



Strategic Planning & Research Unit

For and on behalf of
Mr Edward Spanton

**Thanet District Local Plan Examination
Response to MIQ's Matter 5: Strategic Sites**

Land at Cliffsend, West of Ramsgate, Kent

Prepared by
Strategic Planning Research Unit
DLP Planning Ltd
2 Tenter Street
Sheffield
S1 4BY

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Prepared by:	Emma Raine BA (Hons) MA MRTPI Planner
Approved by:	Roland G Bolton BSc (Hons) MRTPI Senior Director
Date:	March 2019

Strategic Planning Research Unit

V1 Velocity Building
 Ground Floor
 Tenter Street
 Sheffield
 S1 4BY

Broad Quay House (5th Floor)
 Prince Street
 Bristol
 BS1 4DJ

4 Abbey Court
 Fraser Road
 Priory Business Park
 Bedford
 MK44 3WH

Tel: 01142 289190

Tel: 01179 058850

Tel: 01234 832740

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1.0 INTRODUCTION

- 1.1 This response to the Thanet Local Plan Inspector's Matters, Issues and Questions are made by Strategic Planning Research Unit ('SPRU') of DLP Planning Ltd on behalf of our client, Mr Edward Spanton, the landowner of land west of Cliffsend, west of Ramsgate, Kent. The site is, in part, identified for housing and a new railway station in the emerging Local Plan as proposed policies HO15, HO16, HO17 and SP45. If allocated as a whole, our client's site could provide **at least 600 dwellings**, the exact number will be confirmed upon completion of the masterplan.
- 2.1 The proposed development area extends to approximately 54 hectares of land across 4 parcels of land in the ownership and control of the landowner, Mr Edward Spanton.
- 2.2 Whilst partially allocated under emerging Policies HO15, HO16, HO17 and SP45, it is considered that given the shortage of available and developable site to make provision for the full 15 year period or to meet the OAN in the early part of the plan period there is a strong justification for the whole of the site to be allocated.
- 2.3 The site has been assessed (albeit in parts rather than as a single site) and is identified below. This is adjacent to the parkway station and represents a very sustainable location to the south of the district, a location which will assist in improving the overall delivery rates within the district by adding a further sustainable choice. In particular sites such as the one below can be developed quickly and assist the plan in achieving a five-year housing land supply at the date of adoption.

Figure 1. Location Plan



2.0 MATTER 5: STRATEGIC SITES

a) Issue 1: Methodology

Q1) **What was the process for identifying the residential site allocations, including their size, location and distribution? How were they chosen?**

2.1 The methodology for site selection is unclear and has not been properly explained. For example, in Section 5.4 of the 2018 Sustainability Appraisal it states:

“The objectively assessed need in 2014 was 12,000 dwellings based on migration trend based population projections and labour requirement. Following release of sub national population data, projections rose in January 2016 to 15,660 and again in September 2016 to 17,140. Following this increase it was decided that further SA work was required to look again at the option of a new settlement and whether the negative effects of the option could be mitigated against.”

3.1 The report goes on further to explain that *“due to the increased housing need, it was decided that a review of a potential new settlement options should be undertaken”*. It is clear that the only option considered for increasing the housing requirement from 12,000 to 17,140 was a new settlement. No proper explanation is given for the identification of a new settlement and the rejection of reasonable alternatives.

3.2 Similarly, at the Full Council meeting on 16th July 2018, the decision was voted through by Members to not allocate the airport for a specific use and to reallocate 2,500 dwellings to sites that were selected from sites submitted to the Council throughout the Local Plan process.

3.3 This is illustrative of the SA actually simply reviewing the impact of sites following on from the site selection process rather than the SA being a tool to inform the site selection process.

3.4 In respect of the location of the strategic residential site allocations, Figure 2 of our Regulation 19 Housing Land Supply representation identifies that strategic sites Birchington, Westgate and Westwood seek to deliver some 5,050 dwellings in a 3.5-mile radius of one another. This is a significant number of dwellings to be delivered in close proximity and will be perceived as being in competition with one another (see paragraph 4.7 of our Regulation 19 Five Year Land Supply report).

Q2) **Was the process of allocating sites robust? Did it take into account sufficient factors?**

2.2 No.

2.3 The fact that the SA has failed to recognise the importance of the new parkway station and has been used as simply to justify the council's selection of sites rather than inform the choice of sites means that sustainable sites such as the one subject to this objection has simply been overlooked.

2.4 The overreliance on a few large sites to the north of the district and the inadequate approach of the SA means that the LPA has failed to recognise the potential of Cliffsend and the proposals to develop a sustainable community around the new 'parkway' railway station. The provision of this new railway station which is an important piece of public transport infrastructure should have been properly considered and reflected in the proposed spatial strategy.

2.5 The justification for the Strategic Housing Sites (Policy SP13 to SP17) focusses on the

spatial distribution of greenfield development and implications that this could have on accessibility to transport infrastructure, links and key services and facilities. It states that *“Assuming key facilities and transport links are more likely to be concentrated within and between built up areas, locating new development adjacent to existing urban areas will mean they are more likely to be better served.”* (page G4, 2018 SA)

2.6 While this acknowledges the positive impacts of focussing housing development in areas with good accessibility to transport infrastructure, this would also apply to sites close to the new parkway station, however this has not been considered as an option and has not been assessed as a reasonable alternative.

2.7 In respect of our client's site, during the site selection process it has not been assessed as a whole and comprises 6 different assessments. This means that significant portions of three of the four promoted sites (see figure 1) have not been fully assessed in the SA. This is a significant failing of the assessment. The site should have been assessed as a single site and covering the entire site area. The site selection fails on both these points. The manner of the assessment of the sites as smaller piecemeal parcels fails to recognise the strategic potential of the site to provide a larger residential allocation which contains within it the new railway station. This is a significant failing of the SA and demonstrates its failure to assess all reasonable alternatives.

Q3) How were site areas and dwelling capacities determined? Are the assumptions justified and based on available evidence?

2.8 No.

2.9 The decision to remove the new settlement policy (Policy SP05) from the Draft Local Plan meant that 2,500 dwellings needed to be re-allocated to alternative allocations in the District. This reallocation should have been subject to a revised SA which should have considered increased provision adjacent to the parkway station. Instead the Council's response resulted in allocating an additional 600 dwellings to the Birchington strategic allocation.

2.1 This has the effect of significantly increasing the quantum of housing delivery at these strategic sites by 60-100%. However, this is not adequately reflected in the Sustainability Appraisal. There is no evidence that reasonable alternatives have been assessed and considered. The expansion of these sites is only justified under the general principle set out above that sites on the edge of urban centres are likely to be better served by services and good transport infrastructure.

Q4) For the strategic sites, how was the mix of uses determined?

2.2 No comment.

Q5) How have the constraints of each site been taken into account and any necessary mitigation been considered as part of the process of allocating land for housing? In particular, how has the Council considered and assessed the impact of development on transport infrastructure, heritage assets and drainage? Where is this set out?

2.3 All of the main strategic allocations are completely reliant on road transport and the only opportunity the plan has of actually locating housing in very close proximity to the new railway stations is completely ineffective as it has not even managed to translate its objective into effective allocations. Policy SP41: Safe and Sustainable Travel is therefore completely ineffective as it has not even managed to translate its objective into effective allocations.

Q6) Where the delivery of sites is dependent upon new infrastructure is it clear who will make this provision and when? Where applicable have the additional costs been factored into an assessment of viability?

2.4 No.

2.5 Several of the large strategic housing allocations identify the requirement for new infrastructure items such as a relief road and a new bypass. However, it is also noted in paragraph 6.24 of the Draft Plan that a new bypass is required for Birchington *“to serve new development”*. Paragraph 6.25 further states that *“these road proposals are required to support proposed new development in the area, and the roads are safeguarded in this draft local plan to ensure that they can be completed in due course alongside the development set out in the draft Local Plan. As set out in the working draft of the Infrastructure Delivery Plan, this infrastructure is regarded as critical to support the development proposed in the draft Local Plan, and it is expected that all new development will contribute to the provision of all key infrastructure in a proportionate and appropriate way. The Council, with its partners, will also seek other forms of funding, to support infrastructure provision.*

2.6 The Plan Viability report does not take into account individual infrastructure costs (paragraph 18) as *“cost estimates are in some cases not yet available”*. It goes on to state in this paragraph that *“in addition to testing CIL across a range of ‘trial rates’, an allowance has been made for potential site-specific planning mitigation through a s.106 contingency.”* It is difficult to understand how these ‘trial rates’ can confirm the viability of the strategic sites if the costs of a new bypass is unknown. They are unusually large items with high costs that have apparently not been considered and could add to the delay in the site coming forward.

2.7 Until an estimated cost has been calculated for these large infrastructure items, it is difficult for the Council to identify how much funding is required and whether any external funding is required. In this regard, Paragraph 173 of the Framework (2012) states that *“pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”*.

Q7) How has the Council taken into account the agricultural land classification when considering whether to allocate sites for housing? Has an assessment of each site been carried out?

2.8 No comment.

Q8) How has the effect of development on the landscape character of the area been considered as part of the allocation process?

2.9 No comment.

Q9) Are there any factors which indicate that a site(s) should not have been allocated for development? Are all the sites developable within the plan period?

2.10 No comment.

b) Issue 3 – Birchington Strategic Housing Site – Policy SP14

Q1) How was the site boundary defined and what is it based on? Are there any ownership constraints likely to affect the deliverability of the site?

2.11 No comment.

Q2) What is the justification for allocating the site for up to 1,600 dwellings? What is this based on and is it achievable?

2.12 The decision to remove the new settlement policy (Policy SP05) from the Draft Local Plan meant that 2,500 dwellings needed to be re-allocated to alternative allocations in the District. This reallocation should have been subject to a revised SA which should have considered increased provision adjacent to the parkway station. Instead the Council's response resulted in allocating an additional 600 dwellings to the Birchington strategic allocation.

2.13 This has the effect of significantly increasing the quantum of housing delivery at these strategic sites by 60-100%. However, this is not adequately reflected in the Sustainability Appraisal. There is no evidence that reasonable alternatives have been assessed and considered. The expansion of these sites is only justified under the general principle set out above that sites on the edge of urban centres are likely to be better served by services and good transport infrastructure.

Q3) What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?

2.14 No comment.

Q4) How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?

2.15 No comment.

Q5) Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed primary school will be delivered?

2.16 No comment.

Q6) Is it sufficiently clear to decision-makers, developers and local communities what is expected in relation to the provision of additional healthcare?

2.17 No comment.

Q7) Have the costs associated with the open space, primary school and medical centre expansion been taken into account in considering the viability of the site? Is the site developable within the plan period?

2.18 No comment.

Q8) How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?

2.19 No comment.

Q9) What is the relationship with the Strategic Route safeguarded under Policy SP47? How will the Strategic Route be delivered, and is the delivery of the allocation dependent upon this new infrastructure?

2.20 No comment.

Q10) How has the effect of the proposed development on air quality been taken into account? What effect will the proposal have, and what mitigation will be necessary?

2.21 No comment.

Q11) How will proposals be expected to provide connections with existing public rights of way and cycle networks to promote the use more sustainable modes of transport?

2.22 No comment.

Q12) How does the scale of proposed development relate to the size, role, function and character of Birchington?

2.23 No comment.

Q13) Appendix B to the Plan estimates that 50 dwellings will be delivered on the site in 2019/20. What is this based on and is it a realistic expectation?

2.24 No.

2.25 The site does not have a planning application lodged or determined. The local housing market (as identified in our submissions to the Regulation 19 consultation [housing land supply report]) does not suggest that it can bring sites forward for development quicker than the national average. The NLP Research entitled "*From Start to Finish*" (2016) found that sites in excess of 500 dwellings, takes on average, 5 years for greenfield sites. In addition, the more recent research by Chamberlain Walker Economics entitled "*The Role of Land Pipelines in the UK Housebuilding Process*" (2017) found lead-in times to be up to 6.8 years from the pre-planning phase through to construction.

2.26 It is also noted in paragraph 6.24 of the Draft Plan that a new bypass is required for Birchington "*to serve new development*". Paragraph 6.25 further states that "*these road proposals are required to support proposed new development in the area, and the roads are safeguarded in this draft local plan to ensure that they can be completed in due course alongside the development set out in the draft Local Plan. As set out in the working draft of the Infrastructure Delivery Plan, this infrastructure is regarded as critical to support the development proposed in the draft Local Plan, and it is expected that all new development will contribute to the provision of all key infrastructure in a proportionate and appropriate way. The Council, with its partners, will also seek other forms of funding, to support infrastructure provision.*"

2.27 The Plan Viability report does not take into account individual infrastructure costs (paragraph 18) as "*cost estimates are in some cases not yet available*". It goes on to state in this paragraph that "*in addition to testing CIL across a range of 'trial rates', an allowance has been made for potential site-specific planning mitigation through a s.106 contingency.*" It is difficult to understand how these 'trial rates' can confirm the viability of the strategic sites if the costs of a new bypass is unknown. They are unusually large items with high costs that have apparently not been considered and could add to the delay in the site coming forward.

2.28 It is therefore extremely unlikely completions will be delivered in 2019/20.



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- 2.29 Assuming an application is lodged by the end of 2019, the earliest completions could be reasonably expected would be 2024.

c) Issue 4 – Westwood Strategic Housing Site – Policy SP16

Q1) How was the site boundary defined and what is it based on? Are there any ownership constraints likely to affect the deliverability of the site?

2.30 No comment.

Q2) What is the justification for allocating the site for up to 1,450 dwellings? What is this based on and is it achievable?

2.31 No comment.

Q3) What is the justification for specifying a maximum density of 40 dwellings per hectare? Is this policy requirement justified? Why is a higher density justified on this site, compared to other strategic allocations?

2.32 No comment.

Q4) How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?

2.33 No comment.

Q5) How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?

2.34 No comment.

Q6) Is it clear to decision-makers, developers or local communities when the access road will be provided, and by who?

2.35 No comment.

Q7) How will proposals for the site be expected to provide connections with existing public rights of way and cycle networks to promote the use more sustainable modes of transport?

2.36 No comment.

Q8) How does the scale of proposed development relate to the size, role, function and character of Westwood?

2.37 No comment.

Q9) What is the justification for requiring development proposals to retain an undeveloped corridor as part of an extension to the Green Wedge to the east of the site? How will this be achieved?

2.38 No comment.

Q10) Is it clear to decision-makers, developers and local communities what is required in respect of contributions towards education provision? What existing and proposed schools are within the catchment area of the site, and how will they be affected as a result of the development proposed?

2.39 No comment.

Q11) What is the justification for safeguarding land for the expansion of Margate Cemetery under Policy CM03? Does the cemetery expansion land fall within, or outside the boundary of the strategic site allocation? Is it clear who will deliver the expansion to the cemetery, and when?

2.40 No comment.

Q12) What consideration has been given to the standard of living accommodation for potential future occupants, having particular regard to the proximity of the site to the CEMEX Margate Concrete Plant and Margate Waste Recycling Centre?

2.41 No comment.

Q13) What effect will the proposed development have on existing drainage infrastructure? Will additional infrastructure be required to accommodate the proposal, and if so, how will this be provided?

2.42 No comment.

Q14) What effect will the proposed development have on existing healthcare provision in the area?

2.43 No comment.

Q15) Appendix B to the Plan estimates that 50 dwellings will be delivered on the site in 2019/20. What is this based on and is it a realistic expectation?

2.44 No.

2.45 The site does not have a planning application lodged or determined. The local housing market (as identified in our submissions to the Regulation 19 consultation [housing land supply report]) does not suggest that it can bring sites forward for development quicker than the national average. The NLP Research entitled "*From Start to Finish*" (2016) found that sites in excess of 500 dwellings, takes on average, 5 years for greenfield sites. In addition, the more recent research by Chamberlain Walker Economics entitled "*The Role of Land Pipelines in the UK Housebuilding Process*" (2017) found lead-in times to be up to 6.8 years from the pre-planning phase through to construction.

2.46 It is therefore extremely unlikely completions will be delivered in 2019/20.

2.47 Assuming an application is lodged by the end of 2019, the earliest completions could be reasonably expected would be 2024.

d) Issue 5 – Westgate-on-Sea Strategic Housing Site – Policy SP15

Q1) How was the site boundary defined and what is it based on? Are there any ownership constraints likely to affect the deliverability of the site?

2.48 No comment.

Q2) What is the justification for allocating the site for up to 2,000 dwellings? What is this based on and is it achievable?

2.49 The decision to remove the new settlement policy (Policy SP05) from the Draft Local Plan meant that 2,500 dwellings needed to be re-allocated to alternative allocations in the District. This reallocation should have been subject to a revised SA which should have considered increased provision adjacent to the parkway station. Instead the council's response resulted in an additional 1,000 dwellings being allocated to the Westgate-on -Sea strategic allocation.

2.50 This has the effect of significantly increasing the quantum of housing delivery at these strategic sites by 60-100%. However, this is not adequately reflected in the Sustainability Appraisal. There is no evidence that reasonable alternatives have been assessed and considered. The expansion of these sites is only justified under the general principle set out above that sites on the edge of urban centres are likely to be better served by services and good transport infrastructure.

Q3) What is the justification for specifying a maximum density of 35 dwellings per hectare? Is this policy requirement justified?

2.51 No comment.

Q4) How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?

2.52 No comment.

Q5) Is it clear to decision-makers, developers and local communities what community facilities are required as part of the development?

2.53 No comment.

Q6) Is it sufficiently clear to developers, decision-makers and local communities when and how the proposed primary school and medical centre will be delivered?

2.54 No comment.

Q7) Have the costs associated with the open space, primary school and medical centre been taken into account in considering the viability of the site? Is the site developable within the plan period?

2.55 No comment.

Q8) What is the justification for the provision of a new District Centre as part of proposals for the site?

2.56 No comment.

Q9) How has the effect of the proposed development on the local road network been taken into account? How will the site be accessed, and is it clear to decision-makers, developers and local communities what the necessary highway improvements consist of?

2.57 No comment.

Q10) What is the justification for requiring a Landscape and Visual Impact Assessment, but not for other strategic allocations?

2.58 No comment.

Q11) How has the effect of the proposed development on air quality been taken into account? What effect will the proposal have, and what mitigation will be necessary?

2.59 No comment.

Q12) How will proposals be expected to provide connections with existing public rights of way and cycle networks to promote the use more sustainable modes of transport?

2.60 No comment.

Q13) How does the scale of proposed development relate to the size, role, function and character of Westgate-on-Sea?

2.61 No comment.

Q14) What effect will the proposed development have on the setting of the Grade II* listed Dent-de-Lion Court?

2.62 No comment.

Q15) Appendix B to the Plan estimates that 50 dwellings will be delivered on the site in 2019/20. What is this based on and is it a realistic expectation?

2.63 No.

2.64 The site does not have a planning application lodged or determined. The local housing market (as identified in our submissions to the Regulation 19 consultation [housing land supply report]) does not suggest that it can bring sites forward for development quicker than the national average. The NLP Research entitled *"From Start to Finish" (2016)* found that sites in excess of 500 dwellings, takes on average, 5 years for greenfield sites. In addition, the more recent research by Chamberlain Walker Economics entitled *"The Role of Land Pipelines in the UK Housebuilding Process" (2017)* found lead-in times to be up to 6.8 years from the pre-planning phase through to construction.

2.65 It is also noted in paragraph 6.24 of the Draft Plan that a relief road is required for the Westgate allocation *"to serve new development"*. Paragraph 6.25 further states that *"these road proposals are required to support proposed new development in the area, and the roads are safeguarded in this draft local plan to ensure that they can be completed in due course alongside the development set out in the draft Local Plan. As set out in the working draft of the Infrastructure Delivery Plan, this infrastructure is regarded as critical to support the development proposed in the draft Local Plan, and it is expected that all new development will contribute to the provision of all key infrastructure in a proportionate and appropriate way. The Council, with its partners, will also seek other forms of funding, to support infrastructure provision."*

2.66 The Plan Viability report does not take into account individual infrastructure costs

(paragraph 18) as “*cost estimates are in some cases not yet available*”. It goes on to state in this paragraph that “*in addition to testing CIL across a range of ‘trial rates’, an allowance has been made for potential site-specific planning mitigation through a s.106 contingency.*” It is difficult to understand how these ‘trial rates’ can confirm the viability of the strategic sites if the costs of a new relief road is unknown. They are unusually large items with high costs that have apparently not been considered and could add to the delay in the site coming forward.

- 2.67 It is therefore extremely unlikely completions will be delivered in 2019/20.
- 2.68 Assuming an application is lodged by the end of 2019, the earliest completions could be reasonably expected would be 2024.

BEDFORD

4 Abbey Court, Fraser Road
Priory Business Park, Bedford. MK44 3WH
bedford@dlpconsultants.co.uk
01234 832 740

BRISTOL

Broad Quay House (5th Floor)
Prince Street, Bristol. BS1 4DJ
bristol@dlpconsultants.co.uk
01179 058 850

EAST MIDLANDS

1 East Circus Street, Nottingham
NG1 5AF
nottingham@dlpconsultants.co.uk
01158 966 622

LEEDS

Princes Exchange
Princes Square, Leeds. LS1 4HY
leeds@dlpconsultants.co.uk
01132 805 808

LONDON

The Green House, 41-42 Clerkenwell Green
London. EC1R 0DU
london@dlpconsultants.co.uk
020 3761 5390

MILTON KEYNES

Midsummer Court, 314 Midsummer Boulevard
Milton Keynes. MK9 2UB
miltonkeynes@dlpconsultants.co.uk
01908 440 015

SHEFFIELD

Ground Floor, V1 Velocity Village
Tenter Street, Sheffield. S1 4BY
sheffield@dlpconsultants.co.uk
0114 228 9190

RUGBY

18 Regent Place, Rugby, Warwickshire
CV21 2PN
rugby.enquiries@dlpconsultants.co.uk
01788 562 233



RTPI

Chartered Town Planner