

**Thanet District Council**

**Strategic Housing  
Land Availability  
Assessment**

**Updated 2013**



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# 1 Executive Summary

This Strategic Housing Land Availability Assessment (SHLAA) assesses the individual and combined potential capacity of a pool of sites to accommodate additional dwellings over the period of the emerging Local Plan to 2031. Reflecting the challenge of identifying sufficient sites to meet Objectively Assessed Need, and government guidance on land availability assessment, the approach has been to cast the net wide in identifying a pool of sites and to take a hard look at them notwithstanding that a significant number of sites involve a degree of conflict with established local planning policies.

The SHLAA itself does not allocate land for housing, and indication that a site may have potential does not signify that planning consent would be granted for such development. It will be for the Local Plan making process (drawing on the information from the SHLAA) to determine which sites are appropriate to allocate for development.

For the purposes of assessing sufficiency of dwelling potential a nominal target requirement of 12,000 additional dwellings distributed evenly across the Plan period to 2031 has been assumed. This equates with the higher illustrative option featured in consultation on Local Plan issues and options in summer 2013.

**The SHLAA indicates that potential supply is sufficient to meet the target housing requirement across the Plan period.**

The following tables summarise the SHLAA's conclusions regarding potential housing capacity within and beyond four 5 year time bands over the period to 2031. The figures represent single dwelling units and include potential arising from dwelling houses and flats.

An indicative "trajectory" illustrating the amount of housing that can be expected to be provided and at what point in the future is featured in the results and conclusions section of the report.

## Potential Housing Capacity - Summary table

Source of housing potential	2011-2016	2016-2021	2021-2026	2026-2031	Post 2031	Total
Assessed Identified sites	3782	10008	2589	1277	1813	19469
Identified small sites	200	-	-	-	-	200
Windfall	240	680	680	680		2280
Completed 2011-2012	320	-	-	-	-	320
Total	4542	10688	3269	1957	1813	22269

## Potential capacity within period to 2031

	2011-2016	2016-2021	2021-2026	2026-2031	Total
Total	4542	10688	3269	1957	20456

## 2 Introduction

### Purpose of the Strategic Housing Land Availability Assessment

The new Local Plan will reflect a strategy for the planned location of new housing, which contributes to the achievement of sustainable development. This will need to be informed by evidence regarding the opportunities and options for the location of future housing provision. It is the purpose of this Strategic Housing Land Availability Assessment (SHLAA) to assess the potential availability of land for new homes in Thanet to provide this essential baseline information.

Government requires that Local Plans be based on adequate and up to date evidence. Its National Planning Policy Framework (NPPF), published in March 2012, maintains the requirement for local planning authorities to prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet identified need for housing over the plan period. It also states that assessment of, and strategies for, housing and employment and other uses should be integrated and take full account of market and economic signals.

A Strategic Housing Land Availability Assessment for Thanet was published in 2010. This 2013 Review provides an updated and longer term perspective on potential housing land in the District.

A separate Strategic Housing Market Assessment and forecasting work has been carried out to assess housing needs in the area and to inform a target level of housing to be provided for.

It is the role of the Local Plan to determine which sites are appropriate to be allocated for housing development, taking into account its strategy, higher level policy, plan targets and competing uses. **It is therefore important to note that even if a site is assessed as deliverable or “developable” for housing in the SHLAA, this does not signify that the site will be allocated for such use in the Local Plan or that planning permission for residential development will or might be granted.** (Appendix 10 provides more information).

### SHLAA Stakeholder Partnership

A stakeholder partnership was established to participate in the preparation of this SHLAA. While the Council has taken the lead role in drafting the work, the partnership has participated by helping to shape the methodology and contributing expertise and knowledge to inform views on the deliverability and developability of sites and how market conditions may affect economic viability.

Alongside the Council itself, the SHLAA stakeholder partnership encompassed stakeholder members of the East Kent Strategic Housing Market Partnership established to oversee the Strategic Housing Market Assessment, together with other selected groups and agencies with relevant expertise and local knowledge. Stakeholder involvement and engagement in the process has evolved, including for example registered housing providers, builders and property agents participating in a number of workshops focusing on assessment of viability of development in the district.

## Strategic Housing Land Availability Assessment – 2013 update

The 2010 Strategic Housing Land Availability Assessment assessed dwelling potential to 2026 against the benchmark target of 7,500 dwellings in accordance with the Regional Spatial Strategy (the 2009 South East Plan).

Since the 2010 SHLAA was carried out, Government has abolished the South East Plan and stated that decisions on future levels of housing will be decided by local planning authorities based on an objective assessment of need. Government has also introduced fundamental changes to the plan making system, including

- Introduction of the new National Planning Policy Framework (NPPF) to replace previous individual national policy statements,
- introduction of Planning Practice Guidance to amplify the NPPF and provide updated guidance on assessing land availability,
- greater emphasis on local authorities preparing single development plan documents to be known, again, as Local Plans.

The Council is now preparing a Local Plan for the District which is to cover the period to 2031.

The changes referred to above have contributed to a deceleration of our plan preparation process, and this 2013 SHLAA update is considered timely to:

- Assess options for accommodating an alternative housing provision target
- Reflect the longer term Local Plan period now proposed (2031)
- Review the portfolio of sites considered to have housing potential.

As part of the evidence base for the new Local Plan, it is important that the SHLAA is as up to date and robust as possible. The 2010 SHLAA assessed the potential of sites from a variety of sources including sites which already had planning permission and sites identified by landowners in response to previous “calls for sites”. Although intended as a self-contained piece of work this 2013 update has reviewed these assessments taking account of any material factors such as progress in removing constraints, current planning proposals, and any progress on site. In addition, further sites have come forward since 2010 through the planning process and more have been identified through fresh calls for sites. In order that the most sustainable site options can be assessed in preparing the local plan these additional sites have been screened and where appropriate assessed through this 2013 update.

The process applied in the 2010 SHLAA was developed in light of government practice guidance, a county protocol and in consultation with stakeholders. In August 2013 Government published draft Planning Practice Guidance (PG) to amplify the NPPF. The PG was published in revised form in March 2014 and includes guidance on assessing land availability. This 2013 Review has been undertaken on a similar basis to the 2010 version but having regard to the above guidance as it has evolved. The review is considered to be consistent with the PG published in March 2014.

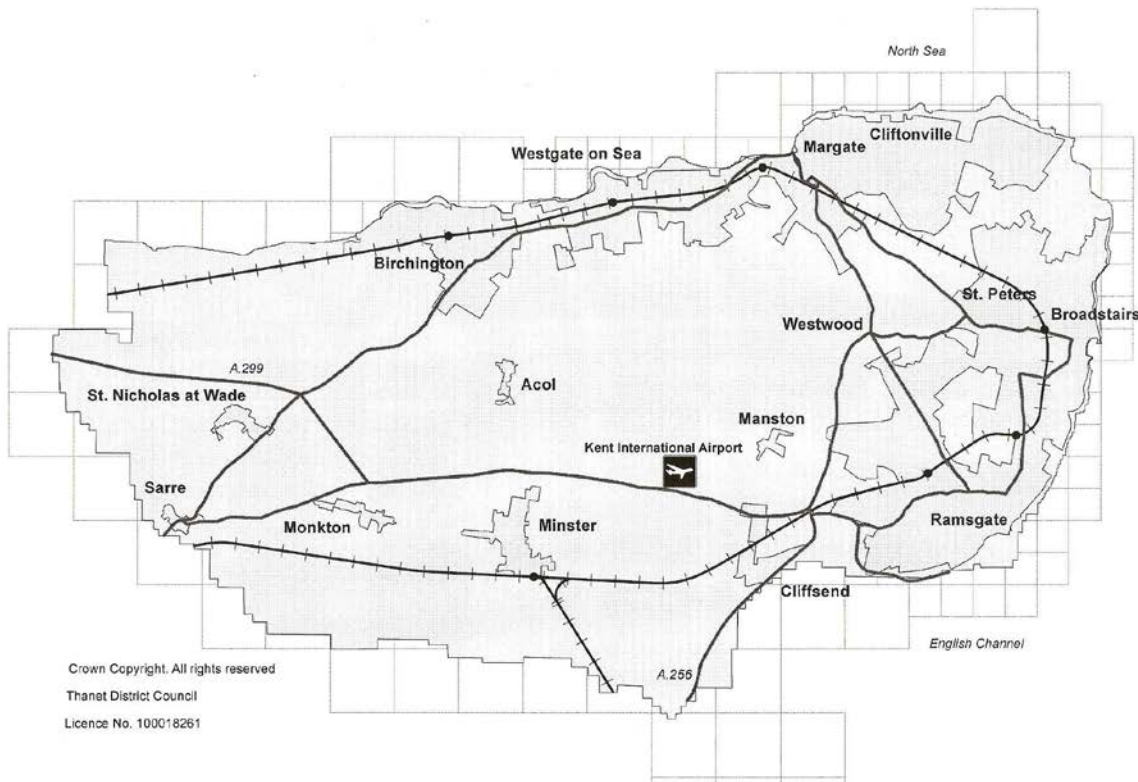
# 3 Study Area & Target Housing Requirement

## Thanet SHLAA Study Area

Government's Planning Policy Guidance (PG) states that the Strategic Housing Land Availability Assessment should cover the relevant housing market area. The PG describes this as a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.

The 2009 East Kent Strategic Housing Market Assessment indicates that Thanet is a highly self-contained housing market area. A review of the SHMA suggests that this conclusion remains valid. Accordingly the geographical coverage of this SHLAA equates with the area of Thanet District, as illustrated on the map below.

Thanet District



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## Target Housing Requirement

At the time of publication the level of additional housing to be provided for in the district has yet to be finalised. However, for the purposes of identifying sufficient and suitable sites to allocate through the Local Plan process, this SHLAA assumes the need to identify provision for 12,000 additional homes over the period to 2031. This equates with higher level options put forward to elicit responses to consultation on issues and options for the new Local Plan.

## 4 The Context for the 2013 Update

### National Planning Policy Framework (NPPF)

Certain of the NPPF's core principles are particularly relevant to the context of this 2013 SHLAA review. They include:

- Always seeking high quality design and a good standard of amenity for existing and future occupants of land and buildings.
- Preference in allocating land for development to land of lesser environmental value where consistent with the NPPF policies.
- Encouraging effective use of land by using land that has been previously developed provided that it is not of high environmental value.
- Promoting mixed use developments recognizing that some open land can perform many functions (including wildlife, recreation and food production).
- Managing patterns of growth to make fullest possible use of public transport, walking and cycling, and focusing significant development in locations which are or can be made sustainable.

### Sources of Sites Included in the Assessment

Government's Planning Policy Practice Guidance advises that all available types of sites and relevant sources of data should be considered in the SHLAA assessment process, and gives examples. Key sources used in assembling the pool of sites for this SHLAA are listed below.

#### Sources of Sites

1. The 2006 Urban Capacity Study
2. Sites allocated for development in the adopted (2006) Local Plan
3. Sites granted planning permission (including those not started and under construction) sourced from annual Housing Information Audits.
4. Potential sites subject of pre-application discussions.
5. Council owned land with potential availability.
6. Sites to be the subject of development briefs/master plans (for example due to their recognised potential for area regeneration).
7. Sites requested for allocation in the Local Development Framework by landowners and developers. (Such submissions included requests to consider allocation of sites for housing and some sites for other purposes)
8. Land allocated or protected for employment use.

## Strategic Housing Land Availability Assessment – 2012 Update

The base date for this SHLAA is 31 March 2013. Each individual site has been given a unique reference number and these are featured in the maps and tables in the appendices.

An important source of information about potential sites is the 2006 Urban Capacity Study of Thanet. This provided a thorough survey and assessment of potential housing sites. The SHLAA exercise reviews these sites and re-assesses them. This includes a review of capacity assumptions, including concerns about the need to safeguard residential amenity and avoid developments which would worsen the existing imbalance in the make-up of the district's housing stock which has a high proportion of flats.

The 31 March date coincides with the annual Housing Information Audits (HIA) carried out by the County Council in liaison with the District Council. These HIA's identify housing sites allocated or having planning permission and/or under construction. Due to the preparation periods involved in the HIA and SHLAA processes, the list of sites with planning permission is drawn from the 31 March 2012 HIA. However, assessments of them reflect any subsequent information available. Sites granted residential planning permission for residential development since 31 March 2012 are not necessarily captured in this SHLAA review.

As part of the Local Development Framework preparation process, land owners and developers have been invited through several "calls" (the latest being summer 2013) to put forward any sites they felt should be assessed for development potential and possible allocation as part of that process. Many such submissions involve larger sites on greenfield land. A map at Appendix 4 shows the location of sites put forward in response to these calls.

Certain of the above categories include sites in/last used for employment purposes and which may be available and suitable for residential development. Assessment of such sites has been informed by specific survey and review as part of an Employment Land Review of the district, which has effectively been carried out in parallel with the SHLAA.

### Key Stages

The following sections summarise the key stages involved in undertaking this SHLAA. Principal outputs from the SHLAA are

- A list of sites cross-referenced to maps of the locations and boundaries of specific sites.
- Assessment of the deliverability/developability of each identified site (in terms of its suitability, availability and achievability) to determine when each site is realistically expected to be developed.
- The potential quantity of housing that could be delivered on each identified site together with an indication of potential windfall sites potential
- Constraints on the delivery of identified sites.
- Recommendations where appropriate on how these constraints could be overcome and when.



## 5 Screening of Sites

The level of housing provision to be provided over the period to 2031 is being established through the process of preparing the Local Plan. Having consulted on a range of illustrative options, this SHLAA applies a nominal target to identify capacity to accommodate of 12,000 net additional homes over the period 2011-2031.

That target translates into an annual average of 600 dwellings (i.e. 3,000 per 5 year period as illustrated below).

	2011-16	2016-21	2021-26	2026-31	Total (2011-2031)
Target requirement (dwellings)	3,000	3,000	3,000	3,000	12,000

### Managing the Assessment Process.

The aim of this SHLAA has been to identify sufficient deliverable and developable sites to meet the target requirement shown above. The SHLAA process is resource intensive, and including every piece of land in the district would not be feasible. Nonetheless the extent of the search and survey needs to match the challenge of informing sustainable policy options for providing a land supply that is sufficient both in terms of meeting the numerical housing target as well as accommodating the type of homes required to meet policy objectives.

The sources referred to above brought forward a substantial pool of sites. In order to keep the process manageable and to focus first on the most suitable sites, the total pool of sites was screened against the high level sustainability criteria set out below. Sites not meeting the criteria were placed on a “reserve list” to be assessed only in the event that the first trawl did not show sufficient capacity. The reserve list is featured at Appendix 3. Assessment has shown that the “first trawl” sites provide sufficient potential as set out in the results and conclusions section. It has not therefore been necessary to assess the sites on the reserve list.

The PG indicates that sites with planning permission for housing will be suitable for housing unless circumstances have changed. In order to keep the SHLAA exercise manageable only sites with potential capacity of 5 or more dwelling units net were subject to individual assessment. Sites below 0.15 ha or with nominally less capacity than 5 dwelling units have been excluded. However an exception has been made for specific sites below this threshold which have planning permission for residential development. The Housing Information Audit identifies a significant number of such sites and it is important that the cumulative contribution of these sites is not overlooked. More information is provided on small sites below.

## Screening Criteria

Sites assessed in the “first trawl” were those meeting criteria a) or b) and meeting criterion c) below.

**a) Located within the built confines of the urban area extending from Birchington to Ramsgate or within the built confines of rural settlements identified as sustainable. (See map A and notes below)**

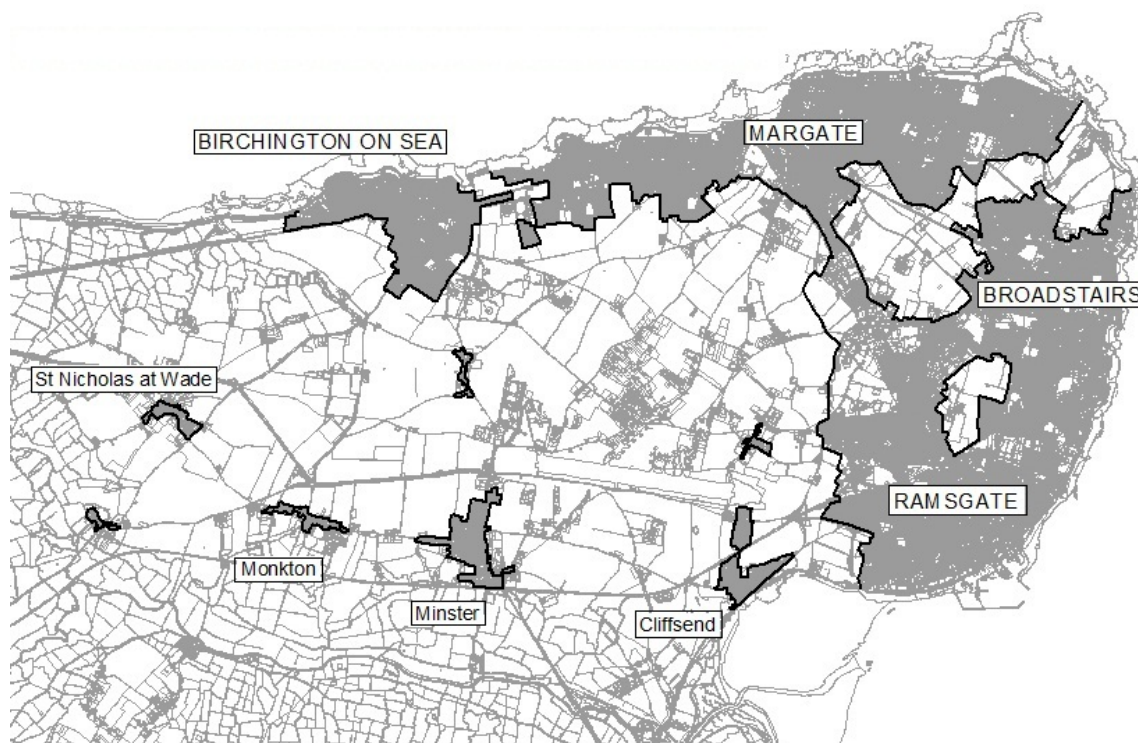
**b) Located adjoining the confines mentioned above provided that the site substantially abuts the confines to represent a proportionate urban extension.**

**c) The first trawl also excluded:**

- any site within an SPA, Ramsar, SAC, SSSI, or National Nature Reserve (see map B below)
- any site in use or allocated for employment or other use and which remains suitable and required for that use or is protected by a current development plan policy from development for other uses.

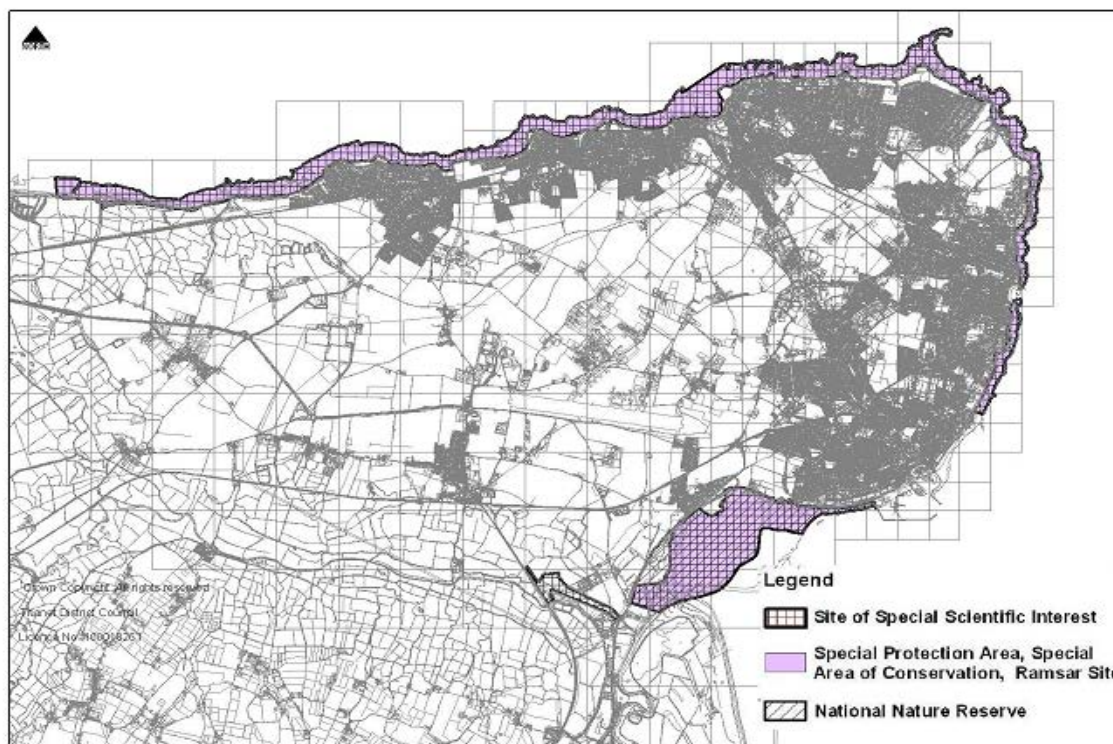
Notes to criteria a) and b) - Rural settlements identified as sustainable are Minster, Saint Nicholas-at-Wade, Cliffsend and Monkton. A separate topic paper explains why they meet this definition.

**Map A - Urban and Village Confines**



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**Map B - Location of Sites of Special Scientific Interest, SPA, Ramsar, SAC and National Nature Reserve (criteria c)**



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## Notes Regarding Screening Criteria

As a result of stakeholder engagement and changes in national planning policy, the screening criteria applied in this 2013 update as featured above have been amended since the 2010 SHLAA. Relevant factors are identified below.

A core principle of the National Planning Policy Framework (NPPF) is recognition of the intrinsic character and beauty of the countryside. It advises that plans should include identification of land where development would be inappropriate for instance because of its environmental or historic significance. However, the NPPF does not specifically recognize individual designations such as Green Wedges which as in Thanet's case, serve an important local function.

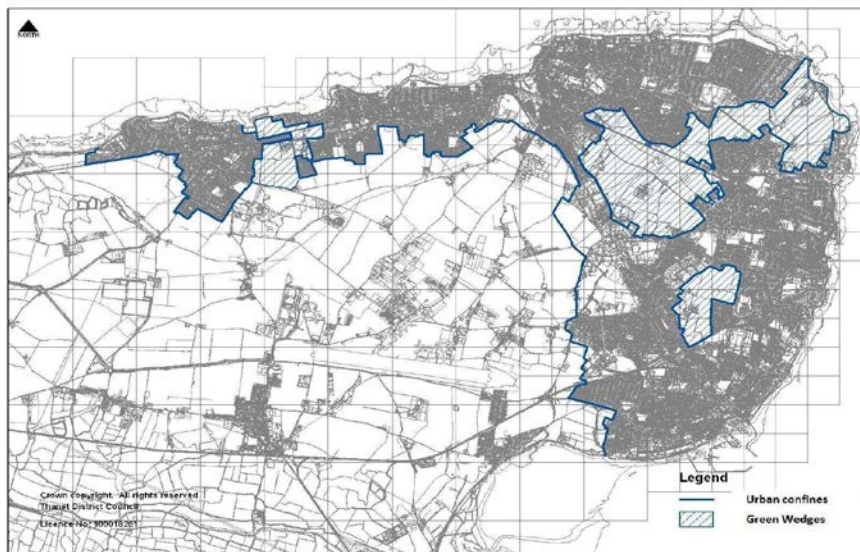
The NPPF states that planning policies should avoid the long term protection of allocated employment sites where there is no reasonable prospect of a site being used for that purpose.

Representations received include the assertion that the rural settlements and areas have a potential role not only in meeting local housing need but also in providing a degree of locational choice.

The amendments are summarised below.

- 1) First trawl criteria no longer exclude
  - sites within (and adjoining built confines of the more sustainable) rural settlements
  - sites within the Green Wedges. (shown in map C below)

**Map C - Location of designated Green Wedges**

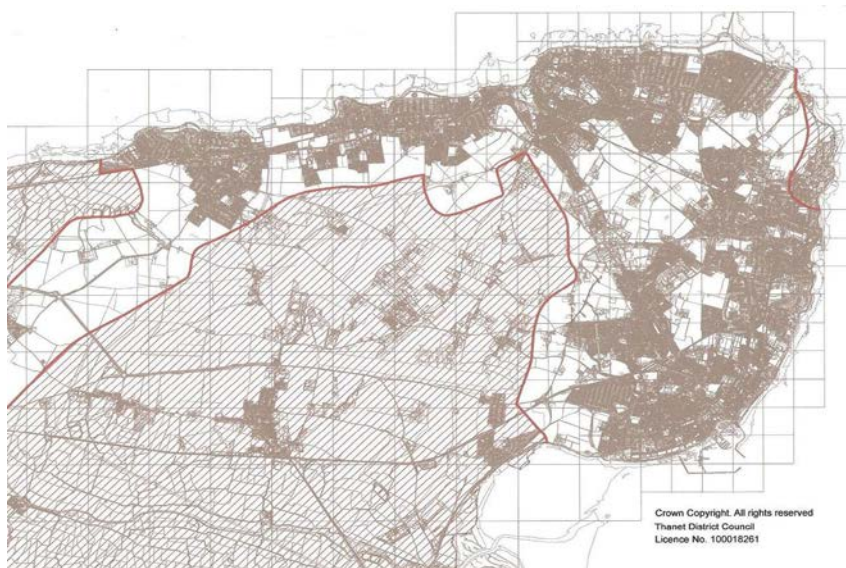


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2) A number of employment sites have been subject to assessment in the 2013 SHLAA in parallel with the 2013 employment land review.

3) Criterion b) of the 2010 SHLAA has also been amended by removing the requirement for sites to be within a defined corridor where a range of services is accessible by public transport within 30 minutes. While this remains an important sustainability consideration, it is difficult to accurately map. However, the map produced for this purpose (Map D below) although a little dated serves to show that the most accessible locations are focused within and at the edges of the urban area of the Thanet coastal towns and serve to validate such locations under criterion a and b) above.

**Map D - 30 minute public transport corridor.**



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These changes have resulted in a number of sites not assessed in the 2010 SHLAA now meeting all current criteria being subject to assessment in the 2013 review.

## 6 Assessment Principles

### Intensity of Development

The 2010 SHLAA applied the principle of avoiding the assumption that larger garden areas or family sized dwellings should be systematically examined as candidates for redevelopment to provide a greater number of homes. Since 2010 SHLAA definition of private residential gardens has changed from Previously Developed Land to Greenfield.

Governments' National Planning Policy Framework states that local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area. This will need to be addressed in the new Local Plan.

The 2013 review continues to apply the same principle and normal planning criteria in assessing potential from these sources.

### Type of Housing Units

A second principle applied in the 2010 SHLAA was for a lower than historic contribution from flatted development. The 2009 Strategic Housing Market Assessment points to the need to prioritise rebalancing of the housing stock to incentivise provision of family homes and control the expansion of flatting of larger homes. Future policy on the mix of new homes has yet to be resolved. However, for the sake of consistency with the 2010 SHLAA and in light of the SHMA's findings this 2013 SHLAA update maintains the principle of assessing capacity in terms of new houses/bungalows unless flats are appropriate for good planning reasons (e.g. townscape) or where for example such development is anticipated as a result of a consented scheme.

### Green Wedges

Thanet is a geographically compact district and its towns are contained within an almost continuous urban belt. The role of the Green Wedges in maintaining open and undeveloped character and physical separation between the conurbations of the Thanet towns has been, and may continue to be, strongly protected in planning policy. The Green wedges were excluded under the screening criteria of the 2010 SHLAA. However, in order to take a more comprehensive view of options, sites within the Green Wedge are now included in the 2013 SHLAA review unless excluded as a result of other relevant screening criteria. For the purposes of this review the Green Wedge Policy is assumed not to exist otherwise such sites would automatically score poorly under the suitability criteria. However, in using the SHLAA to inform site allocations the individual potential of Green Wedge sites will, at that stage, be weighed alongside their significance in terms of Green Wedge policy considerations.

## 7 The Updating procedure

The 2010 SHLAA identified a large pool of potential housing sites, including a large number put forward in response to calls for sites. To ensure the SHLAA is up to date and as robust as possible this 2013 review provides a fresh update on potential housing sites and capacity. Two key steps in this review have been to: -

A - Identify further sites which may have housing potential, and to screen and assess them as appropriate for potential housing capacity. In summary this includes:

- sites where residential planning consent has since been granted (up to 31/3/2012)
- further sites identified by developers/landowners following fresh “calls” for sites in 2012 & 2013
- further sites owned by the District Council with potential for disposal/housing development
- sites in the Green Wedges (previously placed on reserve list)
- some sites allocated/safeguarded as employment land
- sites within and adjoining villages considered sustainable (these are identified in a separate topic paper).

B - Review the status and potential dwelling capacity of sites previously identified through the 2010 SHLAA. In summary this involved:

- Identifying any development which has since taken place (for example dwelling units under construction)
- Assessing any progress made in removing identified constraints.
- Identifying any alternative development on site or in prospect as a result of planning decisions or pre application enquiries.
- Identifying other factors which may necessitate re-assessment (for example as a result of changes to national planning policy and work in preparing our Local Plan within that context).
- Netting off dwelling units completed before the base date.

A key source in updating the SHLAA has been the annual Housing Information Audits carried out with a base date of 1<sup>st</sup> April each year. It is important to note that in terms of large consented sites the 2013 SHLAA review only encompasses the results of the HIA for the period to 31/3/12 and not to 31/3/13. Thus in this respect its base date is 31/3/12. However this 2013 review has incorporated additional sites resulting from a fresh call for sites in summer 2013.

## 8 Assessment Process

### Site Surveys

Unless sufficient information already existed, all sites identified (including sites with residential planning consent) were surveyed to record their essential characteristics including existing use, obvious constraints, initial observations on suitability for housing or mixed-use development and any development progressing on site. The results for each site assessed are shown in the table at Appendix 2. This includes estimated total achievable dwelling potential by time period, a scoring for suitability, availability and achievability, and any potential constraints which may need to be addressed.

### Estimating Housing Potential

An indicative dwelling capacity estimate was attributed to sites as part of the assessment process. This was informed by the benchmarks applied in Local Plan policy which indicate that a density of 30 dwellings per hectare net may be applicable or a density of 50 where the site meets the following criteria:

A) within 800 metres convenient walking distance of the town centres or local centres providing a range of shops and services, and/or

B) within both

- 800 metres convenient walking distance of a railway station and
- 400 metres convenient walking distance of bus routes with frequent services or public transport interchanges.

Before concluding estimated capacity, each site was subject to individual assessment to consider whether the 30/50 benchmark is inappropriate. This included considering whether the character of the locality or other established policies applying suggest that an alternative capacity is more realistic or desirable; for example where particular dwelling types, density or layout would be appropriate in the area. Where a valid and detailed planning permission existed then the relevant capacity was applied unless site assessment or other circumstances indicate otherwise.

Stakeholder partnership participation raised the issue as to whether the application of a density of 50 dwellings per hectare was appropriate on larger sites (typically those submitted by landowners and located just beyond the urban area). It was felt that with the potential policy direction to restrict flats and encourage more family homes, this density would be too high, and if applied to a number of such sites, could inflate deliverable capacity. A benchmark density of 40 dwellings per hectare on sites initially assessed as having capacity of 250 or more dwellings was suggested. In recognition of this, the assessed capacity of sites of 5 or more hectares has been reduced by 20% where that capacity estimate was originally based on 50 dwellings per hectare.

No such reduction was applied where an alternative basis of assessment had been used (for example estimated potential at site S141, whose estimated capacity is derived from an existing planning permission).

## Assessing Whether and When Sites May be Developed

Various criteria and considerations were applied to inform judgement as to whether in plan-making terms sites can be considered deliverable and developable. These factors have been established in light of the methodology advocated in the Strategic Housing Land Availability Assessment Protocol for Kent & Medway. Such assessments were made against a specific assessment form (specimen at Appendix 9). Scoring of the key factors on which the housing potential conclusions were based is featured Appendix 8. Each assessed site was attributed a score from 1 to 4 for suitability, availability and achievability. Criteria for scoring each aspect are shown on the specimen site survey assessment form. For example a suitability score of 1 indicates that identified constraints are unlikely to be removed or impacts sufficiently mitigated by 2031, whereas a score of 4 signifies no material constraints.

## Criteria and Considerations Applied in the Assessment Process

### Constraints

Possible and known policy constraints were recorded, together with any indication of how such constraints may be overcome.

### Suitability for Housing

In general sites allocated in the adopted 2006 Local Plan or with planning permission were regarded as suitable. However, for the sake of completeness all sites with a capacity of 5 or more dwellings were subject to assessment. The specific criteria being suitability in terms of access, accessibility, physical or infrastructure constraints, adverse impact on certain environmental features or on residential amenity, and whether any adverse factors can be overcome.

### Availability for housing

Sites were considered available where best available information suggests there are no legal or ownership problems such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. Where applicable consideration was given as to how and when such problems could be overcome.

### Achievability

To be achievable there must be a reasonable prospect that a site will be developed with housing at a particular point in time. This essentially requires a judgment about its economic viability and the capacity of a developer to complete and sell the homes over a certain period. Specific considerations were:

- Market factors - including compatibility of adjacent uses, land values compared with alternative uses, attractiveness of locality, market demand, projected rate of sales.
- Cost factors - including site preparation to overcome physical constraints, on-site and off-site planning and infrastructure requirements and availability of funding.
- Delivery factors – including developer's phasing, build-out rates, number of developers and size & capacity of developer.



## Strategic Housing Land Availability Assessment – 2012 Update

In assessing the market viability of sites account has been taken of the views and information supplied by stakeholder representatives.

Consideration of the above factors informed whether adjustments to earlier estimates of dwelling capacity would be appropriate, and informed the final assessment of how much of each site's potential capacity can be delivered within the four 5 year periods up to 2031.

## 9 Other Sources of Capacity

### Small Identified Sites

The size threshold for seeking potential sites in the SHLAA is 5 units net. However, smaller sites (identified as a result of receiving planning permission) also contribute to total potential.

The 2013 Housing Information Audit shows that capacity from identified small sites with planning permissions is about 200 units deliverable within the period to 2016/7 as shown below. About 61% of this consented potential is in the form houses as opposed to flats.

#### Consented small sites

Period	2013/4	2014/5	2015/6	2016/7
Net dwellings	98	61	36	3

Appendix 5 sets out the methodology for identifying these.

The SHLAA attributes potential capacity of 200 dwellings from this identified source

### Windfall Sites

Historically, a significant proportion of the new homes delivered in Thanet has been by way of “windfall” sites, which the National Planning Policy Framework (NPPF) defines as

*“Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.”*

The NPPF states that allowance can be made for windfalls sites in the five year housing land supply subject to compelling evidence that they have consistently become available and will continue to provide a reliable supply. It says that any such allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens.

Windfall sites have historically contributed significantly to dwelling completions in Thanet. The following tables show the contribution of such sites to total housing completions in the period 2010/11 to 2012/3. Large site windfalls refer to sites delivering 5 or more dwellings net.

**Total Completions and Windfall Component**

	2010-11	2011-12	2012-3	Total/ Average % p.a.
Total Dwelling Completions	927	307	217	1451
All Size Windfall Completions	881	277	191	1349
% windfall completions	95%	90%	88%	93%
Large site Windfalls	551	156	134	841
% large site windfalls	59%	51%	62%	58%
Small windfall completions	330	121	57	508
% small windfall completions	36%	39%	26%	35%

The NPPF says that windfall allowance should not include residential gardens. The table below presents the same information as above but excluding windfall completions that were on residential gardens. In the last 3 years an average of 88% of dwelling completions was on such windfall sites. Small site windfall sites (less than 5 dwellings) contributed an annual average of 155 units over the 3 year period to March 2013 representing on average nearly 1/3 of total completions.

**Total Completions and Component of Windfall Sites Not On Residential Gardens.**

	2010-11	2011-12	2012-3	Total/ Average % p.a.
Total Dwelling Completions	927	307	217	1451
All Size Windfall Completions	837	265	176	1278
% windfall completions	90%	86%	81%	88%
Large site Windfalls	537	148	127	812
% large site windfalls	58%	48%	58%	56%
Small windfall completions	300	117	49	466
% small windfall completions	32%	38%	23%	32%

Small windfall sites have historically made a significant contribution to housing delivery and can be expected to continue to provide a significant aspect of potential supply. This is evidenced by a report published on 31/3/2008 by Kent County Council as part of the HIA process in respect of housing land supply from unidentified sites. This shows that dwelling completions from small sites of less than 5 units net have historically made a significant contribution to total housing completions in Thanet District. (An average of 120 units per annum).

Small site dwelling units completed in Thanet

2003/4	121
2004/5	100
2005/6	56
2006/7	178
2007/8	152
Total	607

In line with the NPPF, this SHLAA makes allowance for potential arising from windfall sites for a five year period. However, this allowance is based only on expected capacity from small sites. This is because the SHLAA aims to identify potential sites having housing potential of 5 or more units. However, because it is unlikely that any SHLAA can identify all such sites, the 5 year windfall allowance is considered very conservative.

Small site allowance has been further reduced to reflect the nominal assumption that small windfall sites delivered by way of houses will remain constant but that the component delivered as flats will reduce in number by 66%. The calculations are set out at appendix 7 which also shows the breakdown of actual windfall completions by type (flats and houses).

After such discounting, small site allowance is conservatively estimated at 88 per annum. (440 over the first 5 year period). Estimated capacity from identified small sites referred to in the preceding section has been deducted from this windfall allowance to avoid potential duplication.

### Broad Locations for Future Housing Development

National Planning Practice Guidance signifies that beyond the initial 5 year period housing land supply can be by way of specific developable sites or broad locations for growth. It notes that a windfall allowance can be included through the ability to identify broad locations in years 6-15.

This SHLAA focuses on identifying and assessing specific sites. Nonetheless the expansive urban areas embracing the coastal towns have historically been the source of the vast majority of housing completions on unidentified sites in the District, including a substantial proportion on sites of more and less than 5 units net. On this basis the Urban Areas represent broad areas likely to continue to yield significant new housing alongside that yielded from individually assessed sites. The Council believes the only reasonable and manageable means of assessing potential from this area is by considering the context of their historic rates of delivery and the rate at which this may continue. On this basis there would be no duplication between capacity of the broad urban area and windfalls from that source as they are in effect only dealt with in the latter context.

As shown above windfall sites (having overall capacity of 5 or more dwellings net) contributed an average 270 dwelling completions per annum (812/3). However, as the SHLAA aims to identify sites having potential capacity of 5 or more dwellings, some discounting is required from any projected additional windfall allowance to avoid duplication. It is estimated that about 36% of large site windfall completions were on sites that would unlikely be identifiable from the SHLAA process. (See Appendix 7c). This implies an annual average unidentified large site contribution of 97 p.a. ( $812 \times 36\% / 3 = 97$ ).

This allowance is further reduced to reflect a nominal assumption that the component of large windfall sites delivered by way of houses will remain constant but that the number delivered as flats will reduce by 66%. This additional discounting results in a conservative total allowance of 48 per annum. (Calculations are featured at Appendix 7)

Monitoring of larger windfall site completions show that sites are dispersed across the urban area of the Thanet towns broadly in proportion to the size of the town themselves. (For example a high proportion of large site windfall completions were in Margate and Ramsgate).

In addition, smaller unidentified sites can be expected to continue to come forward in the broad urban areas of the Thanet Towns at a similar rate from the conservative contribution projected for years 1 to 5.

On this basis the broad areas of the urban parts of the Thanet Towns are assumed to provide dwelling potential of 136 dwellings per annum (88 pa from small sites and 48 p.a. from larger sites) beyond the initial 5 year period.

### Empty Property

Thanet has a substantial stock of empty and vacant dwellings including a high proportion which have been vacant or empty for 6 months or more. While often difficult and resource intensive to achieve the Council continues to work vigorously to bring empty properties back into beneficial use. Empty property brought back into residential use can contribute to housing requirements where the previous use was not residential or where a larger number of residential units is delivered through re-use. Monitoring suggests that in recent years non-residential property alone

## Strategic Housing Land Availability Assessment – 2012 Update

brought back into use has provided an average of about 35 additional homes per annum. It also suggest that location of empty property brought back into use is spread across the urban part of the district but more concentrated in higher density areas such as Cliftonville and the inner suburbs of the town centres of Margate and Ramsgate

Properties that may be brought back into use to yield additional dwelling potential are typically difficult to identify in advance. However, such opportunities are likely to require planning permission and thus past windfall allowances should already reflect previous delivery from this source. On this basis no separate allowance is made for dwelling potential through re-use of empty property, as such allowance is assumed to be accounted for within the assumptions for potential associated with windfall and broad areas as above.

## 10 Results and Conclusions

**The SHLAA indicates that potential supply is sufficient to meet the total target housing requirement.**

The table below summarises the overall estimated housing potential for the period 2011 to 2031 and beyond. Sources include potential capacity from specific sites assessed using the SHLAA methodology, forecast contributions from windfall sites and actual dwelling completions between 1/4/2011 and 31/3/2012.

### Potential Housing Capacity - Summary table

Source of housing potential	2011-2016	2016-2021	2021-2026	2026-2031	Post 2031	Grand total
Completed between 2011 and 2012 (study base date)	320					320
Urban capacity audit	106	12	124	97	88	427
2006 Local Plan allocations	339	307	280	280	6	1212
Sites with Planning permission (residual)	606	451	185	11	7	1260
Sites with planning permission (new)	564	10	0	0	0	574
Council owned sites with development potential	24	86	33	0	20	163
Potential regeneration sites	16	12	80	59	0	167
Landowner/developer submissions (call 1)	348	2960	1398	509	1116	6331
Owner/developer submissions (call 2)	0	91	47	45	213	396
Owner/developer submissions (call 3)	970	14	0	18	0	1002
Owner/developer submissions supplemental	0	1558	0	0	0	1558
Green Wedge (early calls)	0	945	320	250	0	1515
Green Wedge (2013 call)	135	110	0	0	0	245
Employment land (from 2010 EL review)	0	0	0	0	321	321
Employment land (from 2013 EL review)	630	0	0	0	0	630
Rural Area sites (all calls)	44	3452	122	8	42	3668
Small sites	200					200
Small windfall sites ( <i>note 1</i> )	240					240
Broad area windfall contribution		680	680	680		2040
GRAND TOTAL	4542	10688	3269	1957	1813	22269
GRAND TOTAL TO 2031	4542	10688	3269	1957		20456

#### Notes

(1) assumes 88 per annum but deducting extant small site capacity to avoid duplication.

**The SHLAA indicates that potential supply is sufficient to meet the target housing requirement across the Plan period.**

The target housing requirement applied at the time of undertaking this SHLAA update was 12,000 net additional dwellings over the 20 year period to 2031. The SHLAA aimed to identify more than sufficient capacity to allow a degree of choice and acknowledging that even where sites appear deliverable/developable there is a risk that they will not come forward.

## Strategic Housing Land Availability Assessment – 2012 Update

In seeking to identify more than sufficient potential the process involved taking a hard look at all potentially sustainable options. This has included assessing some sites involving very significant tensions with local policy. It will be for the Local Plan process to identify the most suitable sites to meet requirements drawing upon the information provided by the SHLAA.

The table below shows that potential capacity is sufficient to meet the cumulative target housing requirement over all periods within the Plan period.

### Potential supply against requirement (cumulative)

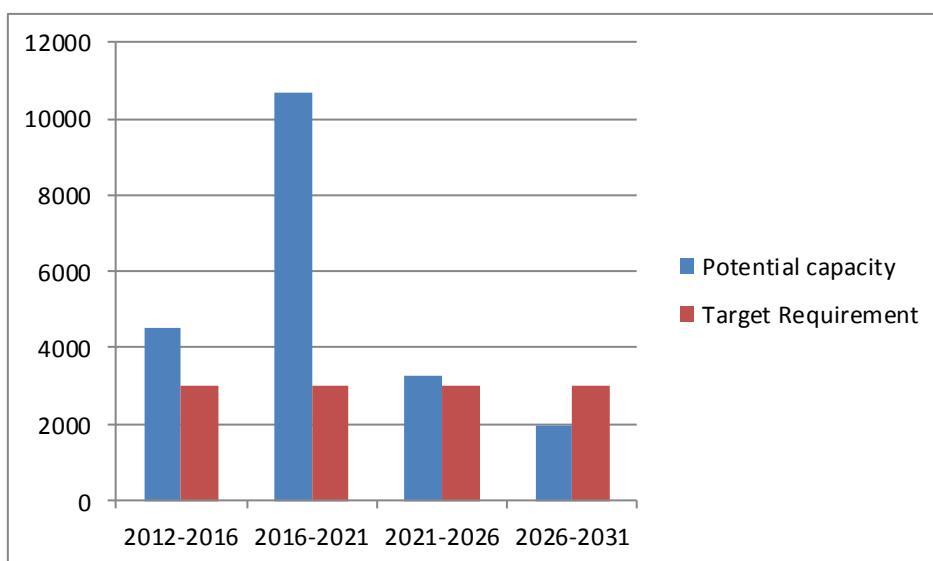
	2011-2016	2016-2021	2021-2026	2026-2031	Total
Target requirement	3000	6000	9000	12000	12,000
Potential	4542	15230	18499	20456	20,456

Planned provision will be set at a lower level than the potential supply with appropriate sites subsequently identified through the plan making process. In these circumstances the figures shown in the table represent “unconstrained” potential capacity.

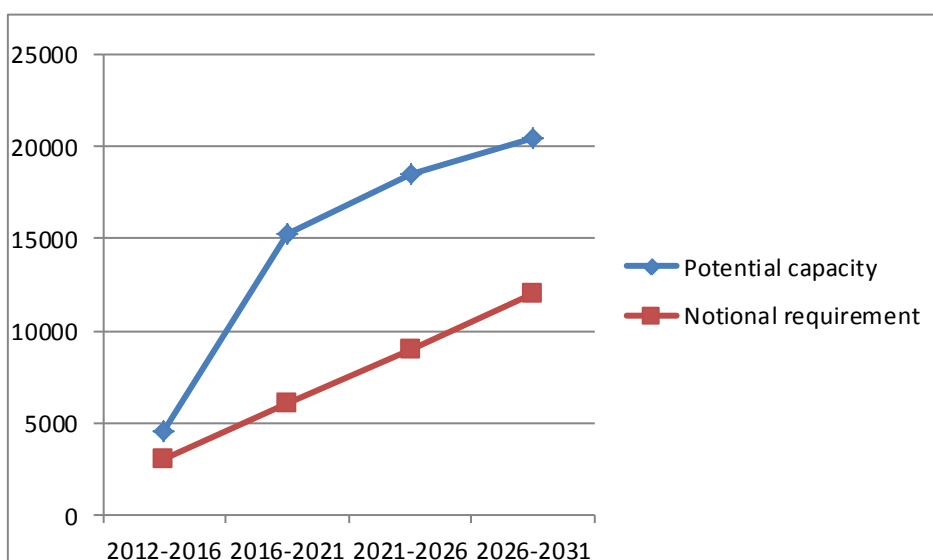
## Indicative Trajectory

The following table and chart illustrate the relationship of the potential requirement and unconstrained potential over the period to 2031.

	2012-2016	2016-2021	2021-2026	2026-2031	Post 2031	Grand total
Potential capacity	4542	10688	3269	1957	1813	22259
Notional requirement	3,000	3,000	3,000	3,000	n/a	12,000
Potential v requirement	+ 1539	+7688	+262	-1043		



The chart below shows the cumulative relationship of unconstrained potential alongside the target requirement. It indicates that potential exceeds the target across all periods to 2031.





## Risk Assessment

The underlying philosophy of the assessment process applied in this SHLAA has been to consider whether there is a reasonable prospect that housing potential can be realised. In some instances assessment has revealed that certain conditions need to be met before potential can be realised (for example the need to investigate/clean up contaminated land, or to acquire land from a third party to achieve access). These conditions have been recorded, and judgement has then been applied as to their nature. Where such conditions are considered sufficiently significant, assessed potential has been discounted or deferred proportionately. Where necessary, further investigation/ consideration of recorded constraints would be applied to inform ultimate achievability and suitability for allocation as part of the plan making process.

Members of the stakeholder partnership have been given the opportunity to comment on preliminary site assessments, culminating in a specific workshop where application of the assessment process and draft results were debated.

Representations from the workshop have resulted in application of lower density benchmarks on larger sites. An issue was also raised questioning whether in the current economic climate any housing development on previously developed land would be feasible over the next five years. Subsequent monitoring has revealed that during the period 2007/8 to 2011/12 (including one of recession) the proportion of new homes delivered on previously developed land was still substantial, 93% and 98% respectively. The Council considers that the overall findings of this SHLAA are as robust as reasonably possible in current economic circumstances and uncertainties. The overall rate of dwelling completions including the proportion on previously developed land will continue to be monitored annually.

It would be beyond the Council's resources to have applied exhaustive evaluations and viability assessments to the large number of sites in the SHLAA pool. However, the SHLAA review has been informed by a stakeholder viability workshop. In addition a separate independent viability assessment will be applied in assessing the deliverability of options for future housing allocations drawing on the information provided by this SHLAA and other relevant evidence.

The SHLAA has shown that housing potential exceeds the nominal benchmark target applied, and in these circumstances no re-iteration or further assessment is considered necessary at the present time.

## Reviewing the Assessment

The number of homes delivered will continue to be monitored annually through the Council's established monitoring process, in particular to assess the availability of a rolling 5 year land supply. A Housing Implementation Strategy will set out the Council's approach to managing the delivery of housing land including, where necessary, actions that may be required to support delivery or maintain an adequate land supply.

The Assessment will be subject to more substantial review at such time as this is required to assess availability of housing land over the longer term.

# Appendices

- 1 Maps showing locations of SHLAA sites**
- 2 Site assessment results table**
- 3 List of non-assessed (reserve list) sites**
- 4 Maps showing sites requested for consideration by landowners/developers**
- 5 Method of estimating potential of small identified sites.**
- 6 List of small identified sites (appendix 5 refers)**
- 7 Windfall Site Information**
- 8 Site assessment process**
- 9 Site survey form.**
- 10 Using the Assessment to Inform Plan Making.**
- 11 Summary of Partnership Participation**
- 12 References**

## **APPENDIX 1**

**The following maps show the location of sites included in the SHLAA pool.**

**Sites shown in light brown were assessed for potential dwelling capacity. These sites are also featured in Appendix 2 which shows estimated dwelling potential (dwelling units), notional delivery period and any potential constraints which may need to be overcome.**

**Sites and areas shown in outline and uncoloured were not subject to assessment but placed on a reserve list. (Please refer to the section of the main report referring to screening criteria). The sites are listed in Appendix 4**

**Site reference numbers are featured as a cross reference between the maps and the relevant lists.**

### **Important note**

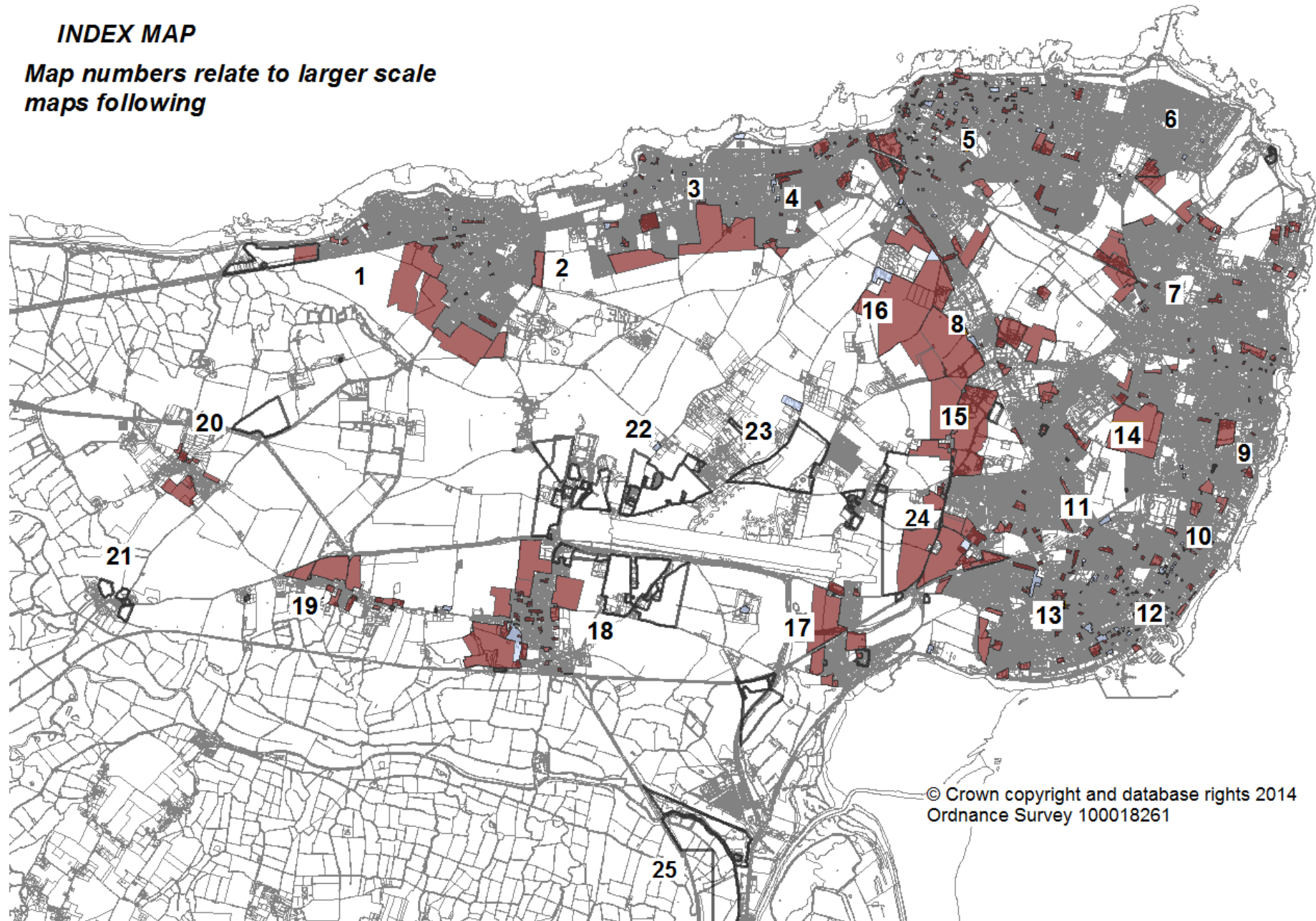
**The maps are currently subject to further checking. It is therefore important to first refer to the list of sites (which follow these maps) to confirm whether particular sites were assessed or placed on the reserve list.**

**As sites sometimes overlap, because sometimes sites can be merged and because subsequent submissions may result in boundary changes, the maps should be treated as being for general identification only.**

**A few sites (featured in pale blue) identified in the previous SHLAA but not carried forward in this 2013 review (e.g. because built out before the review base date) may still show on the maps. Such sites (not featured in the lists at Appendix 2 or 3) do not form part of this SHLAA review.**

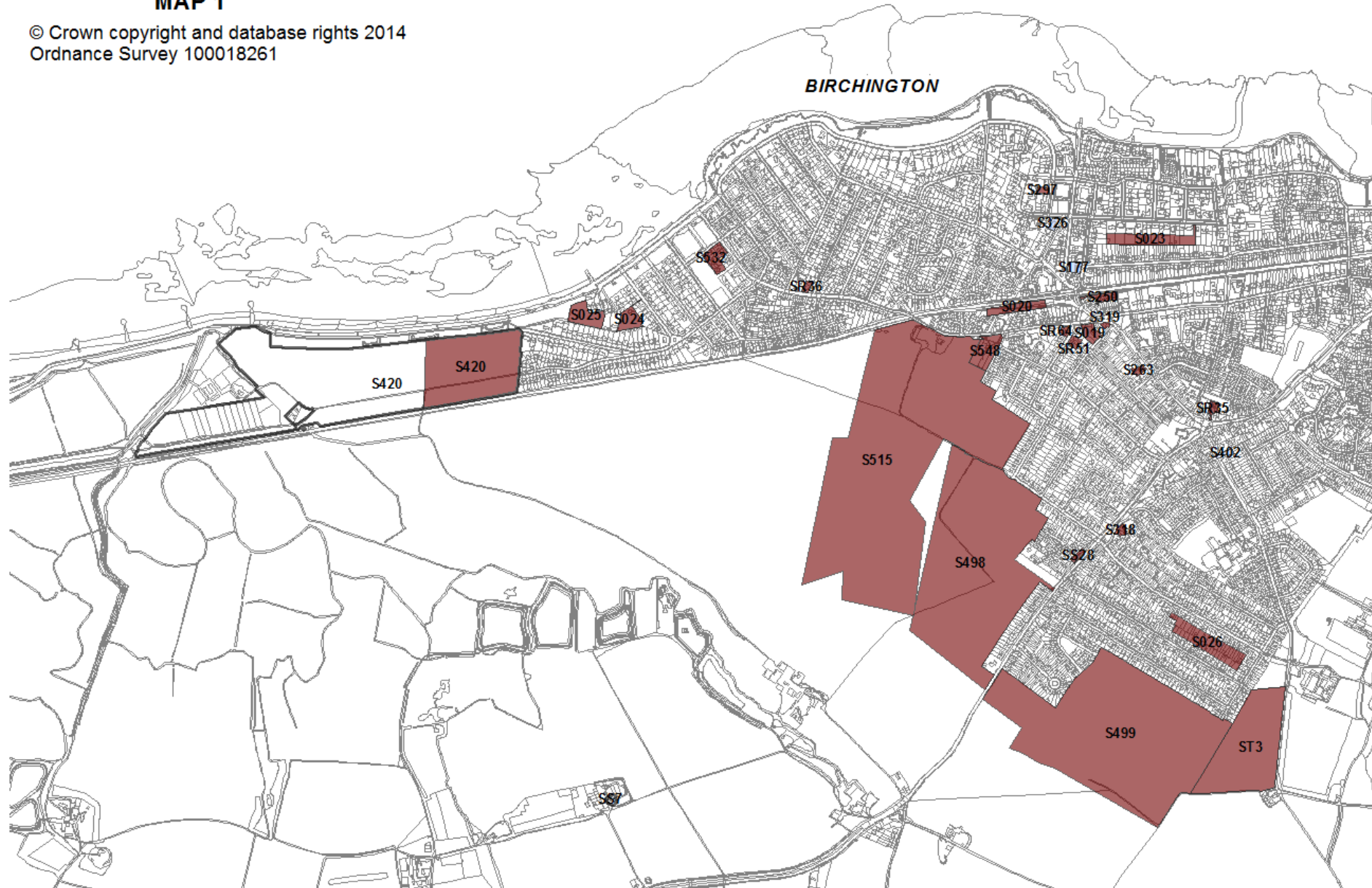
**INDEX MAP**

**Map numbers relate to larger scale maps following**



**MAP 1**

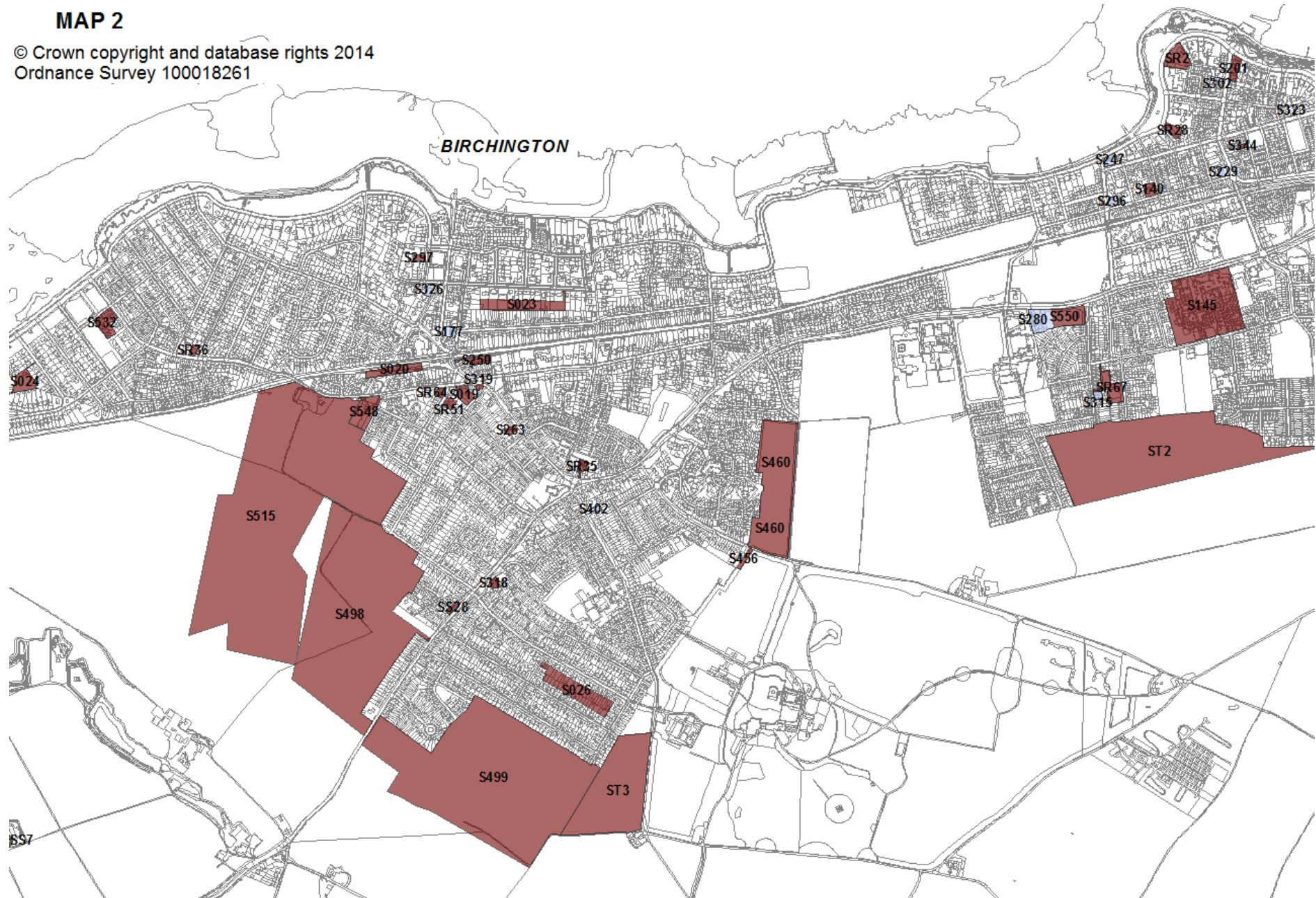
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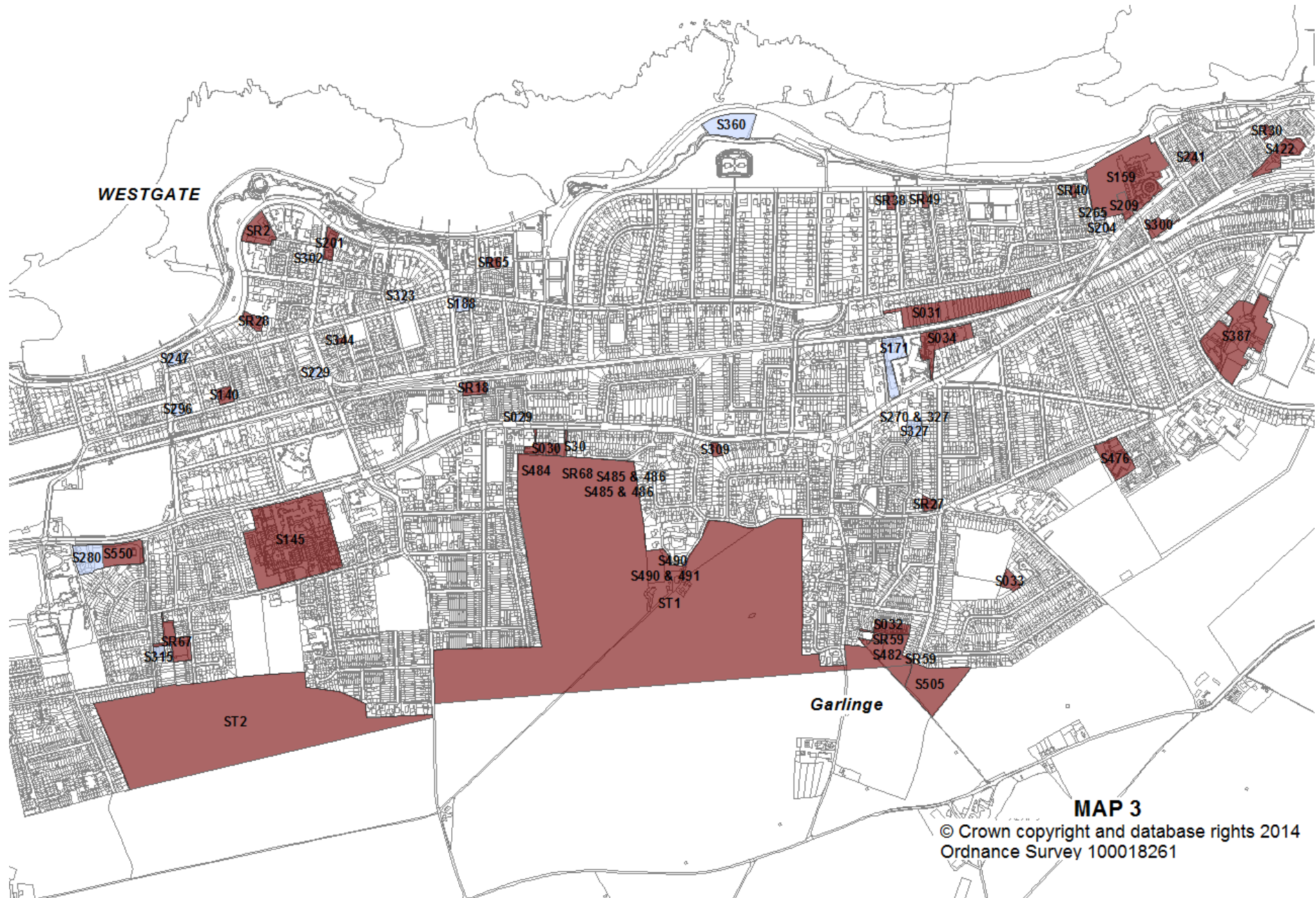


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## MAP 2

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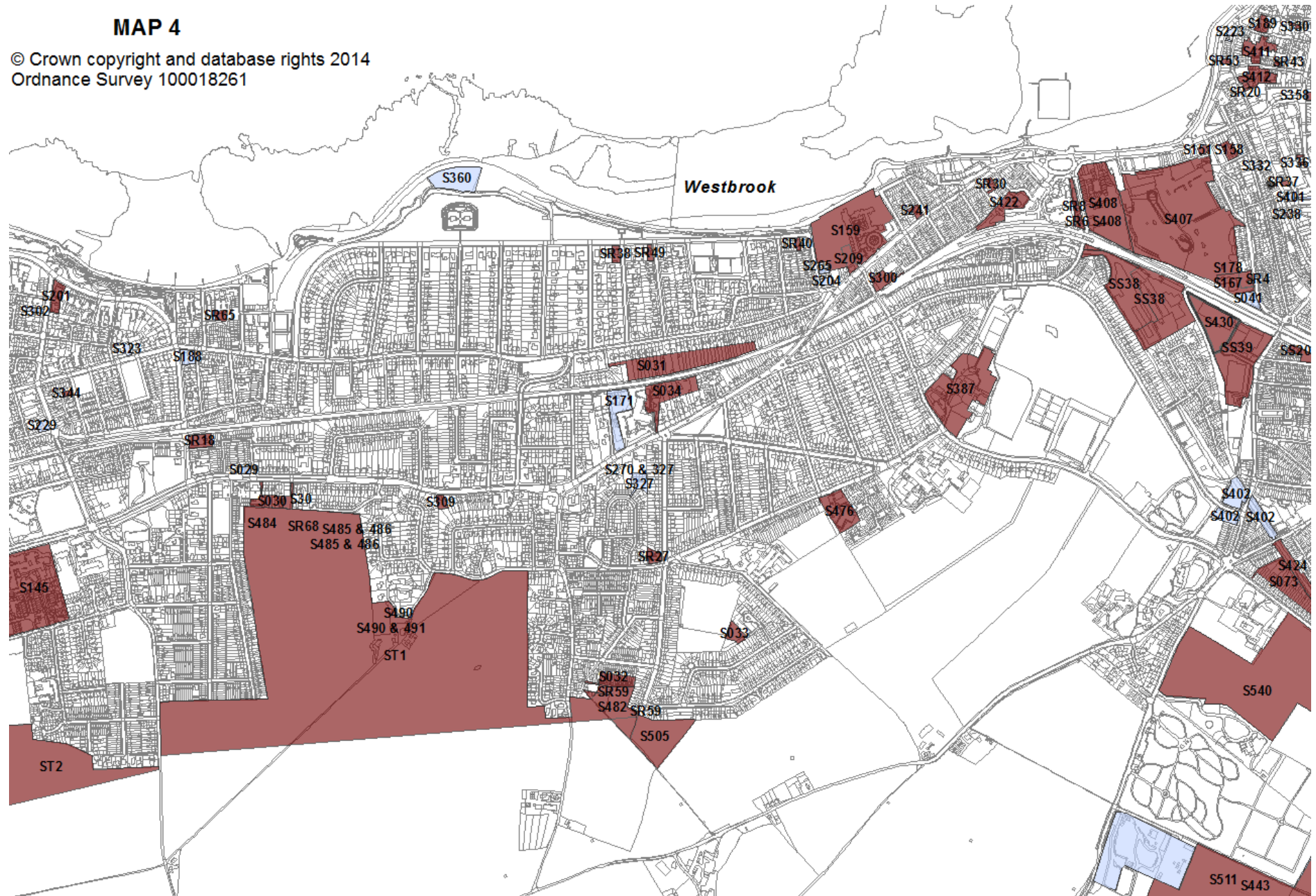




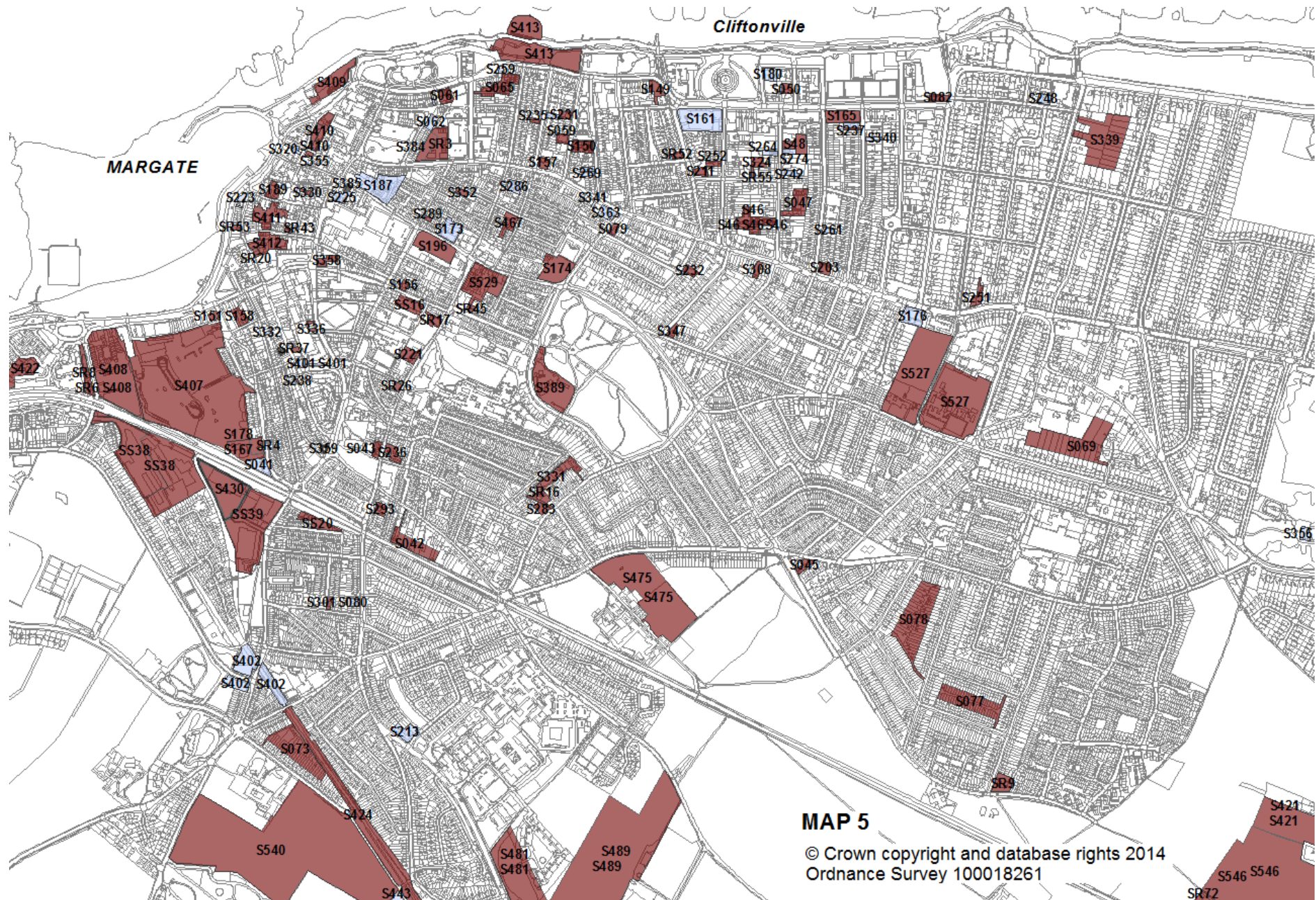
# Strategic Housing Land Availability Assessment – 2012 Update

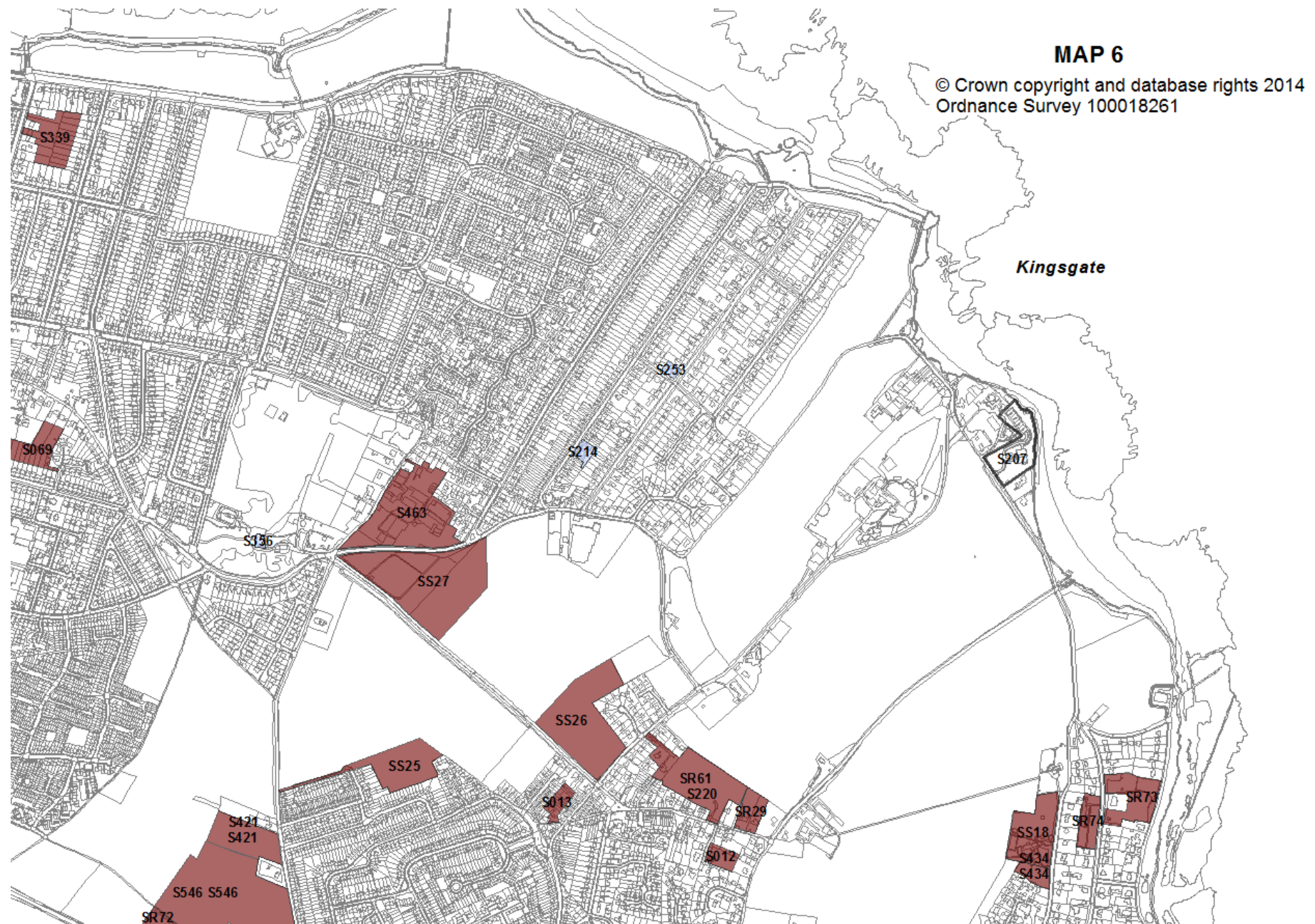
## MAP 4

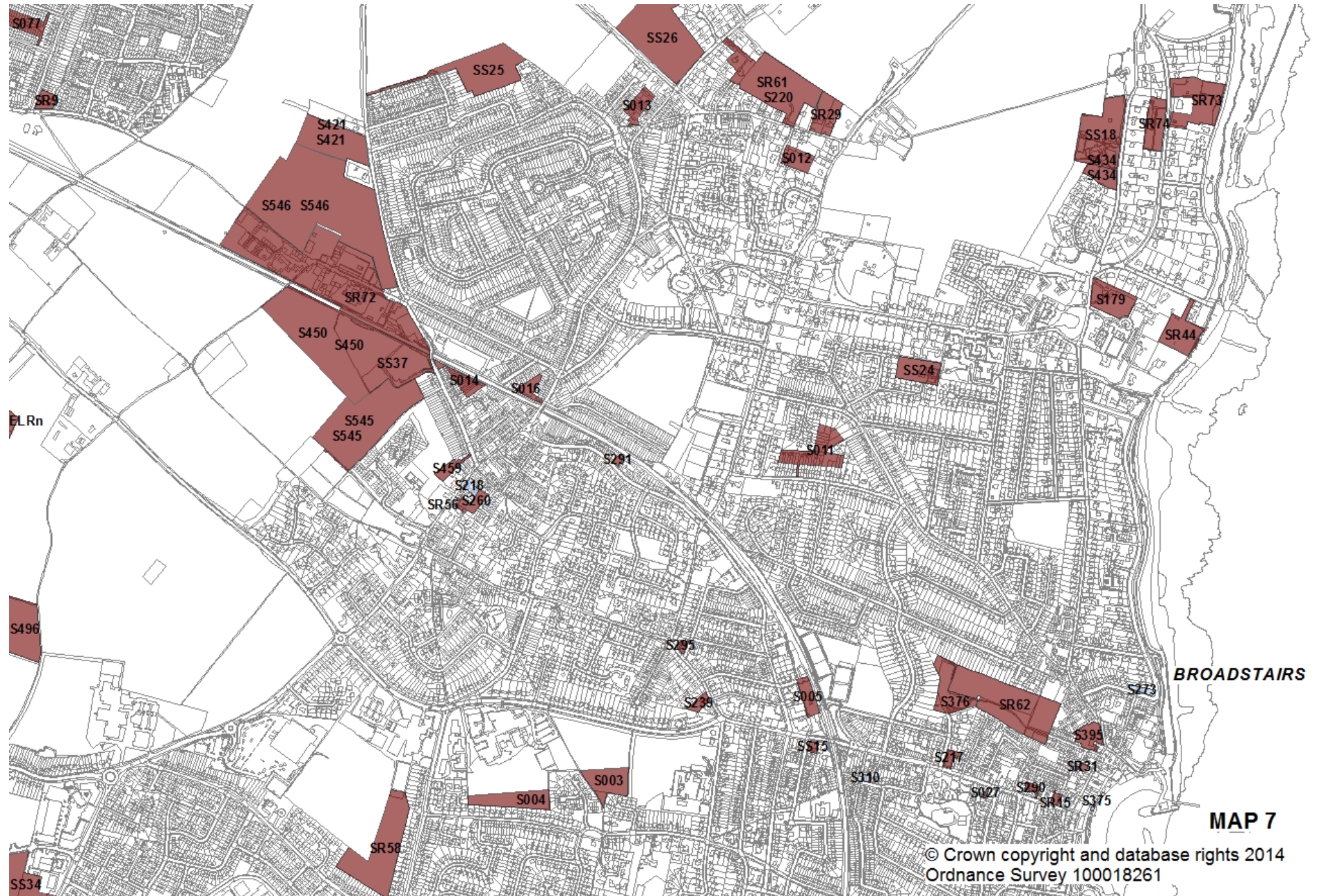
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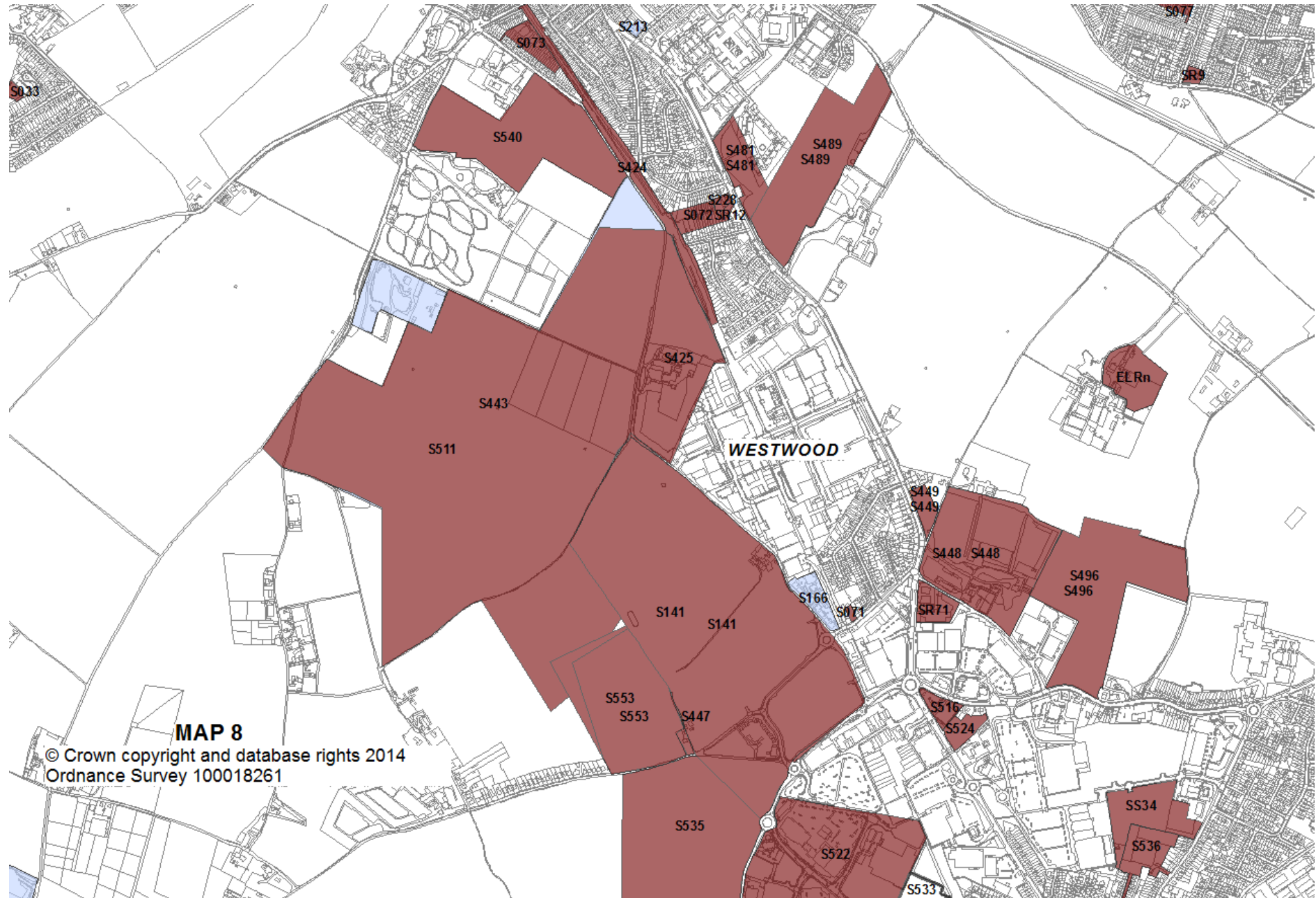






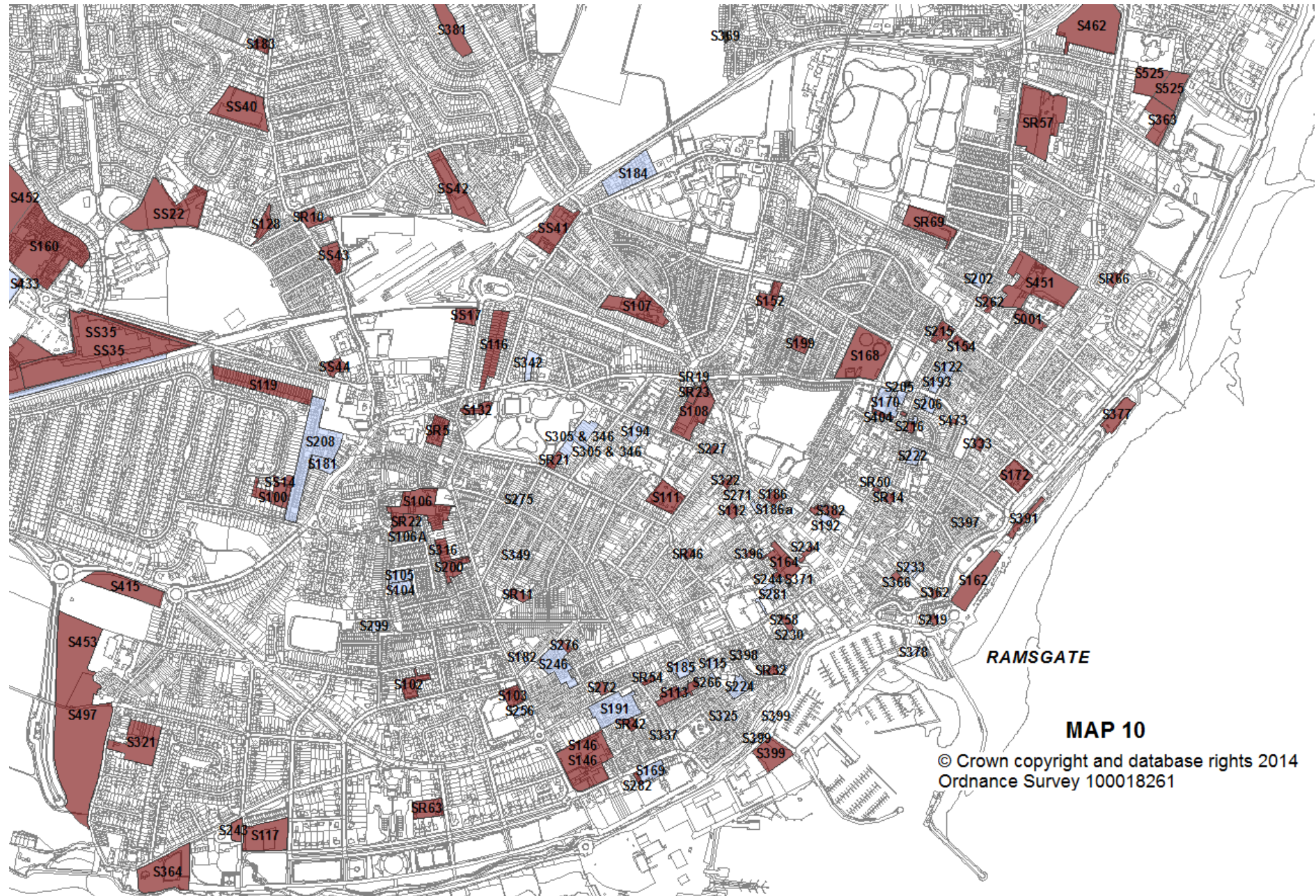


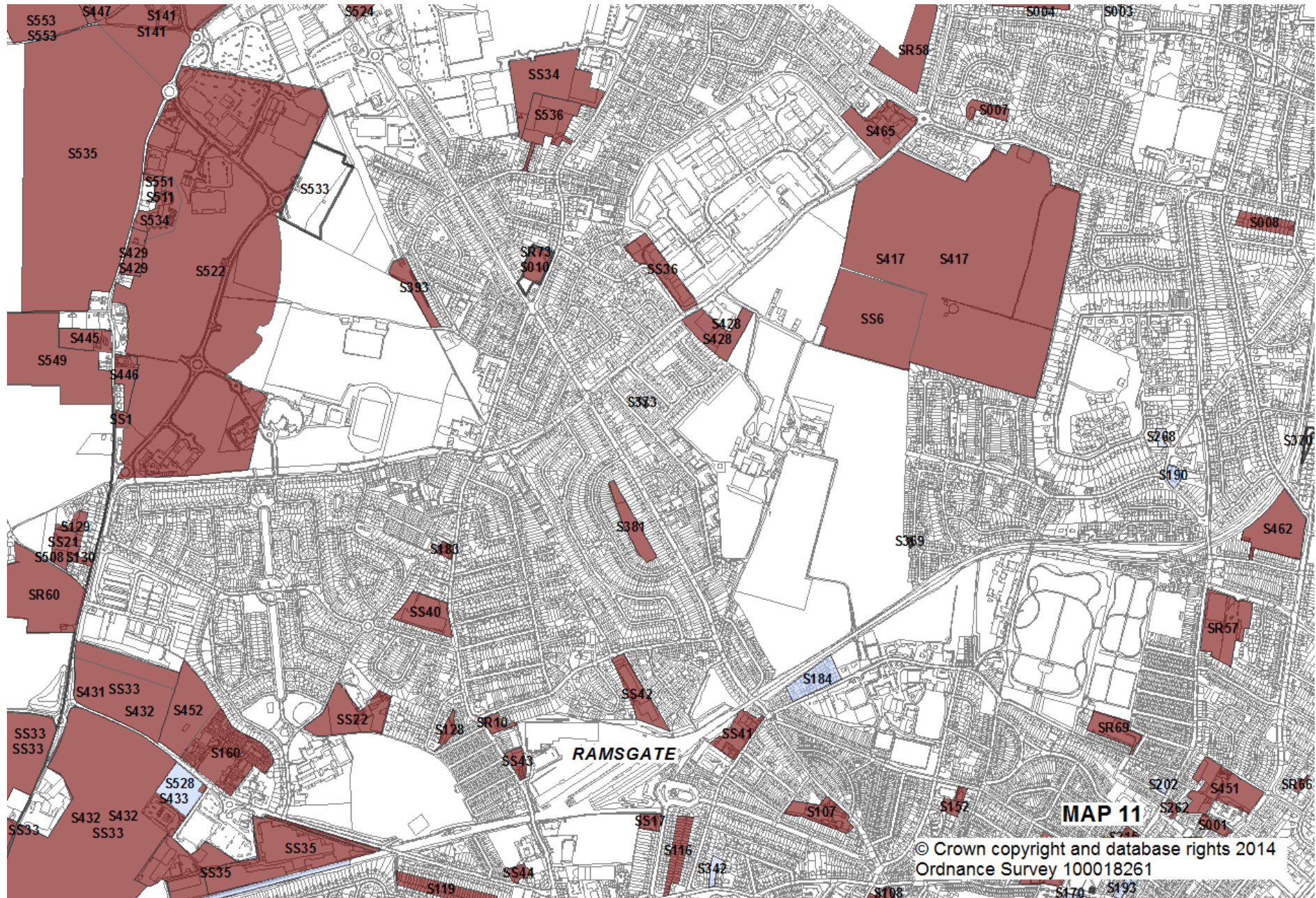






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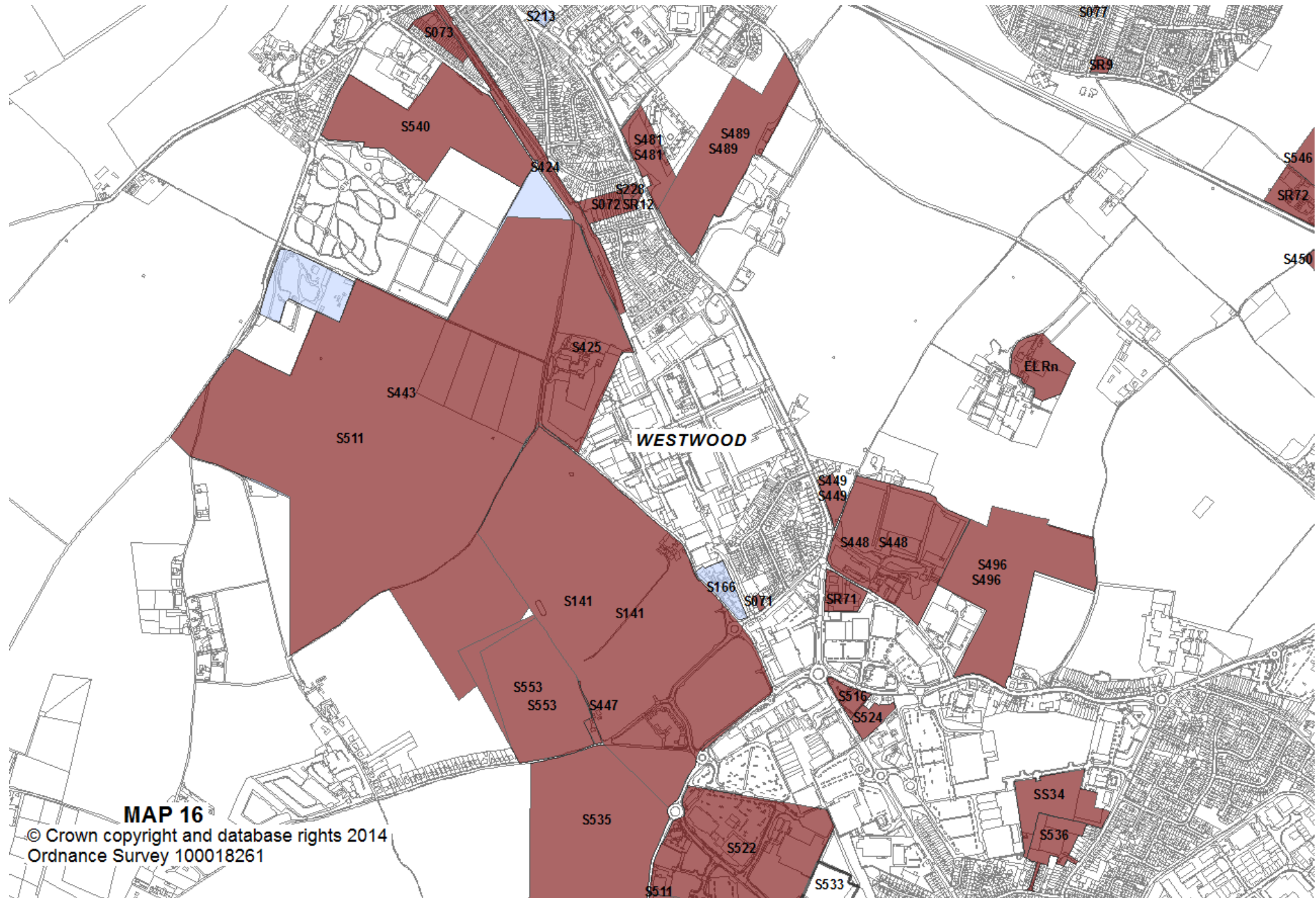






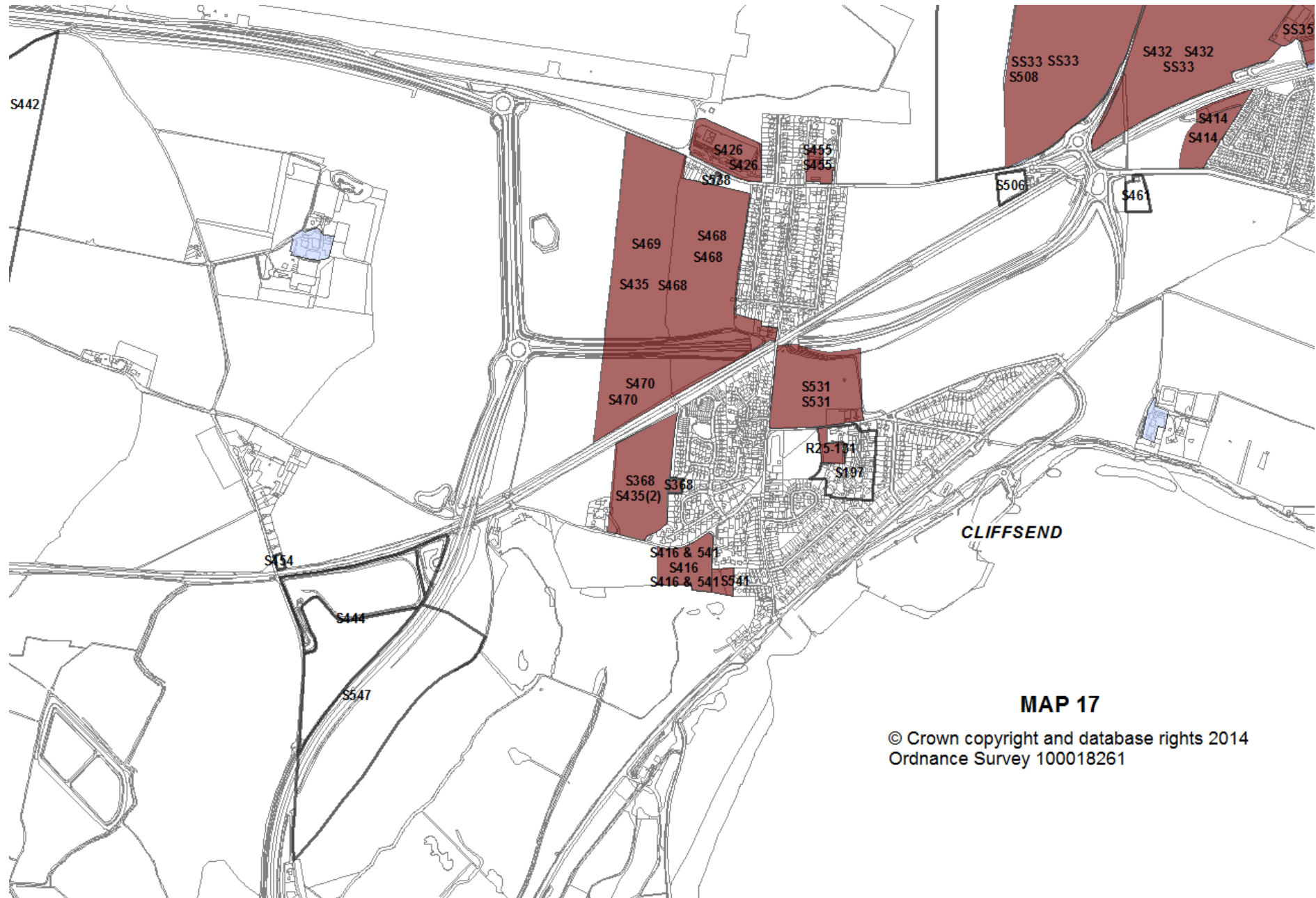






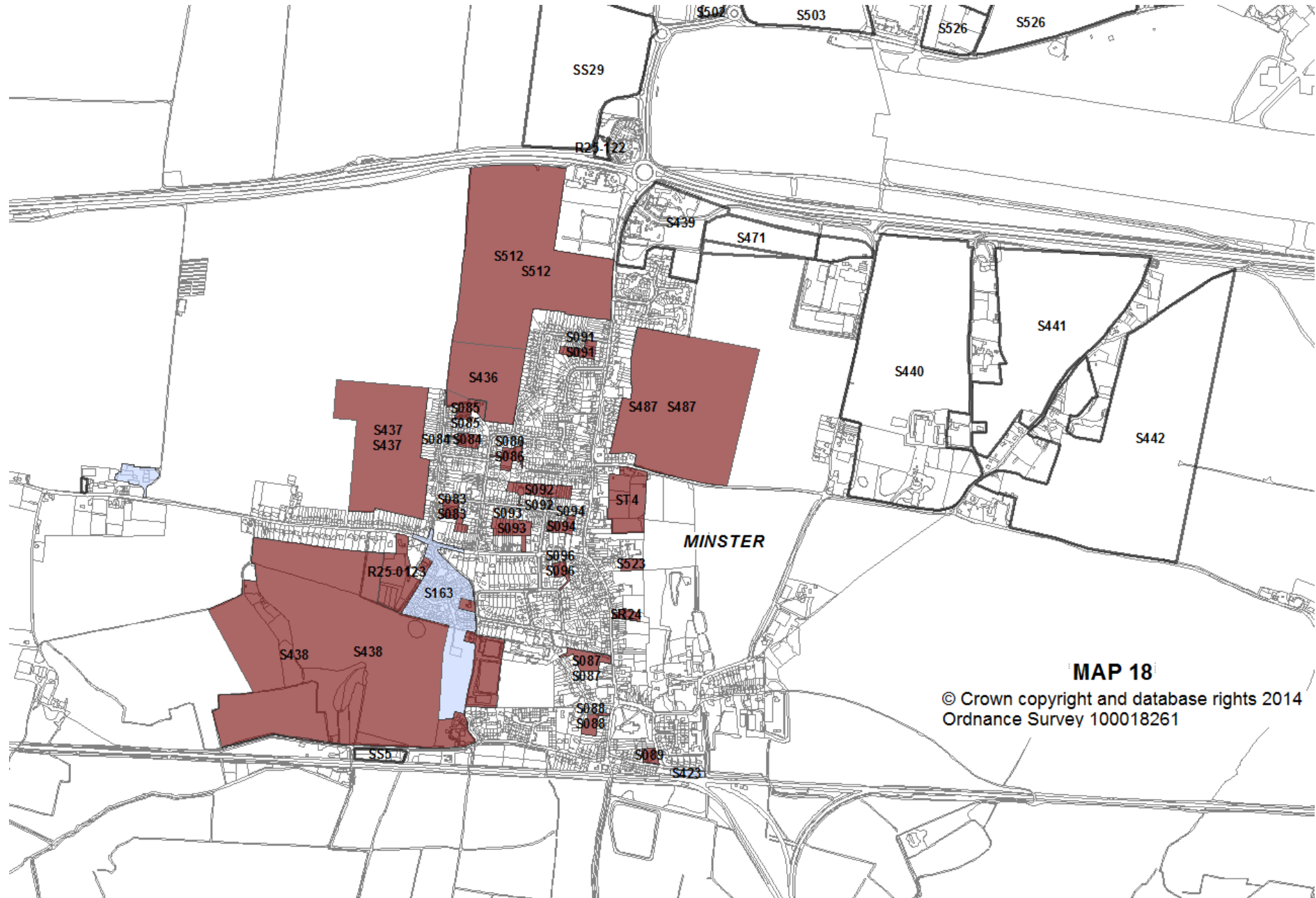
**MAP 16**

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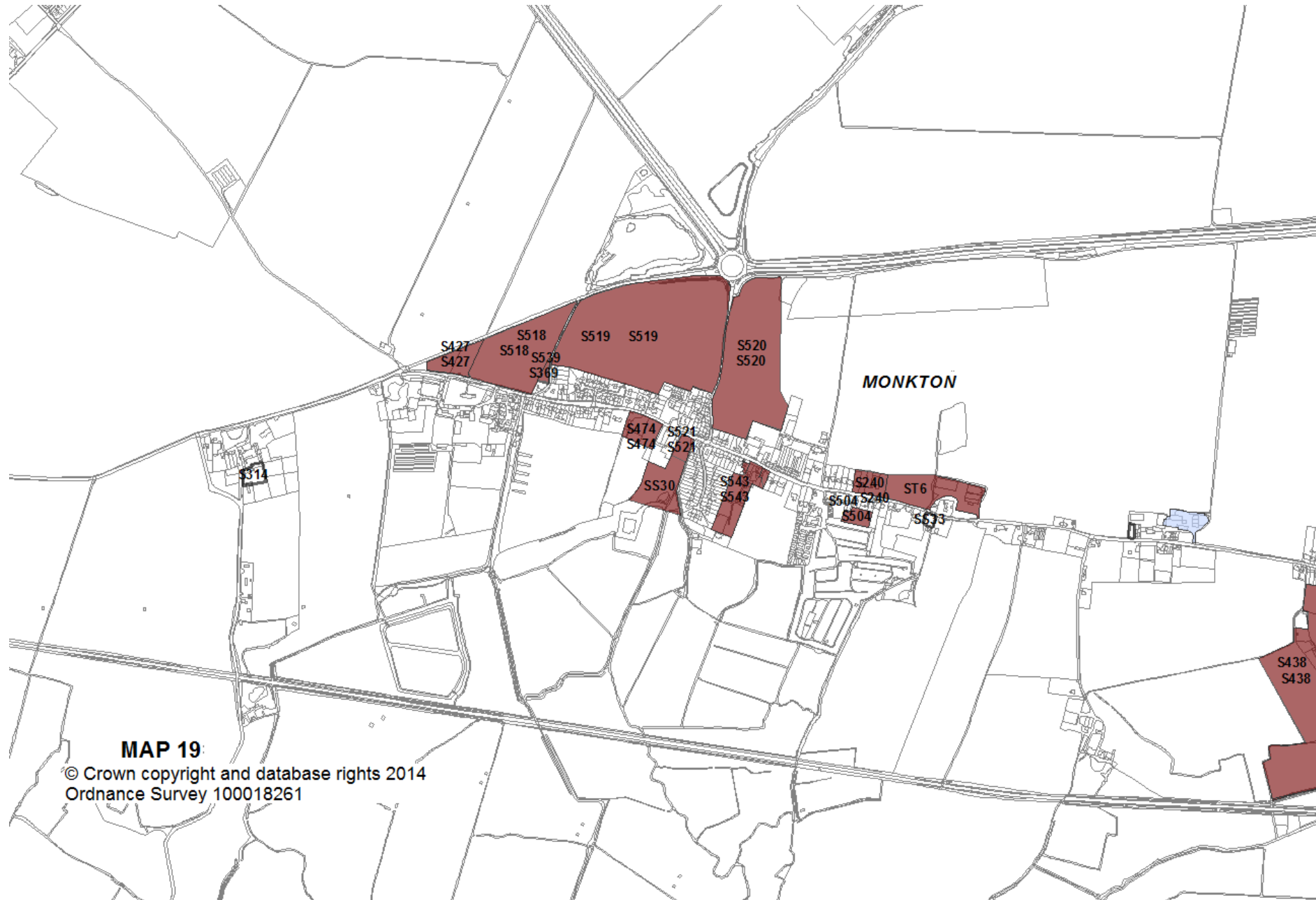
**MAP 17**

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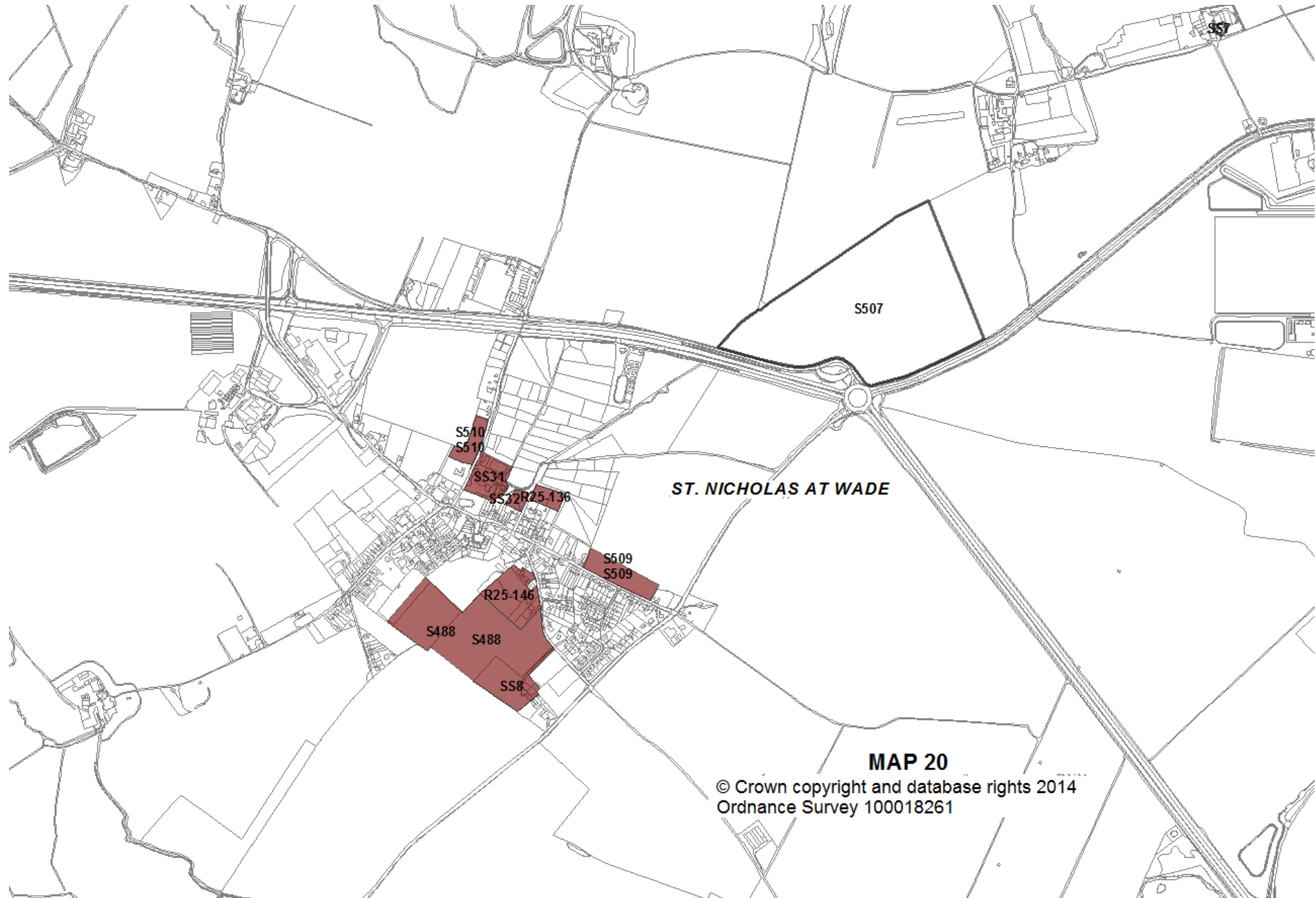
**MAP 18**

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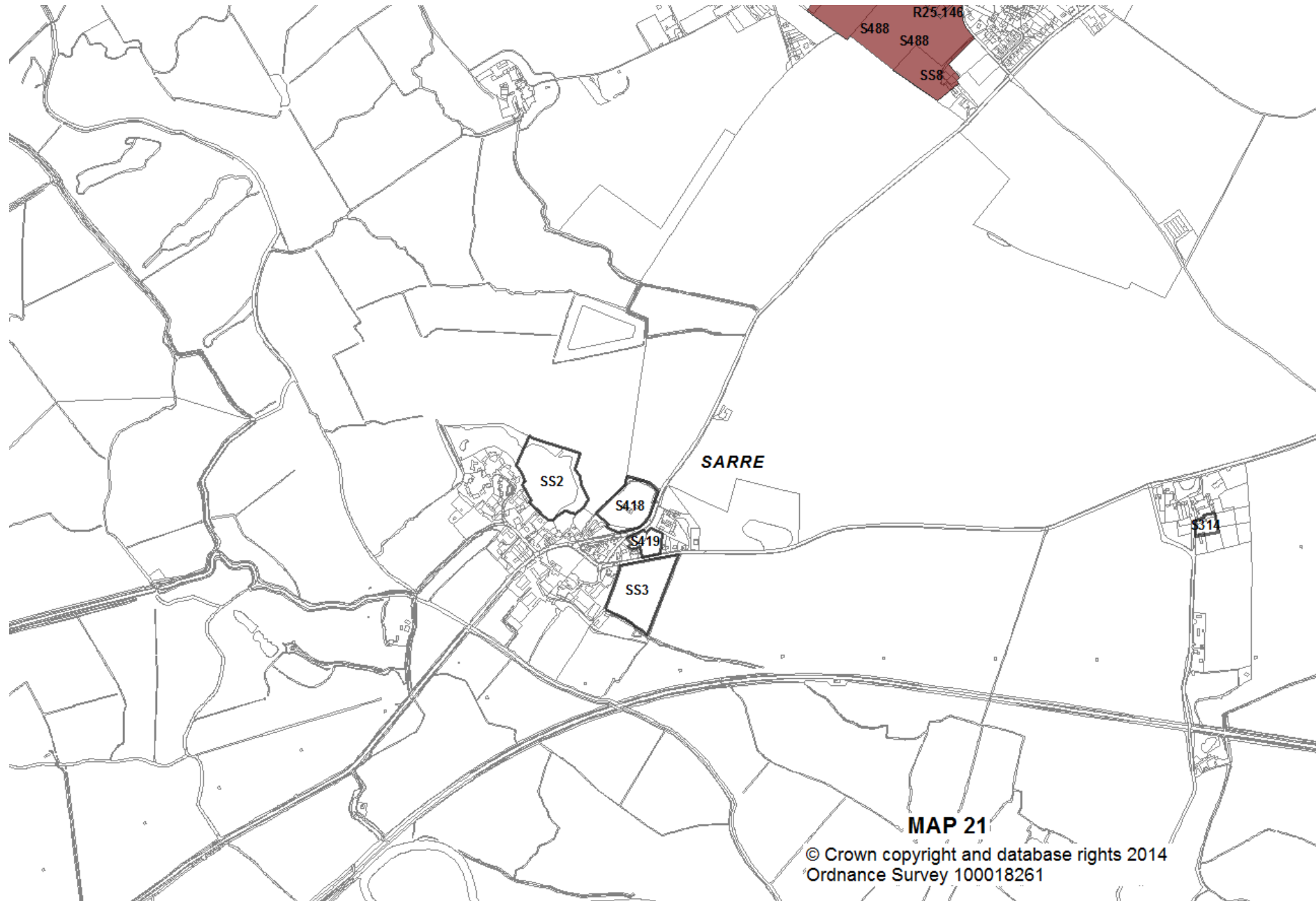


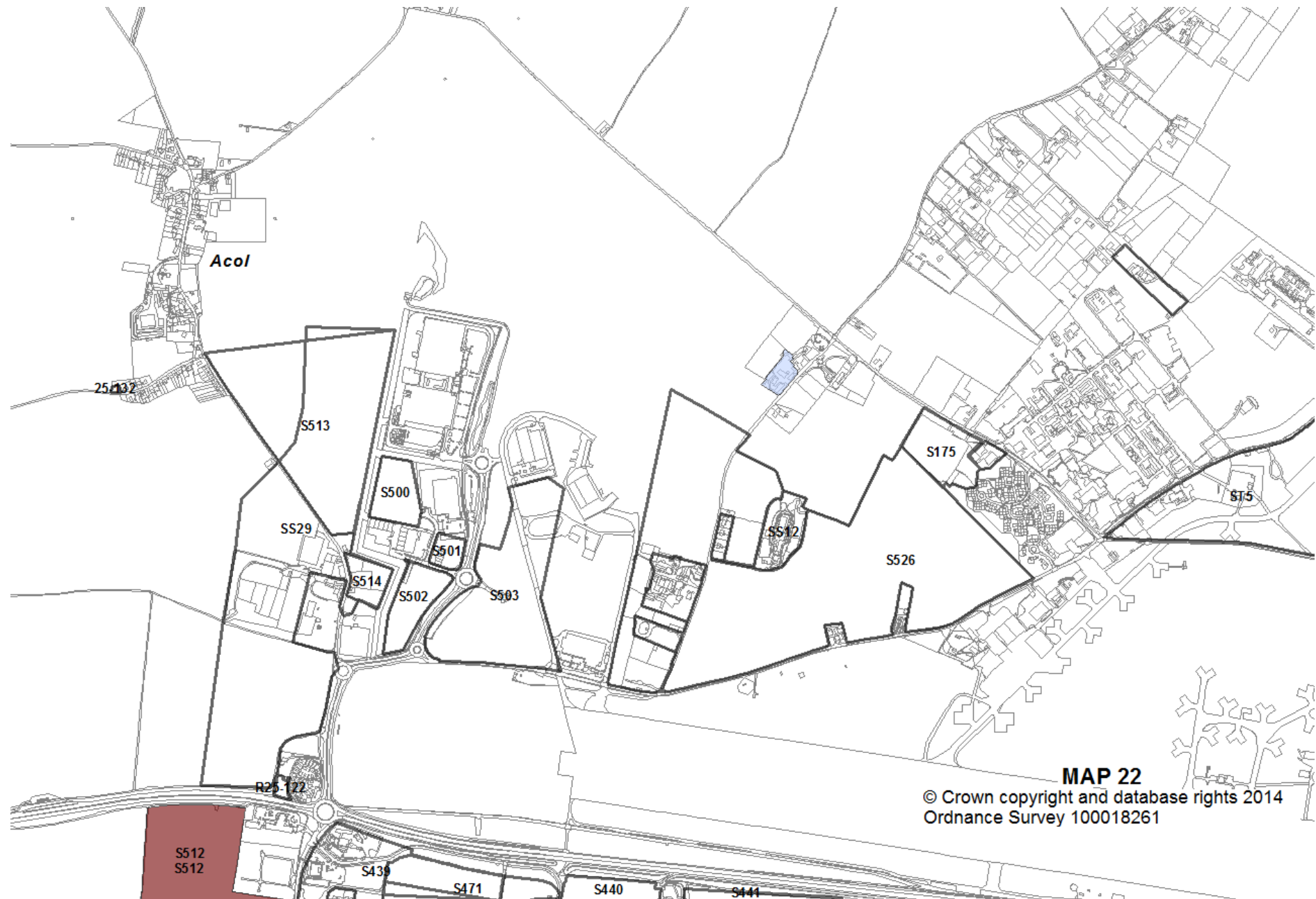
**MAP 19**

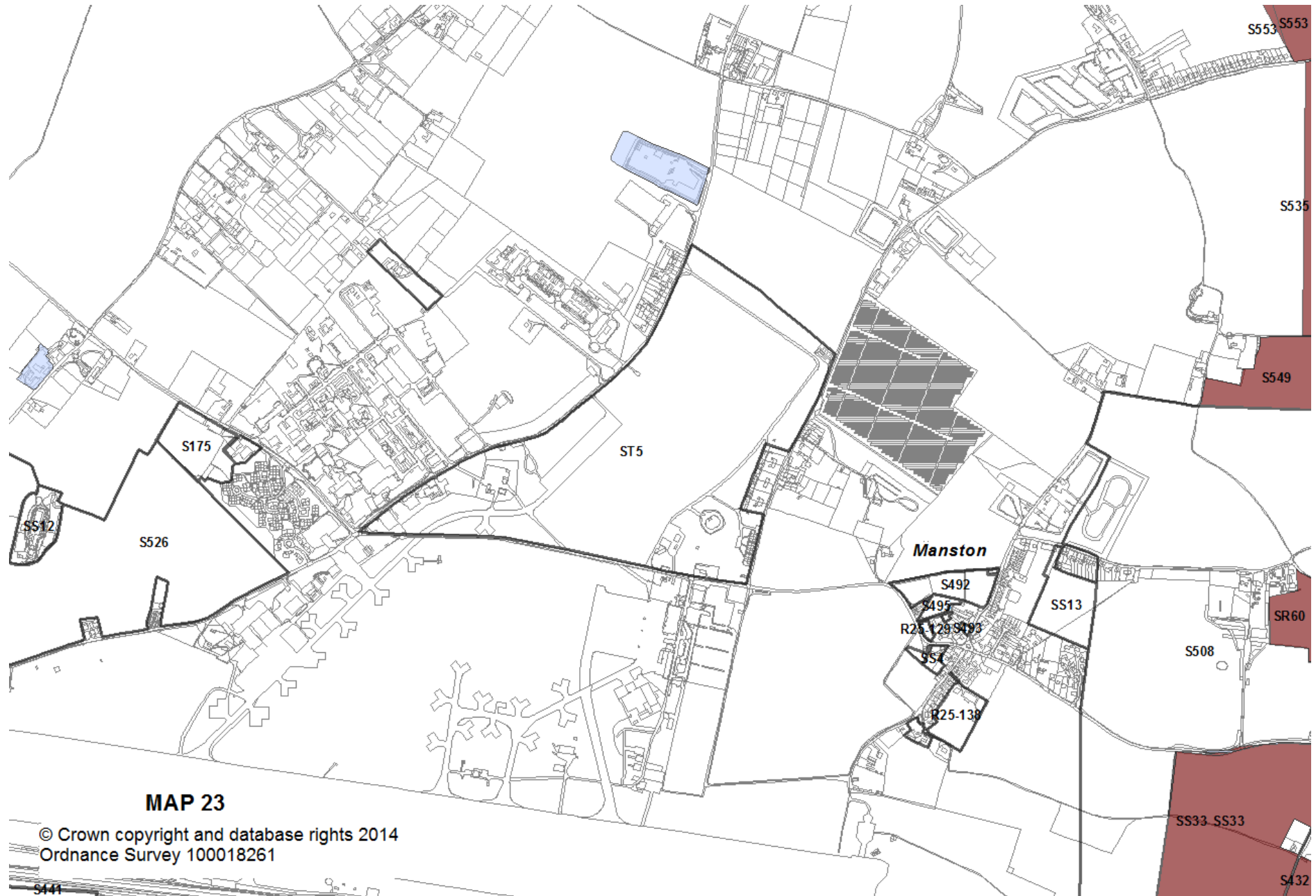
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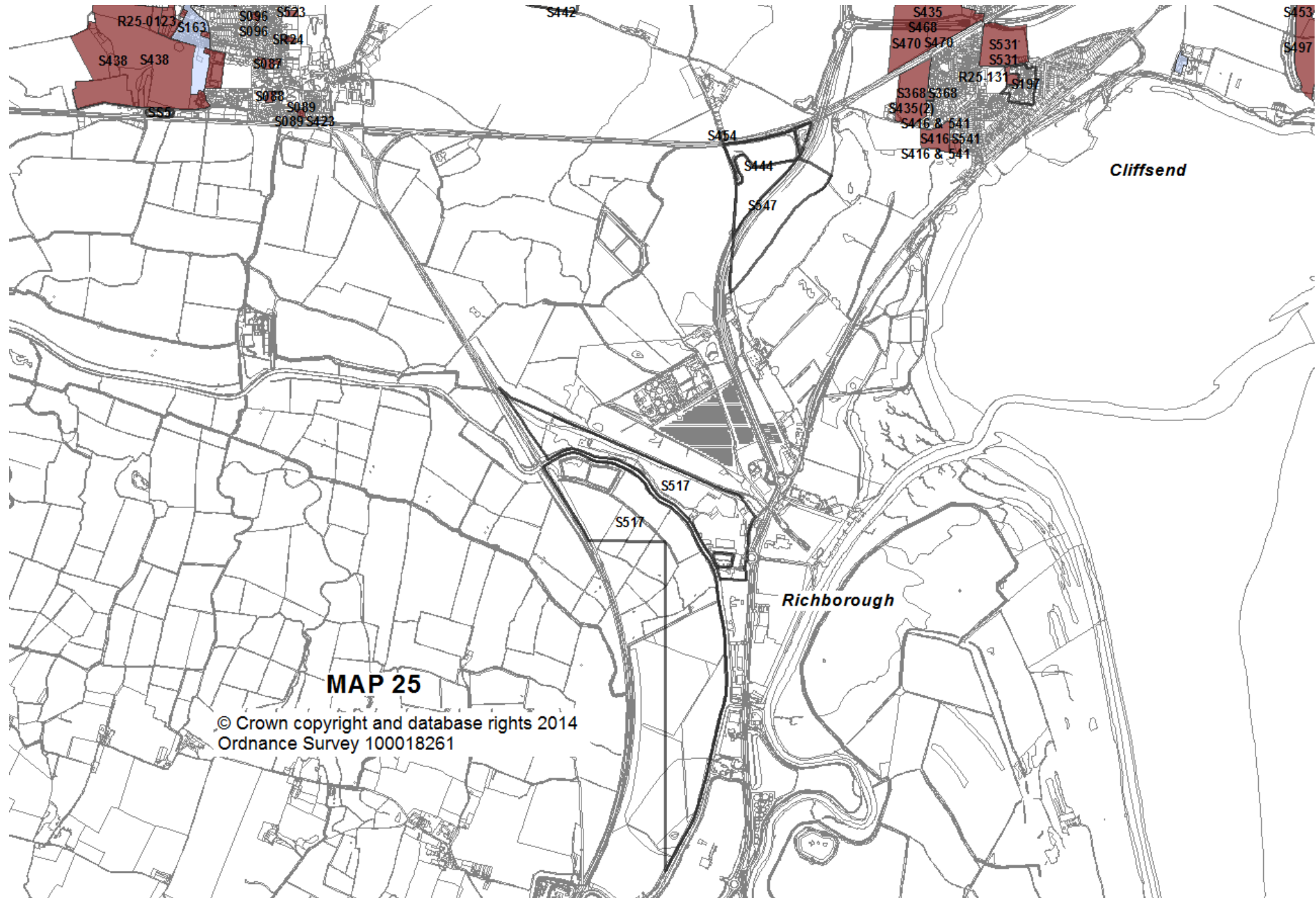












## APPENDIX 2

The following list features sites which were subject to assessment in the SHLAA. The site references shown cross refer to the maps. Each site is scored 1 to 4 for suitability, availability and achievability; score 4 being most favourable. The columns marked “Total achievable potential (dwellings)” shows estimated dwelling unit potential for each site by notional delivery period. The columns further right illustrate where possible the notional split of total capacity by houses/flats.

The lists are presented in order of the source of information that led to the sites being included.

**content of Appendix to be provided via separate link**

## APPENDIX 3

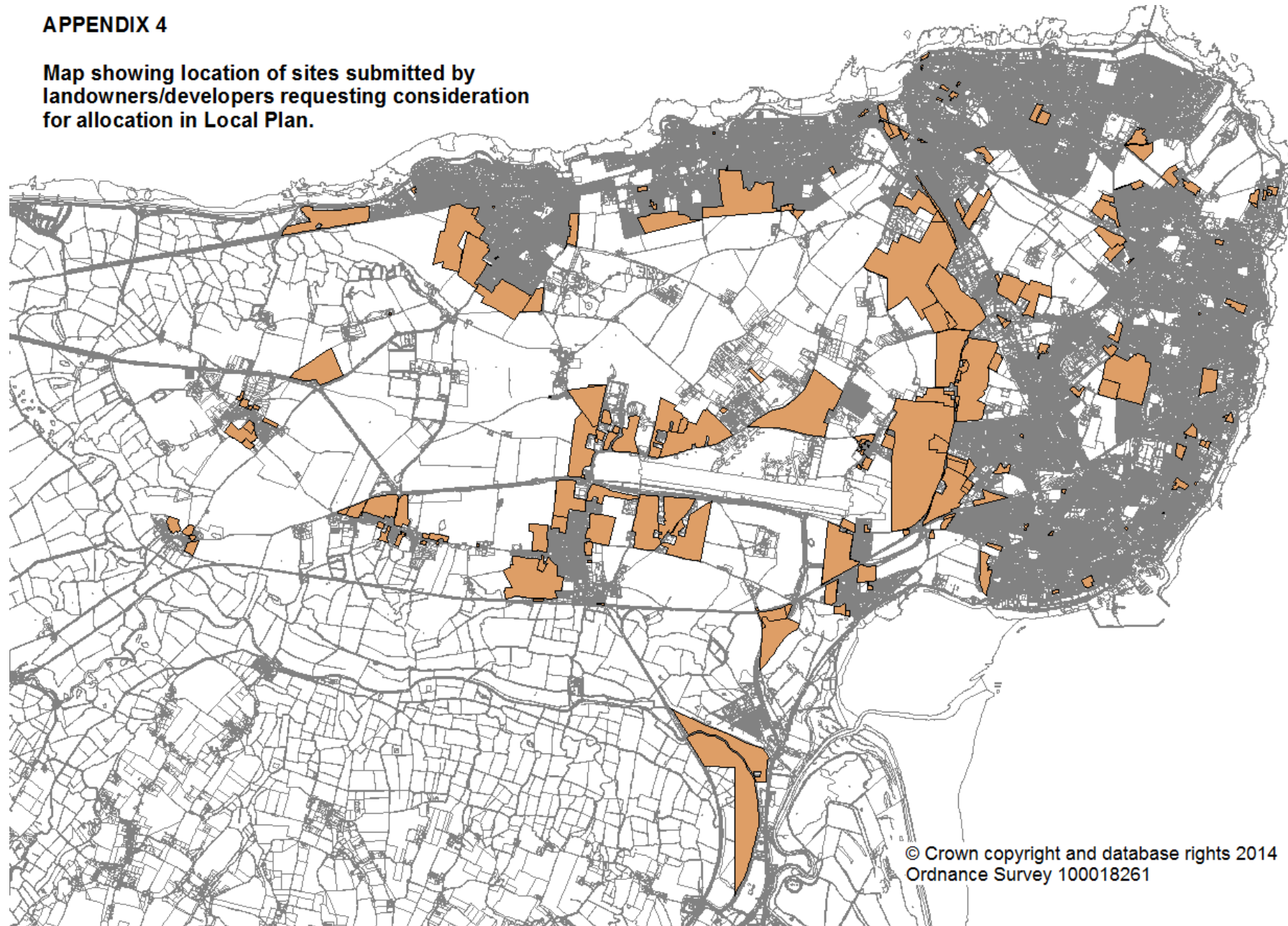
The following list features “Reserve list” sites. These are sites which did not meet the initial SHLAA screening criteria and were not to subject to assessment in the SHLAA. The list outlines the reasons the sites were not subject to assessment.

The sites/areas are shown with a heavy outline and unshaded on the map at Appendix 1.

**content of Appendix to be provided via separate link**

**APPENDIX 4**

**Map showing location of sites submitted by landowners/developers requesting consideration for allocation in Local Plan.**





## **APPENDIX 5 METHOD OF ESTIMATING POTENTIAL OF SMALL IDENTIFIED SITES.**

Potential from small identified sites has been estimated from the 2013 Housing Information Audit which includes anticipated date of delivery of dwelling units. Potential has been estimated using the following steps.

- 1) Identify all sites with planning permission for residential where between 1 and 4 units remain to be delivered.
- 2) Remove any site where the original capacity was for 5 or more units
- 3) Sum remaining units to give grand total and total by individual year of expected delivery

This list is featured at Appendix 6

**APPENDIX 6 - LIST OF SMALL IDENTIFIED SITES REFERRED TO IN APPENDIX 5**

Planning ref	Address	2013/4	2014/5	2015/6	2016/7	2017/8
TH100223	LAND REAR OF 7 QUEX VIEW ROAD, BIRCHINGTON	0	1	0	0	0
TH110570	72A STATION ROAD, BIRCHINGTON, CT7 9RA	0	3	0	0	0
TH110734	MAGWITCH COURT, ALEXANDRA ROAD, BROADSTAIRS, CT10 1EP	0	0	0	0	0
TH100159	Land Adj 2 Linden Avenue	1	0	0	0	0
TH100279	42 Albion Street, Broadstairs	0	0	0	1	0
TH100261	25-27 QUEEN STREET, RAMSGATE	3	0	0	0	0
TH110086	88 QUEEN STREET, RAMSGATE, CT11 9ER	1	0	0	0	0
TH110430	6 SION PASSAGE, RAMSGATE, CT11 9HQ	0	3	0	0	0
TH110754	1-2 WESTCLIFF WORKS, ADDINGTON PLACE, RAMSGATE, CT11 9JG	0	1	0	0	0
TH110502	51 GRANGE ROAD, RAMSGATE, CT11 9LR	0	3	0	0	0
TH100797	107 LONDON ROAD, RAMSGATE	0	1	0	0	0
TH120985	23 Royal Esplanade, Ramsgate	0	0	1	0	0
TH120473	2 WESTCLIFF TERRACE MANSIONS, PEGWELL ROAD, RAMSGATE, CT11 0JD	0	0	1	0	0
TH100307	1A MINSTER ROAD, RAMSGATE	0	1	0	0	0
TH120191	LAND BETWEEN 2 AND 3, KEVIN DRIVE, RAMSGATE	0	0	1	0	0
TH120916	YOUNGS NURSERY, ARUNDEL ROAD, RAMSGATE, CT12 5DZ	0	0	1	0	0
TH130006	51 SANDHURST ROAD, MARGATE, CT9 3JQ	0	0	1	0	0
TH110766	THE RIDGEWAY, EAST NORTHDOWN CLOSE, MARGATE, CT9 3YA	0	1	0	0	0
TH100558	Land opposite 2-6 Booth Place, Margate	0	0	0	0	0
TH111067	32 ADDINGTON STREET, MARGATE, CT9 1QU	0	2	0	0	0
TH110821	LAND ADJACENT 15, DANE HILL ROW, MARGATE	0	2	0	0	0
TH100649	24 -28 CLIFTON STREET, MARGATE	4	0	0	0	0
TH100258	VIKING COURT, CLIFTONVILLE AVENUE	2	0	0	0	0
TH120481	REAR OF 33, GROTTO ROAD, MARGATE	0	0	1	0	0
TH110513	45 SWEYN ROAD, MARGATE, CT9 2DD	0	1	0	0	0

TH110788	38 SWEYN ROAD, MARGATE, CT9 2DH		0	-3	0	0	0
TH110044	19-25 EDGAR ROAD, MARGATE		1	0	0	0	0
TH100397	LAND ADJ 18B LEOPOLD ROAD, RAMSGATE		0	2	0	0	0
TH111008	62 Bellevue Road		0	0	2	0	0
TH120143	LAND ADJACENT 2, SHAFTSBURY STREET, RAMSGATE		0	0	1	0	0
TH110855	7 TURNER STREET, RAMSGATE, CT11 8NG		0	0	2	0	0
TH120103	63-67 KING STREET, RAMSGATE		0	0	2	0	0
TH111086	62-64 KING STREET, RAMSGATE, CT11 8NY		0	3	0	0	0
TH120256	128 KING STREET, RAMSGATE, CT11 8PA		2	0	0	0	0
TH120981	130 KING STREET, RAMSGATE		0	2	0	0	0
TH12/0050	RAMSGATE TROPHIES, 111 KING STREET, RAMSGATE, CT11 8PH		0	0	1	0	0
TH110532	LAND ADJACENT TO 5, WESTFIELD ROAD, MARGATE		0	1	0	0	0
TH110876	KALEWA, THANET PLACE GARDENS, BROADSTAIRS, CT10 1EE		0	1	0	0	0
TH110033	71 FITZROY AVENUE, BROADSTAIRS		0	2	0	0	0
TH100915	LOWER WAYFARING & WAYFARING, CLIFF PROMENADE		0	1	0	0	0
TH101045	NORTH GOODWIN HOUSE, CLIFF PROMENADE		1	0	0	0	0
TH110191	ST GEORGES, CLIFF PROMENADE, BROADSTAIRS, CT10 3QY		0	0	0	0	0
TH100835	WAYFARING, CLIFF PROMENADE, BROADSTAIRS		1	0	0	0	0
TH090149	GARAGES AT, NEWBY'S PLACE, MARGATE		0	2	0	0	0
TH110615	19 HIGH STREET, MARGATE, CT9 1DL		0	0	2	0	0
TH110149	50 HIGH STREET, MARGATE, CT9 1DS		0	1	0	0	0
TH110398	16 MARINE DRIVE, MARGATE, CT9 1DH		0	1	0	0	0
TH110684	3 Lombard Street		0	0	1	0	0
TH130030	42 TRINITY SQUARE, MARGATE		0	0	0	1	0
TH100432	178 HIGH STREET, MARGATE		1	0	0	0	0
TH111006	20 PRINCES CRESCENT, MARGATE, CT9 1LY		0	0	2	0	0
TH120978	3-4 CECIL STREET, MARGATE		0	0	3	0	0
TH120660	34 GROSVENOR PLACE, MARGATE, CT9 1UW		0	1	0	0	0
TH121003	LAND REAR OF 122, GROSVENOR PLACE, MARGATE		1	0	0	0	0
TH110315	26-28 EATON ROAD, MARGATE, CT9 1XA		0	1	0	0	0
TH120472	71 EATON ROAD, MARGATE, CT9 1XB		0	0	2	0	0

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TH120675	17 MARINE TERRACE, MARGATE, CT9 1XJ		0	0	4	0	0
TH110958	LAND REAR OF 12 TO 13, TIVOLI ROAD, MARGATE		0	1	0	0	0
TH091049	2 Southwood Road		0	0	0	0	0
TH120413	LAND ADJACENT 33, LORNE ROAD, RAMSGATE		0	3	0	0	0
TH120909	THE CENTRE, NEWINGTON, RAMSGATE		0	4	0	0	0
TH120484	LAND ADJACENT, 22 CLEMENTS ROAD, RAMSGATE		0	0	1	0	0
TH120188	HIGHFIELD COURT, HIGHFIELD ROAD, RAMSGATE, CT12 6QL		0	0	1	0	0
TH100694	LAND JUNCTION, SOWELL STREET, BROADSTAIRS		1	0	0	0	0
TH101066	SACKETTS HILL FARM, SACKETTS HILL, BROADSTAIRS, CT10 2QS		0	4	0	0	0
TH110842	46-48 HIGH STREET, ST PETERS, BROADSTAIRS, CT10 2TD		0	1	0	0	0
TH110705	104 RAMSGATE ROAD, MARGATE, CT9 4BH		2	0	0	0	0
TH110728	97 RAMSGATE ROAD, MARGATE, CT9 4BL		1	0	0	0	0
TH110498	REAR OF, 49 NASH COURT GARDENS, MARGATE, CT9 4DG		1	0	0	0	0
TH110777	30 MARLBOROUGH ROAD, MARGATE, CT9 5SU		3	0	0	0	0
TH120094	20 THE CHASE, MONTEFIORE AVENUE, RAMSGATE, CT11 8BF		0	0	0	1	0
TH100075	79 HIGH STREET, MINSTER, RAMSGATE		1	0	0	0	0
TH120961	LAND ADJ FOXBOROUGH HOUSE, FOXBOROUGH LANE		1	0	0	0	0
TH100785	55 HIGH STREET, MINSTER, RAMSGATE		1	0	0	0	0
TH111071	ST MILDREDS CHURCH, 7 ST MILDREDS ROAD, MINSTER, RAMSGATE, CT12 4DE		0	1	0	0	0
TH110814	LAND ADJACENT, WILD THYME, BRAMWELL COURT, MINSTER, RAMSGATE		0	1	0	0	0
TH120005	31 HIGH STREET, MINSTER, RAMSGATE, CT12 4BT		0	2	0	0	0
TH120162	198 MONKTON STREET, MONKTON, RAMSGATE, CT12 4JN		0	0	1	0	0
TH110069	THE CHEVIOTS, MANSTON ROAD, MANSTON, RAMSGATE, CT12 5BE		0	0	0	0	0
TH110013	31 YORK STREET, BROADSTAIRS		0	1	0	0	0
TH110831	PLOT 1 FORMER CASTLEMERE HOTEL SITE, WESTERN ESPLANADE, BROADSTAIRS		0	1	0	0	0
TH100899	GLADSTONE COURT, 2 SEAFIELD ROAD		2	0	0	0	0
TH110518	16 LUTON AVENUE, BROADSTAIRS, CT10 2DH		0	0	1	0	0
TH120127	24 ROSEMARY GARDENS, BROADSTAIRS, CT10 2ET		0	0	2	0	0
TH120008	3 HATFEILD ROAD, MARGATE, CT9 5BL		0	0	1	0	0

TH090138	19 ROYAL ESPLANADE, MARGATE		0	0	0	0	0
TH100761	SURBITON COURT, 7 CUTHBERT ROAD		1	0	0	0	0
TH110232	LAND ON THE NORTH SIDE OF, ROWENA ROAD, WESTGATE ON SEA		0	1	0	0	0
TH120602	43 ETHELBERG SQUARE, WESTGATE ON SEA, CT8 8SR		2	0	0	0	0
TH120287	25 ROYAL ESPLANADE, MARGATE, CT9 5DZ		0	0	0	0	0
TH130048	The Old Post Office, Canterbury Road, Sarre, Birchington		0	0	1	0	0
TH090732	Land Adjacent To 10 Berkeley Road		1	0	0	0	0
TH110715	LAND REAR OF 17 TO 19, LYNDHURST ROAD, BROADSTAIRS		1	0	0	0	0
TH070392	17 Albion Street		2	0	0	0	0
TH090786	38 Lanthorne Road		0	0	0	0	0
TH081367	47 Lanthorne Road		1	0	0	0	0
TH110786	FALSTAFF INN, 18 ADDINGTON STREET, RAMSGATE, CT11 9JJ		2	0	0	0	0
TH110189	27 Addington Street, Ramsgate CT11 9JL		0	3	0	0	0
TH101078	59 GRANGE ROAD, RAMSGATE, CT11 9LR		2	0	0	0	0
TH110993	REAR OF 183, GRANGE ROAD, RAMSGATE		3	0	0	0	0
TH101009	58 PARK ROAD, RAMSGATE		0	0	0	0	0
TH120984	167 PEGWELL ROAD, RAMSGATE		1	0	0	0	0
TH120081	MARTRICE, WINDSOR ROAD, RAMSGATE, CT12 5EB		1	0	0	0	0
TH120746	12 ZION PLACE, MARGATE, CT9 1RP		1	0	0	0	0
TH090364	5 Zion Place		0	0	0	0	0
TH120638	26 ETHELBERG CRESCENT, MARGATE, CT9 2DU		0	3	0	0	0
TH090891	41 Norfolk Road		1	0	0	0	0
TH110995	50-50A SURREY ROAD, MARGATE, CT9 2LA		2	0	0	0	0
TH110529	LAND ADJACENT 17, CLARENDON ROAD, MARGATE		1	0	0	0	0
TH110548	THE EASTCLIFFE TAVERN, 130 NORTHDOWN ROAD, MARGATE, CT9 2RB		4	0	0	0	0
TH040965	5, Wellington Crescent		-2	0	0	0	0
TH110774	8 ARKLOW SQUARE, RAMSGATE, CT11 8PS		2	0	0	0	0
TH081070	St. Annes Cottage North Foreland Avenue		0	0	0	0	0
TH120398	DEEPDENE, NORTH FORELAND AVENUE, BROADSTAIRS, CT10 3QT		0	0	0	0	0
TH100749	THE BARN AND NEW INN, NEW STREET, MARGATE		0	0	0	0	0
TH120052	GIRLINGS SOLICITORS, 2-10 BROAD STREET, MARGATE, CT9 1EW		1	0	0	0	0

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TH130008	180 HIGH STREET, MARGATE, CT9 1JZ		1	0	0	0	0
TH100041	10-14 VICARAGE CRESCENT, MARGATE		2	0	0	0	0
TH120820	LAND BETWEEN 6 TO 14 VICTORIA ROAD AND FORMER YARD FRONTING, CHURCH STREET, MARGATE		2	0	0	0	0
TH100524	LAND ADJOINING 92, TRINITY SQUARE, MARGATE		2	0	0	0	0
TH120436	7 EATON ROAD, MARGATE, CT9 1XE		2	0	0	0	0
TH100337	59 SOUTHWOOD ROAD, RAMSGATE		3	0	0	0	0
TH110341	13 HIGHFIELD CLOSE, RAMSGATE, CT12 6QN		2	0	0	0	0
TH090855	1 Sowell Street		1	0	0	0	0
TH080343	31 Westwood Road Rear Of		1	0	0	0	0
TH120692	LAND AND BUILDINGS AT BLAGDON, VICARAGE STREET, BROADSTAIRS, KENT, CT10 2SG		2	0	0	0	0
TH090162	Land Between, 77-79 Fairfield Road		1	0	0	0	0
TH090173	Storage Building Colemans Yard		0	1	0	0	0
TH110692	HAINAULT HOUSE, HAINE ROAD, RAMSGATE, CT12 5ET		4	0	0	0	0
TH050158	The Forge, The Length		1	0	0	0	0
TH120158	16 THE VALE, BROADSTAIRS, CT10 1RB		3	0	0	0	0
TH120586	23 WESTERN ESPLANADE, BROADSTAIRS, CT10 1TD		4	0	0	0	0
TH100145	GLENALMOND, 39 ST MILDREDS AVENUE		1	0	0	0	0
TH120293	112 PARK AVENUE, BROADSTAIRS, CT10 2EZ		0	0	0	0	0
TH110025	THE FLAG AND WHISTLE, 19 STATION ROAD, MARGATE		2	0	0	0	0
TH080546	5 Westbrook Gardens		3	0	0	0	0
TH121021	29 WESTCLIFF ROAD, MARGATE		1	0	0	0	0
TH120816	10 RYDERS AVENUE, WESTGATE ON SEA, CT8 8LN		1	0	0	0	0
TH110927	14 RYDERS AVENUE, WESTGATE ON SEA, CT8 8LW		1	0	0	0	0
TH120895	26 WESTGATE BAY AVENUE, WESTGATE ON SEA, CT8 8TA		-1	0	0	0	0
TH080555	BUILDERS YARD, ARNOLD ROAD, MARGATE		0	0	0	0	0
TH120927	68 West Cliff Road, Broadstairs		1	0	0	0	0
TH110989	THE ARCADIAN, FORT HILL, MARGATE, CT9 1HJ		0	0	0	0	0
<b>Totals</b>			<b>98</b>	<b>61</b>	<b>36</b>	<b>3</b>	<b>0</b>

## APPENDIX 7 – WINDFALL SITE INFORMATION

### A) Summary of Completed Windfall Sites

Summary – All Windfall Completed Sites

	Flats Completed		Houses Completed		Total Completions		Totals	Private Garden Land	Private Garden land (Units)
	New Build	Conversion	New Build	Conversion	New Build	Conversion			
2012-13	81	33	56	21	137	54	191	7	15
2011-12	63	128	48	38	111	166	277	5	12
2010-11	235	421	192	33	427	454	881	26	44
2009-10							490		
2008-09							629		

Summary – Windfall Completed Sites of 5 or more dwellings

	Flats Completed		Houses Completed		Total Completions		Totals	Private Garden Land (Sites)	Private Garden land (Units)
	New Build	Conversion	New Build	Conversion	New Build	Conversion			
2012-13	73	18	43	0	116	18	134	1	7
2011-12	57	59	26	14	83	73	156	1	8
2010-11	196	227	118	10	314	237	551	2	14
2009-10							395		
2008-09							404		

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### B) Estimating discounted small site windfall allowance

*Flats represented 65% of w/f completions on small sites (331/508) and 75% of w/f completions on large sites (630/841) over the three year period 2010-13*

#### *Houses*

*Small sites  $466 / 3 = 155\text{pa} \times 35\% = 54\text{pa}$*

*Large site w/f =  $812/3 = 270\text{ pa} \times 36\% = 97 \times 25\% = 24\text{ pa.}$*

*Total = 78 houses p.a.*

#### *Flats*

*assuming flat allowance with previous completion rate reduced by 66%*

*Small sites  $466/3 = 155 \times 22\% = 34$  (n.b. 22% based on 65% x 33%)*

*Large sites =  $270 \times 36\% = 97 \times 25\% = 24$  (n.b. 25% based on 75% x 34%)*

*Total = 58 flats pa*

*Small sites (h & f)  $(54 + 34) = 88\text{ p.a.}$*

*Large sites (f & h)  $(24 + 24) = 48\text{ p.a.}$*



**C) Discounting large site windfall contributions**

Large Windfall Site Completions/

	Capacity on original application	Likelihood of identification though SHLAA methodology	Notional unidentified capacity
2010/11 Th021182 Cliffs End Farm, (Land At) Cliffs End Road	34	n/a	0
Th081255 Crispe House Minnis Road	8	y	0
Th090811 24 Granville Road	9	n	9
Th080969 20 Albion Road, Broadstairs	8	y	0
Th071625 15 Granville Road, Broadstairs	5	n	5
Th060886 1 & 2 Perkins Avenue & 160 Ramsgate Road	11	n	
Th070028 4 Lewis Crescent	8	n	8
Th070198 2-4 Surrey Road	11	n	11
Th080074 Benjamin Beale Fort Hill , Margate	6	n	6
Th080154 17 Arthur Road , Cliftonville	7	n	7
Th080282 24 Westcliff Gardens< margate	7	y	0
Th090104 14-16 Athelstan Road	13	n	13
Th090268 10 Arthur Road	6	n/a	0
Th090707 73 Norfolk Road	9	n	9

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Th090896	22 Westcliff Road, Margate	5	n	5
Th090930	63-71 Norfolk Road	5	n	5
Th060119	15 Harold Road	7	n/a	0
Th050971	Munro Cobb Ltd, Northdown Road, 223-229	17	n/a	0
Th080366	Stimson House Eastern Esplanade 1-19	140	y	0
Th070947	12-15 Cliff Terrace, Margate	10	y	0
Th071212	9 Dalby Square	12	n	
Th090956	18-20 Athelstan Road	8	n	8
Th080548	55 & 55a Queen Street, Ramsgate	9	n	7
Th060141	67-69 Addington Street, Ramsgate	5	n	5
Th071751	12a Albion Place Falkland Residential Home	7	n	7
Th080877	21 College Road, Ramsgate	5	n	5
Th081287	78-88 King St. Ramsgate	8	n	8
Th090428	Former Ellington Girls School Ellington Place	28	n	28
Th010384	Willsons Road, Land At & Edgevale & The Orchard	29	n/a	0
Th030253	143-145/1a, King Street/Brights Place	5	y	0
Th070020	High Street Motor Co High Street 166-172	20	y	0
Th080003	99 Crescent Road	7	n/a	0
Th090674	15 Harold Avenue, Westgate	7	n	7
Th090816	Hundreds Farm House Canterbury Road	7	y	0
F/Th/10/0827	43-48 Edgar Road, Margate, Ct9 2eh	6	n	6
F/Th/09/0823	31 High Street, Minster, Ramsgate	7	n	7
Th090695	61 - 67, High Street & 1 - 7 Queen Street< Margate	14	n	14

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Th071400 Land At Molyneux Road & Thorne Road, Monkton Road 2011/12	99	y	0
Th100559 69 High Street, Broadstairs	5	n	5
Th090604 140-142 Ramsgate Road, Broadstairs	6		0
Th070290 208 Ramsgate Road	7		0
Th101053 Ellington School, Ellington Place, Ramsgate, Ct11 0qq			
Th110588 1 Granville Marina, Ramsgate, Ct11 8na	5	y	0
Th080264 40 Albert Street	7	n	7
Th090831 2 Archway Road	10	n	10
Th100898 41 Royal Road, Ramsgate	5	n	
Th090006 78-88 High Street Rear Of	7	y	0
Th100385 Land Rear Of 235-237 Margate Road, Ramsgate	8	n	8
Th090677 Reeves Yard Hawley Street , Margate	9	n	9
Th100705 42 High Street And 16, Marine Drive, Margate	5	n	5
Th071723 5 & 6 & 5-7 Mansion Street & Fort Road	9	n	9
Th051003 2 - 14, High Street, Margate	12	y	0
Th100374 36 Grosvenor Place, Margate	5	n	5
Th081286 56 Canterbury Road, Margate	8	y	
Th090222 58 Maynard Avenue	7	n/a	0
Th090695 61 - 67, High Street & 1 - 7 Queen Street, Margate	14	n	14
2012/13			
Th090865 10-14 The Square	6	n	6

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Th120579 94 High Street, Broadstairs, Ct10 1jj	14	y	0
Th110736 Caffyns Ltd, Grange Road, Ramsgate, Ct11 9na	42	y	0
Th090109 109a St. Lukes Avenue, Ramsgate	7	n	7
Th110127 Old School Lodge, New Cross Street, Margate, Ct9 1eh	6	n	6
Th120604 Carlton Lodge, 21 Victoria Parade, Broadstairs, Ct10 1ql	12	n	12
Th120061 Land Adj The Promenade, All Saints Avenue, Margate	21	n	21
Th100304 The Centre, Newington, Ramsgate, Ct12 6lb	5	y	0
<b>ALL</b>	<b>851</b>		<b>304</b>

Percentage of large windfalls unlikely to have been identified by SHLAA methodology = 36% (304/851)

## **APPENDIX 8 - SITE ASSESSMENT PROCESS.**

The process applied in this Thanet SHLAA generally reflects that established in the Kent & Medway Protocol, as set out for information below. Some local interpretation has been applied to reflect Thanet's circumstances (for example the criteria for assessing whether sites should be assessed in trawl 1 or 2).

### **POLICY CONSTRAINTS**

**PCA - Is the site within any of the following Areas?**

***Category 1: National and Regional***

SPA, Ramsar, SAC, SSSI, National Nature Reserve, AONB, Ancient Woodlands.

***Category 2:***

Metropolitan Green Belt

***Category 3: Local***

To be determined by each individual Authority in the light of local policies and local circumstances (*In respect of Thanet this might include the designated Green Wedges*)

**PCB - Is the site currently in use or allocated for employment or other use and remains suitable and required for that use or is protected by a current development plan policy from development for other uses?**

**PCC - Is the site neither in nor adjacent to a settlement?**

**PCD - Does the site fall within or adjacent to a settlement which has not been identified in a development plan document as a settlement/settlements suitable for future housing development with sufficient capacity to meet future housing requirements?**

IF A SITE FALLS WITHIN ANY OF THESE CATEGORIES IT SHOULD BE EXCLUDED FROM THE ASSESSMENT AT THIS STAGE.

### **SUITABILITY.**

**SA Is the site allocated for housing in an existing development plan or does it have planning permission for housing?**

If yes, the site will be suitable unless circumstances have changed to render it unsuitable. If no, the site should be assessed against the questions set out in B to E as follows.

**SB Is the site in a suitable location when measured against the following criteria?**

- Within 800m. walking distance of a bus stop or railway station providing two or more services per hour.
- Within 800 m. walking distance of a convenience store, a primary school and a GP surgery.

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- Within 30 minutes public transport time of a hospital/health centre, secondary school, employment area, town or district centre.

***In the case of Thanet the criterion applied is whether the site falls within a corridor where a range of services is accessible by public transport within 30 minutes.***

IF A SITE FAILS TO MEET ANY OF THESE CRITERIA IT SHOULD BE EXCLUDED FROM THE ASSESSMENT AT THIS STAGE UNLESS THE SITE IS OF SUCH A SCALE THAT THESE CONSTRAINTS COULD BE OVERCOME AS A RESULT OF ITS DEVELOPMENT.

### **SC Does the site have any of the following physical or infrastructure constraints?<sup>1</sup>**

- Access
- Highway capacity
- Infrastructure –
  - Water Supply
  - Sewerage/Drainage
  - Electricity supply
  - Gas Supply
  - Electricity Pylons
- Contamination/Pollution
- Adverse Ground Conditions
- Hazardous Risk
- Topography
- Flood Zone

If yes, how and when can the constraint be overcome?

IF THE NATURE AND SCALE OF THE CONSTRAINT IS SUCH THAT IT CANNOT BE REMOVED DUE TO COST OR TIMESCALE OR BOTH, IT SHOULD BE DELETED FROM THE ASSESSMENT AT THIS STAGE.

### **SD Would development have a detrimental impact on the following, either within or adjacent to the site or in its vicinity?**

- Townscape
- Landscape
- Trees
- Conservation Areas
- Historic Parks and Gardens
- Listed Buildings
- Scheduled Ancient Monuments
- Sites of Nature Conservation Interest/Protected Species

If yes, could the impact be mitigated through the design process, the imposition of a condition or a legally binding agreement?

IF THE NATURE AND SCALE OF THE IMPACT IS SUCH THAT IT CANNOT BE MITIGATED, THE SITE SHOULD BE EXCLUDED FROM THE ASSESSMENT AT THIS STAGE.

**SE Would the amenity of residents be adversely affected by any external, environmental factors?**

If yes, could the impact be mitigated to such an extent that the residents' living conditions would be acceptable?

IF THE NATURE AND SCALE OF THE IMPACT ON AMENITY IS SUCH THAT IT CANNOT BE SATISFACTORILY MITIGATED, THE SITE SHOULD BE EXCLUDED FROM THE ASSESSMENT AT THIS STAGE.

**AVAILABILITY.**

**AVA Do any of the following legal or ownership factors apply to the site?**

- Multiple ownership likely to result in protracted site assembly, part of the site being unavailable for development or a ransom strip situation.
- Existing tenancy or lease agreement, which could affect the timing of the release of the site for development.
- The willingness of an owner of owners to sell.
- The willingness of a developer with control of the site to develop.

If yes, how and when can the constraint be overcome?

IF THERE ARE ANY CONSTRAINTS TO THE DEVELOPMENT OF THE SITE WITHIN THE RELEVANT TIMESCALE WHICH CANNOT BE OVERCOME, (i.e. IT IS NOT AVAILABLE), THE SITE WILL NOT SUBSEQUENTLY BE ASSESSED FOR ITS ACHIEVABILITY.

**ACHIEVABILITY.**

**Can development of the site be achieved during the plan period having taken into account the following market, cost and delivery factors?**

**ACA Market**

- Compatibility of adjacent uses
- Land values compared with alternative uses
- Attractiveness of locality
- Market demand
- Projected rate of sales.

**ACB Cost**

- Site preparation to overcome physical constraints
- On-site and off-site planning and infrastructure requirements
- Availability of funding

**ACC Delivery**

- Developers' phasing
- Build-out rates
- Number of developers
- Size and capacity of developer.

**If the site is deliverable and developable, in which of the following periods would development take place?**

- During the next five years
- During years six to ten
- During years eleven to fifteen
- Beyond year fifteen and a) within plan period or b) beyond plan period, if known.

Information on the timing of overcoming physical, infrastructure, and legal constraints, identified under "Suitability" and "Availability", will be taken into account, together with the "Achievability" criteria when determining the time of development.



## APPENDIX 9 - SHLAA REVIEW -SITE SURVEY FORM.

### 1. SITES THAT HAVE PLANNING PERMISSION

#### Status of the permission

Full ( ) Outline ( ) Expiry date .....

#### Number of residential units

New Build: Houses ( ) Flats ( ) not known ( )

CoU: Houses ( ) Flats ( ) not known ( )

Total: ( )

Is permission for mixed use including non residential element? Yes ( ) No ( )

#### Applicant name address inc tel. no.

.....

Certificate A Yes ( ) No ( )

Are there any precedent conditions? (e.g. archaeological evaluation required)

.....

Has there been any change in circumstance since permission was granted that would affect capacity? (e.g. subsequent planning permissions, changes on site or on adjacent land)

.....

**Accessibility** – is the site within:

- 800m walking distance of bus stop or railway station with 2 or more services per hour  
Yes ( ) No ( )
- 800m walking distance of a convenience store, primary school & GP surgery  
Yes ( ) No ( )
- Within 30 minutes public transport travel time to a hospital/health centre, secondary school, employment area, town or district centre?  
Yes ( ) No ( )  
(Map of such areas to be supplied by S Moore)

**IF THE PLANNING PERMISSION COVERS THE ENTIRE SITE GO TO BOX 3**

**2. SITES WITHOUT/NOT COMPLETELY COVERED BY A PLANNING PERMISSION**

**Date of Visit** .....

**Existing Use(s)**.....

**Relevant Planning Policies/designations** (e.g. TPO, CA, LB, SAM, allocation for specific use)

**Constraints (on-site & surrounding area – including impact on future occupiers)\***

**Surrounding land use(s) & character of surrounding area. Does character of area inform potential housing density?\*** (e.g. high density area)

**Is the site previously developed?** Yes ( ) No ( )

**Accessibility** – is the site within:

- 800m walking distance of bus stop or railway station with 2 or more services per hour  
Yes ( ) No ( )
- 800m walking distance of a convenience store, primary school & GP surgery  
Yes ( ) No ( )
- Within 30 minutes public transport travel time to a hospital/health centre, secondary school, employment area, town or district centre? (Map of such areas to be supplied by S Moore) Yes ( ) No ( )

**Is highway capacity sufficient to serve development?** .....

**Does the site appear to be in multiple ownership?** Yes ( ) No ( )

**\*Constraints** e.g. access availability, contamination/pollution, hazardous risk, adverse ground conditions – topography, steep slopes, potential for flooding, natural features of significance, location of pylons, utility infrastructure – water supply, sewerage/drainage, electricity/gas supply

**\*Character:** e.g. context of townscape, landscape features, trees, nature conservation/protected species

**GO TO BOX 3**

**3. AVAILABILITY**

**In light of the above and on best information available are you aware of any of the following factors that would affect the availability of the site for housing development?**  
 Select any that apply

( ) Multiple ownership likely to result in protracted site assembly, part of the site being unavailable for development or a ransom strip situation.

( ) Existing tenancy or lease agreement, which could affect the timing of the release of the site for development.

( ) The willingness of an owner or owners to sell.

( ) The willingness of a developer with control of the site to develop.

**If any of the above, how and when is the constraint likely to be overcome?**

.....

**If you consider there is reasonable doubt about these factors please contact the owner.**

**GO TO BOX 4**

**4. SUITABILITY AND AVAILABILITY**

Based on the information above assess the *suitability* of the site for housing.(If the whole site has housing permission/allocation tick here ( ) & score 4 unless any change in circumstances)

**a) Assess Suitability**

4 ( ) no material constraints/ or impact mitigation required

3 ( ) constraints/impacts easily overcome/mitigated

2 ( ) overcoming constraints/impact mitigation more difficult to achieve

1 ( ) constraints unlikely to be removed/impacts mitigated before 2031.

**List any constraints/impact mitigation needed to render the site suitable**

**b) Assess Availability**

4 ( ) development commenced

3 ( ) no known constraints to availability

2 ( ) any constraints can be overcome within relevant timescale

1 ( ) constraints cannot be overcome by 2031

**List any known constraints to availability and how and when they may be overcome**

**Total score for suitability & availability:** score a) + score b) = ( )

**Calculate potential dwelling capacity by time period.** Use either:

- a) Housing numbers in existing planning permission;
- b) Local Plan density (30-50dph) – use accessibility criteria in Policy H1
- c) A comparable development scheme

Give a likely timescale given constraints:

	Now -2016	2016-2021	2021-2026	2026-2031	Post 2031
Houses (if known)	( )	( )	( )	( )	( )
Flats (if known)	( )	( )	( )	( )	( )
<b>Total</b>	<b>( )</b>	<b>( )</b>	<b>( )</b>	<b>( )</b>	<b>( )</b>

**How did you calculate these figures?** a ( ) b ( ) or c ( )

Please note any reasoning behind suggested mix flats houses/or any non res mix use element.

**GO TO BOX 5**

**5. ACHIEVABILITY**

**Based on the information that you have gathered, and the factors below, assess whether development of this site is achievable.**

Score the site using the criteria at the bottom of the page

**Market**

- Compatibility of adjacent uses
- Land values compared with alternative uses
- Attractiveness of locality
- Market demand
- Projected rate of sales.

**Cost**

- Site preparation to overcome physical constraints
- On-site and off-site planning and infrastructure requirements
- Availability of funding

**Delivery**

- Developers' phasing
- Build-out rates
- Number of developers
- Size and capacity of developer.

**Assess Achievability:**

- 4 ( ) The development is well in progress
- 3 ( ) Factors above are unlikely to impact availability
- 2 ( ) Factors above may cause a delay but site could be available by 2031
- 1 ( ) No development seems achievable before 2031

**Give your reasons for your assessment**

.....

**Achievable Housing Capacity** (adjust previous results if influenced by above factors)

	Now -2016	2016-2021	2021-2026	2026-2031	Post 2031
Houses (if known)	( )	( )	( )	( )	( )
Flats (if known)	( )	( )	( )	( )	( )
<b>Total</b>	<b>( )</b>	<b>( )</b>	<b>( )</b>	<b>( )</b>	<b>( )</b>

**Any comments on adjustment**

## **APPENDIX 10 - USING THE SHLAA TO INFORM PLAN MAKING**

As indicated in the introduction, the SHLAA will inform spatial options to accommodate overall planned housing provision, and it will be for the plan making process to establish specific site allocations. In addition to the criteria-based assessment applied in the SHLAA, this process will be informed as appropriate by principles contained in the Strategy for Planned Location of Housing (SPLH) and in light of any additional relevant information since and alongside the SHLAA snapshot.

The fact that a site has been assessed as having housing potential in the SHLAA does not signify that it will be allocated or receive planning permission, nor that assumed dwelling types or numbers indicated in site assessments will be appropriate. Conversely, a site scoring poorly in the SHLAA may, in light of subsequent information, be regarded as potentially suitable for allocation.

As also indicated above, for the purposes of assessing sites within the Green Wedges the SHLAA scoring has been applied as though such designation did not exist in order that scoring is not skewed. However, as part of the plan making process the individual potential of such sites will then be weighed alongside their significance in terms of Green Wedge policy considerations.

An order of preference will be established taking account of the SHLAA and other relevant criteria and information as outlined above, thus informing the best options for planned provision.

## APPENDIX 11 - SUMMARY OF PARTNERSHIP PARTICIPATION

### Methodology

The advice of a wider steering group has been sought in preparing the Strategic Housing Land Availability Assessment through consultation, progress updates and a stakeholder workshop. This participation is gratefully acknowledged. As well as consulting with local house builders and property agents on the current and future housing demand in the District a range of representatives including local Registered Social Landlords, Homes and Communities Agency, and Kent County Council were involved.

The partnership was invited to participate in establishing the methodology for the SHLAA. As a result of feedback on the draft methodology the following changes were made

- The trawl 1 criteria were amended to include sites beyond the built up confines of the Thanet Towns subject to stated criteria.
- Sites with planning permission or existing allocation were subject to individual assessment.

The partners (including landowners and developers promoting sites) were subsequently given access to the list of all sites in the SHLAA pool together with a map showing their location, submitted information about the sites and an indication as to whether they would be assessed under trawl 1 or held in reserve. This resulted in a number of approaches by landowners/ developers providing updated information for consideration.

The Council's response/observations and further changes are featured in italic below.

Following initial assessment of all trawl 1 sites, stakeholder partners were provided with a matrix showing draft assessments of potential and phasing for each site. This was followed by a presentation and workshop at which stakeholders assessed a sample of sites using the SHLAA methodology and discussed any issues arising from that and from the draft site assessments previously supplied. Discussions were in some detail but key points arising are summarized below (including responding comment where appropriate):

- Concern that application of a 50 dwelling per hectare density benchmark on larger sites would falsely inflate estimates of housing potential (*since addressed in the updated SHLAA methodology*).
- At a time when there is little market appetite, where availability of public funding is diminishing, and where building more flats may be counter to our aspirations for regeneration, it might be advantageous in policy terms to consider a reduced overall level of provision (focusing on non flatted homes) and assuming lower density. (*The SHLAA methodology already took account of this policy aspiration. It will be for the Local Plan process to determine the overall level of provision and balance of dwelling types*).
- Whether any previously developed land is deliverable in Thanet in the next 5 years. Incentives and reduced developer contributions may assist. *It is acknowledged that land development values in Thanet are comparatively low. However, it is also important to note that the level of housing completions in some recent years has remained substantial.*
- Why has the Green Wedge been excluded from trawl 1? *The Green Wedges represent the remaining areas separating the almost continuous urban belt containing the Thanet towns in a geographically small district. The Green Wedges have received longstanding*

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*protection from development that would erode that function. However, in recognition of the advice in the NPPG, and the comments raised, sites within the Green Wedge are no longer placed on the reserve sites list unless they fail other screening criteria.*

- Key to delivery will be quality homes, which in turn will improve land values and attract more economically dependent people. (Noted).

### Viability Workshop

To assist the SHLAA review process including viability of development a viability workshop session was held in 2013. This was attended by representatives of the house building industry, property agents, registered housing providers, planning consultants and officers from neighbouring districts. The purpose of this was to draw on the expertise and experience of delegates to help gauge capacity of the market to deliver different levels of housing overall in light of their views on market prospects for the district. This identified a number of issues relevant to the SHLAA. These, together with responding observations are summarized below.

*Should the SHLAA assess sites first on basis of deliverability then sustainability? - Although the supply needs to be deliverable/developable, development also needs to be sustainable. In order to optimize sustainability, screening and assessment criteria include sustainability factors. In the event that assessed sustainable sites are found not to be deliverable then the SHLAA process allows for a second trawl to identify deliverable sites from the pool held in reserve as performing less sustainably.*

*Assessment should be informed by where jobs will be located. Access to employment and other services is a criterion built into the SHLAA process. It will also be a factor taken into account in considering site allocations through the Local Plan process.*

The market is probably able to deliver higher numbers if the right sites are selected. This might include some large sites but these will generally be deliverable later on in the plan period and smaller sites are needed in the mix. Choice needs to be augmented by including some village homes including on smaller sites. These may have a higher price tag and this plus popular village schools would attract aspiring households. Conversely see need for fewer brownfield flats. Market and development financing for providing flats has largely dried up. Note also that older people want houses not apartments. General consensus on message in 2009 SHMA regarding the need to redress an oversupply of smaller homes. *Noted. SHLAA criteria now include sites within/adjoining the confines of sustainable rural settlements. Approach applied in SHLAA is to assume some policy emphasis will be applied in constraining the number of additional flats.*

### Draft SHLAA Stakeholder Event

A further stakeholder event was held on 7<sup>th</sup> November 2014. Stakeholders included planning agents, developers, representatives of parish councils and neighbouring district councils and people involved in preparing neighbourhood plans. Stakeholders attending received a presentation revisiting the purpose of the SHLAA, its scope, sources, screening criteria and methodology applied. The results of previous engagement were presented together with changes made to the methodology resulting from such engagement and other factors. Delegates then viewed maps showing the sites included in the SHLAA pool (including assessed and reserve list sites), together with charts summarizing for each site the scoring, potential unconstrained capacity and notional development period.

At the subsequent debate questions and matters raised by stakeholders were predominantly focused on policy related issues, including the magnitude of the potential housing target, the risk of unplanned development being allowed on appeal in advance of adoption of the Local Plan, how



neighbourhood planning could assist in promoting the most appropriate sites and the approach regarding timing of release of greenfield land.

No significant concerns were raised regarding the approach applied in conducting the SHLAA. However the question was raised as to whether some refinement could be added to assist selection for allocation between sites scoring similarly in terms of suitability, achievability and availability. It was noted that the SHLAA effectively represents an unconstrained stock take, that scores were not definitive, and that refinement and further analysis would be applied as required to inform selection.

## APPENDIX 12 - REFERENCES

- (1) National Planning Policy Framework. Department for Communities and Local Government March 2012
- (2) Strategic Housing Land Availability Assessments (Practice Guidance) Communities and Local Government – July 2007
- (3) Strategic Housing Land Availability Assessment and Development Plan Document Preparation (Planning Advisory Service) (Improvement & Development Agency) January 2008
- (4) Strategic Housing Land Availability Assessment – protocol for Kent & Medway
- (5) Planning Practice Guidance (updated March 2014) Department for Communities and Local Government
- (6) Thanet District Housing Information Audits Kent County Council Research & Intelligence Team

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