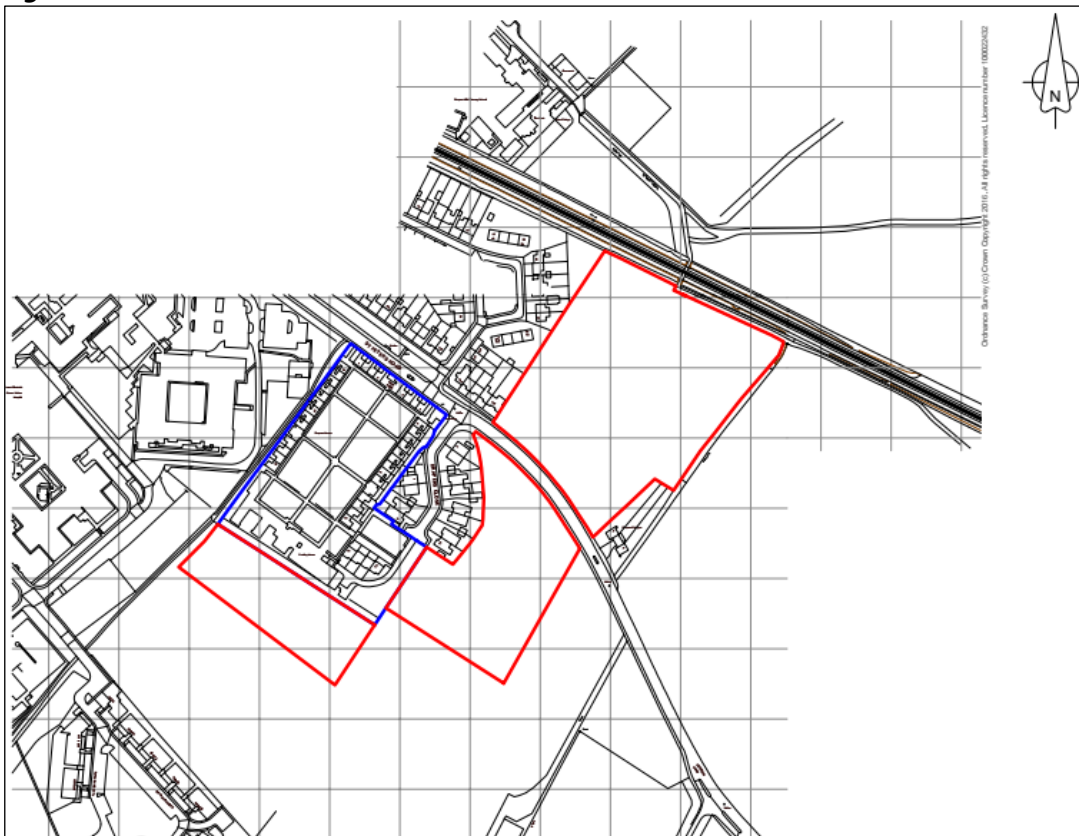


**Thanet Local Plan
Submission Version October 2018
Hearing Statement on Behalf of Quinn Estates Ltd
Matters 2, 3 and 4**

Land adjacent to Yoakley House, Margate

We have been instructed by our client, Quinn Estates ('Quinn'), to attend the Examination on Public in relation to land adjacent to Yoakley House in Margate for specialist older people's accommodation and residential development. Whilst the Council has not proposed to allocate the site, Quinn has made representations at previous stages of the Local Plan preparation process to highlight the site's suitability and availability for development. The Site is outlined in red on **Figure 1**.

Figure 1 – Location of the Site



Quinn is supporting Michael Yoakley's Charity which owns the land outlined in blue on **Figure 1**, upon which are located Drapers Almshouses and an associated care home. Drapers Almshouses were established as accommodation for the poor elderly members of Margate in 1710 following Michael Yoakley's death as a legacy of caring for his relative.

The nine original Almshouses still exist to this day and are in use, alongside 39 additional almshouses, and a 31 bed care home. Drapers Almshouses at the St Peter's Road frontage of Yoakley House are Grade II listed. The Drapers Lodge House is also Grade II listed.

The proposal is to bring forward a new 32-bed care home and residential units on the remainder of the land. Quinn considers the land to have capacity for approximately 190 residential units. On the 2006 Proposals Map the land is partly in a 'Green Wedge' and partly in an area identified for expansion of the QEQM Hospital.

Matter 4 – Spatial Strategy (Policies SP12, SP21, HO1, HO10, HO11 and HO18)

Issue 1 – Settlement Hierarchy and Housing Distribution

We have no comments on this issue.

Issue 2 – Housing Development – Policies HO1 and SP12

There should not be a requirement for housing on allocated sites to be consistent with the indicative phasing schedule in Appendix B (**Question 1**), not least given that the buffer in the five-year housing land supply calculation involves land from later in the plan period. Taking this approach may also result in greater vulnerability to adverse economic conditions, for example if development is not allowed to begin before a certain date and, by that date, market conditions have changed.

There is no justification for a policy that restricts proposals on non-allocated sites to only previously-developed land (**Question 2**) – it is an unnecessary layer of policy; development on non-previously-developed land (such as in the countryside) would be assessed against other policies, and the preference for / presumption in favour of the development of previously-developed land would also ensure that appropriately-located development would come forward, having regard to other policies of the plan (for example those which should allow development based on a specific locational need).

Similarly, we do not see why it is justified to specifically refer to residential gardens in **Policy HO1 (3) (Question 3)** given that development on such land would be assessed against another policy in any event.

We do not see why there should be a need for a Statement of Social Impacts in relation to developments of 50 dwellings or more (**Question 9**). First, site allocations should already make provision for necessary infrastructure. Second, if larger development were to come forward as a 'windfall', any infrastructure requirements should be dealt with via tariff-based S106 guidance or CIL, the rates for which would be set having regard to viability and the desirability of not placing unnecessary burdens on housing delivery.

Issue 3 – Cliftonville West and Margate Central – Policy HO10

We have no comments on this issue.

Issue 4 – Housing at Rural Settlements – Policies HO11 and HO18

We have no comments on this issue.

Issue 5 – Development in the Countryside – Policy SP21

Question 1 asks how a decision-maker would determine if the need for a development overrides the need to protect the countryside for the purposes of draft **Policy SP21** and whether the policy is effective. At this stage the policy is not effective because it does not provide developers or decision-makers with an indication of the criteria that might be considered to constitute a 'need' for development. These should include the need for the development itself as well as a locational dimension so that existing facilities can be expanded or new facilities co-located with existing facilities when there is a clear justification for such.

Montagu Evans LLP
19 March 2019