

Thanet District Local Plan Examination

Hearing Statement

Matter 5 – Strategic Sites

9th and 10th April 2019

Gillings Planning on behalf of Millwood Designer Homes

March 2019

Matter 5 – Strategic Sites (Policies SP13-SP18 and HO2)

This Statement is prepared on behalf of Millwood Designer Homes in response to Issue 1 and Issue 5 only. These should be read in the context of Appendix 2, which sets out the relationship between Millwood and Places for People.

Word Count: 2994

Issue 1 – Methodology

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

It is considered that the process of allocating land at Westgate on Sea was robust and appropriate. This was based in part on the SHLAA and SA.

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

The number of dwellings for Westgate is considered appropriate and based on a reasonable assumptions of suitability, availability and deliverability. This is addressed further at Issue 5, Q4.

However, the site area is not justified, as set out in response to Issue 5, Q1.

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

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?

The key constraints have been fully considered by both the Council and respondent in the representations submitted. Where the full likely impact on elements is not yet known this is provided for within the relevant site specific policies.

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?

The Viability Assessment considers the requirement for infrastructure, and thus these costs have been taken into account. Further, as confirmed in Issue 5, Q7 the infrastructure requirements of SP15 have been confirmed by the respondent to have been taken into account in reaching the consideration that the site is generally viable.

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?

As set out in the SOCG, an Agricultural Land Classification has been carried out and its findings are accepted. The Council have sought to minimise the loss of agricultural land unless justified otherwise. It is considered that the delivery of the strategic allocation in a sustainable form of development justifies the loss of Grade B land in this instance.

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

The evidence base to the Plan includes a Landscape Character Assessment which has been considered as part of the allocation process. More detailed and site specific landscape character matters are proposed to be addressed through the LVIA, as set out within the policy.

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?

There are no matters which indicate that the SP15 should not be allocated for development. A full assessment has been undertaken in principle through the SHLAA and Sustainability Appraisal – the findings of which are supported.

Detailed matters raised by respondents in objection in relation to infrastructure provision can be adequately addressed at application stage. The policy and Plan as a whole is clear on the infrastructure requirements that will be necessary.

The site is considered to be developable in its entirety within the Plan period, as set out in detail in respect of Issue 5, Q2.

Matter 5 – Strategic Sites (Policies SP13-SP18 and H02)

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

The respondent understands that the site boundary was defined as being the minimum land take to deliver 2000 homes, based on a density of 35dph, in addition to the open space identified. This resulted in a site area of 76ha. However, the southern boundary is drawn in an arbitrary manner, unrelated to features on the ground and no consideration is given to the quality of place that can be created. The driver appears to have been the minimum land take possible, as opposed to the delivery of a sustainable new community.

The following extract from the representations submitted confirms this through a graphical representation of the outcome of delivering the requirements of the draft allocation.



Although the respondent considers that 2000 homes can be accommodated within the site boundary, there are significant benefits, as set out in the original representations, which support a wider area, in order to deliver the same number of homes.

In usual circumstances one might expect a site respondent to argue for an increase in dwelling numbers or a limited site area (limiting the expense in land acquisition). However Millwood/Places for People are prepared to take a different approach and secure a wider area of land to deliver the same quantum, albeit in a higher quality environment.

Included at **Appendix 1** is the revised masterplan document, which builds on that submitted in October 2018 to the Regulation 19 Plan, taking on board pre application discussions undertaken since that time, an extract of which is below.



This seeks to demonstrate there are significant benefits in the delivery of the same number of units over a wider area in terms of the quality of spaces that can be created. This principle is accepted by the Council as set out in the SOCG. The key benefits include:

- Significantly greater landscaping opportunities to deliver a variety of spaces, above the minimums set out, enhancing the setting of the area
- This provides a higher quality environment and end product, enhancing viability and certainty of delivery
- Significant health and wellbeing benefits to both existing and new residents
- A softer transition to the landscape to the south, allowing for a parkland edge (which would be difficult to deliver on the smaller area)
- Greater opportunity for ecological enhancements, removing the sterilising effects of some farming practices.

The loss of Grade 2 agricultural land to deliver the scheme has been given full consideration, and it is considered that the 'harm' caused by the 'loss' is more than outweighed by the benefits arising.

There are no ownership restrictions to either the draft allocation, or the expanded area as proposed by the respondent, as the entire area (and beyond) lies in the control of Millwood/Place for People, as set out in the SOCG.

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

The allocation of the site is considered entirely justified, as will be evidenced by the Council, but in summary relates to the following (in no particular order):

- The site is *available* for development, having been formally promoted by Millwood Homes since 2018 and the Call for Sites. Millwood/Places for People are established developers with experience in delivering both small and large scale development (as discussed further in response to question 15).
- The site is *suitable* for development in principle as it lies in a sustainable location, as set out in the SOCG and as confirmed by the SA and SHLAA.
- The site is suitable for the delivery of 2000 homes specifically as there is sufficient land available and no major constraints which can not be accommodated within the masterplan.
- The policy requirements are economically *viable* as there are no major constraints which can not be overcome through appropriate mitigation or contribution towards infrastructure. This is supported by the Dixon Searle Strategic Sites Viability (2018) which demonstrates that with the exception of the site at HO2, SP15 remains the 'most' viable and generated the highest potential surplus over BLV.

The site is therefore *deliverable* under the terms of the NPPF (2019).

The delivery of 2000 homes on the site is therefore entirely achievable and has the full support and commitment of a developer experienced in large scale development.

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

As noted within the SOCG, the Council accept that a variation in density is appropriate across the site, in response to the need to create of different character areas and the introduction of other uses. For example, it is accepted that higher densities can be appropriate within the central areas, while a lower density will be appropriate at the extremities of the site (in order to create the soft edge required). This variation can not be achieved with the application of a 'maximum'.

Flexibility is therefore justified. This can be achieved in a number of ways, however use of an 'average' measure, rather than a 'maximum' measures is appropriate.

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

In terms of mix of uses, it is accepted by the respondent that a range of uses are appropriate to a Strategic Housing Site. Specifically, the following is noted in relation to the specified uses:

- District Centre – as set out within the representations, it is accepted that there is a need for some form of retail uses. However, there is no specific evidence based requirement for a 'District Centre'. It is noted that Westgate at present is defined as a District Centre, serving a catchment of circa 3250 households. As such, this suggests that 2000 homes would support a lower order centre. It is also noted that Birchington has a proposed allocation of 1600 homes, only 400 less than Westgate, and yet is required to provide 'small scale convenience retail provision' This approach is considered appropriate and there is no justification for a significantly larger scale of development for an additional 400 homes at SP15.
- Two form entry Primary School – discussions have been undertaken with KCC, and it is accepted that there is likely to be a need generated by the proposal for circa 560 pupils. There is

understood to be insufficient capacity in the adjoining schools to accommodate all of this demand and therefore a new 2FE primary school is required. This is supported by KCC. It is reasonable to provide a serviced plot, up to the boundary of the site. This is standard procedure in such cases and should be reflected in the policy. This is accepted within the SOCG.

- New medical centre – Subsequent negotiations with the CCG have confirmed that the site area of 0.5ha is appropriate. This is set out within the SOCG.

Reference is also made to 'community facilities which may include the above. Any additional provision is not considered necessary, appropriate or justified. This is considered further in Question 5 below.

The SOCG accepts that the higher level of open space is accepted – albeit it is on the basis of the wider site area only. Should this be accepted without the increase in site area it would result in a density well over 35dph and an inappropriate form of development for the settlement edge.

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

In so far as the community facilities are limited to the inclusion of a two form entry primary school and new medical centre, these are accepted, subject to the comments above. It is noted that the policy references the IDP which remains in draft. On this basis beyond that specifically identified, it is *not* clear to the developer which, if any, further community facilities are required.

However, it is understood this will emerge as the IDP progresses and be applied at planning application stage.

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?

As noted above, discussions have been held with the KCC and to a limited extent, the CCG. It is not clear however *when* the facilities will be delivered, nor *how*. However, the delivery of those elements within the applicants control will be secured during negotiations on any s106 at planning application stage and need not be defined in policy.

It is acknowledged however that there is no clarity within the policy however on the commitment of other bodies.

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?

The costs associated with all the policy requirements have been taken into account in the respondents viability testing, which concludes that the site is developable within the plan period, in accordance with the indicative trajectory.

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

As noted above, there is no justification for a District Centre, although the need for some degree of retail provision is accepted. Flexibility should be incorporated into the policy to allow for the scale of provision to be resolved at planning application stage.

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?

KCC have developed a transport model for the Thanet area. The respondents believe that the model is fit for purpose. It is also agreed that the model should be used by the strategic site developers in their Transport Assessments of the individual sites.

The respondents have also had discussions with KCC, regarding the elements of the Thanet Transport Strategy that fall to be delivered as part of their development. It is considered that the respondents can and will deliver these elements although further clarification regarding the scale and attribution of proportions of the scheme costs will continue as part of the current pre-application discussions.

Notwithstanding these ongoing discussions, the respondents control a large proportion of the land adjacent to the highway in the vicinity of the planned improvements and therefore has the ability to deliver a substantial proportion of the improvements in the Thanet Transport Strategy in its own right.

The highway SOCG addresses this in more detail.

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

It is accepted that the site-specific characteristics of this site justify a requirement for an LVIA, and a baseline assessment has been undertaken to inform the emerging masterplan. This provision within the policy is supported as the appropriate response to the context.

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?

Although not explicitly noted within the Policy, the applicant expects to consider air quality within the application process, as evidenced by the inclusion of Air Quality within the request for a Scoping Opinion in respect of EIA. This will acknowledge the AQMA at Birchington and St Lawrence and consider the impact of the traffic arising as a result of the development. Sensitive receptors within 350m of the site boundary will also be considered. Potential construction and operational impacts will be considered and any mitigation necessary proposed. At this stage, no specific mitigation is likely to be necessary aside from good masterplanning. The issue of air quality was also appropriately considered within the Sustainability Appraisal which finds that any masterplan should maximise connectivity for alternative forms of transport (e.g. walking and cycling) and extending bus service provision and promotion of multi-modal access. This will be adopted and is reflected in the policy requirements of SP15 (as addressed below).

On this basis, there is no requirement for the policy to consider air quality specifically as it will be appropriately addressed at planning application stage.

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?

The requirement to provide for measures to promote multimodal access and local connections is expressly included within the policy, and this is accepted. The detail of how such connections will be secured is a matter for a planning application as it will depend on the local circumstances in each connection.

However, to provide comfort, at this stage, it is proposed to include:

- Multiple pedestrian and cycle connections points along the site's northern boundary, linking the new neighbourhood towards the town centre, train station, seafront, and other attractions and amenities.
- Pedestrian and cycle connections to Minster Road through the centre of the site, Garlinge High Street towards its east, and Shottendane Road to its south
- A network of pedestrian and pedestrian/cycle routes through proposed new public open space offering appealing, safe and direct routes through the new neighbourhood, and
- A segregated footway/cycleway alongside the proposed spine road through the new neighbourhood

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

Defining characteristics of Westgate include an east-west settlement disposition along the Kent coastline, through which the railway line and Canterbury Road run, broadly parallel to the coast. These arteries serve a settlement that is then defined at a secondary tier by a prevailing north-south pattern of streets and secondary east-west connections. This results in a loose but prevailing grid pattern, defining residential areas and accommodating within it larger land uses such as schools and open spaces in a scattered patchwork. Open spaces are often clearly bounded by built form on four sides, in contrast to the vast and open landscape along the coastline to the north. The grid gives way to the informal pattern of the shoreline and beach / public routes / spaces along it. Retail uses are consolidated in a defined area.

The proposed development would reflect some of these characteristics by:

- Accommodating an east-west settlement disposition;
- Reflecting and extending the loose grid pattern of streets and spaces;
- Accommodating pockets of space of varying size and character within neighbourhoods, defined on all four sides;
- Allowing the grid to then give way to an informal pattern of open space and landscape to the south;
- Consolidating non-residential uses at a central and highly accessible location

The scale of the allocation is therefore considered appropriate.

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

The impact on any proposal on the historic environment will be fully considered at application stage. This is evidenced by the inclusion of Heritage within the topics to be scoped in with the 'request for Scoping Opinion'. The policy requirement to safeguard the setting is included and provides suitable clarity.

In terms of mitigation, it is anticipated that embedded mitigation will be incorporated into the masterplan to provide a suitable setting.

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

The trajectory has since been amended, as set out in the SOCG. This sees the first 25 homes being delivered in the monitoring period of 2020 to 2021, and the first 200 being delivered in the next five years.

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
		25	75	100	150	200	250	250	250	250	250	200

This is justified as follows:

- A hybrid application is submitted in Autumn 2019, with the entire site in outline, and the first parcel (or number of parcels) in detail
- Planning permission is anticipated in Spring 2020 for at least the first parcel (which will comprise circa 100 dwellings)
- Detailed design and relevant conditions discharge to take place concurrently and until Summer 2020, with construction commencing in June 2020
- The first 25 completions are therefore delivered by April 2021.
- Completions then increase exponentially until full delivery of 250 units in the later years of the Plan period.

This programme is considered deliverable by the applicant based on the experience of the applicant which combines local delivery by Millwood and large scale urban extensions delivered by Places for People.

In terms of the lead in period, there is no onward sale required to another party and hence no delay caused by this process. The hybrid approach to an application provides this certainty.

In terms of the full delivery, Millwood are able to call on the full resources of Places for People in delivery. Attached at **Appendix 2** is a letter from Places for People which confirms this, and supports the ambition to deliver up to 250 units (in favourable market conditions). Places for People have a long and established history in delivering large scale development of this nature, including Brooklands at Milton Keynes, as referenced within the letter.

Although we acknowledge that 250 units is dependant on the market context and other factors, it is notable that such rates have been achieved on other sites nationwide. Reference is made to the Strategic Growth Option – Housing Trajectory prepared by Eastleigh Borough Council in June 2018 as included at **Appendix 3** to this statement. Although the details are not applicable to the situation in Thanet, it includes (at Appendix 4) an assessment of large strategic sites across the County, prepared to sensitivity test the delivery of housing. It noted that that of the 30 sites reviewed an annual completion rate of 244 dwelling per year is identified, with some sites anticipated to deliver circa 500-600 homes. Care should be taken in applying these examples to SP15, but it highlights that in the right circumstances, 250 homes a year can be achievable.

Appendix 1 – Masterplan Document

Appendix 2 – Places for People Confirmation

Appendix 3 – Eastleigh Borough Council – Strategic Growth Option –
Housing Trajectory (extracts)

