

**Thanet District Local Plan Examination**

**Hearing Statement**

**Matter 4 – Spatial Strategy**

**4th April 2019**

**Gillings Planning on behalf of Millwood Designer Homes**

**March 2019**

## Matter 4 – Spatial Strategy (Policies SP12, SP21, H01, H010, H011 and H018)

This Statement has been prepared by Millwood Designer Homes and addresses Issue 1 and 2 only.

### Issue 1 – Settlement Hierarchy and Housing Distribution

#### Q4 – How did the Council decide on the scale and level of growth attributed to Margate, Ramsgate, Broadstairs, Westwood and the Rural Settlements?

The overall housing distribution is considered appropriate and based on the evidence gathered within the SA and SHLAA, which, together with the entire evidence base, set out the reasoned justification for the growth at these settlements, and specifically the Strategic Allocations.

#### Q8 – What is the rationale for pursuing growth on larger, strategic sites, rather than smaller site allocations to meeting the housing requirement

The rationale for the overall spatial strategy is clear and robust. In order to meet the OAN in full Strategic Sites are required. There is simply insufficient capacity identified through the SHLAA to deliver the OAN on smaller site allocations. The Strategic Sites are an appropriate and reasoned response and on this basis the spatial strategy is justified.

### Issue 2 – Housing Development – Policies H01 and SP12

#### Q1 - What is the justification for requiring 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?

It is accepted that in order to provide for policy SP11 and the indication of the stepped delivery of homes throughout the plan period, a detailed housing trajectory is required. However, that trajectory can only be indicative.

A Local Plan can not require adherence with the delivery of homes, and certainly not in advance of planning permission being granted. Hence, the majority of the draft plan (with the exception of wording within SP15 for example) makes reference to 'indicative' phasing. So long as this reference is continued, it is clear that the Council anticipate this level of delivery, but it can not be enforced.

For the avoidance of doubt, the respondent is supportive of the revised trajectory set out in the Statement of Common Group in respect of SP15.

A full case in respect of the trajectory in respect of SP15 is made in respect of Matter 5, Issue 5, Question 15.

#### Q4. Is the final requirement of Policy H01 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?

There is clearly a degree of confusion, and for the avoidance of doubt, a Main Modification would be welcome to confirm that the restriction of non-residential development does not apply to Strategic Sites, including SP15 where such uses are explicitly required.

