
Hearing Statement

Stone Hill Park Ltd. – Matter 2 Objectively Assessed Need and the Housing Requirement (SP11)

Issue 6 – Housing Requirement

Q1. Is the housing requirement justified and is it based on robust, up-to-date and available evidence? If not, what should the housing requirement be?

The most up-to-date evidence base identifying housing needs across the District comprises the Thanet Updated Assessment of Objectively Assessed Housing Need (OAN) 2016. Overall, the study identifies a District-wide OAN of 17,140 dwellings over the 2011-2031 plan period (equating to 857 dwellings per annum). This forms the basis of draft Policy SP11 of the Draft Local Plan, which adopts this figure as the District's housing target over the plan period.

In September 2017 the Ministry of Housing, Communities and Local Government (MHCLG) consulted on changes to planning practice guidance relating to the standard method for assessing local housing needs. Alongside this, they published an indicative assessment of housing need for each local authority area based on the proposed formula. For Thanet, the MHCLG estimated that applying the standard method would result in an OAN of 1,063 dwellings per annum between 2016-2026. Applying this to Thanet's local plan period would result in a total OAN in the District of 21,260 dwellings.

In October 2018, the Government clarified in their Technical consultation on updates to national planning policy and guidance that 2014-based data should continue to form the baseline for of assessment of local housing need, and confirmed that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies a departure from the standard methodology. The MHCLG estimate for OAN in Thanet using the standard method would therefore remain unchanged.

As the Draft Local Plan was submitted for examination prior to the 25th January 2019, the Council is able to rely upon their own (lower) locally assessed OAN for the purpose of local plan examination even though it plans to provide for fewer homes than up to date need assessments show are required. However, any future review of the Local Plan will need to conform with the standard method OAN unless exceptional circumstances justified departure. The Secretary of State has directed that a review must take place 6 months after adoption of the local plan (Letter Rt Hon James Brokenshire MP, 28th January 2019). We therefore expect Thanet's scale of housing need will grow by 4,120 in the near future.

Because any proposed revisions to the PPG will apply from the date of publication, the significant gap between Thanet's locally assessed housing need (17,140 dwellings over the plan period) and the standard method (21,260 dwellings) will form a material consideration in decision-making. To ensure the proper planning of the District and defend against piecemeal development there would be merit in adopting the higher standard method for the Local Plan. The re-allocation of the former Manston Airport would help meet this need.

Q2. Policy SP11 states that provision is made for a 'total' of 17,140. Is this consistent with the evidence-base, or should the figure be referred to as a minimum?

The figure should be referred to as a minimum, particularly in light of the fact that the OAN will increase following the adoption of the standard method when the Local Plan is reviewed six months after adoption.