

From: mg@goddardplanning.co.uk <mg@goddardplanning.co.uk>

Date: Thu, 17 Oct 2019 at 13:19

Subject: Inspector's consultation : Sustainability Appraisal

To: Annette Feeney <annette.feeney@thanet.gov.uk>

Cc:

Dear Annette,

3. Sustainability Appraisal

Thank you for your email of 7th October. I would like to make a further comment on the sustainability appraisal addendum report and specifically section 2.53 which relates to the former gas holder station site in St Peters, Broadstairs. That appraisal demonstrates the suitability of the site for development in 2.53.4. However, 2.53.5 states that the site was de-allocated on the basis of the viability evidence submitted as part of a planning application. In response to that, we have previously provided as part of our submissions in connection with the consultations on the emerging Local Plan, new compelling information and evidence to demonstrate that circumstances have changed and that the redevelopment of this site for residential use is now economically viable.

The appraisal summary in 2.53.4 demonstrates the suitability of this brownfield site, located within an existing town centre and in close proximity to a wide range of local services and amenities, including public transport. The suitability of the site is further supported by the conclusion that there are no significant adverse effects which would flow from the development of the site.

The site was previously allocated in an earlier draft Local Plan, but removed because it was considered not to be viable in isolation from the development of additional land. As we have explained in our previous submissions which are attached, more detailed evaluation of viability and the availability of information not previously given to the land owner results in a very different conclusion.

Having now directly addressed the issue of viability, it is clear that the one barrier to the reallocation of this site for housing has been removed. The inclusion of this site would go some way towards assisting the council in its future housing delivery.

We ask the inspector to reconsider that evidence and reallocate the site for housing development, the lack of a year housing land supply and comments we have made about the persistent problems of delivery.

Regards.

Mike