

Thanet District Local Plan Examination

Hearing Statement

Matter 3 – Affordable Housing Need

3rd April 2019

Gillings Planning on behalf of Millwood Designer Homes

March 2019

Matter 3 – Affordable Housing Need

This statement has been prepared on behalf of Millwood Designer Homes and responds to Issue 3 only.

In light of the consistency in theme, the responses to Matter 9 Issue 2 (provision of Affordable Housing) is repeated under Matter 3.

Issue 3 – Viability

Q2 - How has the evidence-base considered the differences between bringing forward strategic and non-strategic sites? Does it justify a consistent approach to affordable housing across all sites, regardless of size?

Representations were submitted to confirm that flexibility should be provided within the policy if site specific circumstances suggest a different approach should be taken. This is because a rigid consistent approach across all sites is highly unlikely to be appropriate.

This is noted within the evidence base document in multiple locations. Despite the ‘at least 30%’ wording of the policy, the evidence base is clear in confirming that ‘at least 30%’ on a borough wide, consistent, basis would not be justified.

Such a rigid consistent approach would affect deliverability of housing, unless viability can be taken into account. This is supported by the evidence base which recognises that each site is likely to be negotiated on its merits – specifically the Local Plan Viability Assessment (Strategic Sites Update) which notes at para 2.3.3 that “the exact nature of the s.106 or equivalent requirements that may be viable at a site-specific level will not usually be determined until the planning application stage, however”.

Although the policy justification notes that viability can be taken into account, the representations hold that in order to provide developers certainty, the policy itself must allow for flexibility to specifically allow for viability to be taken into consideration on a site by site basis. This is in respect of both the overall percentage and the mix of tenures.

Simply, it will not be appropriate for all qualifying sites to provide ‘at least’ 30% affordable homes with exactly the split provided.

Flexibility is therefore required. This could be achieved in a number of ways, however the simplest would be as per the representations submitted – that ‘where appropriate’ be added, to allow for site specific circumstances to be taken into account. We welcome alternative approaches to achieve this objective however.