

Goddard Planning obo Mockett Trust

Dear Ms Feeney,

Thank you for your email.

I now submit a brief statement in relation to the inspectors' questions in respect of Matter 8 - Housing Land Supply.

In doing so I draw attention to our previous submissions which we have made for the inclusion of our omission site SHLAA337 and southern part of 267 , The former gas holder station site of Northdown Road, St Peters, Broadstairs where we suggested an allocation for 70 dwellings.

Issue 1 - Five Year Housing Land Requirement

Q2 to Q6 Inclusive

The inspectors will be aware that there has been a record of persistent under-delivery of housing within the district. The latest annual monitoring report reveals a further reduction in delivery when compared with the previous year at 238 new dwellings. There has been significant under-delivery of housing over the last three years. Consequently, the supply should include a buffer of 20% in accordance with paragraph 73 c)of the NPPF. And the council's approach should be consistent with the NPPF which Indicates dealing with any under supply within the first five years of the plan period where possible.

Issue 2 - Supply Methodology

We also have concerns about the supply methodology. We are concerned that the council may be unrealistic in its assessment of housing trajectory for sites proposed to be allocated but without planning permission.

The NPPF (paragraph 75) requires the authority to prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years.

Paragraph 68 of the NPPF recognises that small and medium size sites can make an important contribution to meeting the housing requirement of an area, and built out relatively quickly. We question whether the council has identified, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on smaller sites (68a).

Issue 5 - Future Supply : Q3

Thanet has traditionally been one of the first areas within the South East region to suffer the adverse effects of a downturn or economic recession. This includes a reduction in interest from developers and a decline in the delivery of housing.

The Secretary of State for Housing, Communities and Local Government, in his letter of 28th January 2019, stated:

"I am also, for the avoidance of doubt, now putting on public record my concerns about the low level of housing supply and delivery in Thanet. I expect planning decision-takers to have regard to these concerns as a material consideration when

deciding local planning applications.”

In our opinion, there is not likely to be a sufficient supply of housing land throughout the lifetime of the plan. Additional deliverable large, medium and small scale sites should be allocated to address this significant shortfall in delivery. This should include sites such as the former gas holder station site, currently allocated for employment uses in the 2006 Local Plan, identified as a housing allocation in the 2015 draft Local Plan but excluded because of concerns about viability which have now been addressed in our submissions. This site is located within the identified urban area and is brownfield. Its allocation would result in the early delivery of housing. There would be social, environmental and economic benefits from the contribution of around 70 additional dwellings.

Kind regards.