



Strategic Planning & Research Unit

For and on behalf of
Mr Edward Spanton

**Thanet District Local Plan Examination
Response to MIQ's Matter 3: Affordable Housing Need**

Land at Cliffsend, West of Ramsgate, Kent

Prepared by
Strategic Planning Research Unit
DLP Planning Ltd
2 Tenter Street
Sheffield
S1 4BY

March 2019





Strategic Planning & Research Unit

Prepared by:	Emma Raine BA (Hons) MA MRTPI Planner
Approved by:	Roland G Bolton BSc (Hons) MRTPI Senior Director
Date:	March 2019

Strategic Planning Research Unit

V1 Velocity Building
Ground Floor
Tenter Street
Sheffield
S1 4BY

Broad Quay House (5th Floor)
Prince Street
Bristol
BS1 4DJ

4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

Tel: 01142 289190

Tel: 01179 058850

Tel: 01234 832740

DLP Consulting Group disclaims any responsibility to the client and others in respect of matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence. This report is confidential to the client and DLP Planning Ltd accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

CONTENTS	PAGE
1.0 Introduction.....	4
2.0 Matter 3: Affordable Housing Need	5
a) Issue 1 – Definition of Affordable Housing	5
Q1) Does the Plan include a definition of affordable housing? If not, to be effective should one be included?	5
b) Issue 2 – Affordable Housing Need.....	5
Q1) What is the annual net need for affordable housing as defined by the SHMA? For clarity to decision-makers, developers and local communities should the need for affordable housing be clearly set out in the Plan?	5
Q2) Has the affordable housing need been correctly established, and is it based on up-to-date information?	5
Q3) How does it compare to the housing requirement?	5
Q4) What is the justification for requiring at least 30% affordable housing on qualifying sites? What is this based on, how was it calculated and what alternatives were considered?	5
Q5) Based on the requirements for qualifying developments to provide 30% affordable housing, how many affordable homes is the Plan expected to deliver?	6
Q6) How does this compare to the identified need?.....	6
Q7) How does this compare to previous performance? How many affordable homes have been provided as a percentage of total output over the past 5-10 years?.....	6
Q8) The PPG states that an increase to the total housing figures should be considered where it would help deliver the required number of affordable homes. Has an uplift to the housing requirement for this reason been considered? If so, where is this set out?	6
c) Issue 3 – Viability.....	7
Q1) The <i>Thanet District Council Local Plan and CIL Viability Assessment</i> indicates that for schemes on previously developed land, where development costs are typically higher than greenfield sites, the affordable housing target could be lowered to 20% (paragraph 3.12.3). With this in mind, what is the justification for a 30% target across all development types and locations? Is Policy SP20 justified?	7
Q2) How has the evidence-base considered the differences between bringing forward strategic and non-strategic sites? Does it justify a consistent approach to affordable housing across all sites, regardless of size?	7

1.0 INTRODUCTION

- 1.1 This response to the Thanet Local Plan Inspector's Matters, Issues and Questions are made by Strategic Planning Research Unit ('SPRU') of DLP Planning Ltd on behalf of our client, Mr Edward Spanton, the landowner of land west of Cliffsend, west of Ramsgate, Kent. The site is, in part, identified for housing and a new railway station in the emerging Local Plan as proposed policies HO15, HO16, HO17 and SP45. If allocated as a whole, our client's site could provide **at least 600 dwellings**, the exact number will be confirmed upon completion of the masterplan.
- 2.1 The proposed development area extends to approximately 54 hectares of land across 4 parcels of land in the ownership and control of the landowner, Mr Edward Spanton.
- 2.2 Whilst partially allocated under emerging Policies HO15, HO16, HO17 and SP45, it is considered that given the shortage of available and developable site to make provision for the full 15 year period or to meet the OAN in the early part of the plan period there is a strong justification for the whole of the site to be allocated.
- 2.3 The site has been assessed (albeit in parts rather than as a single site) and is identified below. This is adjacent to the parkway station and represents a very sustainable location to the south of the district, a location which will assist in improving the overall delivery rates within the district by adding a further sustainable choice. In particular sites such as the one below can be developed quickly and assist the plan in achieving a five-year housing land supply at the date of adoption.

Figure 1. Location Plan



2.0 MATTER 3: AFFORDABLE HOUSING NEED

a) Issue 1 – Definition of Affordable Housing

Q1) Does the Plan include a definition of affordable housing? If not, to be effective should one be included?

2.1 Given the potential for definitions to change then it would be better to exclude any definition and instead make reference to “as defined in National Guidance”.

b) Issue 2 – Affordable Housing Need

Q1) What is the annual net need for affordable housing as defined by the SHMA? For clarity to decision-makers, developers and local communities should the need for affordable housing be clearly set out in the Plan?

2.2 The 2016 OAN Report identified in Table 26 some, 4,490 households who are living in unsuitable housing, or 7.5% of the estimated total number of households living in the district in 2011. This is then further reduced to 2,860 households to take forward for affordability testing (Table 27).

2.3 An affordable housing need of 1,637 households in the district is identified in paragraph 5.43.

2.4 The number of homeless or in temporary accommodation suggests a need of 59 households per annum (Table 26).

2.5 Newly arising need for affordable housing is calculated as being 467 households per annum (OAN 2016 Table 29).

2.6 Existing households falling into need is calculated as being 257 household per year (OAN 2016, Table 30).

2.7 The current committed supply of affordable housing is calculated as being 441 dpa (OAN 2016, Figure 24).

2.8 The requirement for affordable housing is therefore calculated to be 397 dpa or 7,940 dwellings in the plan period to 2031 (OAN 2016, Table 33).

2.9 This represents 47% of the need for housing identified on demographic growth and enhanced migration from London (paragraph 2.12 of the 2017 OAN Update).

Q2) Has the affordable housing need been correctly established, and is it based on up-to-date information?

2.10 Caution needs to be excised as these calculations can vary annually. Ideally the SHMA would have a series of assessments and average them out.

Q3) How does it compare to the housing requirement?

2.11 The figure of 397 dpa represents 47% of the need for housing identified on demographic growth and enhanced migration from London (paragraph 2.12 of the 2017 OAN Update).

Q4) What is the justification for requiring at least 30% affordable housing on qualifying sites? What is this based on, how was it calculated and what alternatives were considered?

2.12 No Comment

Q5) Based on the requirements for qualifying developments to provide 30% affordable housing, how many affordable homes is the Plan expected to deliver?

- 2.13 While we have not undertaken the calculation, it is apparent that at least 17% of the affordable housing need will go unmet throughout the whole of the plan period if the proposed level of overall housing is to be delivered.
- 2.14 Increasing the level of overall housing to secure a larger proportion of the need can be met would be an appropriate response to the evidence.

Q6) How does this compare to the identified need?

- 2.15 It will be well below the identified level of need.

Q7) How does this compare to previous performance? How many affordable homes have been provided as a percentage of total output over the past 5-10 years?

- 2.16 The table below sets out the level of affordable housing provision that has been delivered since the start of the Plan period in 2011 against the requirement in the Local Plan. This shows that at present affordable housing is being delivered at an average of 69dpa against a requirement of 397dpa.
- 2.17 Against the Local Plan requirement for affordable housing, there is now a shortfall of some 2,293 affordable homes since 2011.
- 2.18 In light of the affordable housing requirement and considering the significant shortfall of delivery since 2011, it is highly unlikely the affordable housing need will be met in the remainder of the plan period without intervention. Such as the allocation of additional site such as ours.

Table 1. Net Affordable Housing Completions Since Start of Plan Period

Year	Net Affordable Dwellings	Requirement	Difference
2011/12	30	397	-367
2012/13	109	397	-288
2013/14	73	397	-324
2014/15	86	397	-311
2015/16	43	397	-354
2016/17	107	397	-290
2017/18	38	397	-359
Total	486	2,779	-2,293

Source: Table 1 Thanet Annual Monitoring Report 2018

Q8) The PPG states that an increase to the total housing figures should be considered where it would help deliver the required number of affordable homes. Has an uplift to the housing requirement for this reason been considered? If so, where is this set out?

- 2.19 This has not been explicitly set out nor have the reasons for not considering an uplift to meet this need been set out. It is our view that an increased level of overall provision would assist in delivering a higher number of affordable dwellings both in terms of the

definition of affordable housing but also by increase the availability of market dwellings would assist in addressing the overall affordability ratio.

c) Issue 3 – Viability

- Q1) The *Thanet District Council Local Plan and CIL Viability Assessment* indicates that for schemes on previously developed land, where development costs are typically higher than greenfield sites, the affordable housing target could be lowered to 20% (paragraph 3.12.3). With this in mind, what is the justification for a 30% target across all development types and locations? Is Policy SP20 justified?**
- Q2) How has the evidence-base considered the differences between bringing forward strategic and non-strategic sites? Does it justify a consistent approach to affordable housing across all sites, regardless of size?**