

Thanet District Local Plan Examination

Hearing Statement

Matter 9 – Meeting Housing Needs

16th April 2019

Gillings Planning on behalf of Millwood Designer Homes

March 2019

Matter 9 – Meeting Housing Need

This Statement is prepared on behalf of Millwood Designer Homes in response to Issue 1 and 2. In light of the consistency in theme, the response to Matter 9 issue 2 (provision of Affordable Housing) is repeated under Matter 3.

Issue 1 – Type and Size of Dwelling

Q3. Is Policy SP19 sufficiently flexible to react to changing circumstances over the plan period, and to reflect the different characteristics of sites, such as smaller, town centre developments?

It is important to recognise that the different characteristics of all sites must be taken into account, and not just the smaller town centre developments. The larger strategic sites will also have specific circumstances that may justify a different approach.

The evidence base is now somewhat dated (relating to 2016) and a strict adherence to its findings through the plan period would not be appropriate. The statement at 3.32 of the Local Plan which acknowledges that relevant evidence to update the SHMA will be taken into account is welcomed, but this must be reflected within the policy wording.

As such flexibility is required as set out in the respondent's comments.

Issue 2 – Provision of Affordable housing

Q1. What is the justification for requiring at least 30% of dwellings to be affordable on all qualifying sites? Is the requirement consistent with, and justified by, the evidence contained in the Thanet District Council Local Plan and CIL Viability Assessment?

Q2. What affect will the requirement for proposals to provide 30% affordable housing have on the deliverability of housing, especially for proposals on previously developed land?

Q3. Is it clear to decision-makers, developers and local communities under what circumstances a lower amount of affordable housing is acceptable?

Q4. What is the justification for the proposed affordable housing split in Policy SP20? What is this based on, and will it be appropriate for all qualifying development proposals across the District?

Representations were submitted to confirm that flexibility should be provided within the policy if site specific circumstances suggest a different approach should be taken. This is because a rigid consistent approach across all sites is highly unlikely to be appropriate.

This is noted within the evidence base document in multiple locations. Despite the 'at least 30%' wording of the policy, the evidence base is clear in confirming that 'at least 30%' on a borough wide, consistent, basis would not be justified.

Such a rigid consistent approach would affect deliverability of housing, unless viability can be taken into account. This is supported by the evidence base which recognises that each site is likely to be negotiated on its merits – specifically the Local Plan Viability Assessment (Strategic Sites Update) which notes at para 2.3.3 that “the exact nature of the s.106 or equivalent requirements that may be viable at a site-specific level will not usually be determined until the planning application stage, however”.

Although the policy justification notes that viability can be taken into account, the representations hold that in order to provide developers certainty, the policy itself must allow for flexibility to specifically allow for viability to be taken into consideration on a site by site basis. This is in respect of both the overall percentage and the mix of tenures.

Simply, it will not be appropriate for all qualifying sites to provide 'at least' 30% affordable homes with exactly the split provided.

Flexibility is therefore required. This could be achieved in a number of ways, however the simplest would be as per the representations submitted – that 'where appropriate' be added, to allow for site specific circumstances to be taken into account. We welcome alternative approaches to achieve this objective however.