
HEARING STATEMENT

MATTER 3 – AFFORDABLE HOUSING NEED

03 APRIL 2019 - PM

THANET DISTRICT LOCAL PLAN EXAMINATION

Prepared on Behalf of
Ptarmigan Land
[Representor Id – 493]

March 2019

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1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of Ptarmigan Land in respect of Matter 3 relating to Affordable Housing Need. This statement specifically regards Issue 3 relating to Viability.

2.0 RESPONSE TO MATTER 3

Matter 3 Issue 3 – Viability

Qn3.1 The Thanet District Council Local Plan and CIL Viability Assessment indicates that for schemes on previously developed land, where development costs are typically higher than greenfield sites, the affordable housing target could be lowered to 20% (paragraph 3.12.3). With this in mind, what is the justification for a 30% target across all development types and locations? Is Policy SP20 justified?

- 2.1 Paragraph 3.12.3 of the Thanet District Council Local Plan and CIL Viability Assessment (CD1.3) sets out 3no. options for affordable housing policy for TDC to consider, these being:
- A differential affordable housing policy within the range 20 – 30%, with a higher target for greenfield sites (30%) and a lower target for previously developed land sites (20%);
 - A single affordable housing target of 25%; or
 - A single affordable housing target of 30%.
- 2.2 Paragraph 3.12.4 confirms the direction of this policy will not be dictated by the viability assessment but informed by it along with other information and the review of delivery experience available.
- 2.3 The Strategic Housing Market Assessment 2016 (CD4.2, para 9.36) confirms TDC will seek 30% affordable housing, reflecting previous economic viability considerations. This figure has been tested through the Local Plan and CIL Viability Assessment (CD1.3) completed as part of the evidence base for the Plan which recognises viability will need to be reviewed in some cases and the level of provision reduced (paragraph 29).
- 2.4 Policy SP20 includes flexibility for affordable housing provision to be reduced if necessary should the 30% affordable housing requirement render a scheme unviable. TDC therefore has the capability to reduce levels of affordable housing in individual application circumstances.
- 2.5 As detailed in our Matter 9 representations, Policy SP20 should be amended removing the requirement for housing developments to provide at least 30% affordable housing. Subject to this, Policy SP20 is justified and includes the necessary flexibility to ensure schemes are viably delivered.

Qn3.2 How has the evidence-base considered the different between bringing forward strategic and non-strategic sites? Does it justify a consistent approach to affordable housing across all sites, regardless of size?

- 2.6 The Thanet District Council Local Plan and CIL Viability Assessment appendices include appraisal summaries for residential development sites including strategic sites (CD1.5 and CD1.6). This includes a number of assumptions such as 20% or 30% affordable housing provision.
- 2.7 TDC has therefore considered the impact of affordable housing contributions across a range of housing sites, of varying sizes.
- 2.8 As acknowledged in Qn3.1, Policy SP20 includes flexibility to allow individual housing sites to review site specific viability at the time of an application, should the affordable housing requirements result in the scheme being unviable. In light of this flexibility, the consistent approach across all housing sites is therefore justified.