

Thanet District Council **Matter Statement**

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

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Issue 1 – Settlement Hierarchy and Housing Distribution

Q1. 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?

As part of the local plan process, a Topic Paper - 'Settlement Pattern and Hierarchy' was prepared to inform and support the Preferred Options draft plan which was consulted on in 2015. The paper reviewed the pattern and role of Thanets settlements and identified a sustainable settlement hierarchy illustrating appropriate future roles and scales of growth. The paper identified the following classification of settlements:

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| Westwood Cross | Centre characterized by and capable of attracting major national multiple retailers due to central location and district wide catchment. Focal location containing retail, employment, higher education/training, and sport facilities. Virtually no residential client catchment in immediate vicinity, but planning commitment for 1,020 new homes. |
| Margate Ramsgate Broadstairs | Centres with significant commercial core and whose retail and service catchment equates with their wider town population. Established residential catchment generally well served with a range of services across their wider suburban areas. |
| Cliftonville Westgate Birchington | Centres catering for needs and services of more limited local residential catchments including the suburbs and smaller towns. |
| Westbrook St. Peters | Centres serving a limited catchment (e.g. convenient walking distance) within suburbs. |
| Minster | Village where level of accessible services is considered suitable to meet day to day needs of its resident population. |
| Acol, Cliffsend Manston Monkton St Nicholas Sarre | Village lacking level of accessible services to meet day to day needs of its resident population. |

The Topic Paper identified the following roles of the settlements and key policy implications of potential growth:

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| Primary Town centres <i>Westwood</i> | <p>Maintain established role as the location for comparison retail stores demanding central location/ not available in the coastal town centres.</p> <p>Accessible mixed use hub incorporating employment, education, and recreational use.</p> <p>Potential to accommodate housing development which benefit from a range of accessible services. Scope for such development to augment local services (e.g. medical).</p> <p>Potential for all development to contribute to rationalizing configuration</p> |
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| | of area to permit safer and more sustainable travel within to from and around the area. |
| Coastal Town centres <i>Margate, Ramsgate Broadstairs</i> | Deliver, reinforce and protect respectively individual roles to underpin each town's economy capitalizing on cultural heritage and consideration of scale and blend of uses. Potential to accommodate new housing development as result of general accessibility of services across urban area informed by site opportunities identified in Strategic Housing Land Availability Assessment |
| District Centres <i>Birchington Westgate Cliftonville</i> | Maintain range of local shops and services compatible with catchment within urban area. District centres and catchments have general potential to accommodate new housing development as result of general accessibility of services across urban area informed by site opportunities identified in Strategic Housing Land Availability Assessment |
| Local Centres <i>St Peter's Westbrook</i> | Maintain small range of small scale services such as convenience shops accessible to more restricted local catchments than district centres. Being part of the urban area these centre's catchments have potential to accommodate new housing development informed by site opportunities identified in Strategic Housing Land Availability Assessment |
| Rural village with range of services. <i>Minster</i> | Maintain individual form and character. Maintain range of local shops and services compatible with catchment of village which may include potential to sustainably serve to reduce reliance of neighbouring villages on the urban area. |
| Larger rural village with no/limited services <i>Cliffsend Monkton St Nicholas</i> | Maintain individual form and character. Maintain and where feasible increase local services to level to serve village population and reduce reliance on other centres. |
| Smaller Rural village with no/limited services <i>Acol Manston Sarre</i> | Maintain individual form and character. Maintain and where feasible increase local services to level to serve village population and reduce reliance on other centres. Housing development should be limited to opportunities within current village confines and to scale reflecting village's character and availability of accessible local services. |

The conclusions from this Topic Paper helped inform the allocation of sites in the Preferred Options Local Plan 2015 and have been reflected in subsequent versions of the Local Plan.

Q2. 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?

Margate, Ramsgate and Broadstairs originated as small fishing villages which grew to become sea-bathing resorts, and later the three main coastal town centres of Thanet. The towns together with their

hinterlands do form an almost continuous urban belt. However the gaps between the towns, known as Green Wedges (draft Policy SP22), have consistently been subject to strong protection from development that would erode their open and undeveloped character in order to safeguard the individual identities of the towns they separate.

Westwood is equidistant from the coastal towns and was dominated by a cluster of employment uses and an industrial estate. Some large scale retailing development followed, and the 2006 Local Plan allocated Westwood Cross as a new town centre comprising a mix of uses. The new shopping centre at Westwood opened in 2005 and attracted major national retailers that require larger premises and would not otherwise locate in the coastal town centres. Residential development associated with the town centre allocation is still underway.

New development has been concentrated in the town centres where possible.

There are separate policies for each of the town centres to realise and support their individual roles and characteristics (SP 7-10)

Q3. 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?

There is limited land available for directing growth in Thanet due to the following reasons:

- Proximity to the European and National Environmental designations along the coast
- Significant proportion of land (approximately 11% of the district area) to the south west of the district is a flood risk area/marshland
- The district is a peninsula location, bound on three sides by the sea

Development has therefore been focussed - within or adjoining the existing built up areas of the towns and villages as they are more likely to be served by services and public transport links, and less likely to affect natural and semi-natural assets. This is also the approach recommended in the Sustainability Appraisal.

There is therefore no specific objective to attribute a particular proportion of growth to individual urban or rural settlements as the focus is on the availability of land and its relationship to existing settlements, rather than assigning percentages of growth to certain areas.

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

The scale and level of growth was informed by the Settlement Hierarchy as referred to in Q1. Growth has been focussed on the urban areas, particularly Westwood to enable it to consolidate and evolve as an accessible, successful and sustainable residential and business community.

This was also informed by the recommendations of the Sustainability Appraisal.

Q5. How did the Council consider the economic and other benefits of best and most versatile agricultural land in pursuing the growth options in the Plan?

The level of growth proposed in the Local Plan (using the Government's recommended methodology at the time) is significantly higher than it has been in any previous Local Plan. There is limited availability of land in Thanet to meet these levels of development (as set out in Q3).

There is a very high proportion of best and most versatile agricultural land within the district. In addition to this, the majority of greenfield land in the district is either marshland which is in the flood risk area or high quality agricultural land.

Whilst the Council acknowledges the benefits of best and most versatile agricultural land, the benefits of delivering a spatial strategy that seeks to boost housing supply and economic growth is considered to outweigh its loss. Policy E18 seeks to protect best and most versatile agricultural land from other forms of development. This was assessed in the Sustainability Appraisal which supports the policy for contributing to the agricultural economy.

Q6. Is the distribution of development consistent with the Framework's Core Planning Principles which, amongst other things, seek to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable?

Yes. Larger sites have been allocated in sustainable locations, as recommended in the Sustainability Appraisal, which are at the urban edge and can make the fullest possible use of public transport, walking and cycling networks. There is also scope to improve existing networks which has been included as a policy requirement in SP41. Sites that do not meet the Frameworks Core Planning Principles in terms of public transport, walking and cycling have not been allocated.

Q7. What alternative options were considered as part of the Plan's preparation and why were they discounted?

The distribution of housing growth was first considered using broad spatial options:

- Adjoining the Urban Area
- Adjoining the Villages
- Freestanding Countryside Sites
- In the Green Wedges
- Housing in the Form of a New Settlement

The options of locating housing adjoining the urban area and adjoining the villages were the preferred option primarily due to their access to key services and facilities, and sites in these locations were selected accordingly. Freestanding countryside sites and housing in the form of a new settlement scored poorly in this respect. The function of Thanet's green wedges were considered highly important due to Thanet's limited geographical area and almost continuous urban belt.

This is documented in Appendix G of the Sustainability Appraisal - Environmental Report - July 2018 (CD7.4). This summarises the interim appraisal produced to accompany the issue and options consultation in 2013. The Interim Sustainability Appraisal is Core Document CD7.4.2.

The Issues and Options Consultation also explored locations for housing in questions 9.1, 9.2 and 9.3 of the consultation document - the least favourable options were discounted where possible in still being consistent with the Interim Sustainability Appraisal:

9.1 Which of the following broad approaches do you think is right in guiding the future location of new homes? (Please note that in any approach we may apply, we anticipate that some greenfield land will be required for future homes)

- Maximise development within the existing built up areas of the towns and villages in order to minimise use of greenfield land
- Focus on existing built up areas of the towns and villages but with restrictive criteria, for example to safeguard gardens / family homes / sites that are not previously developed land
- Focus provision on greenfield sites and aim to restrict housing sites in the existing built up areas to those important for regeneration

9.2 If any is required, how do you think the greenfield housing should be provided?

- At a single location
- At a small number of locations
- At dispersed sites

9.3 If any is required, which of the following do you think is the right location for new greenfield homes?

- Adjoining the urban area
- Adjoining the villages
- Freestanding countryside sites
- As a new settlement

Q8. What is the rationale for pursuing growth on larger, strategic sites, rather than smaller site allocations to meet the housing requirement?

Although the strategic sites are the most prominent element of the housing land supply, the draft Local Plan contains a flexible mix of housing sites, including urban and village locations, and a mix of scales.

Of the total allocations, 77% are sites of 50 units or less (or 10% of units), and 47% are sites of 20 units or less (3.6% of units).

In addition, the draft Plan indicates a windfall supply over the Plan period of 2250 (sites less than 10 units), or 13% of the housing requirement (see Matter 8), and an additional 357 units from empty properties (see Matter 8).

In total, therefore, 30% of the identified land supply is on sites of 50 units or less, and 25% of the supply is on sites of 20 units or less.

Allocating a number of larger strategic sites was necessary in order to accommodate the amount of housing identified in the OAN, and facilitate the provision of the necessary road infrastructure (inner circuit and associated improvements) and other infrastructure requirements to accommodate this level of growth. This approach is also consistent with para 52 of the NPPF which states that the supply of new homes can sometimes be best achieved through planning of larger scale development.

Q9. Is the spatial strategy justified? Does it represent the most appropriate strategy, when considered against the reasonable alternatives?

The spatial strategy allocated sites around the urban and village edges. The sustainability appraisal considered that these were the most sustainable locations for development when judged against the reasonable alternatives.

When the housing numbers increased in 2016 further SA work was carried out to test whether a new settlement could be robustly mitigated and therefore a sustainable option. Several sites were assessed and one scored better as a brownfield site however this was not selected as the site became subject of the DCO. A decision to await the outcome of the DCO process and continue to apportion the increased house numbers in line with the urban and village edge strategy was chosen and therefore this represents the most appropriate option in the circumstances.

Issue 2 – Housing Development – Policies HO1 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?

Proposals are required to be consistent with the indicative phasing set out in Appendix B to demonstrate a total land supply and consistent delivery of the allocated sites over the course of the Plan period. The indicative phasing aims to ensure that the rate of release and take up is reasonably related to the planned infrastructure provision. Information about delivery has been provided by some developers, phasing for other sites has been estimated using at least a three year lead in period. The Council would not object to the submission of planning applications earlier than indicated in Appendix B.

Q2. What is the justification for restricting proposals on non-allocated sites to only previously developed land? How would a decision-maker be expected to react to a proposal for residential development on a greenfield site within one of the main towns?

The allocated sites already include a significant amount on greenfield land, and have the capacity to meet the OAN. It is therefore considered that there is no need to allow residential development on non-allocated greenfield sites. This approach reflects one of the NPPF Core Planning Principles in encouraging the effective use of brownfield land. Any greenfield sites within the main towns are likely to be protected open space or local green spaces, which are required to be retained for the wider benefit of residents and visitors.

Q3. What is the justification for specifically referring to residential gardens under Policy HO1(3)? Does this apply to all residential gardens, regardless of location? Is this sufficiently clear to decision-makers, developers and local communities?

The reference to residential gardens in Policy HO1(3) reflects para 53 of the NPPF which states that the case for policies should be considered that resist inappropriate development of residential gardens. Although residential gardens in urban areas are considered as greenfield sites, Policy HO1 would allow their development if appropriate by the virtues of HO1(3) and policy QD02. Residential gardens in rural areas are considered as brownfield sites and the same policies would apply.

Q4. 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?

The policy is effective as it sets requirements for non-strategic sites which do not have their own site specific policy, or windfall sites. However, for clarity, the Council suggests the following modification to the last sentence of the policy for the Inspectors' consideration:

'Alternative development on non-strategic sites allocated for residential development will not be permitted'

Q5. What is a housing implementation strategy referred to in paragraph 11.8 of the Plan? Is the purpose of this strategy clear? Who will be responsible for the strategy and what outcomes does it seek to achieve?

The Housing Implementation Strategy sets out the Council's vision and approach to housing delivery, reducing homelessness, enhancing health and wellbeing and improving the condition of existing stock. The purpose of the Implementation Strategy is to seek to identify strategic and thematic priorities and establish a plan for how new homes will be delivered. The key outcomes will be improved partnerships across the public and private development sector to increase housing supply, identifying and unlocking barriers to delivery by investing in affordable housing and mixed tenures across the district and bringing back into use empty homes. The Draft Housing Implementation Strategy is due to be submitted to Cabinet in late 2019 and will be lead by the Housing Strategy team.

The Housing Strategy team proactively engage with developers, landowners and land promoters to identify site and viability issues which may be impacting on build out and where possible brokering partnerships with Housing Associations, contractors and institutional investors to de-risk sites. For allocated sites, cross functional collaboration between strategic planning, development control and housing enabling is implemented early on which supports land assembly and defining clear planning requirements. This holistic approach creates an open development environment and advance understanding of key risks to delivery.

Q6. What is the justification for having separate criteria for housing developments over 10 units in Policy SP12?

Clauses 1-7 would apply equally to a single dwelling or 10 or more. It would be unreasonable to expect development of less than 10 units to deliver the second set of clauses.

10 units is the threshold identified in the PPG to require the provision of affordable housing so was considered an appropriate threshold for the purpose of this policy.

Q7. Does the Plan provide sufficient support for self-build and custom housebuilding? Has a need been identified, and if so, how does the Plan seek to meet this need?

The Council holds a self-build and custom build register which currently has 19 individual entries. The relating Clause included in Policy SP12 seeks the provision of a plot suitable for self build to meet the needs of those on the register.

Q8. How will the Council ensure that developments make every reasonable effort to accommodate self-build needs as required by Policy SP12?

This would be negotiated at planning application stage.

Q9. What is the justification for requiring a Statement of Social Impacts to be provided on developments of 50 or more dwellings? Is it clear to decision-makers, developers and local communities what is required?

This is to ensure that developments of this scale identify and consider what effect on community infrastructure the development will have, and whether new facilities will need to be provided. The Council does not consider this to be an onerous requirement as much of the information is available in the Infrastructure Delivery Plan.

Issue 3 – Cliftonville West and Margate Central – Policy HO10

Q1. What is the justification for requiring development proposals in Cliftonville West and Margate Central to increase the number of family homes?

Cliftonville West and Margate Central wards have experienced extreme issues brought about by their previous focus for holiday accommodation. Many hotels were permitted to extend into garden areas - multi-level rear extensions and extensive coverage of rear gardens with chalets, often of a poor standard of accommodation, proliferated. The amount of building in the area has resulted in a disagreeable living environment.

As a result of the decline in the domestic holiday trade to Margate, virtually all of these hotels and many smaller properties have been lost to residential uses, many becoming flats or Houses of Multiple Occupation. This has resulted in the balance being weighted towards one and two person households and a lack of family accommodation. The area has suffered from high levels of deprivation and high levels of transience associated with the large supply of private rented housing and small converted flats and bedsits. The relative cheapness of accommodation in Cliftonville has led to other local authorities and agencies placing dependant and vulnerable population into the area, exacerbating the

serious social problems and making the function of the local council significantly more difficult.

In 2005, parts of Margate Central and Cliftonville West wards were declared a 'Renewal Area', the objectives of which included:

- Working with property owners to encourage them to improve and maintain standards of their properties
- Working with landlords and property owners to ensure that there is an improvement of housing standards in the private rented sector
- Bringing previously empty properties and derelict land back into use
- Improving general amenities in the area, through social and environment improvements
- Encouraging all residents to participate and take pride in the area and towards their community
- Encouraging employment opportunities and economic prosperity

A Development Plan Document was prepared to implement additional planning controls in the area and was adopted in February 2010. One of the key issues of the DPD is to re-establish a balanced community, however, the over dominance of small flats occupied by one or two people, often only living in the area for a short period of time, clearly contributes to the imbalance. One of the policies in the DPD is Policy CV3 - Provision of Family Housing in New Developments. The aim of that policy is to provide high quality family housing to help redress the balance of accommodation mix and reduce the current transient trend of residents that develops from a high number of flats.

The aim of increasing the number of family homes in the area still applies.

(The Cliftonville Development Plan Document 2010 - CD7.7 includes more detail about the issues and supporting evidence)

Q2. Is it clear to decision-makers, developers and local communities what is required of proposals for new development? Is the policy effective?

Yes. The supporting text points to other interventions operating in the Cliftonville West and Margate Central wards (ie the DPD and the Live Margate initiative) and the policy summarises the key points of those interventions.

There is an error in the first sentence of the policy - it should read as follows:

Proposals to provide residential accommodation in Cliftonville West and Margate Central wards (~~as defined in the map below~~) will be expected.....

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

Q1. Policy HO11 permits housing development within “the confines of the rural settlements...”. Are the rural settlements defined in paragraph 11.11 of the Plan? Is this clear to decision-makers, developers and local communities?

The rural settlements are defined in paragraph 11.11 of the plan and boundaries/confines are shown on the policies map. A cross reference to paragraph 11.11 could be included in the policy if considered necessary.

Q2. What is the justification for development proposals in rural settlements to be compatible with the historic scale of growth of the settlement? How would this be determined? Is the policy effective?

This is to ensure that development is not of a size or scale that is unreasonable in comparison to the existing settlement. The Area Specific Objectives set out in Table 4 states that development in the rural settlements should be 'at a scale compatible with the size and character of the settlement and....accessibility of services and community facilities'. A cross reference to Table 4 could be included in the policy if considered necessary.

Q3. For the purposes of Policy HO11(2) how will development “more than minor in scale” be determined? Is this sufficiently clear to decision-makers, developers and local communities? Is the policy effective?

The scale of a proposed development would be judged on the size of the settlement in which the development is proposed. This would be a consideration for the Council in relation to each individual application which should be assessed on its own merits.

Q4. Is the text under Policy HO11 part of the policy, or supporting text? What is the justification for points (1) and (2)?

This is a formatting error - the text beneath Policy HO11 should in bold to make it clear that it is part of the Policy. Some of the bullet points have also been subject to formatting errors. The policy should read as follows:

Policy HO11 - Housing at Rural Settlements Housing development will be permitted within the confines of the rural settlements subject to the provisions of policy HO1 and the criteria below.

1) The proposal being compatible with the size, form, historic character and historic scale of growth of the settlement, and

2) In the case of development more than minor in scale accessible community services will be available.

The sites listed below are specifically allocated for residential development under policy HO1. The appropriate dwelling capacity on each site will be considered in light of planning policy and usual development management considerations, and capacities featured in Appendix B should be regarded as a notional maximum.

Table 9 - Sites allocated for residential development at Rural Settlements

Tothill Street, Minster
Land at Manor Road, St Nicholas
Land at Walter's Hall Farm, Monkton
Land south side of A253, Cliffsend
Land north of Cottington Road, Cliffsend
Land south side of Cottington Road, Cliffsend
Builders yard south of 116-124 Monkton Street, Monkton
Former Jentex site Canterbury Road West, Cliffsend
Foxborough Lane (south side), Minster
Station Road, Minster
Land at The Length, St. Nicholas
Young's Nursery, Arundel Road, Cliffsend

Applications for housing development at and adjoining the rural settlements will be expected to: a) demonstrate that engagement has taken place with the relevant parish council to:

- assess and where feasible incorporate an appropriate element of housing to meet any identified need for particular types of housing arising in the parish including sheltered and extra care housing.
- address how any affordable element to be provided can serve to address need arising in the relevant parish as priority.
- identify any community facilities required and scope for incorporating or contributing towards provision of these.

b) be informed by liaison with the County Council as education authority regarding the need to accommodate or contribute to any required expansion or improvements to village primary school capacity.

The justification for the requirements in (now points a and b) is to ensure applications are submitted to the Council well-informed and reduce delays during the planning application process.

Q5. Is Policy HO11 consistent with paragraph 55 of the Framework? Will there be sufficient growth in the Rural Settlements to help support sustainable rural communities?

Yes. The policy permits appropriate development in the rural settlements outside of the sites allocated in the Plan. It is positively prepared.

Q6. Is it clear to decision-makers, developers and local communities what settlements Policy HO18 applies to?

The urban and village confines are shown on the Policies Map, however a reference to the villages listed in para 11.11 could be included in the policy if considered necessary.

Q7. Is Policy HO18 consistent with paragraph 54 of the Framework which states that local planning authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs? Is the policy positively prepared and worded?

Yes - para 11.18 explains that some market housing will be permitted. The policy is positively prepared and worded, taking into consideration the development pressures on rural settlements for sporadic forms of development.

Q8. How often are the detailed parish surveys referred to in Policy HO18 carried out? Are they available for all rural settlements?

The last Parish Surveys were carried out in 2013 - there was a relatively low response rate to the surveys so they may not be available for all rural settlements. New parish surveys are being carried out at the time of writing - a better response rate is expected due to the local awareness of the draft local plan.

Issue 5 – Development in the Countryside – Policy SP21

Q1. How would a decision-maker determine if the need for a development overrides the need to protect the countryside for the purposes of Policy SP21? Is the policy effective?

Paragraph 4.4 sets out the possible exceptions to this policy, as also set out in paragraph 55 of the NPPF. Any other development that would override the need to protect the countryside (for example, necessary utilities infrastructure) would be considered as an exception to the policy.

Q2. Is Policy SP21 consistent with paragraph 55 of the Framework which allows for certain forms of development in the countryside, such as the need for rural workers to live at or near their place of work?

Yes. The Policy does allow for exceptions, such as the need for rural workers to live at or near their place of work.