
Thanet Local Plan (Proposed Submission)

Local Plan Examination
Hearing Statement – Matter 3

On behalf of
The Master, Fellows and Scholars of the College of
St John's the Evangelist in the University of
Cambridge



Contents

1.	Introduction	1
2.	Matter 3: Affordable Housing Need	2



1. Introduction

- 1.1. This Hearing Statement has been prepared by Savills (UK) Limited on behalf of The Masters, Fellows and Scholars of the College of St John the Evangelist in the University of Cambridge ('St John's College').
- 1.2. Savills (UK) Limited on behalf of the College have made the necessary and relevant representations at all consultation stages of the emerging Plan. This includes representations made to the Regulation 19 version of the Plan.

2. Matter 3: Affordable Housing Need

Issue 3: Viability.

Question 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. Policy SP20 confirms the Council will seek at least 30% affordable housing. This should not be at least 30% as this figure has not been tested through the Local Plan and Viability Assessment (CD1.3). It goes on to say at paragraph 3.1.19 that 30% became the practical upper end of the affordability testing. Consequently we believe that the words 'at least' should be removed from the policy. It is also recognised in paragraph 29 of this document that viability may have to be reviewed in some cases. It is important that viability is examined on a site by site basis. This is reflected in Policy SP20 which allows for affordable housing to be reduced only if it would make the proposed development unviable. We believe this provides the flexibility necessary to ensure that development comes forward and on this basis Policy SP20 is justified.

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

- 2.2 The Council has assessed the provision of 20% or 30% affordable housing across the strategic sites in the appraisal summaries for residential development on the strategic sites (CD1.5 and 1.6). As noted above Policy SP20 allows for flexibility on viability at the time of an application and therefore the consistent approach for affordable housing is justified.