
HEARING STATEMENT
MATTER 4 – SPATIAL STRATEGY

04 APRIL 2019

THANET DISTRICT LOCAL PLAN EXAMINATION

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

March 2019

HEARING STATEMENT
THANET DISTRICT LOCAL PLAN EXAMINATION
MATTER 4 – SPATIAL STRATEGY
04 APRIL 2019
Prepared on behalf of
Ptarmigan Land
March 2019

Project Ref:	26281
Status:	FINAL
Issue/Rev:	01
Date:	19 March 2019
Prepared by:	Joshua Mellor
Checked by:	Andrew Wilford
Authorised by:	Andrew Wilford

Barton Willmore LLP
The Observatory
Castle Hill Drive
Castle Hill
Ebbsfleet Valley
Kent
DA10 1EE

Tel: 01322 374660
Email: andrew.wilford@bartonwillmore.co.uk

Ref: 26281/A5/JM/kf
Date: 19 March 2019

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

	PAGE NO.
1.0 INTRODUCTION	01
2.0 RESPONSE TO MATTER 4 – SPATIAL STRATEGY	02

Word Count: 1,513 words (excluding Inspector's Questions and title pages)

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of Ptarmigan Land in respect of Matter 4 relating to Thanet District Council's (TDC) proposed Spatial Strategy. This statement specifically regards Issues 1 and 2 relating to the settlement hierarchy and housing distribution (Issue 1) and Housing Development Policies HO1 and SP12 (Issue 2).

2.0 RESPONSE TO MATTER 4 ISSUES 1 AND 2

Matter 4 Issue 1 – Settlement Hierarchy and Housing Distribution

On1.1 Does the Plan set out a hierarchy of settlements where new development will be directed towards? If so, is it clear to decision-makers, developers and local communities?

- 2.1 No, the Plan does not include a hierarchy of settlements but that does not mean to say it is unclear where new development is to be directed towards.
- 2.2 The Urban Boundary of Thanet District is comprised of a compact conurbation of the built-up areas of Birchington, Westgate-on-Sea, Margate, Broadstairs, Westwood and Ramsgate.
- 2.3 Policy HO1 directs housing development to allocated sites and on previously developed land within the Urban Boundary, as well as on residential gardens (subject to additional criteria).

On1.2 How have the main urban areas of Margate, Ramsgate, Broadstairs and Westwood been defined? Do they represent a single urban area where the majority of new development is concentrated?

- 2.4 The Urban Boundary includes the existing built-up areas of Birchington, Westgate-on-Sea, Margate, Broadstairs, Westwood and Ramsgate and the proposed strategic and non-strategic housing sites. This forms a single area where 95% of the population of the District resides (CD1.1, paragraph 12) and most of Thanet District's existing and proposed development is located.
- 2.5 The majority of the Urban Boundary is continuous, with the exception of Birchington which has an Urban Boundary of its own right, being separated from Westgate-on-Sea by a small gap (circa. 100m at narrowest point) consisting the Green Wedge containing King Ethelbert School and Ursuline College. Paragraph 4.5 – 4.12 of the Local Plan (CD1.1) details the importance to Thanet District of the Green Wedges which are protected from development through Policy SP22.
- 2.6 There is no single location where the majority of new development is concentrated with a broadly even distribution of new development adjoining the existing built-up area.

Qn1.3 Does the Plan seek to direct a certain percentage, or proportion of growth to particular areas and/or settlements? If so, where is this set out and what is it based on?

- 2.7 Paragraph 3.12 of the Local Plan (CD1.1) confirms the urban area of Thanet is relatively constrained, surrounded by the coast on 3no. sides. TDC's spatial strategy is therefore led by available land.
- 2.8 TDC has a historically high windfall development at an average annual rate of 225 dwellings per year (Annual Monitoring Report, CD7.11 page 11). Predominately these are small brownfield sites within the urban area.
- 2.9 TDC's Brownfield Register (2018) identifies land available for circa. 1,800 dwellings on brownfield sites (excluding the former Manston Airport site) of which approximately half have consent for residential development and the remaining are existing Local Plan 2006 allocations.
- 2.10 Outside of small brownfield development there is little scope for major development within the existing built up area. TDC has acknowledged through its Strategic Housing Land Availability Assessment process that greenfield development will be necessary to meet its housing needs.
- 2.11 Given the coastal location there is little scope for greenfield development in a northerly or easterly direction. Available land is therefore located to the south and west of the existing built up area.

Qn1.4 How did the Council decide on the scale and level of growth attributed to Margate, Ramsgate, Broadstairs, Westwood and the Rural Settlements?

- 2.12 There is little land within the existing built up area and the availability of greenfield land adjoining this area is itself limited.
- 2.13 TDC tested, through its Issues and Options Sustainability Appraisal Interim Assessment (2013) (summarised in Appendix G of CD7.4), 5no. broad options for where best to locate greenfield housing. This confirmed the option for locating housing adjoining existing urban areas or settlements as the preferred option.

- 2.14 TDC's Strategic Housing Land Availability Assessment (CD4.4) reviewed sites on the basis of their suitability, including sustainability criteria. Para 5.8 of CD4.4 confirms sites within/adjacent to existing settlements will be more sustainable than those which are not and there is merit in considering some housing in rural settlements to address local housing need and providing a degree of locational choice.
- 2.15 The majority (circa. 94%) of proposed housing allocations (strategic and non-strategic) are located within the proposed urban boundary / adjoining the existing urban area, locating development in the most sustainable location and assisting with delivery of the necessary Plan infrastructure. This also reflects where the majority (95%) of Thanet District's existing population is located. The remaining allocations (identified as 'Rural Sites' in CD1.1 Appendix B) are located adjoining rural settlements to assist in addressing housing needs by providing choice in the housing market.

On1.7 What alternative options were considered as part of the Plan's preparation and why were they discounted?

- 2.16 TDC's Strategic Housing Land Availability Assessment (SHLAA, CD4.4) initially applied the locational principles established in TDC's Issues and Options Sustainability Appraisal Interim Assessment (2013). The Interim Assessment tested broad options, with the option for accommodating development on brownfield sites within the urban area scoring best.
- 2.17 For where to best locate the greenfield element, the Interim Assessment reviewed 5no. broad spatial options, these being:
- Adjoining the Urban Area;
 - Adjoining the Villages;
 - Freestanding Countryside Sites;
 - In the Green Wedges; and
 - Housing in the form of a New Settlement.
- 2.18 Appendix G of the Sustainability Appraisal (CD7.4) provides a summary of the options tested, concluding the key differences relate to the implications on accessibility to transport infrastructure, links and key services and facilities, with the options of siting development adjoining existing urban areas or settlements having a more beneficial effect and being served by existing transport links.

2.19 In regards to the discounted options, Appendix G confirms:

- A freestanding countryside site would be less sustainable, especially in terms of access to facilities, infrastructure connections, community integration and likely impact on high grade agricultural land, than those within/adjoining existing built up areas;
- The functions of the Green Wedges remains highly important and is subject to continued protection and therefore the release of Green Wedge land would be considered only exceptionally where shortcomings in the sustainability merits of alternative housing sites outweigh the importance of a site to the function of the Green Wedges; and
- A new settlement would be unsustainable for the same reasons as a freestanding countryside site. In addition, a new settlement would be incompatible with the District's limited geographical area which embraces extensive urban areas and closely grouped villages. A single settlement would also risk over reliance on delivery, likely to be impacted by the need for very substantial investments in new infrastructure.

2.20 The Sustainability Appraisal assessment has tested alternative options, which scored lower than the proposed strategy and therefore have been discounted. TDC's chosen option has therefore been justified as the most reasonable and is therefore sound.

Qn1.8 What is the rationale for pursuing growth on larger, strategic sites, rather than smaller site allocations to meet the housing requirement?

2.21 TDC has a housing requirement of 17,140 dwellings across the Plan period.

2.22 Table 3 of the Local Plan (CD1.1, page 36) sets out the sources of supply, of which 8,939 dwellings are to be delivered on housing allocations (without existing consent). Table 3 is replicated below.

Table 2.1 TDC's Housing Supply

Local Plan requirement 2011 – 2031 (857dpa)	17,140
Completions (01/04/11 to 31/03/18)	2,182
Empty homes brought back into use (2016/17)	89
Empty homes brought back into use (2017/18)	84
Residual requirement	14,785
Total allocations supply	8,939
Planning permission supply	4,294
Empty homes allowance 27dpa (27 x 13)	357
Windfall allowance 225dpa (225 x 10)	2,250

- 2.23 The 4,294 dwellings with extant consent includes 900 dwellings identified on the brownfield register and 1,750 dwellings on SP13 and SP17 Strategic Sites.
- 2.24 The existing Urban Area of Thanet is constrained, being bounded by the coast on 3no. sides. There is limited capacity to support major development within the existing urban area as established by TDC's brownfield register.
- 2.25 Appendix A of the Strategic Housing Land Availability Assessment (SHLAA, CD4.4) demonstrates the distribution and size of sites submitted through the call for sites and assessed in the SHLAA. This demonstrates that the make-up of sites submitted are generally large in nature, reflect land ownership boundaries and characteristic of the large field sizes in the countryside area of Thanet District.
- 2.26 Para 3.17 of the Local Plan (CD1.1) acknowledges the allocation of strategic sites provides the opportunity to deliver development at a scale that will serve both to facilitate a step change in delivering the type of homes required to meet need and secure the infrastructure required to support them. This includes the delivery of the Inner Circuit Route Improvement Strategy, a key element of TDC's Draft Transport Strategy 2015 – 2031 (CD6.1).
- 2.27 The rationale is therefore dictated by the type of sites submitted, as well as reflecting TDC's preferred strategy.

Qn1.9 Is the spatial strategy justified? Does it represent the most appropriate strategy, when considered against the reasonable alternatives?

- 2.28 Yes. As detailed in Qn1.7 TDC has justified its approach to accommodating housing needs through its Sustainability Appraisal process. This included reviewing the reasonable alternatives which were discounted when considered against the option which scored highest (i.e. accommodating greenfield development adjoining urban area and villages).

Matter 4 Issue 2 – Housing Development – Policies HO1 and SP12

Qn2.1 What is the justification for requirement proposals on allocated housing sites to be consistent with the indicative phasing schedule in Appendix B? How will this be determined, and is it clear to decision-makers, developers and local communities what is expected of proposals for new development?

- 2.29 The phasing schedule in Appendix B (CD1.1) seeks to enable TDC to demonstrate a rolling supply of housing across the Plan period, based on a stepped trajectory geared towards the latter part of the Plan period.

- 2.30 For the Birchington Strategic Site, the trajectory should be amended to reflect the Indicative Delivery Trajectory provided within our Regulation 19 Local Plan representations. This trajectory has been agreed by the Promoters of the Birchington Strategic Site and TDC through the Statement of Common Ground for SP14.

Qn2.4 Is the final requirement of Policy HO1 consistent with the strategic site allocations, some of which seek to promote alternative uses as part of new mixed-use developments? Is the policy effective?

- 2.31 The final requirement of Policy HO1 seeks to ensure allocated housing sites (strategic and non-strategic) contribute towards the housing supply requirements and are not brought forward for solely alternative uses. The principle of this policy is acceptable however the current drafting is unclear.
- 2.32 Policy HO1 should be amended to reflect other uses are acceptable, where the allocation policy supports such uses. We propose the following amendment:

Alternative development on sites allocated for specific uses residential development will not be permitted unless otherwise identified as being appropriate through specific allocation policy or if specific evidence supports alternative uses.