



Planning Design & Access Statement

Outline application for the redevelopment of the existing site for up to 118 dwellings including access, following demolition of existing buildings.



Flambeau Europlast, Manston Road, Ramsgate, Kent, CT12 6HW.

Prepared by Hume Planning Consultancy Ltd

On behalf of Flambeau Europlast Limited

Our Reference: HPC_1019

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1 Introduction

- 1.1 The application seeks outline planning permission for up to 118 dwellings with all matters reserved, except access, at Flambeau Europlast Ltd, Manston Road, Ramsgate CT12 6HW. The application would comprise the demolition of the existing factory on site. The proposal follows the grant of outline planning permission on 7 November 2017 for a similar residential redevelopment proposal (Ref: OL/TH/15/0187). This earlier permission has expired and the applicant now wishes to pursue the grant of a new outline permission.
- 1.2 In the intervening period since the original grant of permission, an opportunity has been taken to review the scheme and address more recent policy considerations and to update technical and environmental reports. The most notable policy change since the earlier residential permission was granted is the adoption of the 2020 Thanet Local Plan within which the site is now allocated for housing. In terms of the scheme design, this closely follows the previous approval save for the vehicle access which now utilises the current site access rather than a new access further east on Manston Road. Following a review of traffic data, this is considered to be a more suitable technical arrangement.
- 1.3 A key consideration for the applicant remains the need to relocate the Flambeau business from the application site to a purpose-built facility elsewhere. Whilst the application is for residential development only, the needs of the business to secure a financially viable transition to new premises (as in the assessment of the 2017 application) remain an important material consideration.
- 1.4 The 2017 application was supported by a viability assessment which concluded that the full range of policy compliant infrastructure (including 30% affordable housing and relevant financial contributions requests from KCC) would not be viable. In granting permission at this time it was accepted by the LPA that a payment of £100,000 towards planning obligations was justified. Since 2017, and accounting for Covid, higher interest rates and geo-political events, financial/market conditions have become more challenging. An updated viability assessment for the current development will follow the submission of the application, when the KCC and other contribution requests for infrastructure are received.

2 Site Description & Context

- 2.1 The application site comprises an irregular shaped brownfield site currently occupied by the Flambeau Europlast industrial building fronting the south side of Manston Road, Ramsgate.
- 2.2 The site has a frontage to Manston Road of 300 metres by a maximum depth of 190 metres. The total site area measures 3.5 hectares.



Figure 1. Existing Site

- 2.3 The site is bounded by the railway line to the south and by an adjoining employment use partially to the west, with the remainder of this boundary adjoined by Tesco's superstore and its car park.

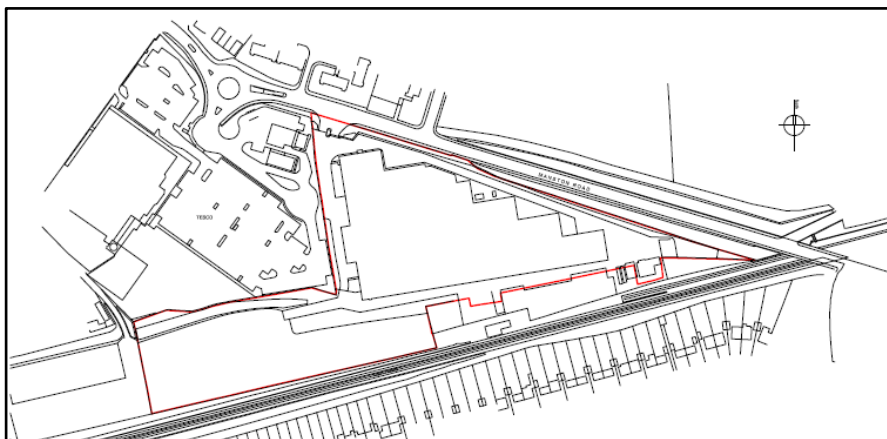


Figure 2. Site Location Plan

- 2.4 To the north of Manston Road, the character of this area is dominated by residential use with a mix of house styles, designs and layout patterns including high rise apartments.



Figure 3. Aerial photo of the application site

- 2.5 The eastern boundary of the site tapers as the alignment of the railway line and Manston Road highway converges. It is relevant that the eastern portion of the site is progressively screened by the rising embankment to the road as it bridges the railway line immediately east of the application site boundary.
- 2.6 Beyond the railway line to the south, the residential housing is separated by rear gardens which front Windermere Avenue, with the main rear elevations of these properties enjoying a minimum 15 metre rear garden length.
- 2.7 Within the immediate site context, residential permissions have recently been granted for other schemes, including for 48 dwellings on land west of Tesco's (OL/TH/20/1320).

3 The Development Proposal

- 3.1 This statement relates to an outline planning application with all matters reserved, except access. The proposal seeks to establish the principle only of the redevelopment of the site for up to 118 dwellings to facilitate the relocation of the existing business to modern purpose-built premises.
- 3.2 An illustrative layout plan and elevational drawings are submitted which give an indication of one possible way the site might be developed. However, the detailed design and layout will be matters that are considered once the principle of redevelopment is established by this proposal as part of a later reserved matters application.
- 3.3 This application therefore seeks only to establish the point of vehicular access to the site and the principle of residential redevelopment for up to 118 dwellings is acceptable. The illustrative plans are submitted to provide the LPA case officer with confidence that this quantum of development is realistically achievable as a guide for a later reserved matter application.

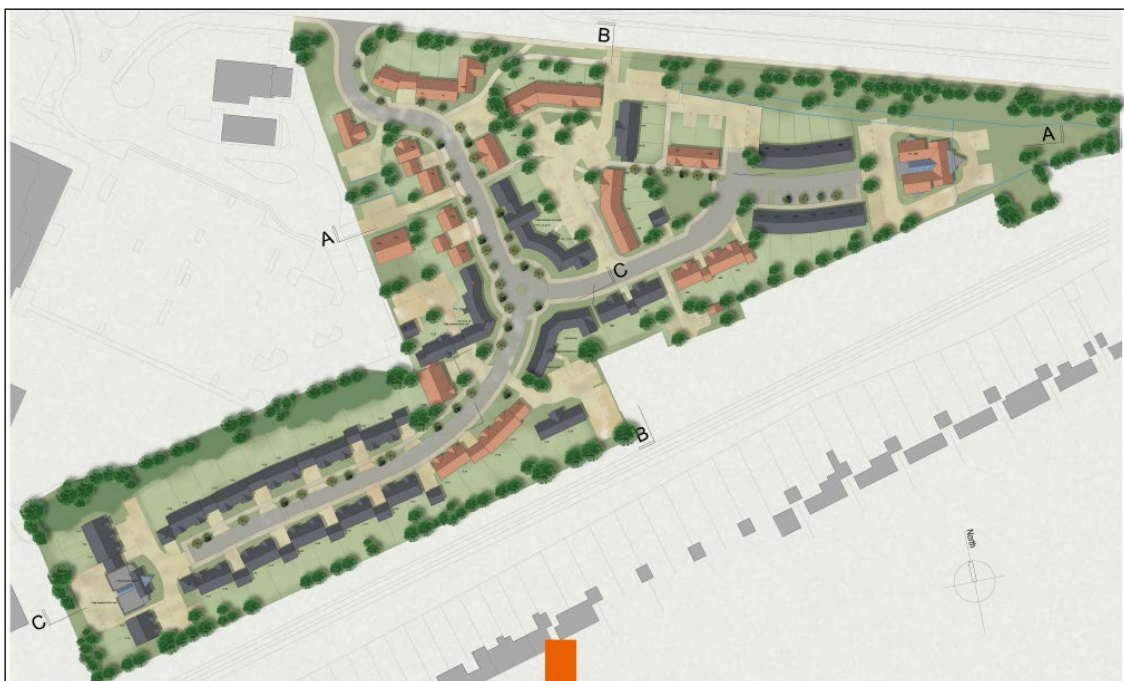


Figure 4. Proposed Illustrative Site Layout

- 3.4 The indicative housing mix proposed is as follows:
- 76 dwellings; and

- 42 apartments.

3.5 The housing development will be mainly two storey in height with three storey elements at focal points within the layout. An indicative street elevation is shown below. The areas of the site where three storey height is proposed, is shown on the coloured layout below.



Figure 5. Proposed Street Scene



Figure 6. Layout showing height of proposed development

3.6 The breakdown of unit sizes is not fixed at this stage but as a guide the illustrative layout shows a mix of semi-detached and detached properties. The sketch layout has used the footprint of a 3-bedroom dwelling, providing scope to easily increase the two bedroom and four dwelling units at the detailed design stage without affecting the overall masterplan principles.

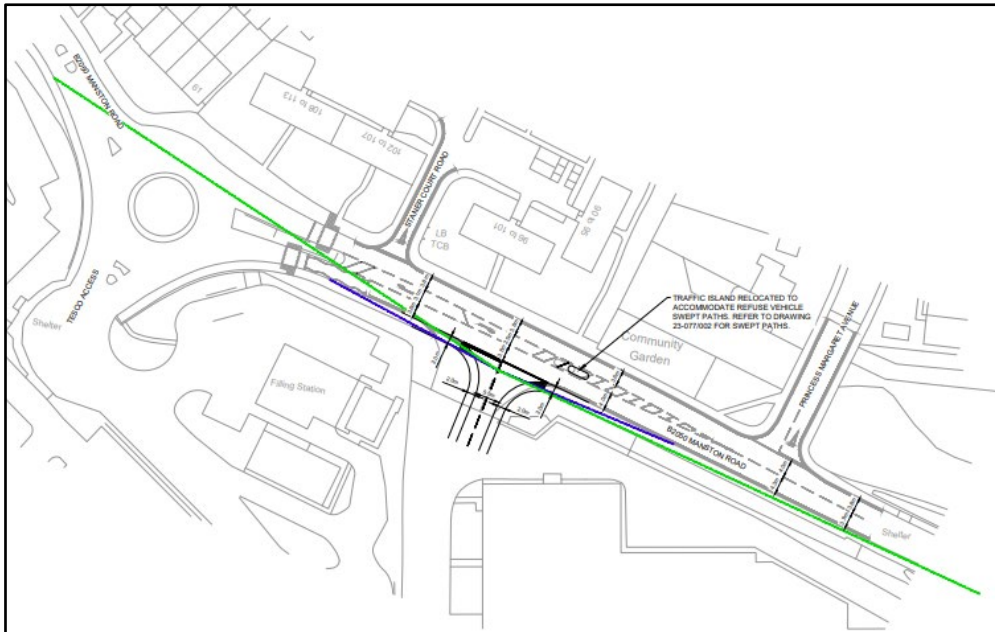


Figure 7. Proposed Site Access (utilising the existing access to the site)

3.7 The proposal includes the re-use of the existing access onto Manston Road. Compared to the previously consented scheme, this is considered to be a more desirable arrangement, providing greater separation between the site access and the nearby Princess Margaret Drive junction with Manston Road to the east.



Figure 8. Existing site access

4 Planning Policy Context

Development Plan

- 4.1 The Development Plan for the purposes of S38(6) of the Planning and Compulsory Purchase Act (2004) comprises the adopted Thanet Local Plan adopted 2020. A significant material planning consideration since the previous grant of permission in 2017 is the identification of the application site (referred to in the Plan as, “Manston Road Industrial Estate, Ramsgate (south)”) as suitable for housing development under Policy HO1 of the 2020 Plan.
- 4.2 In view of the allocation of the site in the Local Plan for housing (and the previous planning permission for residential development), the main material planning issues for this proposal now relate to site specific matters rather than the principle of development. While this is the case, the Local Plan identifies a range of planning policy objectives that should be addressed through residential development proposals. These are set out in detail in the forthcoming sections of this report and include:
- Promoting safe and sustainable travel opportunities (Policy SP43) and through Transport Assessment work demonstrating the transport impact and how multi-model travel options will be achieved (Policy TP01).
 - Reducing pollution risks associated with: Development of contaminated land (Policy SE03); land within a groundwater protection area (Policy SE04); air quality (SE05); and noise impacts on the proposed housing/noise-sensitive development (Policy SE06).
 - Suitable management of surface water through use of sustainable drainage systems where possible (Policy CC02).
 - Safeguarding biodiversity interests, mitigating impacts as appropriate and securing net gain benefits (Policy SP30).
 - Safeguarding European Protected sites (Thanet Coast and Ramsar) by mitigation in accordance with the Strategic Access Management and Monitoring Plan (Policy SP29).
 - Provision of affordable housing (Policy SP23) and infrastructure needs arising from the development including relevant KCC contributions and open space (Policies SP41 and GI04), notwithstanding the need to acknowledge the need for viability considerations to be taken into account. This point is particularly relevant in this case as Flambeau is one of the largest employers in the district and the overriding objective

of this application is to facilitate Flambeau's expansion and increased competitiveness as a large manufacturing business. The overall economic benefits of this proposal for the Thanet economy combined with job security and growth is also a significant material consideration and this was previously acknowledged by Members of the Planning Committee when granting permission for the previous housing scheme in 2017.

- 4.3 In view of the outline nature of the application (with all matters reserved save access), the full range of policy matters within the Plan would be appropriately addressed as part of any future reserved matters application. This would include issues covered by Policy SP14 (General Housing Policy), SP22 (Type and Size of Dwellings), SP37 (Climate Change) and the Plan's design policies. An indicative layout plan has been submitted with the proposal for the purpose of demonstrating that the quantum of the development being sought is appropriate. Reference will be made to relevant policy matters therefore to the extent that the indicative layout needs to be explained and justified.

National Planning Policy Framework (NPPF)

- 4.4 The NPPF (paragraph 7) states that the purpose of the planning system is to contribute to the achievement of sustainable development which is underpinned (paragraph 8) by the pursuit of economic, social and environmental objectives. These include ensuring: that sufficient land of the right type is available in the right places and at the right time to support growth (economic); that a sufficient number and range of homes can be provided to meet the needs of present and future generations and by fostering well-designed, beautiful and safe places, with accessible services (social); and protecting and enhancing the natural environment, making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy (environmental).
- 4.5 Paragraph 10 states that at the heart of the NPPF is a presumption in favour of sustainable development. For decision making this means (paragraph 11):
- a) approving development proposals that accord with an up-to-date development plan without delay; or

- b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (including where a 5-year housing supply cannot be demonstrated or where the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years), granting permission unless:
 - i. the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 4.6 Paragraph 12 confirms that the presumption does not change the statutory status of the development plan as the starting point for decision-making.
- 4.7 Paragraph 38 states that LPA's should approach decision making on development proposals in a positive and creative way and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. The focus of decision makers should be to seek to approve applications for sustainable development where possible.
- 4.8 Paragraph 58 states that it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment and that the weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.
- 4.9 Paragraphs 60 – 77 emphasise the importance of delivering a sufficient supply of housing. Paragraph 60 confirms the Government's objective of significantly boosting the supply of housing, requiring that a sufficient amount and variety of land should come forward where it is needed. LPA's must demonstrate that they have a 5-year supply of deliverable housing sites to meet their objectively assessed needs and are subject to an annual

housing delivery test, in which the number of new homes built in the district is calculated as a percentage of the number of homes needed over the previous three years.

- 4.10 In respect of affordable housing provision, paragraph 64 states that to support the re-use of brownfield land where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.
- 4.11 Paragraphs 81 – 85 encourages planning decisions that help create the conditions in which businesses can invest, expand and adapt.
- 4.12 Paragraphs 104 – 113 promotes sustainable transport, including walking, cycling and public transport and states that opportunities for such should be considered when managing growth. Significant development should be focused at locations which are, or can be, made sustainable through limiting the need to travel and offering a genuine choice of transport modes. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.13 Paragraphs 119 – 125 require that decisions should promote an effective use of land in meeting the need for homes, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Applications should be refused which fail to make efficient use of land. Decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes, support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land and promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 4.14 Paragraphs 152 – 173 address climate change and flood risk and state that new development should be planned in ways that help reduce greenhouse gas emissions, such as through its location, orientation and design.
- 4.15 Paragraphs 174 – 188 stress the importance of conserving and enhancing the natural environment. Decisions should inter alia minimise impacts on and provide net gains for

biodiversity, prevent existing development from contributing to pollution (including soil and air pollution) and secure the remediation and mitigating of contaminated land where appropriate.

- 4.16 In considering this application, and with reference to the requirements of the NPPF, it should be noted the Council is currently unable to identify a 5-year supply of housing. As outlined at paragraph 11 of the NPPF, this application must therefore be determined in the context of the presumption in favour of sustainable development. With reference to the relevant policy considerations applicable to this application (and as explained in this report), this means that planning permission should be granted, "unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

5 Planning Assessment

Illustrative Design – Layout

- 5.1 The updated indicative layout serves to demonstrate one way that the site could accommodate up to 118 dwellings. The framing of the design has been informed by the recommendations/findings of reports prepared in support of this application and on-site considerations including:
- The incorporation of a rear garden buffer from the rail line at the southern boundary, to address potential noise impacts;
 - The limited options for a point of access to Manston Road due to the rising embankment to Manston Road and the achievement of a necessary junction stagger with the intersection of Princess Margaret Avenue with Manston Road;
 - The raised ground level of Tesco's' on the western boundary and the treatment of the boundary banks;
 - The irregular shape of the site with the tapering configuration to a point at the eastern boundary and the southwestern leg of the site which has a more limited depth. The shape of the site and the single point of access strongly influences the alignment of internal access roads.
- 5.2 Given the rail, road and retail/parking uses in close proximity to the site the main principle steering the design process was the need to create an attractive place for potential residential occupiers. The design focus in this location was about quality place making and this necessitated an inward facing housing development where the fronting of dwellings to the internal road network was felt to be of primary importance. Whilst a central consideration would normally be the effect of development on the public realm and the need for the proposed housing to have an active frontage to Manston Road, in this case, because of the screening effect of the rising ground to Manston Road the advantages of such a layout would not have had a significant benefit on the public realm. For this reason, the focus of the design approach was to create a layout that has a character and strives to create a sense of place where the road and railway line and adjoining retail car park can exert the least visual influence over the environment created for the residential occupiers.

- 5.3 The shape of the site and single point of access did serve to influence the layout. The concept of three focal points at the central interval roundabout and anchoring at either end of the development site at the eastern and western ends created by the three storey elements and apartment buildings, sited well back from Manston Road was felt to represent a logical design response. These areas of the site are well separated from the nearest residential occupiers and set well back from the road. The additional height at focal points within the site is considered justified in design terms. These design principles have been previously accepted by the LPA when granting permission for a similar residential scheme to that now proposed.
- 5.4 The application is in outline form. The mix shown on the illustrative layout comprises a mix of apartments and dwellings. The majority of the dwellings are shown as 3 bedroom but provide scope to be adjusted to a 2 bed or 4 bed dwelling with relatively small changes that will not affect the site layout principles. The illustrative layout incorporates a mix of terraced and semi-detached properties only. Sales feedback from agents suggested that whatever the quality of the layout/design, the market was unlikely to attract buyers looking for larger detached dwellings in this location.
- 5.5 The site area is 3.5 hectares. The proposed density equates to 35 dwellings per hectare which is considered appropriate given the number of apartments incorporated within the focal points within the development which amounts to 33% of the total units.
- 5.6 It is concluded that the proposed density, mix and height of dwellings shows one way in which the scheme can achieve a high-quality environment. This was a conclusion previously accepted by the LPA when considering the earlier residential scheme that was approved at this site. (Ref: OL/TH/15/0187)

Illustrative Design - Parking Provision

- 5.7 The illustrative layout assumes a total of 118 dwellings comprising:
- 42 apartments; and
 - 76 dwellings, comprising mainly 3 bed units, as illustratively indicated.
- 5.8 Each dwelling is provided illustratively with 2 spaces per dwelling with the majority designed to be sited within the curtilage of each dwelling. The majority of apartments

have provision for 1.5 spaces per unit. A total of 222 spaces is provided within the illustrative layout. The mix will be redefined at the reserved matters stage to account for market demand at this time. Visitor parking has also been incorporated within widened sections of the internal road.

Residential Amenity Considerations & Benefits

- 5.9 The site is separated by adjoining residential properties by Manston Road and the railway line to the south. The eastern portion of the site is partially screened by an embankment. The remaining western boundary is adjoined by retail and employment uses. The site is sufficiently separated from residential occupiers in the vicinity not to give rise to a physical impact or overlooking issues.
- 5.10 The illustrative layout submitted with the application shows conventional distances of separation from adjoining residential occupiers, demonstrating that the number of residential units proposed can be accommodated without harm to the living conditions of existing or proposed occupiers.
- 5.11 The removal of the existing employment use (which is not restricted in terms of hours of operation by planning condition) would have a positive effect on existing residential occupiers by:
1. Removing a Class B2 employment use from the housing uses adjoining it;
 2. Improving the visual appearance of the site; and
 3. Reducing the potential for noise and reducing the number of heavy goods traffic movements from the site.

Transport & Travel

- 5.12 The previous outline application (approved 2017) was considered acceptable in highways terms. The current application shows the retention/augmentation of the existing site access, rather than the installation of a new access further east, as proposed in 2017. The application has been accompanied by a Transport Assessment (TA). This updates the transport data, accounting for the current traffic conditions and recent

committed/approved development schemes in the vicinity. The TA concludes that the proposal will be acceptable in transport terms.

- 5.13 Evidence provided in the TA compares the anticipated number of trips to/from the site arising from the residential use, with trip data linked to the existing authorised business use. This shows that while the proposed application would generate more trips, highways benefits would be derived from a reduction in the number of ordinary goods vehicles accessing/exiting the site via Manston Road. This would improve road safety and the environmental conditions in the locality.
- 5.14 The TA explains the results of traffic modelling on the Manston Road/site access and states that the junction would operate well within capacity during the AM and PM peak period and that the impact on the operation of the local highway network would not be material.
- 5.15 The site adjoins a Tesco Superstore and would facilitate opportunities for travel on foot and by public transport to services/facilities within the locality. Ramsgate station (at just over 1km away) is also a walkable distance from the site. The application site also lies opposite a primary school. Consequently, the proposal would more than adequately address development plan policies aimed at encouraging/facilitating sustainable travel options.

Contamination

- 5.16 The previous (LPA Ref: OL/TH/15/0187) application was accompanied by a Phase 1 and Phase II Environmental Ground Investigation. This included a site walkover and intrusive investigation from 7 boreholes across the site. The risk assessment concluded that no indications of contamination could be found that would render the site unsuitable for residential redevelopment. This position has been reaffirmed by a further updated Phase I walkover survey carried out for this application. Further investigation works are recommended as part of the development implementation which it is anticipated will be addressed by appropriate planning conditions.

- 5.17 The site lies within a groundwater protection area (Zone II Outer Protection Zone). It is recognised that the views of consultees (such as the Environment Agency) will be important to determining how the detailed scheme design, including the location/design of SuDs, should safeguard water quality. At this stage, it is considered that this issue can be safely addressed through planning conditions and any subsequent reserve matters application, although a preliminary surface water drainage strategy based on the illustrative layout is set out in the accompanying FRA.
- 5.18 In view of the technical information supporting this submission it is considered the proposal will comply with the requirements of Policy SE03 and SE04.

Air Quality

- 5.19 An Air Quality Assessment (AQA) has been prepared in accordance with relevant national and local policy, including the TDC Air Quality Technical Planning Guidance (2016). The AQA examines both the construction and operational air quality impacts of the development and takes into account the recent decision of TDC (June 2023) to revoke the Air Quality Management Area (AQMA) within which the application site had previously been located. The AQA notes that the application site now lies approximately 450m to the west of the Ramsgate AQMA.
- 5.20 In respect of the construction phase of the development, the AQA concludes that the implementation of suitable on-site mitigation measures should ensure impacts arising from dust and particulate matter will be negligible. For future occupiers of the development (operational phase) the use of appropriate modelling finds that predicted pollutants at selected receptors across the site would remain below relevant standards. The AQA concludes that air quality would not pose a constraint on development.
- 5.21 The sites 'location (as described above) would also provide an opportunity to promote a shift to more sustainable travel modes (walking, cycling and public transport) and help reduce/limit vehicle emissions. These considerations and the outcomes from the AQA show that the proposal would satisfy the requirements of Policy SE05.

Noise

- 5.22 To account for the proximity of the site to a main road and railway line, a Noise Impact Assessment was commissioned to inform the indicative layout option. This follows a similar report submitted with the 2017 application.
- 5.23 A baseline noise survey was undertaken of the existing noise sources. The report concludes that the daytime ambient noise level is relatively low with no existing screening and recommends that gardens are positioned adjacent to the railway line boundary. This approach is reflected in the indicative scheme.
- 5.24 For the boundary adjacent to Tesco's car park, the dwellings have been sited at right angles to the boundary and a 1.8m acoustic fence is proposed in line with the recommendations of the report.
- 5.25 The Manston Road frontage is affected by road noise. The report confirms that provided suitable double-glazing specifications are installed, then it would be appropriate for habitable rooms to front this road.
- 5.26 The evidence submitted with the application demonstrates that occupiers of the development would be protected from unacceptable noise impacts, in accordance with the objectives of Policy SE06.

Flood Risk/Surface Water Drainage

- 5.27 As the site falls within the surface water flooding risk zone, Herrington's has produced an innovative way to manage the surface water from the residential development by creating a drainage attenuation basin which is located at the eastern portion of the site, with a smaller basin located at the west. The proposal site lies within Flood Zone 1 which demonstrates that flooding from all other sources is considered low on the site.
- 5.28 Surface water flooding is demonstrated in the Flood Risk Assessment prepared by Herrington Consulting, the pluvial modelling undertaken mainly shows surface water flooding in the eastern corner of the site. The proposal seeks to utilise the existing nearby

combined gravity sewer to the north of the site. The swale runs along the northern edge of the site, maintaining distance from residential curtilage, and this will provide a sustainable solution to the site in events of heavy rainfall and when surface water can lead to flooding. However, the residential development has been positioned outside of the affected areas and the sustainable drainage system is proposed to the east, with a small retention area to the west. This is in accordance with Policy CC02, where suitable management of surface water through sustainable drainage systems is supported where possible.

- 5.29 The drainage system has influenced the illustrative design and layout of the proposed development to ensure all sleeping accommodation is not affected by surface water flooding and the parking is not located within vulnerable areas. Recommendations have been considered which include raising development by 300mm across the site and by 500mm in some instances to accommodate swales and the flood retention areas on site. Additionally, proposed access roads will be lowered and it has been recommended that future residents sign up to weather warnings.
- 5.30 As shown on the illustrative layout, a very small portion of the proposed apartment building falls within the attenuation zone, however this is indicatively shown to be a balcony on the upper levels and therefore will not be affected by surface water flooding. Additionally, there is a small amount of visitor parking located within the attenuation zone, and this area will be closed in the event of surface water flooding once a warning has been issued.
- 5.31 Overall, this proposal provides less hardstanding surfaces than the existing conditions on the site. As a result, the FRA concludes that the drainage system will not result in an increased risk of flooding to properties at the site or in surrounding areas and an effective solution to managing surface and foul water can be accommodated for the proposed development.

Biodiversity

- 5.32 To inform the application, an ecology study was commissioned to assess the likely presence of reptiles on site, particularly within the western areas which includes grassland and scrub. The results/conclusions from this are included in an Ecology Report

accompanying the application and update the body of earlier ecological baseline survey work that was undertaken for the earlier approved residential permission. Existing buildings and hardstanding occupy the majority of the site area and there is the opportunity for ecological enhancement as was previously recognised by the LPA.

5.33 Survey work was more recently carried out between July and September 2023 and found a ‘low’ population of common lizards; below the level to indicate a ‘Key Reptile Site’. The report states that to accommodate the development, this small population would need to be relocated. A mitigation strategy is proposed involving the provision of a receptor site (some 0.2ha) adjacent to the sites northern boundary comprising an area of unmanaged grassland, scrub and trees. Subject to enhancement and management of the scrub areas this is considered to provide a suitable habitat, also having good connectivity with adjoining landscape to the north and south. The receptor site would not be publicly accessible with access for management purposes only. Biodiversity enhancements are proposed involving the placing of log piles which would aid the carrying capacity of the receptor site, so securing the long-term viability of the reptile population. Details of the precise location of the receptor site (including the maintained grassland areas within it), are shown below.

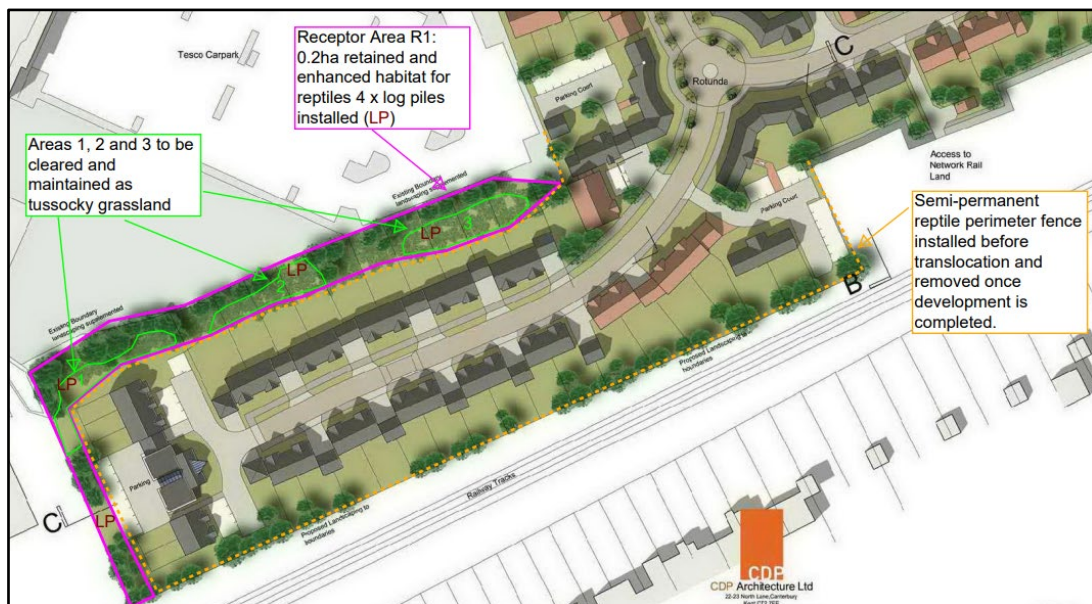


Figure 9. Protected species receptor site

5.34 The measures outlined above will suitably address the requirements of Policy SP30. To mitigate against the impact of the in-combination effects of new development on the Thanet Coast SPA and Ramsar site, the application also proposes a financial contribution

(through a S.106 legal agreement) as required by Policy SP29. This payment would be made as part of (not in addition to) any planning obligation payment deemed affordable through the forthcoming viability appraisal work.

Open Space Provision

5.35 Consistent with the outline permission granted in 2017, this application does not propose the inclusion of a Local Area of Play as part of the schemes open space provision. In 2017, it was accepted that due to the configuration of the site, the road and rail line surrounding it and the retail parking area, the priority was to create a strong built residential character. There were also strong doubts about whether a relatively small area of open space would actually be utilised effectively or be an attractive or a practical location given the specific site context. The following matters were also considered:

- The difficulties of accommodating open space on site because of the sites shape and the nature of the adjoining uses;
- The objective of relying on the design and siting of the pattern of buildings to create a quality sense of place given the desirability of screening out surrounding land uses;
- All dwellings are provided with individual rear garages and there are areas of strategic landscaping on the banks and boundary areas of the site which will be enhanced;
- The aerial photo below shows the number of parks and playing fields in the area which would be accessible for residents of the development.



Figure 10. Aerial Photo showing areas of public open space in the vicinity of the application site

- 5.36 In summary, whilst a portion of the site could accommodate an area of open space, this would reduce the number of houses and would not represent an effective or attractive land use given this Local Area of Play (LAP) would be surrounded by rail, road and retail uses.
- 5.37 Subject to the overall financial viability of the development (and the resultant scale of any planning obligation payment) a better place making option given the level of private garden space provision for the dwellings, would be the acceptance of an offsite contribution toward qualitative improvements of existing public open space that is already within close range of the application site. This approach was accepted in principle in 2017 and is considered to be equally valid in respect of the current application. This solution would serve to represent a more effective use of the land, would enhance the potential for the character of the proposed housing to be established through the built form and would also have the potential to achieve qualitative improvements to open space locally (through an offsite contribution).

Affordable Housing & Community Infrastructure

- 5.38 Reference has been made at the outset of this report to the very strong likelihood that the development will not be capable of delivering affordable housing (Policy SP23) or make full planning obligation payments to meet the relevant community infrastructure needs (Policy SP41).
- 5.39 While regrettable, this position was clearly evidenced and accepted on the previous application and in view of the emergence of strong economic headwinds since 2017, issues around financial viability continue to undermine the ability of the scheme to deliver the full range of policy and consultee planning obligation requirements/requests. A reduction in the 30% affordable housing requirement can be justified by reason of the measures outlined at paragraph 64 of the NPPF (linked to encouraging housing on brownfield sites). The viability evidence assessed as part of the 2017 application concluded that a zero % provision of on-site affordable housing was justified on economic viability grounds. As confirmed earlier in this report, a financial viability assessment will be updated and submitted in due course to support this application.

5.40 A reduction in the level of affordable housing provision and/or financial contributions arising from a robust analysis of the financial viability of a project is a fully accepted part of the planning process, supported by the NPPF. That said, to the extent that any reductions in the provision of affordable housing or planning obligations are viewed as diminishing the attractiveness of the proposal, it is respectfully requested that this be weighed against the other planning merits of the proposal, which include the needs of the existing business (on site) which are considered in the next section below.

Existing Business Needs and Economic Benefits

5.41 As with the previous 2017 application, the objective of the applicant is to establish the principle of residential redevelopment to facilitate the relocation of the existing business to a Thanet Business Park. The applicant has discussed this relocation with the Economic Development Team of Thanet District Council for some time. It will be understood however that a relocation of this type is a significant and complex matter that involves decision making over a period of years. Unfortunately, recent events, such as COVID, have only served to prolong this process. The decision of the applicant to submit this new application however reflects Flambeau's continued commitment to seeking a way forward that will enable the business to adapt and grow to the benefit of the economic welfare of the community.

5.42 There are practical reasons why operationally the existing business premises does not function effectively for the applicant:

- The condition of the building - The roof structure is a complex construction which is in need of constant and costly ongoing repair. The age and condition of the building is poor and does not promote serious long-term investment.
- Sustainability - The building is costly to heat and insulate.
- Layout - The configuration of the site and building does not suit plastic manufacturing and the industrial process because of the frequent "double handling" of goods and difficulties with loading and unloading. To compete with other plastic manufacturers, it is important that Flambeau updates and modernises so that the production is made more efficient to help reduce operational costs and ensure that staff time is utilised more effectively.

- Servicing - The turning and manoeuvring areas around the building are not operationally convenient for larger transport vehicles or even staff parking.

5.43 For a combination of these reasons, the existing building is hampering an efficient production process and has deterred investment by the applicant in new machinery. This application will allow these barriers to increased productivity and investment to be lifted. Residential redevelopment of the site will increase the existing use value of the site, generating funds to assist with the relocation and long-term investment of the company in Thanet and the purchase of up-to-date machinery to enhance the competitive position of the business in the long term.

5.44 The applicant, Flambeau, is one of the biggest employers in the district and it is therefore important to the Thanet economy. Regrettably the condition and layout of the existing premises adds to the costs of production and ultimately, if unchecked, will lead to a loss of economic competitiveness. This proposal seeks to address these issues through the relocation of the business to modern premises which the application for housing development of the existing premises will facilitate. It is relevant that to meet advanced orders the new premises and machinery must be operational before the existing Flambeau site can be disposed of to a residential housebuilder thereby increasing the investment risk. However, Flambeau must ensure that production continues seamlessly during relocation.

5.45 While the relocation of the business does not form part of the application per se, the realisation of a residential permission is a vital first step to enabling an important local business to grow and adapt to meet future challenges and opportunities. In this respect, the potential relocation of the business, arising from a residential development of its existing premises, should be viewed as a material planning consideration that weighs heavily in favour of the application. The grant of outline planning permission (effectively a renewal of the earlier permission that has been granted, LPA Ref: OL/TH/15/0187) would support the prospects of the business and help achieve economic growth in Thanet in line with the objectives of Policy SP04.

6 Conclusion

- 6.1 This is a brownfield site which the applicant is seeking to redevelop for housing to enable the relocation of the existing business to modern premises where the production process will be more efficient and local jobs can be safeguarded. The existing factory building is dilapidated and in poor condition and is not suited to modern day manufacturing.
- 6.2 The applicant submitted a similar application for the same purpose in 2015 (LPA Ref: OL/TH/15/0187) which was granted 2017. This application seeks to re-affirm the principles established by that permission and effectively renew it.
- 6.3 Unlike 2017, the planning policy context is now fully supportive of a residential use of the site with its allocation for housing under Policy H01 of the Thanet Local Plan (2020). Against the backdrop of the previous approval and the latest local plan allocation, it is considered that the residential use of the site is demonstrably acceptable in planning terms. The application follows the grant of permission for other residential schemes within the immediate locality (to the west of Tesco's).
- 6.4 The application is supported by an illustrative layout that shows how noise, highway, environmental, flood risk and ecological considerations have influenced the design process. The design process has carried forward the broad principles established by the 2017 approval and continues to address site specific constraints and satisfies design and conventional development control standards in order to create a sense of place with its own identity.
- 6.5 It is acknowledged that issues relating to the financial viability of the project are likely to preclude the provision of affordable housing on-site and the making of the anticipated full range of developer contribution requests. The precise position on this will be established by financial viability work which is currently on going. Whilst regrettable, it follows a similar conclusion reached/agreed in respect of the 2017 planning approval. Furthermore, it goes without saying that the delivery of a financially viable planning permission is critical to enabling the proposed relocation of the existing business operation.

- 6.6 Notwithstanding the viability issues, it remains the case that the development will deliver a wide range of planning benefits. In particular, the provision of up to 118 residential dwellings on the site will be a significant benefit within the context of the absence of a 5-year housing land supply in Thanet. The proposal provides an opportunity to deliver a notable enhancement to the visual quality of the area through a well-designed, contextually sensitive built development. The removal/relocation of the business operation would reduce noise and result in a significant reduction in operational goods vehicle movements within the immediate vicinity. The proposal would secure the effective re-use of a brownfield site (in line with the objectives of the NPPF), remediate contamination and safeguard and enhance biodiversity interests.
- 6.7 The presumption in favour of sustainable development (NPPF, paragraph 11) means that the application must be approved unless any adverse impacts of doing so are judged to *significantly and demonstrably* outweigh the benefits of the scheme. Taken together with the economic benefits linked to the relocation of the existing business to a more efficient purpose-built facility elsewhere in Thanet, it is considered that the proposal would deliver a range of economic, social and environmental benefits that would fully justify a further grant of outline planning permission at this site. Set against the grant of permission for the very similar proposal in 2017 and the 2020 local plan allocation for housing on this site, it is contended that there are no adverse impacts associated with this application that could justify a planning refusal under the NPPF presumption.
- 6.8 For these reasons, it is respectfully requested that this outline application to establish the principle of residential development be favourably considered.