	5,105	1,525	72,890
South East LEP	22,975	40,695	60,340	23,035	13,315	12,385	3,660	176,410
South East Region	60,645	93,400	144,580	51,765	29,655	28,575	9,750	418,370
ENGLAND AND WALES	367,095	569,300	822,570	318,560	183,715	174,965	60,615	2,496,825

Source: ONS
Presented by: Strategic Commissioning - Analytics, Kent County Council

Table 9: Percentage of VAT and/or PAYE enterprises by turnover

	Turnover size (£ thousand)							
2020	0 to 49	50 to 99	100 to 199	200 to 499	500 to 999	1,000 to 4,999	5,000+	TOTAL
Ashford	19.2	19.9	30.3	12.0	9.9	7.0	1.5	100
Canterbury	13.0	22.4	34.5	13.3	8.0	7.0	1.8	100
Dartford	11.9	27.9	33.6	11.2	5.5	7.5	2.4	100
Dover	14.1	21.0	33.8	13.9	8.1	6.9	2.1	100
Gravesham	14.7	22.5	34.3	13.9	6.8	6.7	1.3	100
Maidstone	13.2	26.1	32.8	13.6	6.6	6.3	1.5	100
Sevenoaks	14.5	22.2	32.9	13.4	7.5	7.2	2.4	100
Shepway	12.7	20.3	35.2	13.6	8.2	7.2	2.8	100
Swale	13.6	22.1	32.8	14.0	7.8	7.8	2.0	100
Thanet	11.5	22.6	36.4	14.6	7.5	5.9	1.4	100
Tonbridge and Malling	12.8	20.5	34.5	13.2	7.5	8.0	3.6	100
Tunbridge Wells	14.3	20.4	36.4	13.2	7.0	6.8	1.9	100
Kent	13.9	22.1	33.9	13.3	7.6	7.1	2.1	100
Medway	12.5	27.3	31.7	12.8	7.5	6.4	1.9	100
Kent + Medway	13.8	22.7	33.6	13.2	7.6	7.0	2.1	100
South East LEP	13.0	23.1	34.2	13.1	7.5	7.0	2.1	100
South East Region	14.5	22.3	34.6	12.4	7.1	6.8	2.3	100
ENGLAND AND WALES	14.7	22.8	32.9	12.8	7.4	7.0	2.4	100

Source: ONS

Presented by: Strategic Commissioning - Analytics, Kent County Council