
Thanet Local Plan (Proposed Submission)

Local Plan Examination
Hearing Statement – Matter 5

On behalf of
The Master, Fellows and Scholars of the College of
St John's the Evangelist in the University of
Cambridge



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1. Introduction

- 1.1. This Hearing Statement has been prepared by Savills (UK) Limited on behalf of The Masters, Fellows and Scholars of the College of St John the Evangelist in the University of Cambridge ('St John's College'). This Statement is prepared in respect of Issue 4 Westwood Strategic Housing Site Policy SP16.
- 1.2. Savills (UK) Limited on behalf of the College have made the necessary and relevant representations at all consultation stages of the emerging Plan. This includes representations made to the Regulation 19 version of the Plan.

2. Matter 5: Strategic Sites (Policies SP13-18 and HO2)

Issue 4: Westwood Strategic Housing Site – Policy SP16

Question 1: 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?

- 2.1. St John's College submitted its landholdings across the district through the 'call for sites' process and the Westwood site is referenced as SHLAA 001 in Appendix D of the Strategic Housing Land Availability Assessment – 2018 update.
- 2.2. There are no ownership constraints from our perspective in terms of delivering the site. The adjoining landowner referenced as SHLAA 002 has also supported the site allocation throughout the Local Plan preparation process and is a party to the Statement of Common Ground in relation to this site. The final part of the allocation (SHLAA 003) has been granted detailed planning permission for 40 homes. Therefore there are no ownership constraints to the delivery of the site.

Question 2: What is the justification for allocating the site for up to 1,450 dwellings? What is this based on and is it achievable?

- 2.3. The site area of the allocation is approximately 70 hectares and can accommodate up to 1,450 dwellings based on the site requirements set out in Policy SP16. This site is proposed as an urban extension to Westwood and is also adjacent to a consented site for approximately 1,000 dwellings (Policy SP17 refers).
- 2.4. Savills has prepared a draft indicative masterplan for the site which demonstrates how the site could be developed and accommodate the policy requirements based on technical evidence including ecology, landscape and heritage. This includes the school requirement. The allocation of sustainable sites for residential development is necessary to meet the objectively assessed need (OAN) for housing development within the housing market area (HMA). This allocation is sustainable in terms of its supporting infrastructure and self-sufficiency, developable and deliverable in terms of its strategic location and immediate availability.

Question 3: 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 the other strategic allocations?

- 2.5. The adjoining permitted site under construction has an approximate density of 40 dwellings per hectare across the site. This Strategic site will be an urban extension to that site and should reflect its scale and character as opposed to the other urban extensions elsewhere in the district. In addition the site is close to Westwood Cross which is the major retail centre in the district and therefore a higher density is justified as the site is close to provision of significant retail and leisure services. It is suggested that this site should have a maximum average density of 40 dwellings per hectare. This will allow flexibility across the site.

Question 4: How has the mix of uses and minimum area of open space been established? Are they necessary, appropriate and justified?

- 2.6 The site is predominantly residential with a requirement for a small retail centre and a two form entry primary school. The introduction of the primary school has recently been required by Thanet District Council as a consequence of representations made by Kent County Council. We are of the opinion that this is an appropriate mix of uses on an urban extension site.
- 2.7 The open space requirement is based on the requirements set out in Table 7 of the Preferred Options Local Plan 2015. This Table should be included within the Proposed Submission Plan and seems to have been omitted due to an administrative error.

Question 5: 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?

- 2.8 Kent and Thanet Councils have undertaken a considerable amount of work related to the proposed development and have produced a number of technical reports including a Strategic Road Network Impact Report, A28 Technical Note, Local Model Validation Report, a Forecasting Report, Forecast Junction Assessments Report and Corridor Studies Existing Conditions. These reports show that the proposed development can be accommodated on the local highway network with associated mitigation and our submitted indicative masterplan shows how the site can be accessed. The effect of increased traffic flows associated with the proposed development on the local highway network will need to be assessed in a Transport Assessment and Travel Plan as part of any planning application. Indeed, as Policy SP16 in the Plan acknowledges, a Transport Assessment and Travel Plan will be required as part of any planning application and this will assess the impact and necessarily introduce mitigation measures as appropriate.

Question 6: Is it clear to decision-makers, developers or local communities when the access road will be provided and by who?

- 2.9 It is anticipated that the main access road through the allocated site will be provided by the developer when the proposed development comes forward as part of a planning application and will be controlled through the planning permission, whilst Kent County Council will be responsible for the delivery of the off-site sections adjoining the Westwood allocation.

Question 7: How will proposals for the site be expected to provide connections with existing public rights of way and cycle networks to promote the use of more sustainable modes of transport?

- 2.10 Our indicative masterplan has taken account of existing public rights of way in order to ensure that sustainable modes of transport are encouraged, and this will be a fundamental part of the sustainable transport strategy that will be developed for the site. A previously mentioned a detailed Transport Assessment and Travel Plan will accompany the planning application explaining these matters in more detail in due course. Policies TP01 – TP04 support a variety of measures to enhance and promote more sustainable modes of transport

Question 8: How does the scale of proposed development relate to the size, role, function and character of Westwood?

- 2.11 Westwood is one of the major town centres within the district as set out in Policy SP07 and Westwood Cross has consolidated retail development in this area. Policy SP07 seeks to develop Westwood as mixed use business and residential community. The strategic allocation of SP16 will help to create a more balanced residential and business community in this area. This site will reflect and connect with the existing permitted site referred to under Policy SP17. The proposed indicative masterplan shows how the site will link in to the site allocated under Policy SP17.

Question 9: 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?

- 2.12 We understand the Council is now proposing to remove this requirement for an undeveloped corridor as part of an extension to the Green Wedge to the east of the site. We are in agreement with this approach.

Question 10: 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?

- 2.13 Whilst the Policy SP16 refers to an off-site education contribution it has now been made clear by Kent County Council that there will be a requirement for an on-site two form entry primary school. We have examined the site allocation and can confirm that there is room within the allocation to accommodate such a provision.

Question 11: 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?

- 2.14 The cemetery expansion land currently falls outside the boundary of the strategic site allocation as shown on the Proposed Submission Proposals Map. It is agreed that the cemetery proposal results from a need in the wider locality and not as a result of the SP16 allocation. The Council has agreed that the SP16 allocation should be increased in area to include the cemetery allocation area. This will allow sufficient flexibility to accommodate the cemetery proposal in due course once the details are resolved. It will be for the Council to deliver the cemetery when required.

Question 12: What consideration has been given to the standard of living accommodation for potential future occupants, having regard to the proximity of the site to the CEMEX Margate Concrete Plant and Margate Waste Recycling Centre?

- 2.15 It is considered that this is a matter for detailed design and our indicative masterplan shows this area adjacent to the concrete plant and recycling centre as a cemetery expansion. However this could be open space or other use which is not sensitive and would not prejudice the operation of these facilities.

Question 13: 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?

- 2.16 We have carried out a utilities survey for this site and our indicative masterplan takes into account the existing infrastructure on the site. Southern Water has said in their representation that it does not have an in principle objection to the allocation.

Question 14: What effect will the proposed development have on existing healthcare provision in the area?

- 2.17 This will be a matter for the detail of the planning application as to what contribution is made to healthcare provision in the Westwood area. Policy SP38 concerns a requirement for a new Westwood Medical Centre and the Council is working with the CCG to deliver this proposal.

Question 15: 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?

- 2.18 We have submitted representations to the Regulation 19 consultation to the effect that 50 dwellings can come forward in the year 2021/22 rather than 2019/20. The College is instructing consultants to prepare for the submission of an outline planning application within 12 months. We anticipate that it is realistic to expect first completions on the site to occur towards the end of the year 2021/2022 and to continue as set out in our representation to the indicative Appendix B and as set out in the Statement of Common Ground regarding Policy SP16. It is possible that 40 dwellings could come forward sooner under the planning permission on SHLAA 003.