

# Hearing Statement

## Stone Hill Park Ltd. – Matter 8 Housing Land Supply

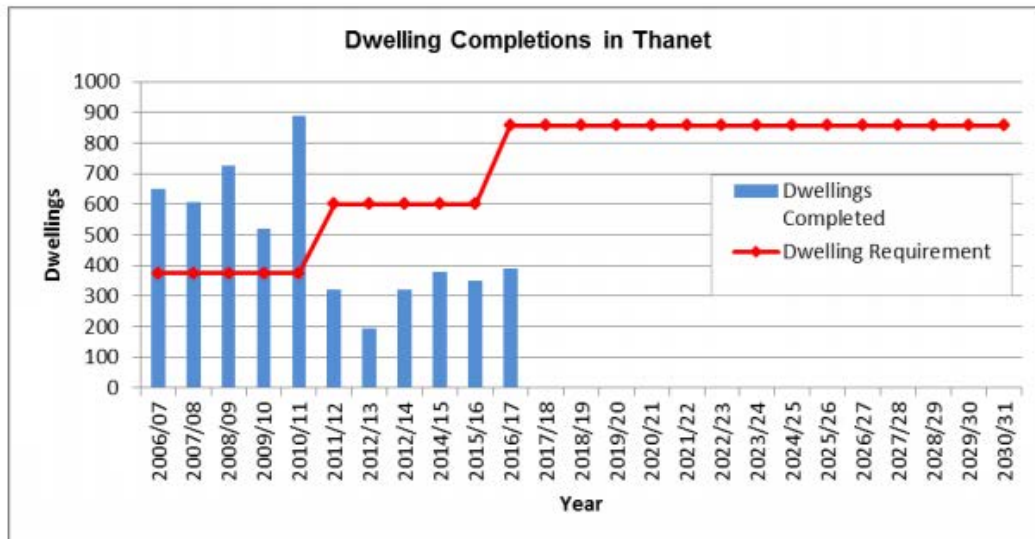
### Issue 1- Five Year Housing Land Requirement

#### Q2. How does the five-year housing land requirement compare to previous rates of delivery?

The most up-to-date evidence base identifying housing needs across the District comprises the Thanet Updated Assessment of Objectively Assessed Housing Need (OAN) 2016. Overall, the study identifies a District-wide OAN of 17,140 dwellings over the 2011-2031 plan period (equating to 857 dwellings per annum). This forms the basis of draft Policy SP11 of the Draft Local Plan, which adopts this figure as the District's housing target over the plan period.

The Council's most recent Annual Monitoring Report (2017) demonstrates that only 1,954 homes have been delivered in Thanet since 2011 (an average of 323 dpa). This figure falls significantly short of the Council's draft annualised target. As of 1st April 2017, unmet housing need in the District equates to 3,188 homes, a shortfall of more than three and a half years. In the most recent reporting year, housing completions stood at 389, less than half of the 857 annualised target. The Council's evidence clearly demonstrates that they have consistently failed to delivery sufficient housing to meet local needs.

**AMR Chart showing Dwelling Completions in Thanet, 2006/07 – 2016/17**



Source: Thanet Local Plan Annual Monitoring Report 2017

The figures in the Thanet AMR 2016 only make an allowance for a provision for a 5% additional buffer of homes against the five year housing provision in the PRDLP. In accordance with NPPF Paragraph 47, local planning authorities are required to significantly boost the supply of housing, and states that "where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land". Although the Revised NPPF (2018) does not apply for the purpose of plan-making in this case, it is worth noting that Paragraph 73c states that a 20% buffer should be included to housing supply "where there has been significant under delivery of housing over the previous three years to improve the prospect of achieving the planned supply".

The Council has a clear track record of under delivery of housing over the entirety of the plan period (since 2011). It is therefore necessary for the Council to make an allowance for a buffer of an additional 20% of homes in the five year housing supply. This equates to a total requirement to identify 5,142 deliverable homes in the relevant five year period, excluding outstanding undersupply which we consider in Q4 below.

Q3. Taking a longer-term view, how has the Council performed against previous annual housing requirements? Does this represent the 'persistent undersupply' defined by the Framework? In this context, should the buffer be 5% or 20%?

Please see answer to Q2.

Q4. If a 20% buffer applies, should this be applied to the basic five-year requirement, or the five-year requirement and any undersupply?

As of April 2017 the shortfall in housing delivery in the District equates to 3,188 dwellings, an equivalent of a three and a half year shortfall against the Council's annualised target of 857 dwellings per annum over the plan period. The NPPF (2012) states Local Planning Authorities should identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements plus with an additional buffer (para 47).

The PPG confirms that the level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach (Paragraph: 044 Reference ID: 3-044-20180913)). The plan period assessed in the Thanet Updated Assessment of Objectively OAN 2016 is 2011-2031. We consider that the outstanding undersupply (of 3,188) forms part of outstanding housing need and the 20% buffer should apply.

Q5. If there has been an undersupply, should this be addressed within the next five years (the 'Sedgefield' method), or over the remainder of the plan period (the 'Liverpool' method)? Is the Council's approach consistent with the PPG which advises that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible?

The PPG states that "where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to reconsider their approach to bringing land forward and the assumptions which they make. For example, by considering developers' past performance on delivery; reducing the length of time a permission is valid; re-prioritising reserve sites which are 'ready to go'; delivering development directly or through arms' length organisation; or sub-dividing major sites where appropriate, and where it can be demonstrated that this would not be detrimental to the quality or deliverability of a scheme."

The former Manston Airport site is capable of delivering a significant proportion of unmet housing need in a comprehensively planned settlement on brownfield land and this should weigh heavily in favour of its allocation for mixed use development. Given the clear and pressing need for housing, we do not consider that there is a sufficient case to justify addressing the full extent of undersupply in the later periods of the plan. As an estimate, the Outline Phasing and Delivery Strategy submitted with the hybrid planning application for redevelopment of the former Manston Airport for 3,700 homes suggests that approximately 1,100 homes will be delivered in the first Development State (2019-2024).

Q6. Taking the above into account, what is the five-year housing land requirement?

Based on the Council's OAN 2016, we consider that the five year housing requirement should be calculated as follows:

OAN over Plan Period (2011-2031)	17,140
OAN dwellings per annum	857
Five year requirement	4,285
(+20% buffer)	+857 = 5,142
Current undersupply (2011 -2017)	3,188
(+20% buffer)	+638 =3,826
<b>Total five year housing land requirement</b>	<b>8,968</b>

## **Issue 2 – Supply Methodology**

### **Q6. What evidence is there to indicate that the sites without planning permission will come forward as illustrated in the housing trajectory?**

As outlined in the NPPG, a deliverable site in the context of housing policy is one that must be able to be delivered in the first five years. Such sites could include those with development plan housing allocations and planning permissions, unless there are identified constraints to their five year delivery (NPPG ID 3-031-2014 03 06).

Based on this definition, Avison Young's own analysis identifies 303 homes at Strategic Sites, 1,179 homes at 'Other Sites', 265 homes at Rural Sites, 1,627 homes with extant planning permission which are deliverable up to 2021 (see **Enclosure 1**). We do not consider that there is sufficient evidence to conclude that the extended Strategic Sites are available, capable, viable and feasible for delivering the quantum of homes allocated over the plan period. In total we estimate 3,374 homes could be deliverable as part of the District's five year housing land supply. This equates to a shortfall of 1,768 against the Council's five year target including 20% buffer (5,142) or shortfall of 5,594 when accounting for current undersupply.

## **Issue 3 – Components of Supply**

### **Q1. What evidence is there to support the housing trajectory for Birchington (Policy SP14)? Does this adequately reflect the time it will take to bring development forward and the necessary infrastructure requirements for the site?**

The Submission version of the Local Plan proposes an allocation for 1,600 homes. This is identified as an increase of 600 homes compared to the previous draft of the new Local Plan, however the revised site boundary incorporates Site ST3 which was already allocated in the Preferred Options Local Plan (Policy H02C) and therefore double counts by 90 homes.

With respect to the 510 additional homes proposed, it is unclear how these could be accommodated on the proposed allocation site as the proposed site boundary has changed only marginally (by 9.3ha) from the Preferred Options Local Plan and the maximum density control proposed by Policy SP14 remains unchanged. The additional areas now included within the proposed site boundary comprises agricultural land/greenfield, has not been assessed in the SHLAA and has not been put forward by a developer. Part of the land has known constraints to development (S515) and there is no evidence that these can be mitigated. There are no extant planning permissions for the site and no recent planning applications have been submitted. We therefore question whether these sites are available, viable, sustainable or feasible within the plan period.

### **Q2. What evidence is there to support the housing trajectory for Westgate-on-Sea (Policy SP15)? Does this adequately reflect the time it will take to bring development forward and the necessary infrastructure requirements for the site?**

The Submission version of the Local Plan proposes the site is allocated for 2,000 homes, an increase of 1,000 homes compared to previous draft of the new Local Plan. The original proposed allocation (for 1,000 homes) was comprised of two sites: ST1 (which was assessed as having capacity for 1,040 homes in the SHLAA) and ST2 (386 home capacity). Outline planning permission for 24 units on ST1 was granted at appeal (OL/TH/16/1473). A comprehensive masterplan for the remainder of the allocated site has not come forward. There is only evidence that 24 units can be delivered between 2021-2026 (subject to reserved matters) and would be on the portion of the site already subject to a proposed allocation (and therefore not additional).

The extended allocation boundary includes land not previously assessed in the SHLAA, and it does not appear to be sufficient in size to account for the additional 1,000 homes now proposed in this location. Indeed, during the most recent call for sites, the land owner suggested 2,500 homes could be delivered on a significantly larger (172ha) site bound by Park Road and Shottendane Road to the south and stretching considerably further west than the proposed allocation, albeit they state that "the full area of the site would not be proposed for built form". We therefore question whether this site is available, viable, sustainable or feasible for the quantum of homes allocated within the plan period. Furthermore, the majority of the proposed allocation site is classified as 'Excellent' in the Agricultural Land Classification, with a small portion identified as 'Very Good', the loss of which has not been properly assessed.

### **Q5. What evidence is there to support the housing trajectory for land at Manston Court (Policy SP18)? Does this adequately reflect the time it will take to bring development forward and the necessary infrastructure requirements for the site?**

The Submission version of the Local Plan proposes the site is allocated for 1,200 homes, an increase of 500 homes compared to previous draft of the new Local Plan. Outline permission for 900 homes was granted on the eastern portion of this site.

The westernmost part of the proposed allocation was promoted by the landowner in most recent Call for Sites for "Between 751 - 667 dwellings (35 dph /30 dph). Site area: 31.33ha" No evidence has been provided to confirm it is deliverable or achievable. The majority is classified as 'Excellent' in the Agricultural Land Classification, with a small portion identified as 'Very Good', the loss of which has not been properly assessed.

### **Issue 5 – Future Supply**

#### **Q3. Is there likely to be a sufficient supply of housing land throughout the lifetime of the Plan?**

The submitted Local Plan redistributes the 2,500 homes previously allocated on the former Manston Airport in Policy SP05 site to greenfield, agricultural land predominantly classified as 'Excellent' in the Agricultural Land Classification, the loss of which has not been properly assessed.

We do not consider that there is sufficient evidence to demonstrate that these sites are available, viable, sustainable or feasible for the quantum of homes allocated within the plan period. We therefore consider that that an insufficient supply of housing has been planned for during the duration of the plan and the Manston Airport site should be re-allocated for housing.

The former Manston Airport comprises a suitable strategic housing site, as confirmed by the Council in their emerging Local Plan evidence base documents as well as the suite of information submitted to support Stone Hill Park's planning applications. SHP's proposals are deliverable, viable and technically sound:

- The former Manston Airport site is a vacant, previously developed site in an area of acute housing and socio-economic need which presents an opportunity to deliver a significant proportion of the Council's projected housing need through a comprehensive, sustainable new settlement which encapsulates the core principles of a Garden City.
- SHP's application makes a well-evidenced case for the appropriateness of residential development on the former Manston Airport site, as part of wider mixed use development. The housing case contributes to a 'total place' approach to future development and the clear inter-dependency between the employment, housing, community, cultural, and sport/recreation uses in achieving a truly rounded sustainable development proposition.
- Stone Hill Park's proposals are for a sustainable mixed-use settlement that enables people to work, shop and access day-to-day services close to where they live. The masterplan encourages residents, employees and visitors to live sustainably by providing a range of necessary facilities and amenities within easy distance of their homes and places of work. Together, the proposed uses ensure that the proposed development is a genuinely sustainable, distinctive place which meets the needs of its residents and visitors and encourages them to live more sustainability. The proposal therefore fully embodies the principles of sustainable development.
- The application is currently well served by public transport (bus) and improvements to bus services are proposed in order to enhance connectivity of the site to surrounding Towns. The accessibility of the site will increase in further following the opening of the Thanet Parkway Station, which will provide a direct railway link to Margate, as well as high speed services to London in just under an hour.
- The proposals will deliver a significant proportion of the District's housing requirements in a way which is planned positively, proactively, and with the principles of sustainability at its heart. The masterplan has been designed to serve as the backbone for the creation of a new community, which will grow and evolve over time. Up to 3,700 homes are proposed within the application boundary, which will create a critical mass of residents needed for the delivery of a rich mix of supporting infrastructure and services.
- SHP's proposals have been devised in line with the development principles and detailed policies set out in the Council's draft Policy SP05, which would allocate the site for mixed use development. The site was scored favourably by the Council in the Sustainability Appraisal for the Revised Preferred Options, which identified that the redevelopment of the site in line with Draft Policy SP05 would have both short and long term positive impacts on most objectives. In particular, the SA confirmed that redevelopment would ensure a sustainable pattern of development, ensure the protection of environmental, cultural and historic assets, and provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand and need.

The former Manston Airport is therefore clearly a suitable site for strategic housing delivery and should be allocated to ensure sufficient land is allocated for housing over the lifetime of the plan.

**Issue 6 – Flexibility**

Q1. What flexibility does the plan provide if some of the larger sites do not come forward in the timescales envisaged?

We are not convinced that the quantum of homes proposed in these locations have a reasonable prospect of being delivered over the course of the plan period in any event as there is no evidence that they are all available, deliverable and achievable.

Q2. Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

Yes. See answer to Issue 5 - Q3.

# Enclosure 1



SHP2-4.1

# Planning Statement Addendum: Housing Evidence

A brighter future for  
Thanet and East Kent



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### Prepared By: GVA

Status: Final

Date: April 2018

For and on behalf of GVA Grimley Limited



# 1. Introduction

- 1.1 GVA have been commissioned to prepare an evidence base to support the proposed redevelopment of the former Manston Airport site. The purpose of this report is to provide the necessary land use evidence to justify housing, as part of the masterplan proposals.
- 1.2 This report initially comprises a critique of the Council's housing evidence base, which focuses on housing delivery, need and supply matters. The report draws on analysis undertaken by GVA in 2016 which provides a robust assessment of objectively assessed housing need. The report also considers recently published Government guidance regarding housing need data. This analysis provides more robust understanding of the alignment between housing need and identified potential supply.
- 1.3 The Housing Evidence report also draws on recent emerging planning policy for Thanet District Council and the most up to date Annual Monitoring Report, which provides the most up to date position of the Council in relation to housing need and supply.
- 1.4 GVA also provide a detailed critique of the Council's identified five year housing land supply, assessing which sites are deliverable in the short term and developable in the longer term.
- 1.5 The outcome of this is an up to date evidence base position that identifies a higher level of housing need (than identified in the Council's existing evidence base) plus a need to identify a greater supply of deliverable housing land (than currently proposed in the 2017 consultation Proposed Revisions to Draft Local Plan) in order to satisfy the updated objectively assessed need figures and to tackle delivery risks associated with existing identified land supply.

## Housing Evidence Base Context

- 1.6 The following, most up to date, evidence base documents have been reviewed. These documents address housing delivery, housing need and housing land supply:

### Housing Delivery:

- Thanet Local Plan Annual Monitoring Report (2016).

### Housing Need:

- Thanet Strategic Housing Market Assessment (SHMA) (2016);
- GVA Assessment of Objectively Assessed Housing Need (2016);
- Thanet Updated Assessment of Objectively Assessed Housing Need Draft (OAN) 2016; and
- Ministry for Housing, Communities and Local Government Housing Need Consultation Data (2017).

### Housing Land Supply:

- Strategic Housing Land Availability Assessment 2013 Update;
- Thanet Local Plan Annual Monitoring Report (2016); and

- Proposed Revisions to Draft Thanet Local Plan: Preferred Options (2017).

1.7 Some of the above documents were prepared in the assumed context of the site continuing to operate as an airport which is no longer the case. Changes to the use of the site will have subsequent impacts on the population growth forecast scenarios, housing need and land availability assessment.

## Report Structure

1.8 The report is structured as follows:

- **Section 2: Assessment of Housing Delivery** – This section reviews recent housing delivery within Thanet, based on the Thanet Local Plan Annual Monitoring Report (2016);
- **Section 3: Housing Need Evidence** – This section provides a detailed review and critique of the existing housing need evidence (including the Thanet SHMA and OAN (2016), the GVA OAN (2016), and the latest Housing, Communities and Local Government (HCLG) figures);
- **Section 4: Assessment of Land Supply** – This section reviews the SHLAA 2013 Update, Annual Monitoring Report (2016) and the Proposed Revisions to Draft Thanet Local Plan: Preferred Options (2017), to provide an assessment of the identified land supply position. This section also provides a review of key strategic sites and the five year housing land supply to provide an up to date position of likely housing delivery. An analysis of the role of windfall sites, and the methodological compliance of the site assessment with the tests set out in the NPPG (suitability, availability and achievability) is also undertaken. Of key importance here is establishing an understanding of the likelihood of identified potential sites coming forward, particularly in relation to strategic sites within the 5 year deliverable period;
- **Section 5: Alignment Between Need and Supply** – This section draws on Sections 2-5 to understand how the identified need aligns with recent past housing delivery levels and assessed supply potential (SHLAA, AMR);
- **Section 6: Appropriateness of the Former Manston Airport Site** – This section considers the suitability of the site to support housing (as part of a mixed use development); and
- **Section 7: Conclusion** – The concluding section brings together the critique and calculations produced throughout the report, to conclude that there is a well evidenced case to justify residential development on the former Manston Airport site, as part of wider mixed use development.

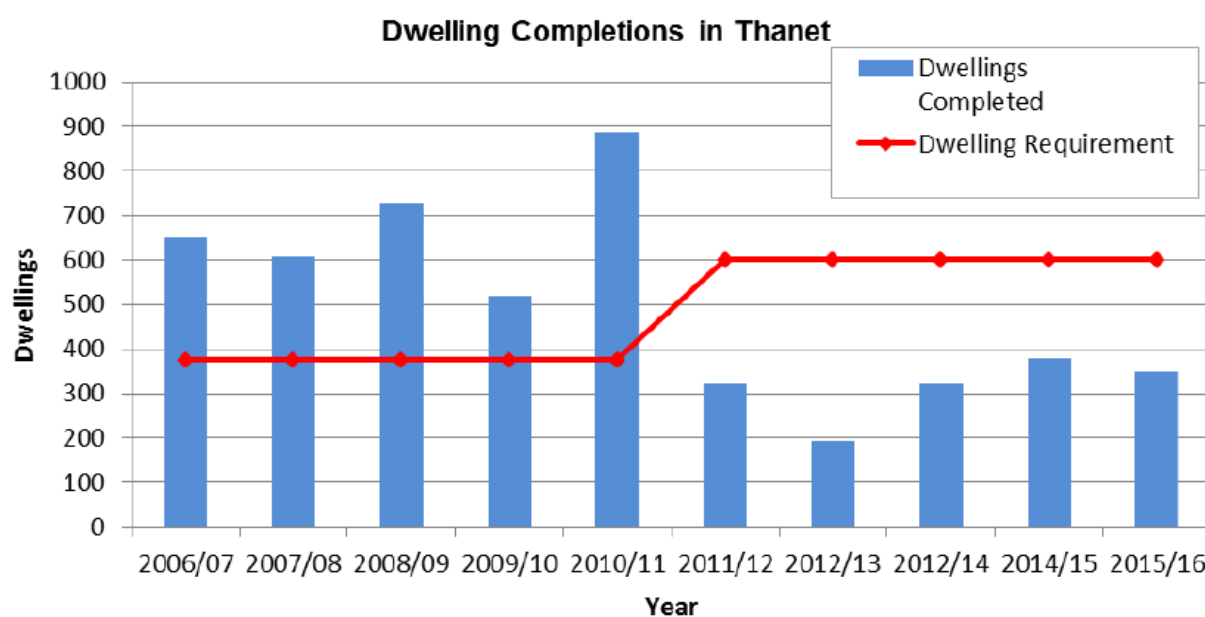
## 2. Assessment of Housing Delivery

- 2.1 This section reviews the latest Thanet Local Plan Annual Monitoring Report (AMR) (2016) in order to understand the level of recent housing delivery within Thanet District. This provides important context to housing provision in the District, and will identify trends in housing delivery which could be likely to continue into the future.

### Dwelling Completions

- 2.2 From 2006/07 - 2015/16 there were 4,957 net additional dwelling completions, which equates to an annual average net completions rate of 496 over the 10 year period. In the most recent reporting year, housing completions stood at 350, which is 250 under the current dwelling requirement. This is shown below in the dwellings completions chart taken from the AMR, see Figure 1.

Figure 1 – AMR Chart showing Dwelling Completions in Thanet, 2006/07 – 2015/16



Source: Thanet Local Plan Annual Monitoring Report 2016

- 2.3 We note that the dwelling requirement identified in the chart above for 2006/07 to 2010/11 was 375 new dwellings per annum, an out-of-date figure which was based on the South East Plan (2009) which was revoked in 2010. The dwelling requirement between 2011/12 to 2030/31 has been increased to 600 new dwellings per annum (in line with the 2015 Preferred Options Local Plan draft housing requirement for 12,000 new dwellings from April 2011 to March 2031). It should be noted that the draft housing requirement has since been increased to 17,140 new dwellings over the same period in the Proposed Revisions to Draft Local Plan 2017. Up-to-date levels of identified housing need are considered in further detail in Section 3 of this report.

- 2.4 It is evident from Figure 1 that there has been a declining trend in dwelling completions when comparing pre-2010/11 and post 2010/11, with figures dropping to just above 300 dwellings in 2011/12, and falling further to approximately 200 dwellings in 2012/13.
- 2.5 The 2015 AMR predicted the delivery of 499 dwellings for the period 2015/16, however the 2016 AMR reports that just 350 were completed. This represents a decrease from the delivery of 380 dwellings in 2014/15, and is below the dwelling requirement of 600 new dwellings.
- 2.6 Closer analysis of completion rates (illustrated in Table 1 below) show that for the last five years the Council has persistently over-predicted completion rates for housing.

**Table 1 – Review of Housing Completions in Thanet District**

Reporting Year	Predicted Delivery	Actual Delivery	Difference
2015/2016	499	350	-149
2014/2015	608	380	-228
2013/2014	588	321	-267
2012/2013	399	194	-205
2011/2012	500	320	-180

Source: Thanet Annual Monitoring Reports 2011-2016

## Previously Developed Land Targets

- 2.7 The AMR also reports that 73.4% of homes in the reporting year (2015/16) were completed on previously developed land (above the stated target of 70%).

## Summary

- Thanet District Council have persistently under achieved in meeting the required delivery of new homes against annual dwelling requirements.
- In accordance with NPPF Paragraph 47, this provides evidence to suggest that there has been a record of persistent under delivery of housing in the District. Accordingly Thanet District Council is required to identify a supply of deliverable sites sufficient to provide five years worth of housing against their housing requirements, with an additional buffer of 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.
- Draft revisions to the NPPF were published for consultation in March 2018, and whilst the revisions provide only limited weight until the policies are closer to adoption, proposed Paragraph 74 Part A defines 'significant under delivery' of homes as where delivery of housing has been substantially below the housing requirement for the last three years. Against this test, Thanet District Council is evidently persistently under-delivering new homes.

- For the last five years the Council has over-predicted housing completions in the District by between 149 to 267 homes per annum, which indicates that the Council's predicted rates of delivery have been unrealistic.
- The implications arising are discussed in more detail later in the report.

### 3. Published Housing Need Evidence

3.1 The purpose of this section is to set out a review of existing housing need evidence and related publications, which comprises the following:

- i) Thanet Strategic Housing Market Assessment (SHMA) (2016);
- ii) GVA Assessment of Objectively Assessed Housing Need (2016);
- iii) (Thanet Updated Assessment of Objectively Assessed Housing Need Draft (OAN) (September 2016); and
- iv) Ministry for Housing, Communities and Local Government Housing Need Consultation Data (2017).

#### **(i) Thanet Strategic Housing Market Assessment (2016)**

3.2 In January 2016, Thanet District Council published a Strategic Housing Market Assessment (SHMA) providing its latest position on the future need for housing in the district. The 2016 SHMA, the first such update to the Council's evidence base since 2009, provides an assessment of the quantum and type of housing needed in Thanet over the period 2011 to 2031.

3.3 The document is prepared in line with the stages set out in the PPG and provides a stepped approach to understanding full objectively assessed housing need ('OAN') starting with the DCLG Household Projections and making a number of adjustments to take account of variations in demographic trends, future economic growth and the effect of improvements to affordability and housing supply on household formation. Whilst the 2016 SHMA largely follows the correct approach, there are a number of concerns about the specific assumptions employed in the SHMA's demographic and economic model which means it will not meet the likely future change in employment growth across the projection period.

3.4 The SHMA starts with an assessment of the latest housing projections; the DCLG 2012 Household Projections (HP). Over the period 2011 to 2031, the 2012 HP project a need for 749 dwellings per annum. The 2012 HP contain both population and household formation projections which use trend-based data. The population projections use short term trends (from the last 5 to 6 years) whereas the household formation projection utilise longer term trend data, dating back to the 1971 Census. The 2016 SHMA assesses past population data to understand if the last 5 to 6 years represents an appropriate basis for future population growth. It identified that net migration from London fell following the recession and that this was likely to be a short-term effect which would reverse over time as the wider economy of Kent improved (relative to London). Furthermore, the Greater London Authority, in the London Plan 2016 (Consolidated with Alterations since 2011), the 'Central' population projection assumes that out migration from London would increase by 5%. With this in mind, the SHMA alters the 2012 HP to assume an increase in migration from London takes place over the plan period, in line with the GLA's assumptions. This results in a 1% increase in population growth over the projection period and a requirement to deliver 777 dwellings per annum (a 4% increase in housing need). Whilst an adjustment to migration rates to understand increased net migration from London is appropriate, it would be instructive to understand the implications of long term migration trends more widely as well as the

impact of un-attributable population change (see below). This is a shortcoming of the SHMA as currently drafted.

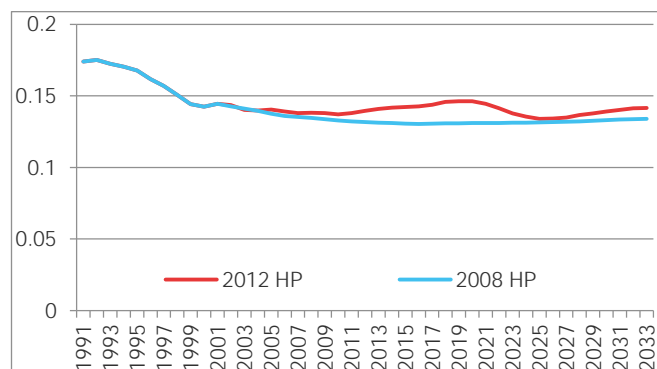
- 3.5 The SHMA then assesses the likely change in job growth over the projection period which draws on the East of England Forecasting Model (Autumn 2014). This model forecasts that 4,800 jobs would be created over the projection period (2011 to 2031), which equates to employment growth of around 0.5% per annum. The SHMA notes that this level of employment growth is 'notably below' the 0.8% per annum achieved historically (1993 to 2010) however this growth was supported by relatively a high level of public sector employment growth.
- 3.6 Translating employment growth into population growth is not straightforward and involves making assumptions about unemployment, commuting, economic activity and double jobbing and how these change over time. The 2016 SHMA makes a number of assumptions around these issues which seem largely sensible however with regard to double jobbing it uses the Annual Population Survey. The Annual Population Survey is not a survey of workers (as the SHMA suggests) but a survey of residents. The double jobbing figure of 5.1% is therefore for a different population. The East of England Forecasting Model provides some indication of double jobbing levels for workers in Thanet and concludes that it lies around 1.2% (average of 2011 to 2031). This would seem an appropriate starting point for the analysis.
- 3.7 Section 6 of the 2016 SHMA looks at market signals which are designed to assess whether the housing market is demonstrating market undersupply relative to demand. It looks at house prices, rents, affordability, housing supply and overcrowding. It concludes that whilst some market signals show a housing market which is relatively affordable and accessible, a number of indicators show pressure in the housing market including increased levels of overcrowding and concealed households. Another issue which is identified in the SHMA is the fall in household formation amongst young adults (25 to 34 year olds). Overall the SHMA concludes that an adjustment to past demographic trends is appropriate to understand the effect of improvements to the housing market on household formation and to therefore ensure the FOAN plans for it. The adjustment the SHMA makes is to increase household formation in 25 to 34 year olds so that they return to 2001 levels by 2025 where after projected rates are linked to the trend within the 2012 HP. The justification for this is to project an improvement in affordability and supply to that exhibited at the late 1990s / early 2000s.
- 3.8 Figure 2 shows recorded household formation over time (1991 to 2011) with projected household formation up to 2033. There are many things that have affected household formation in this country over time including changes in family make-up, inter-generational households, ethnicity and housing behaviour linked to constrained housing supply and accessibility. The main age group affected by the lack of supply are 25 to 34 year olds, as this age group is statistically the most likely to remain in the family home or live in larger shared houses and this reduces their household representative rate (the chance of them being the head of a household, HRR). It can be seen by Figure 2 that between 1991 and 2001 HRRs in 25 to 34 year olds increased, however between 2001 and 2011/12 they fell again. Between 2011 and 2031 (the SHMA's projection period) the 2012 HP project that household formation will increase and fall again. This is the trend that the SHMA follows when it tracks the 2012 HP rate after 2025.
- 3.9 Figure 2 shows the 2008 HP HRR projection alongside the 2012 HP projection. This projection shows an overtly more positive trajectory for HRRs in this age group, which would be the response to a significant increase in



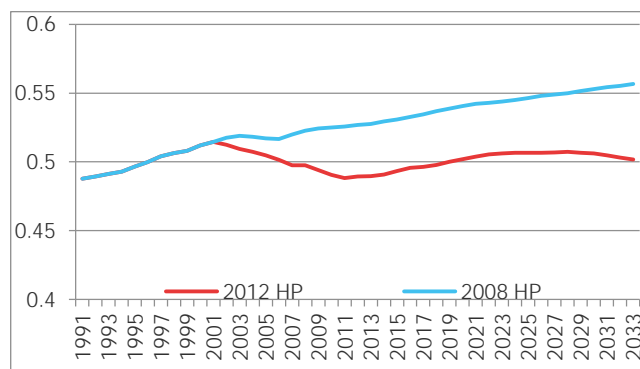
housing supply. The SHMA should therefore follow the 2008 HP projection following its HRR adjustment up to 2025.

Figure 2 - Household Representative Rates from 2012, 2011-interim and 2008 HP (DCLG)

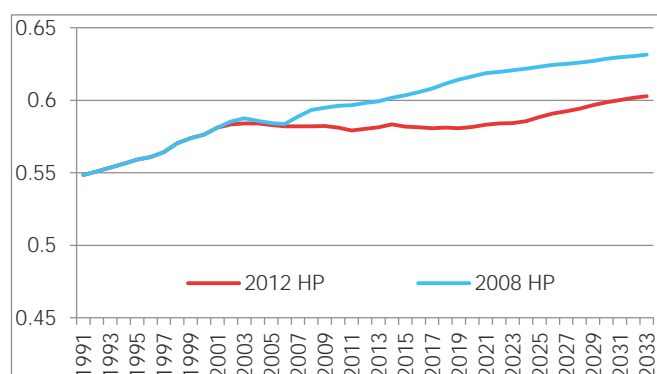
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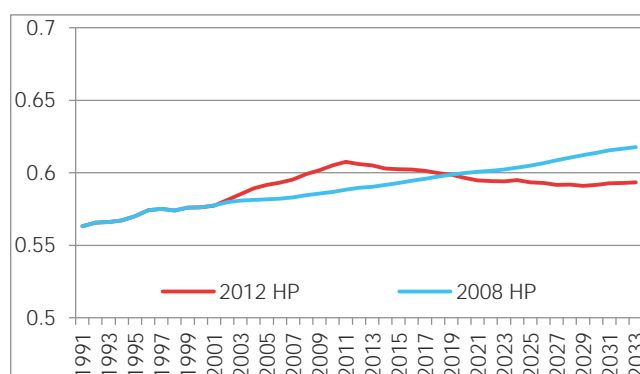
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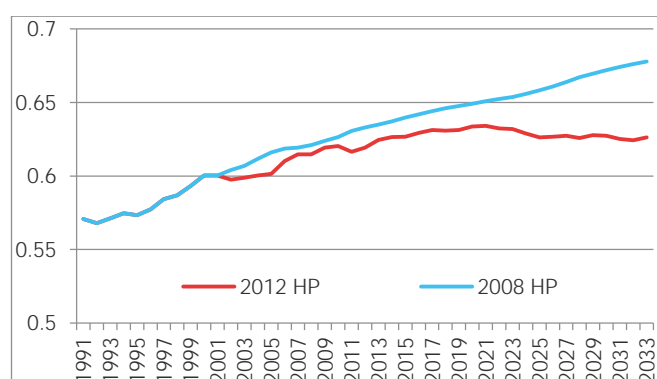
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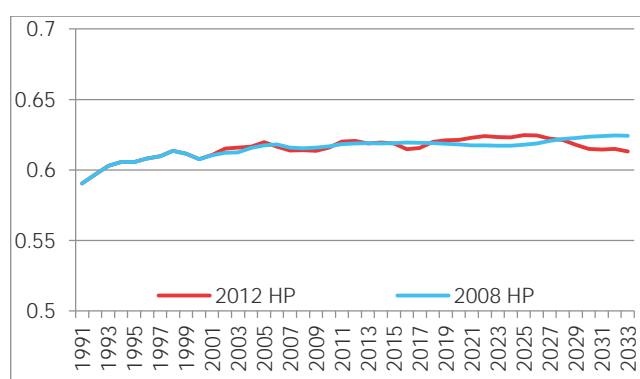
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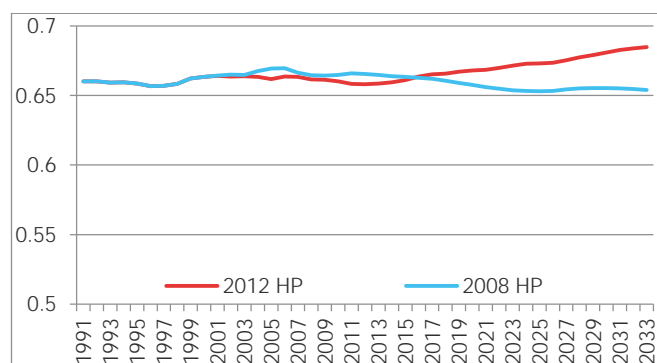
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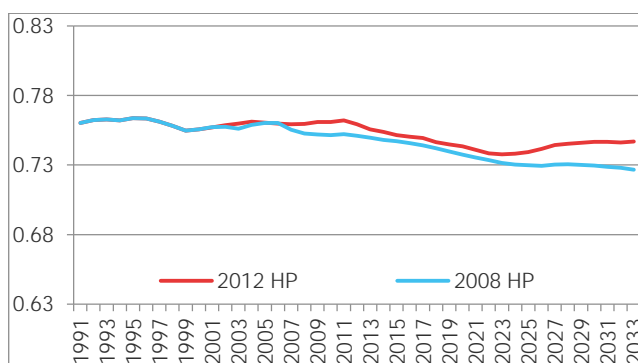
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3.10 In conclusion, the 2016 SHMA's approach broadly follows the correct stages within national planning guidance:

- It starts with the DCLG Household Projections (749 dpa).
- It then makes adjustments to the demographic assumptions (increase to 777 dpa).
- It assesses projected labour supply against the likely change in job numbers and concludes that no increase is justified.
- An assessment of market signals has concluded that there are indicators of pressure in the housing market including overcrowding, concealed households and falls in HRRs in younger demographics. An adjustment is made to HRRs to model an improvement in market signals (increase to 783 dpa), albeit GVA does not consider this goes far enough as the 2012 HP HRRs which the SHMA tracks, shows a fall in HRRs in the end of the projection period.

3.11 The 2016 SMHA concludes with the identification of OAN for **785 homes per annum**, equivalent to **15,700 homes over the 2011-31** period (the above figures are rounded to the nearest 5 dwellings/annum).

## (ii) GVA Assessment of Objectively Assessed Housing Need (2016)

3.12 To support planning application reference OL/TH/16/0550 GVA undertook it's own OAN in 2016, which is provided for reference at Appendix I.

3.13 The key methodology and findings of this re-calculation of objectively assessed need, following the steps set out in the NPPG, are as follows:

- Assess the latest household projections. The latest household projections and demographic indicate a need for 749 dwellings per annum over the period 2011 to 2031. Further analysis of household migration rates indicates that this should be increased to 784 dwellings per annum to take account of a full economic cycle and UPC.
- Review employment forecasts and whether they could provide a justification for increasing housing delivery. Growth in employment of around 15% has been forecast in the district which can be delivered by projected demographic growth.

- Assess housing market signals to understand if this could provide a justification for increasing housing delivery. Housing market signals indicate affordability problems which could justify an increase to objectively assessed needs in excess of household projections. An increase in household formation in younger age groups results in an adjusted demographic scenario of 804 dwellings per annum.

- 3.14 At the time of the previous application it was concluded from this re-calculation that **804 dwellings per annum** was most robust OAN figure for Thanet at that time, which equated to **16,080 homes over the period 2011-31**.
- 3.15 This compares to 785 dwellings per annum/15,700 homes over the period 2011-31 identified in the Council's 2016 SHMA (+2.4%).

### (iii) Thanet Updated Assessment of Objectively Assessed Housing Need (September 2016)

- 3.16 The Thanet Updated Assessment of Objectively Assessed Housing Need (OAN) 2016 provides an updated analysis of housing need in Thanet District. The Thanet OAN 2016 uses 2014-based Sub-National Population Projections (SNPP) and CLG Household Projections. These projections show stronger population growth than the 2012-based projections which informed the 2016 SHMA Update.
- 3.17 The 2012-based population projections were for a population growth of 17.9% over the 2011-31 period, and the new 2014-based projections in the Thanet OAN 2016 point to an increased population of 20.2% in the OAN over the same period. The increased population growth is driven by stronger than expected immigration to the District (of which 80% is internal migration from within the UK). The Thanet OAN identifies that although there is uncertainty over future immigration policy, "it is by no means clear that this will result in lower population growth in Thanet in a context whereby the official projections already assume a significant reduction of over 50% in net international migration to the UK over the next 5 years" (ONA, para 1.2).
- 3.18 Population growth rates are also assessed to grow at a faster rate than anticipated in the 2012-based SNPP; the 2014-based SNPP anticipates growth at a rate of 0.98% pa which is above that expected in the 2012-based SNPP (0.89%). The latest population growth rates are slightly higher than that of the previous five years (0.94%), and notably above that seen over the previous ten years (0.81%).
- 3.19 The Thanet OAN undertakes sensitivity testing to consider population projections based on 10 year and 14 year migration trends (adjusted and unadjusted for Unattributable Population Change (UPC)). The sensitivity analysis indicates that population growth of 1% pa might be expected over the plan period to 2031. The rebased 2014-based SNPP, with 20% growth projected, sits in the middle of the range shown by the sensitivity projections. The Thanet OAN concludes that regardless of the base period studied, the outputs in terms of population growth are broadly similar. Both short and longer-term migration point to similar levels of population growth.
- 3.20 With regard to levels of out migration from London to Thanet, the Thanet OAN undertakes a sensitivity analysis based on the GLA population and household populations which underpin the London Plan. The GLA/ONS figures show that migration flows from London to Thanet fell slightly over the 2001-14 period, and the sensitivity analysis adjusts migration assumptions in the latest SNPP to adopt consistent assumptions on

migration from London. An adjustment has therefore been made to migration levels post-2017 at a level which is half of the difference between pre-recession trends and the trends feeding into the SNPP. On this basis, projected population growth (2011-31) increases modestly from 20% projected growth (2014-based SNPP projection) to 20.5% in the London migration sensitivity scenario.

- 3.21 The changes arising in the population from the 2014-based SNPP projection also impact on age profile and household formation. The projected growth in households will be around 15,450 between 2011-31, which equates to 773 households pa.
- 3.22 In summary the Updated OAN identifies the following housing needs arising from the trend-based scenarios (see Figure 3 below):

Figure 3 – Thanet 2016 OAN Household and Housing Growth Figures (2011-2031)

	Household Growth 2011-31	Household Growth per Annum, 2011-31	Housing Need (Dwellings per Annum)
<b>2012 based SNPP</b>	<b>14,297</b>	<b>715</b>	<b>760</b>
<b>2014-based SNPP</b>	<b>15,397</b>	<b>770</b>	<b>818</b>
<b>Rebased 2014-based SNPP</b>	<b>15,450</b>	<b>773</b>	<b>821</b>
<b>10 Year Migration</b>	<b>15,200</b>	<b>760</b>	<b>808</b>
<b>10 Year Migration adjusted for UPC</b>	<b>15,487</b>	<b>774</b>	<b>823</b>
<b>14 Year Migration</b>	<b>15,514</b>	<b>776</b>	<b>824</b>
<b>14 Year Migration adjusted for UPC</b>	<b>15,825</b>	<b>791</b>	<b>841</b>
<b>London Migration Sensitivity</b>	<b>15,774</b>	<b>789</b>	<b>838</b>

Source: Table 12 Thanet Updated Assessment of Objectively Assessed Housing Need (2016)

- 3.23 The Thanet OAN 2016 includes scenario tests for employment growth. Between 2011-31 the 2014-based SNPP forecasts estimate that the change in resident workforce increases from previous forecasts of 4,800 jobs to 5,100 jobs (Experian Policy-On scenario), and concludes that 'the labour supply will be sufficient to support the projected economic growth; and that there is no need to increase housing provision above the levels shown in the demographic scenarios to support the economy'.
- 3.24 In relation to market signals, the Thanet OAN 2016 revisits previous assumptions regarding average house prices, affordability and rental costs. The analysis indicates that house price to income ratio has increased from 8.22 in 2014 to 8.37 in 2015, likewise the rental affordability ratio has increased from 29.9% in 2014 to 32.6% in 2015. The report concludes that a modest adjustment for market signals would be warranted, and re-asserts that an upward adjustment (as was modelled in the SHMA Update) by returning household formation rates for those aged 25-34 back to 2001 levels over the period to 2025. This adjustment results in an upward adjustment of 19 dwellings pa, which increases the housing need to 857 dpa (2011-31).
- 3.25 Overall the identified housing need in the Thanet OAN 2016 is for **17,140 dwellings over the 2011-31 plan period (857 dwellings per annum)**. This is 9% higher than the 2016 SHMA Update.
- 3.26 The Proposed Revisions to Draft Thanet Local Plan to 2031 (PRDTLP) (Preferred Option) were consulted on in early 2017. Revised Policy SP11 (Housing Provision) targets provision of 17,140 additional homes between 2011 and 2031 (see Table 3 below).

Table 3 – Revised Draft Policy SP11 - Housing Provision

	2011-16	2016-21	2021-26	2026-31	Total
<b>Additional homes</b>	4,285	4,285	4,285	4,285	<b>17,140</b>

Source: Proposed Revisions to Draft Thanet Local Plan 2017: Housing Strategy section

- 3.27 The updated housing need figures in the PRDLP are based on the Thanet Updated Assessment of Objectively Assessed Housing Need Draft (OAN) 2016.

#### (iv) Latest Ministry of Housing, Communities and Local Government (HCLG) Housing Need Figures

- 3.28 During September to November 2017 HCLG consulted on measures set out in the housing white paper to boost housing supply in England. As part of the consultation a 'Housing Need Consultation Data Table' was published which sets out the data for each local planning policy using the standardised method for calculating local authorities' housing need.
- 3.29 The Government's proposed approach to a standardised method of calculation consists of three elements. The starting point should continue to be a demographic baseline. The baseline should then be modified to account for market signals. The final step is to cap the level of any increase in potential housing need to ensure deliverability.
- 3.30 Proposed draft revisions to the NPPF were published for public consultation on 5 March 2018. The draft revisions are available for comment until 10 May 2018. Whilst the revisions are only issued in draft at this stage (and therefore only provide very limited weight in the determination of planning applications), they do provide a useful indication of the future direction of Government's planning policy, and will be a material consideration from the date of publication.
- 3.31 Draft Paragraph 61 of the NPPF states that '*in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method in national planning guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals*'.
- 3.32 Thanet's current Local Plan dates back to 2006. The guidance from HCLG regarding the standardised calculation of housing need, is that where local plans are more than five years old, and if new local plans have not been submitted to the Secretary of State on or before 31 March (or after the revised NPPF is published (whichever is the later)), the new standardised method should be applied immediately. HCLG proposed transitional arrangements for draft plans which are advanced in their preparation, allowing those submitted for examination prior to 31 March 2018 to continue with their current approach to calculating housing need, however Thanet District Council does not benefit from this as the Local Plan has not been submitted for examination.

- 3.33 The published HCLG data for Thanet (based on the proposed calculation methods) for the period 2016-2026 indicates that the current local assessment of housing need of 857 dwellings per annum should be increased to 1,063 dwellings per annum.
- 3.34 Accordingly, the proposed level of housing provision identified in the Proposed Revisions to Draft Local Plan (2017) appears to represent a significant underprovision of new homes in the district (under provision of 4,120 dwellings over plan period, or 206 dwellings per annum), and set out in Table 4 below.

**Table 4 – Housing Need Scenario Comparison**

Local Plan Scenario	Objective Assessment of Housing Need
Scenario 1 - Current Draft Local Plan Policy (Thanet District Council Assessment)	857 per annum 17,140 for Local Plan period 2011-31
Scenario 2 - HCLG Assessment	1,063 per annum (21,260 when applied to Local Plan period 2011-31*)

Source: Proposed Revisions to Draft Thanet Local Plan 2017 and HCLG 2017 Housing Need Figures

\*We assume that the 1,063 per annum target should be applied over the course of the full duration of the plan period.

## Summary

- Previous evidence base documents including the East Kent SHMA (2009), KCC (Thanet) Economic and Demographic Forecasts (2013) and the Thanet SHMA (2016) are considered to be out of date and do not fully and objectively assess housing needs in Thanet. The Thanet SHMA (2016) identified a need for **15,700 homes** between 2011-31 (785 dwellings per annum).
- The 2016 GVA OAN findings (Appendix 1) indicated that the previous evidence base documents had underestimated housing need. For the period 2011-31 GVA estimated a need for **16,080 homes** (804 dwellings per annum).
- The Thanet Updated OAN (2016) is based on the most recent data available in the District and indicates that there is a significant need to boost housing supply in Thanet. The Thanet OAN supports a housing need of **17,140 homes** over the same 20 year period, indicating a significant under provision of housing.
- In terms of planning policy, the Thanet Local Plan Preferred Options Consultation (2015) outlined a previous target of 12,000 new dwellings between 2011 and 2031 (this figure did not align with the East Kent SHMA (2009) or the KCC (Thanet) Economic and Demographic Forecasts (2013). PRDTLP (Preferred Option) Policy SP11 reflects the housing need identified in the Thanet OAN 2016 (**17,140 dwellings between 2011-31**).

- Latest housing data figures from HCLG (2017) using a standardised method of calculation, indicate an even higher need for housing arising in Thanet District of **21,260 dwellings between 2011-31. The published standardised HCLG housing figures are the most appropriate housing need figures to use and should be treated as the effective housing need target for policy making and decision taking.**



## 4. Assessment of Land Supply

- 4.1 This section firstly identifies Thanet's land supply position based on review of the Strategic Housing Land Availability Assessment (SHLAA) Update 2013 (which is the current land supply assessment and informs the Proposed Revisions to Draft Local Plan (Preferred Options) PRDLP 2017), and the most recent Annual Monitoring Report (AMR) (2016) which set out Thanet's current five year land supply.
- 4.2 Another key aspect of focus in relation to the District's identified land supply in the PRDLP (based on the SHLAA 2013 Update) is the methodological compliance of the land supply assessment and more importantly, how realistic it is for the identified sites to come forward in their designated timeframe (particularly for sites at the strategic level). The second part of this section of the report considers the strength of the evidence for sites coming forward and the robustness of the scoring criteria for sites in accordance with the NPPG tests of suitability, availability and achievability. This feeds into GVA analysis of the District's housing land supply.
- 4.3 Overall, this section of the report establishes an understanding of the appropriateness and deliverability of the assessed potential land supply in the District and its ability to meet housing needs, particularly in relation to the five year housing land supply.

### 1) Thanet Assessment of Potential Housing Land Supply

#### i) Thanet SHLAA 2013 Update Overview

- 4.4 The Thanet SHLAA Update was published in 2013 and reviews and updates the findings of the 2010 SHLAA in light of the NPPF and NPPG guidance, providing detail to inform the District's potential housing land supply in the longer term to 2031 using a fully guidance compliant methodology.

#### Methodology

- 4.5 The Thanet SHLAA 2013 Update adopts a base date of 31st March 2013 and draws on sites with planning permission from the 2012 Housing Information Audit, so does not capture planning permissions post 31st March 2012.
- 4.6 To qualify for assessment in the SHLAA, sites had to meet the following criteria:
- 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 (Minster, St Nicholas-at-Wade, Cliffsend, and Monkton); or
  - Located adjoining the confines of the above provided that the site substantially abuts the confines to represent a proportionate urban extension; and
  - Not designated as an SPA, Ramsar, SAC, SSSI, or Natural Nature Reserve site, nor 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 (this criteria was informed by the Employment Land Review).

- 4.7 The methodological approach involves the review and re-assessment of all sites identified within the 2010 SHLAA as well as assessing new sites that were not considered. High level sustainability screening is undertaken first to identify those sites which should only sit within the reserve list (referred to only if there is insufficient capacity), with screening criteria updated from the 2010 approach to achieve compliance within the new guidance. This means that many sites not considered within the 2010 SHLAA have been assessed in this update.
- 4.8 When considering the deliverability and developability of sites, methodological guidance was taken from the Strategic Housing Land Availability Assessment Protocol for Kent & Medway. Sites were assessed in relation to their suitability, availability and achievability and scored on these criteria from 1 to 4.
- 4.9 For Suitability the scoring criteria was as follows:
- 4 = no material constraints/or impact mitigation required;
  - 3 = constraints/impacts easily overcome/mitigated;
  - 2 = overcoming constraints/impact mitigation more difficult to achieve; and
  - 1 = constraints unlikely to be removed/impacts mitigated before 2031.
- 4.10 For Availability the scoring criteria was as follows:
- 4 = development commenced;
  - 3 = no known constraints to availability;
  - 2 = any constraints can be overcome within relevant timescale; and
  - 1 = constraints cannot be overcome by 2031.
- 4.11 For Achievability consideration is made to the market, cost and delivery factors that affect how achievable delivery of development on the site will be, with the scoring criteria as follows:
- 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; and
  - 1 = no development seems achievable before 2031.

### Key Findings & Critique

- 4.12 As shown in Table 5 below, the SHLAA Update identifies an overall potential supply that could accommodate 20,456 dwellings to the end of the plan period (2031), and a further 1,813 dwellings post 2031. This comprises a total capacity of 19,469 on assessed identified sites and 2,800 from other sources (small sites, small windfalls, broad area windfalls, and completions 2011-12). This is based on a range of sources which can be grouped into those sites assessed from the SHLAA methodology, the forecast potential from windfall sites, and the completed dwellings between April 2011 and March 2012. This constitutes unconstrained potential.

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- 4.13 Note that the SHLAA did not include the former Manston Airport site which would have been in use as an airport at the time and therefore would not have met the above criteria to qualify for the assessment.
- 4.14 Potential supply that could accommodate 4,542 dwellings is identified within the first five years of the plan period (2011-16) is considered in the report to be deliverable, and the remainder of the potential supply to 2031, 15,914 dwellings, considered developable (in line with NPPG guidance).
- 4.15 When compared with the notional requirement of 17,140 dwellings over the plan period (as defined in the PRDLP 2017), the identified potential indicates an overall over-delivery 3,316 dwellings over the plan period. Analysis of actual deliverable and developable housing land is provided in further detail below.

Table 5 - SHLAA Table showing Potential Identified Capacity

Source of Housing Potential	2011-16	2016-21	2021-26	2026-31	Post 2031	Grand Total
Urban Capacity Audit	106	12	124	97	88	427
2006 Local Plan allocations	339	307	280	280	6	1,212
Sites with planning permission (residual)	606	451	185	11	7	1,260
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	2,960	1,398	509	1,116	6,331
Owner/developed submissions (call 2)	0	91	47	45	213	396
Owner/developer submissions (call 3)	970	14	0	18	0	1,002
Owner/developer submissions supplemental	0	1,558	0	0	0	1,558
Green Wedge (early calls)	0	945	320	250	0	1,515
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	3,452	122	8	42	3,668
<b>Assessed Identified Sites Sub-total</b>	<b>3,782</b>	<b>10,008</b>	<b>2,589</b>	<b>1,277</b>	<b>1,813</b>	<b>19,469</b>
Small sites	200					200
Small windfall sites <sup>1</sup>	240					240
Broad area windfall contribution		680	680	680		2,040
Completed between 2011 and 2012 (study base date)	320					320
<b>Grand Total</b>	<b>4,542</b>	<b>10,688</b>	<b>3,269</b>	<b>1,957</b>	<b>1,813</b>	<b>22,269</b>
<b>Grand Total to 2031</b>	<b>4,542</b>	<b>10,688</b>	<b>3,269</b>	<b>1,957</b>		<b>20,456</b>

Source: Thanet SHLAA 2013 Update (Potential Housing Capacity – Summary Table)

<sup>1</sup> Assumes 88 per annum but deducting extant small site capacity to avoid duplication

## ii) Proposed Revisions to Draft Local Plan (Preferred Options) (2017) Revised Policy SP11 – Housing Provision

- 4.16 The PRDLP puts in place draft policies to deliver a notional target of 17,140 new homes over the plan period (this target is based on the Thanet OAN 2016).
- 4.17 This includes the allocation of 80 of the identified assessed sites in the SHLAA (out of a total of 374 sites). These sites are listed at Appendix B of the PRDLP, and are listed for reference in Appendix III of this report. These sites make up the total housing provision set out in Revised Policy SP11, which is reproduced below in Table 6:

**Table 6 – Revised Draft Policy SP11 – Total Housing Provision**

Period	2011-2031*
<b>Strategic Sites (Sites of 500+ dwellings)</b>	
Westwood	1,450
Birchington on Sea	1,000
Westgate on Sea	1,000
Manston Green	700
Land at Manston Court / Haine Road	700
Former Airport Site	2,500
<b>Other Housing Sites/Area</b>	
Land at Manston Road / Shottendane Road	250
Margate & Cliftonville	816
Ramsgate	793
Broadstairs & St Peters	304
Birchington on Sea	101
Westgate on Sea	36
Rural Settlements	375
Windfall Sites (based on 225 units per year, discounted for years 1-3 to avoid double counting)	2,700
Completed since 2011	1,555
Extant planning permissions	3,017
Empty Properties	540
<b>TOTAL</b>	<b>17,837</b>

Source: Proposed Revisions to Draft Thanet Local Plan 2017: Housing Strategy section

\*The base-date for this table is 31 March 2016 (as confirmed in paragraph 2.93 of the Extraordinary Meeting of the Council Agenda 18 January 2018)

- 4.18 GVA's detailed critique of the figures which form Revised Policy SP11 is provided in the second part of this section of the report (paragraphs 4.33 onwards).
- 4.19 Proposed additional housing allocation sites (not identified/assessed in the SHLAA) to meet the Thanet OAN (2016) are outlined in paragraph 4.1 of the PRDLP (and included in Policy SP11):
- Land at Manston Road / Shottendane Road – potential capacity for 250 homes\*
  - Eurokent – potential capacity for up to 550 homes (200 additional dwellings)
  - Land at Manston Court Road / Haine Road – potential capacity for 700 homes\*\*
  - Former airport site – potential capacity for 2,500 homes\*\*
- 4.20 It should be noted that the site denoted with \* above is identified as an 'Other Housing Sites/Area', and the two sites denoted with \*\* above are identified within the 'Strategic Sites' in the PRDLP, and therefore the 'Additional Housing Allocation' sites appear to be double counted in the Revised Draft Policy SP11 Total Housing Provision. Accordingly only the Eurokent site (500 homes) solely contributes towards the Additional Housing Allocation Sites.
- 4.21 In the period since 2013, 13 sites identified in the SHLAA are no longer available as potential housing allocations as they are not supported by landowners or are being developed for non-residential uses (as outlined in draft paragraph 4.2 of the PRDLP (provided at Appendix IV of this report for reference).
- 4.22 A further 66 sites identified in the SHLAA are duplicates or have been assessed to have potential capacity of zero (due to suitability, or availability constraints).
- 4.23 This leaves a balance of 215 sites identified in the SHLAA which fall within the following categories:
- **Completions** – Some sites may have been developed (and therefore accounted for in Revised Policy SP11)
  - **Extant Planning Permissions** - Some sites may have been granted planning permission since 2011 (and therefore accounted for in Revised Policy SP11); or
  - **Potential Forced Allocations (117 sites)** – Remaining sites with potential allocation for housing.
- 4.24 An assessment of the suitability, availability and achievability of the 117 Potential Forced Allocation sites is provided in part two of this section and Appendix IV.

### iii) Thanet AMR 2016

- 4.25 Local authority identification of its 5 year supply of deliverable housing sites is a requirement of the NPPF (as stated in paragraph 47), which should be benchmarked against housing requirement;

*"...identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land" (NPPF, paragraph 47).*

- 4.26 The procedure for estimating the five year supply as part of the Thanet AMR involved three main steps; listing all uncompleted housing sites with extant planning permission and sites allocated in the preferred option Local Plan (2015) (the list was derived from the annual Housing Information Audit 2015), estimating deliverability of sites (within the period to March 2021) and the capacity of deliverability, and scoring sites for suitability, availability and achievability (in line with the requirement of the planning practice guidance NPPG ID 3-018-20140306) from 1–4.
- 4.27 The Thanet AMR (2016) identifies that the **estimated five year supply of deliverable housing sites is 4,521 (2016 to 2021)**. This comprises:
- The total capacity of the allocated sites in the Preferred Option Local Plan (2015) that contribute to the five year supply only (2,444 homes); and
  - Sites with planning permission (under construction or not started) (1,627 homes); and
  - A windfall allowance discounted for the first 3 years of the 5 year period (450 homes).
- 4.28 The AMR also indicates that over the remaining planning period (2022-31), a further 7,771 dwellings are projected to be phased for development (years 5-15).
- 4.29 The five year housing land supply identified in the 2016 AMR represents a significant increase in homes when compared to previous AMRs; the 2015 AMR identified 1,649 homes which could be delivered over the five year period 2015-20. It should be noted that the 2015 AMR calculation did not rely on any unallocated sites, or sites which do not have planning permission. An allowance for windfall sites was not included in the 2015 AMR supply figures either.
- 4.30 It is important to note that the figures in the Thanet AMR 2016 only makes an allowance for a provision for a 5% additional buffer of homes against the five year housing provision in the PRDLP. In accordance with NPPF Paragraph 47, local planning authorities are required to significantly boost the supply of housing, and states that “where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land”. The Draft Revised NPPF states at Paragraph 74c that a 20% buffer should be included to housing supply ‘*where there has been significant under delivery of housing over the previous three years to improve the prospect of achieving the planned supply*’.
- 4.31 Taking into account Thanet District Council’s record of under delivery of housing, it is necessary for the Council to make an allowance for a buffer of an additional 20% of homes. This equates to 857 additional homes to be identified as deliverable (on top of the PRDLP requirement to deliver 4,285 dwellings in each five year period, therefore **a requirement for a total of 5,142 homes**). If the 20% buffer is provided in addition to the HCLG housing need requirement for 5,315 homes over the five year period, this would equate to **an NPPF compliant requirement for a total of 6,378 homes**.
- 4.32 **In either scenario, it is clear that the Council’s estimated supply of housing falls significantly short of the requirement to demonstrate a five year housing land supply. This is before considering whether or not the identified supply is in fact deliverable, which we consider in the section part of this section.**



## 2) GVA Analysis of Potential Housing Land Supply

### i) GVA Assessment of Deliverable Housing Sites

#### Methodology and Assumptions

- 4.33 Having reviewed the published housing supply evidence above, GVA has undertaken a full assessment and update of the potential deliverable and developable land identified for residential development in Thanet.
- 4.34 In order to provide a direct comparison with Thanet's identified housing land supply, our assessment follows the same headings as Revised Draft Policy SP11.
- 4.35 This section firstly provides a qualitative review of each of the relevant categories from Revised Draft Policy SP11 (Strategic Sites, Other Housing Sites, Rural Settlements, Windfall Sites, Completed Since 2011, Extant Planning Permissions, and Empty Properties). The GVA analysis does not include the Former Manston Airport site, which is considered in Section 6 of this report. We have also included additional categories (Call for Sites and SHLAA Potential Forced Allocations) in order to provide a fully robust assessment of all potentially deliverable and developable sites.
- 4.36 For consistency with the most up to date information available in the evidence base documents, our assessment of sites assumes the same base date as the PRDLP and the 2016 AMR (31 March 2016), and therefore covers the five year housing land supply period of 2016-2021, and the plan period of 2016-2031. This is considered to be a reasonable approach as this is in accordance with the emerging plan period, and does not require any re-weighting or broadbrush assumptions in terms of re-basing the housing supply figures.
- 4.37 The NPPF outlines that "to be considered deliverable, sites should be available now, offer a sustainable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years" (footnote 11). In addition the NPPF states that "to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged" (footnote 12), for example developable sites provide locations for housing growth for years 6-10, and where possible for years 11-15.
- 4.38 Our methodology for assessing the deliverability / developability of a site is in line with NPPF requirements, and for clarity is summarised below. This methodology has been consistently applied throughout our assessment.

**Deliverable sites** – We define these sites as those which benefit from full planning permission or approved reserved matters and therefore are likely to be built out between 2016-2021.

**Developable sites (2021-2026)** - We assume that sites with outline planning permission could be developable after five years, a reasonable period within which to secure reserved matters approvals and discharge of conditions. In addition, we consider that sites which have a scoring criteria of all 3s and 4s (as per the SHLAA

criteria), have limited constraints in terms of suitability, availability and achievability and could also reasonably be delivered between 2021-2026.

**Developable sites (2026-2031)** – We assume that sites which do not benefit from planning permission, or those which score 2s or above in the SHLAA criteria, are considered to be developable in the longer term (2026-2031), subject to overcoming identified constraints.

**Sites post 2031** – We assume that sites which score 1s in the SHLAA criteria have significant constraints to delivery, which are unlikely to be mitigated/overcome by 2031. This also includes sites identified in the SHLAA to be developable post 2031.

4.39 Qualitative reviews of each category are provided below and quantitatively summarised in Table 9.

#### Detailed Analysis of Strategic Sites (sites of over 500 dwellings) and Proposed Additional Sites from the PRDLP (2017)

4.40 In this section we set out our analysis of the deliverability and developability of the six Strategic Sites (sites of 500+ dwellings) and the Proposed Additional Sites identified in the PRDLP.

4.41 Cumulatively, the six Strategic Sites comprise 41% of the total housing provision over the plan period as identified in the draft Revised Policy SP11, as such the Council's housing supply is reliant on the delivery of these sites. These six key strategic sites are Westwood, Birchington on Sea, Westgate on Sea, Manston Green, Land at Manston Court/Haine Road and the former Manston Airport site. The 'Other Housing Site' is Land at Manston Road / Shottendane Road and the Proposed Additional Site is Eurokent comprise a further 800 homes in total.

4.42 Key details of the individual sites that make up each Strategic Site are shown in Table 7, and assessed in further detail below.

**Table 7 - Table showing Site Assessment Results for Key Strategic Sites Identified in Thanet Housing Strategy**

Strategic Site	Site	Site Source	2016-21 potential (units)	2021 –31 potential units	Deliverability Scores <sup>2</sup>			Identified Constraints
					S	Av	Ac	
Westwood	S511 – Land at Nash Court	Landowner/developer submission - tranche 1	300	1,150	3	2	2	Potential contamination of part of site and potential landscape impacts
	S553 – Land west of Red House Farm							
	S447 – Red House Farm							

<sup>2</sup> S = Suitability

Av = Availability

Ac = Achievability

<b>Birchington</b>	S515 – Land at Gore End Farm	Landowner/developer submission - tranche 1	250	750	3	3	3	Possible contamination, listed buildings and potential landscape impacts
	S498 – Land at Street Farm							
	S499 – Land at Court Mount							
<b>Westgate on Sea</b>	ST1 – Land south of Canterbury Road	Landowner/developer submission – tranche 4	250	750	3	3	3	N/a
	ST2 – Land south of Linksfield Road				3	3	3	
<b>Manston Green</b>	SS33 – Land at Haine Road “Manston Green”	Landowner/developer submission – tranche 3	220	565	3	3	3	Development’s location and magnitude may be affected by significant archaeology
<b>Land at Manston Court / Haine Road</b>	Site defined in Section 5 New Policy in PRDLP	New Strategic Housing Policy PRDLP	90	600	-	-	-	Not assessed in PRDLP
<b>Former Manston Airport</b>	Site identified in Section 3 and 4	New strategic policy for a mixed use development to replace Policy SP05	480	2,020	-	-	-	Not assessed in PRDLP
<b>TOTAL</b>			1,590	5,835				

Source: Proposed Revisions to Draft Thanet Local Plan Housing Strategy (2017) (Amendments to Appendix B) and SHLAA Appendix 2

4.43 The potential housing provision in the table above is taken from the Amendments to Appendix B of the PRDLP, which identifies a total of 7,425 units within the six strategic sites (note that there is a discrepancy with the figures in Appendix B which total 7,435 units). The level of provision in Appendix B is higher than the totals

stated in Revised Policy SP11 Table 2 (7,350 units in total). This is a result of 785 dwellings at Manston Green identified in Appendix B, but an allocation of 700 dwellings in Revised Policy SP11, and 690 dwellings at Manston Court/Haine Road in Appendix B but an allocation of 700 dwellings in Revised Policy SP11. This suggests that the PRDLP is not relying on full unit potential identified in the SHLAA site assessment at Manston Green, possibly due to full delivery being less realistic in light of the identified constraints, however this approach is not clearly explained<sup>3</sup>.

- 4.44 It is important to understand how realistic delivery of the Strategic Sites and Proposed Additional Sites is, as full or partial non-delivery would pose a risk to total housing provision.

#### *Westwood Strategic Site*

- 4.45 Three site allocations form the Westwood Strategic Site. Site S511 (Land at Nash Court) benefits from planning permission (F/TH/11/0691) for a mixed use development comprising up to 1,020 homes. The capacity identified in the PRDLP (Appendix 2) is for 1,300 homes to come forward on this site, so the extant permission **under provides 280 homes** against the site requirement in the PRDLP. SHLAA Update Appendix 2 identifies capacity for up to 1,576 dwellings in total, however in light of the planning permission it is unlikely that this higher quantum will be delivered. For the purposes of the Transport Assessment it is assumed that 1,020 homes will be delivered at Site S511.
- 4.46 Reserved Matters approvals for Phase 1 (74 residential units), Phase 2 and 3b (132 units), Phase 3c (97 units) have been granted (303 units). The SHLAA assumed that 29% of the dwellings on the site could be delivered prior to 2021 (296 dwellings). This assumption seems reasonable and aligned with the current approvals therefore it is considered that **303 homes could be delivered prior to 2021, with the remaining 717 dwellings delivered between 2021-26**.
- 4.47 S447 (Red House Farm) secured outline planning permission on 22 April 2016 (OL/TH/15/1256) for the erection of 40 dwellings (this is **9 homes less than the anticipated site potential** in the SHLAA Update which identified capacity for 49 dwellings). Condition 3 of the decision notice states that 'application for approval of the reserved matters shall be made to the Local Planning Authority before 8<sup>th</sup> November 2016 from the date of this permission'. Accordingly a reserved matters application was submitted on 3 November 2016 (R/TH/16/1522). The application is yet to be determined, despite being considered for 15 months. The latest correspondence available online was in July 2017, with concerns being raised from the Thanet Housing department regarding an unacceptable unit mix, Kent County Council requested a Flood Risk Assessment to be submitted, and Highways required changes in relation to car parking provision. No further updates are available online which poses questions as to whether the Applicant will be making revisions to the scheme. Therefore **it is considered that housing delivery on this site within the short term (up to 2021) is likely to be delayed and could be developable 2021-26**.
- 4.48 Site S553 (Land West of Red House Farm) is allocated in the SHLAA to deliver 281 dwellings, and it was assumed that 140 homes would come forward by 2016-21 and 141 homes by 2021-26. A review of planning application records indicates that no planning application has been submitted in relation to this portion of the site allocation. Therefore it is considered that the provision of 140 homes up to 2021 is ambitious and not

<sup>3</sup> It is stated in the Thanet SHLAA 2013 Update that the Local Plan bases its potential supply on the SHLAA, but determines the most appropriate sites of the SHLAA identified potential after making considerations relating to competing uses, higher level policy, strategy and plan targets.

deliverable within five years, **so it is likely that the 281 dwellings would come forward later in the plan period (2026-31)**, once a detailed masterplan for the site has been prepared and approved.

- 4.49 **Accordingly 303 homes at Site S511 could be delivered up to 2021 (five year housing land supply)**, however it is assumed that all other dwellings within that allocation and within the other two Westwood Strategic Sites (1,038 homes (40 homes at S447 and 281 homes at S553)) would be developable later in the plan period, dependent on securing deliverable planning permissions. It should be noted that Westwood Strategic Site is likely to **under-deliver 109 homes** as a result of the lower than anticipated housing provision permitted at Site S511 (Land at Nash Court). The result is that housing provision for the Westwood Strategic Site is likely to fall below the 1,450 notional housing capacity identified in the PRDLP.

#### *Birchington on Sea Strategic Site*

- 4.50 The Strategic Site at Birchington on Sea comprises three site allocations. Site S515 (Land at Gore End Farm) is allocated in the SHLAA Update for 560 homes (280 homes to be delivered by 2016-21 and 280 homes by 2021-26). There are no extant planning permissions for the site, and no recent planning applications have been submitted in relation to this site. The site is identified in the SHLAA as having potential constraints including contamination, listed buildings and potential landscape impacts. There is no evidence available to suggest that these constraints can be overcome or mitigated, and as such the site is not considered to be deliverable within the five year housing land supply period. Should the identified constraints be fully addressed, it is assumed that **the SHLAA quantum of up to 560 homes could be developable post 2026**.
- 4.51 Site S498 (Land at Street Farm) is allocated in the SHLAA Update to provide 456 homes between 2016-21. There are no extant planning permissions for the site, and no recent planning applications have been submitted in relation to this site. No potential constraints in relation to the site were identified in the SHLAA. Due to the lack of any implementable planning permission it is considered that the provision of 456 homes within the 5 year housing land supply period is ambitious, and it is assumed that **the SHLAA quantum of 456 homes is likely to be developable post 2021**.
- 4.52 The SHLAA Update allocates 800 homes to be delivered at S499 (Land at Court Mount). 100 homes were assumed to be provided prior to 2016, 300 homes provided between 2016-21 and 400 homes between 2021-26. There are no extant planning permissions or pending applications for the comprehensive redevelopment of the site, and in light of this the deliverability of the site within five years is questioned. Therefore it is assumed that **the SHLAA quantum of 800 homes is likely to be developable post 2021**.
- 4.53 Overall the practicality of the three Birchington on Sea sites delivering new homes before 2021 is limited, as each site will need to be fully masterplanned and detailed planning permissions prepared. In the case of Land at Gore End Farm, potential site constraints also need to be fully resolved prior to delivering the site. The SHLAA identifies that the sites could deliver 1,816 homes in the plan period, however the PRDLP takes a more cautious approach, assuming that only 1,000 homes will be delivered within this Strategic Site. This indicates potential issues with the suitability, availability or achievability of these sites and therefore **it is assumed that the 1,000 homes identified in Birchington on Sea will be developable post 2021 (with Gore End Farm being developable post 2026, subject to resolving site constraints**.

*Westgate on Sea Strategic Site*

- 4.54 Two sites form the Westgate on Sea Strategic Site. Site ST1 (Land South of Canterbury Road) is allocated to have capacity for 1,040 dwellings, to be delivered between 2016-21. The site is formed by numerous smaller sites. Analysis of these sites shows only major planning permission granted is for Land South of Briary Close (OL/TH/16/1473). Outline planning application for 24 dwellings, was allowed at appeal December 2017. The Planning Inspector confirmed that a comprehensive masterplan for the Westgate on Sea Strategic Housing Site Allocation has yet to be produced, however the Inspector considered that the proposal would only result in limited harm to bringing forward the rest of the site allocation for development. This assessment concludes that **24 units can be delivered between 2021-2026 following the approval of reserved matters applications**. Taking account that there are no other extant planning permissions or pending applications for the comprehensive development of the site, and it is therefore assumed that **the remaining homes on this site are likely to be developable post 2026**.
- 4.55 Site ST2 (Land South of Linksfield Road) is designated in the SHLAA as having capacity for 386 homes by 2021. No extant planning permissions or pending applications are associated with this strategic site, and it is therefore assumed **the 386 homes identified in the SHLAA are likely to be developable post 2026**, due to the requirement for a comprehensive masterplan to be prepared, and planning permissions granted.
- 4.56 Overall we assume that only **24 homes will be developed on the site between 2021-26**. Despite having capacity for 1,426 homes in the SHLAA, the Westgate on Sea Strategic Site (PRDLP) assumes that only 1,000 homes will be delivered within the Strategic Site, which indicates reservations of the sites being able to reach their fully housing potential. It is assumed that **the remaining 976 homes are likely to be developable between 2026-31**.

*Manston Green Strategic Site*

- 4.57 Site SS33 (Land at Haine Road 'Manston Green' is identified to deliver 800 homes up to 2016. The site has outline planning permission for 785 dwellings (OL/T/14/0050), which was granted in July 2016. The decision notice states that an application for approval of reserved matters for the first phase of development must be made within 3 years (July 2019). For the purpose of the Transport Assessment supporting this planning application it has been assumed that this planning permission will be delivered.
- 4.58 It is therefore considered reasonable to assume that once reserved matters approvals have been submitted and approved, this site could be developed between 2021-26. On the basis of the proposed phasing in the PRDLP we consider **186 dwellings will be delivered between 2021-26, with the remaining dwellings delivered within the rest of the plan period up to 2031**.

*Manston Court / Haine Road Strategic Site (Westwood Village)*

- 4.59 New Section 5 of the PRDLP provides a strategic policy for the site at Land at Manston Court / Haine Road. It should be noted that the notional delivery of homes in PRDLP Appendix B totals 690 homes, rather than the 700 homes indicated. The site is identified in the Total Housing Provision Table 2 of Revised Policy SP11, and is also duplicated at Section 4 (Proposed Additional Sites), therefore the Potential Strategic Site allocation double-counts this site.

- 4.60 The site (Westwood Village) is being promoted by Greenacre Capital Ltd. A consultation event was held in July 2017, and a planning application was anticipated to be submitted at the end of 2017. It does not appear that a planning application has been submitted to the Council, however we assume an application for the development of the site will come forward in 2018. The consultation proposals were for 850 new homes, and therefore Draft Section 5 of the PRDLP takes a modest view regarding capacity of the site.
- 4.61 For the purpose of the Transport Assessment supporting this planning application it has been assumed that the site is a committed development. The proposed phasing in SHLAA Appendix 2 for Site S535 considers that the site will be delivered post 2031, however should a planning application be submitted in 2018 and approved it is assumed that **half of the dwellings (350 units) could be developed between 2021-26, with the remaining 350 dwellings developable between 2026-31.**

#### *Land at Manston Road / Shottendane Road Site*

- 4.62 In the Draft PRDLP, this site is not identified as a Strategic Site, but does contribute towards the Total Housing Provision in Revised Policy SP11 (of 17,837 homes). The site is also identified as contributing towards the 4,000 Proposed Additional Sites at section 4.1.
- 4.63 Section 10 of the PRDLP identifies the site for development of up to 250 dwellings. PRDLP Appendix B indicates that 40 dwellings could be delivered by 2021, with 90 homes to be delivered between 2021-2026. It is assumed that the remaining houses would be delivered after this period, however this is not indicated in Appendix B.
- 4.64 No planning applications have been submitted or approved in relation to this site. It is not evident if the land available for development now, as such the realistic achievability of delivering housing within the next five years is unknown. It is therefore assumed that **250 dwellings could be developable between 2026-31.**

#### *Eurokent Site*

- 4.65 In the Draft PRDLP, this site does not form part of the Total Housing Provision in Revised Policy SP11 (of 17,837 homes), instead it contributes towards the 4,000 Proposed Additional Sites at section 4.1.
- 4.66 Planning permission for the mixed use redevelopment of the site, including up to 550 dwellings, was granted at appeal by the Secretary of State in October 2014 (OL/TH/11/0910). An application for reserved matters for the erection of 54 dwellings from Phase 1 of the outline approval was submitted to the Council in October 2017 (R/TH/17/1485).
- 4.67 For the purpose of the Transport Assessment supporting this planning application it has been assumed that the site is a committed development. On the basis of the pending reserved matters application, it is assumed that the **54 dwellings in Phase 1 could be delivered between 2021-2026, with the remaining 496 dwellings developable between 2026-31.**

#### *Identified Site Constraints*

- 4.68 Referring to the SHLAA, with the exception of the availability of the S511 Land at Nash Court site (ranked 2) all sites receive a score of 3 for suitability, availability and achievability. This reveals no obvious issues relating to availability and achievability, however as identified above, in terms of suitability three of the sites (S511,



S499 and SS33) have identified constraints including landscape impact, potential contamination, listed buildings and significant archaeology.

- 4.69 Whilst the SHLAA suitability score of 3 applies to sites where 'constraints/impacts are easily overcome/mitigated', there is no clear justification that this is the case for these sites, so the GVA assessment perceives some risk of non-delivery of their total delivery quantum.
- 4.70 The NPPG indicates that where there are identified constraints that impact on a site's suitability, availability and achievability, there should be consideration of the action to remove these constraints, how this could be achieved, and whether this will affect the likelihood of delivery (NPPG ID 3-022-20140306). This information is not clear from the site assessments in the SHLAA 2013 Update, despite the score of 3 for suitability, and without appropriate approaches to overcoming these constraints there is some likelihood that delivery may not prove to be fully achievable on these sites.
- 4.71 For Strategic Sites at Westwood, Birchington on Sea and Westgate on Sea there is no completed masterplan or development/design brief nor have they been identified as sites that benefit from existing planning consents. As such it is questionable whether they should be included (in whole or in part) within the five year housing supply to 2021. We note that since the preparation of the SHLAA, the planning position of some of these sites (such as Manston Green) has moved forwards nonetheless delivery constraints do still remain.

#### *Summary of Strategic Site Dwelling Capacity*

**Table 8 – GVA Assessment of Strategic Site Capacity**

Site	GVA Assessment of Housing Delivery 2016-2021	GVA Assessment of Housing Delivery 2021-2031	Total	Comparison to Notional Capacity in PRDLP
Westwood Strategic Site	303	1,038	1,341	-109
Birchington Strategic Site	0	1,000	1,000	Same quantum, delayed delivery
Westgate Strategic Site	0	1,000	1,000	Same quantum, delayed delivery
Manston Green Strategic Site	0	785	785	Same quantum, delayed delivery
Land at Manston Court Road / Haine Road Strategic Site (and Additional Site)*	0	700	700	No timescales for delivery in PRDLP
Land at Manston Road/Shottendane Road (Additional Site)*	0	250	250	Same quantum, but delayed delivery
Eurokent (Additional Site)	0	550	550	No timescales for

				delivery in PRDLP
<b>TOTAL (STRATEGIC AND ADDITIONAL SITES EXCLUDING MANSTON AIRPORT)</b>	<b>303</b>	<b>5,323</b>	<b>5,626</b>	

Source: Proposed Revisions to Draft Thanet Local Plan 2017: Housing Strategy section and GVA analysis

\* Site is double counted in PRDLP within Policy SP11 Total Housing Provision and Section 4 Proposed Additional Sites

- 4.72 PRDLP Revised Policy SP11 (Appendix 2) identifies 1,590 units in Strategic Sites and Proposed Additional Sites to be deliverable and to come forward by 2021, whereas the GVA analysis indicates that only 303 units in Strategic Sites and Proposed Additional Sites are likely to be delivered in this five year period (excluding Former Manston Airport). GVA consider that there is an under provision of 1,287 homes in Strategic Sites and Potential Additional Sites for five year housing land supply.
- 4.73 PRDLP Revised Policy SP11 (Appendix 2) identifies 5,835 units in Strategic Sites and Proposed Additional Sites to come forward between 2021-2031. The GVA analysis indicates that 5,323 units will be developable over the same period (excluding Former Manston Airport). This represents an underprovision of 512 homes in the Council's housing supply between 2021-31.
- 4.74 In relation to the Additional Sites (PRDLP 4.1) three sites are double counted, and therefore the 4,000 dwelling figure is overstated. It is appropriate to include Land at Manston Court / Haine Road, Manston Airport and Land at Manston Road / Shottendane Road sites in relation to the Total Housing Provision (SP11), however

these housing capacity figures should be adjusted so that the total additional dwellings identified is 550 homes (Eurokent site), rather than the 4,000 indicated at PRDLP 4.1.

- 4.75 This brief review gives some initial consideration to achieving the housing delivery set out in both the SHLAA 2013 Update and the PRDLP. The assessment exemplifies the level of uncertainty associated with the sites delivering the target number of units within the allotted five year phases. More detailed investigation into the suitability of potential housing provision sites and their approach to overcoming constraint would be required to formulate more concrete conclusions about delivery prospects.

### Other Housing Sites and Rural Settlements

- 4.76 The GVA analysis of Draft Revised Policy SP11 sites assumes that sites identified as 'Other Housing Sites' (excluding the sites specifically assessed above), will be deliverable / developable in accordance with the Council's assumptions in Revised Appendix B of the PRDLP.
- 4.77 GVA also assume that 'Rural Settlements' will also be deliverable / developable in accordance with the Council's assumptions in Revised Appendix B of the PRDLP.

### Analysis of windfall allowance

- 4.78 In addition to the delivery risks associated with the allocated sites, we note that around 15% of supply in the PRDLP comprises windfall sites. The windfall housing figure has been calculated on the basis of securing 225 windfall units per year (with years 1-3 discounted to avoid double counting). The total number of windfall units for the plan period in the PRDLP is estimated to be 2,700 units. We consider there to be a particular risk associated with the dependence on this source of supply.
- 4.79 Whilst there has been historically significant levels of windfall contributions to total dwelling delivery in Thanet, with small windfall sites delivering an average of 120 units per annum between 2003/04 – 2007/08, this provides no guarantee that windfalls will continue to deliver at the same level into the future. In 2012-13 small windfall completions equated to just 57 dwellings (AMR 2016). This uncertainty raises some question as to how realistic the delivery of these forecast windfall units will be over the plan period, particularly in the second half of the period from 2021 onwards. It is also relevant to note that the 2010 SHLAA identified supply potential without the inclusion of windfall sites. The 2013 SHLAA Update's reliance on windfall sites reduces the certainty of the potential of 2,700 units worth of capacity over the plan period.
- 4.80 When considering the use of windfall allowance, consideration should be made to the draft revision to the NPPF. Of particular relevance is the Government's intention that *'where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends'* (Paragraph 71).
- 4.81 On this basis we question the inclusion of this quantum of windfall sites, particularly as part of the Council's five year housing land supply as identified in the AMR 2016. On this basis GVA assume that the most recent data for average quantum of windfall sites (120 units per annum) is a more realistic figure which should be applied across the plan period from 2021-2031 (1,200 units in total).

### **Completed Since 2011**

- 4.82 We assume that the completions since 2011 have already been delivered and do not form part of the five year housing land supply.

### **Extant Planning Permissions**

- 4.83 The Draft Revised Policy SP11 states that there are 3,017 homes with extant planning permission. The source for this data is not evidenced and therefore we question the validity of this level of planning permissions.
- 4.84 The SHLAA (which has a base date of 2013) identifies sites with planning permission as totalling 1,834 units. The 2016 AMR identifies that at 31 March 2016 there were 1,627 homes with planning permission. The base date of the 2016 AMR aligns with the base date of the Draft Revised Policy SP11 and therefore we consider that the quantum of extant planning permissions should align.
- 4.85 On the basis of the evidence available we assume that at the 2016 base date there were 1,627 extant planning permissions, and in accordance with our criteria we assume that these sites are deliverable between 2016-2021.

### **Empty Properties**

- 4.86 Draft Revised Policy SP11 identifies that there are 540 empty properties in the district. There is no evidence as to when the Council anticipates these properties to become occupied/developed. Accordingly, we consider that these empty properties could be developable later in the plan period (eg. between 2026-2031).

### **Call for Sites**

- 4.87 Thanet District Council held a Call for Sites consultation between February and March 2018 to identify sites for possible future development. Any additional sites identified will be considered by the Council to see if they are suitable to accommodate any future development needs.
- 4.88 We are not aware of any sites arising from the Call for Site 2018 consultation. If any suitable housing sites are identified through the consultation process, it is considered that these will not be deliverable during the five year housing supply period, instead sites may be developable later in the plan period.

### **SHLAA Sites (Potential Forced Allocations)**

- 4.89 As part of our analysis we have reviewed sites in the SHLAA which could potentially deliver housing to meet needs.
- 4.90 We identified in paragraph 4.23 of this report that there are 117 sites with potential for allocation for housing (Potential Forced Allocation sites). These are sites not allocated within the PRDLP, excluding those which are completed or have extant planning permissions.
- 4.91 Appendix IV provides GVA's assessment of the deliverability / developability of the Potential Forced Allocation sites identified as having capacity for a total capacity for 5,995 homes in Appendix 2 of the

SHLAA<sup>4</sup>. The SHLAA identifies 737 units to be supplied between 2013 and 2016, with 3,692 between 2016-21, 693 between 2021-26, 311 between 2026-31 and 562 post 2031. The GVA analysis focuses on delivery of units up to 2021, and developable units between 2021-31, in accordance with the criteria established in paragraph 4.38.

- 4.92 In relation to deliverable sites, there are no Potential Forced Allocation sites which benefit from extant planning permission for residential use, therefore we consider that none of the 117 sites are available, suitable and achievable to deliver housing up to 2021.
- 4.93 There are seven sites which are subject to pending planning applications, which if all granted planning permission could deliver 548 homes. We assume that these homes could be developable between 2021-2026.
- 4.94 None of the other sites are subject to planning applications and therefore we review the SHLAA assessment scores for suitability, availability and achievability to establish the likelihood for housing developability in the medium term (2021-2026), long term (2026-2031) and beyond the plan period (2031 onwards).
- 4.95 In addition to the seven sites with pending planning applications, there are 55 sites which scored all 3s or 4s in the Sustainability Criteria assessment for suitability, availability and achievability which means that there are limited mitigation measures to be overcome. Overall these 62 sites could deliver 3,358 dwellings over the medium term (between 2021-2026).
- 4.96 The GVA analysis identifies 35 sites which included scores of 2s in the Sustainability Criteria for assessment. This indicates that there are constraints that may delay the delivery of the site, but that can potentially be overcome by 2031. Accordingly there are 2,019 homes which could be delivered over the longer term (between 2026-2031).
- 4.97 There were 20 sites identified which either scored a 1 in any of the SHLAA scoring criteria categories (and therefore there are constraints identified which cannot be overcome by 2031), or which the SHLAA phasing identified that the site would come forward outside of the plan period. In total these sites could deliver approximately 613 homes post 2031.
- 4.98 Following review of the Potential Forced Allocations from the SHLAA, no units have been identified by GVA as not being realistically deliverable up to 2021 as part of the Council's five year housing land supply. A total of 3,358 units have been identified as being the subject of a pending planning application or have scored highly against the SHLAA Sustainability Criteria, and for the purpose of assessment we assume that these sites will be delivered between 2021-2036. Towards the end of the plan period 2,019 could be developable, subject to overcoming various constraints before 2031.
- 4.99 A summary of the GVA analysis of housing land supply is set out in Table 9 below.

<sup>4</sup> The SHLAA (Update 2013) assessed the potential of 374 sites, of these 80 sites were identified for allocation in the PRDLP. Since 2013, 13 sites are no longer available, and 66 sites were duplicates. This remains a balance of 215 sites which are either classified as 'Housing Completions', 'Extant Planning Permissions' and 'Potential Forced Allocations'. Appendix V assesses the likelihood of the 117 Potential Forced Allocation sites being deliverable or developable.

Table 9 – Summary of GVA Analysis of Deliverable and Developable Housing Sites

Site Type	GVA Notional Capacity	GVA Assessment of Notional Delivery Period			Comments	
(as per Draft Revised Policy SP11)			2016/17- 2020/21	2021/22- 2025/26		2025/26- 2030/31
Strategic Sites	Westwood	1,341	303	757	281	See paragraphs 4.45-4.49. Deliverable sites include Phases 1, 2, 3b and 3c at Land at Nash Court (all have reserved matters approvals)
	Birchington on Sea	1,000	0	700	300	See paragraphs 4.50-4.53. There are no deliverable sites. Due to site constraints we assume Land at Gore End Farm will come forward at the end of the plan period, with other sites developable 2021-26. The PRDRP only allocates 1,000 homes against the 1,816 home capacity in the SHLAA – we have apportioned housing delivery on each site to the figure in the PRDLP.
	Westgate on Sea	1,000	0	24	976	See paragraphs 4.54-4.56. Outline permission for 24 units at Land South of Briary Close has been granted, once reserved matters are approved these could be developed 2021-26. Other sites could be developed later in the plan period.
	Manston Green	700	0	186	504	See paragraphs 4.57-4.58. Outline permission for 785 homes has been granted, but no reserved matters submissions to date. Taking the number of homes assumed to come forward in the first phase in the SHLAA, we have apportioned this against the PRDLP target of 700 homes.
	Land at Manston Court / Haine Road	700	0	350	350	See paragraphs 4.59-4.61. No application has been submitted for the site, therefore we assume half the quantum of homes would be developable 2021-26, with the remaining homes developable 2026-31.
Other Housing Sites / Area	Land at Manston Road / Shottendane Road	250	0	0	250	See paragraphs 4.62-4.64. No application has been submitted for this site, therefore we assume this could be developable towards the end of the plan period.
	Eurokent Site	550	0	54	496	See paragraphs 4.65-4.67. There is a pending reserved matters application for 54 units, which we assume could be developable post 2021, with the remaining site developable between 2026-31.
	Other Sites	2,050	1,179	643	228	As per Thanet Council assumption in Revised Appendix B PRDLP.
Rural Settlements		375	265	110	0	As per Thanet Council assumption in Revised Appendix B PRDLP.
Windfall Sites		1,200	-	600	600	See paragraphs 4.78-4.82. We assume a realistic figure of 120 windfall site completions per year, in accordance with latest average figures available. To avoid double counting we assume no windfall sites are included between 2016-21.
Completed Since 2011		1,555	-	-	-	Already delivered.

Extant Planning Permissions		1,627	1,627	-	-	See paragraphs 4.84-4.86). Departure from Revised Policy SP11 to align with most up to date evidence (2016 AMR identified 1,627 sites with planning permission as at 31 March 2016).
Empty Properties		540	-	-	540	Assume that empty properties could be developable, but later in the plan period.
Call for Sites		Unknown	0	TBC	TBC	Current Call for Sites may identify additional housing sites, but at this stage we are not aware of any sites. Any new sites would be potentially developable later in the plan period.
SHLAA 117 Potential Forced Allocation Sites		5,995	0	3,358	2,019	See paragraphs 4.90-99 and Appendix IV. GVA analysis of the Potential Forced Allocation Sites from the SHLAA identifies no sites with planning permissions to be delivered 2016-21, pending applications and sites with easily overcome constraints to be developable 2021-26 and other sites with constraints to be developable 2026-31.
TOTAL WITHOUT SHLAA POTENTIAL FORCED ALLOCATIONS		12,888	3,374	3,424	4,525	
TOTAL WITH SHLAA POTENTIAL FORCED ALLOCATIONS		18,883	3,374	6,782	6,544	

Note: Deliverable sites are considered suitable, available and achievable to be delivered within the five year housing land supply period 2016-2021. This is the most up to date five year period provided by Thanet District, and upon which evidence base documents have been prepared. GVA do not consider having a more up to date five year period (eg.2018-2023) would fundamentally alter the findings above.

Note: Former Manston Airport has not been included in the table above.

### GVA Conclusion Regarding Supply of Deliverable Housing Sites

- 4.100 As outlined in the NPPG, a deliverable site in the context of housing policy is one that must be able to be delivered in the first five years. Such sites could include those with development plan housing allocations and planning permissions, unless there are identified constraints to their five year delivery (NPPG ID 3-031-2014 03 06).
- 4.101 Based on this definition, GVA's analysis identifies 303 homes at Strategic Sites from the PRDLP, 1,179 homes at 'Other Sites', 265 homes at Rural Sites, 1,627 homes with extant planning permission, and no potential Forced Allocation Sites from the SHLAA which are deliverable up to 2021. In total this equates to 3,374 homes which could be deliverable as part of the District's five year housing land supply. This equates to a shortfall of 1,147 homes against the Council's identified five year housing land supply (4,521 homes).

## 3) Recent Appeal Decisions

### i) Appeal Decisions

#### 66 Monkton Road, Minster, Ramsgate

- 4.102 In April 2017 an appeal for outline planning permission was allowed for the change of use of land and erection of 36 dwellings with construction of new access from Monkton Road. At the time of the Preferred Options Draft Local Plan was being consulted on, and the Inspector considered that 'there is still no five year

*supply and no indication of when the plan will be submitted for examination. In these circumstances the potential site allocations of the emerging local plan can only be given limited weight and planning permission for housing on other sites should be actively considered if suitable sites come forward' (paragraph 9).*

### **Land South of Briary Close, Margate**

- 4.103 In December 2017 an appeal for outline planning permission was allowed for the erection of 24 homes at Land South of Briary Close, Margate. The Inspector concluded that current Local Plan does not provide a five year supply of housing land against NPPF Paragraph 47. Accordingly the Inspector considered that the relevant policies for the supply of housing in Thanet are out of date, and therefore the presumption in favour of sustainable development applies.

## **ii) Implications of Appeal Decisions**

- 4.104 The Inspectors of both 2017 planning appeals considered that the Thanet District Council did not have a five year supply of housing land. Therefore the relevant policies for the supply of housing should not be considered up-to-date, and therefore should be determined in the context of the presumption of sustainable development (NPPF Paragraph 49).
- 4.105 The lack of identified five year housing land supply accords with the GVA analysis of housing supply in the District.

## **Summary**

- This section has reviewed Thanet's housing land supply position based on a review of the most recent SHLAA (Update 2013), the PRDLP (2017) and the most recent AMR (2016).
- GVA have undertaken an assessment of the identified housing sites, with a particular focus on the deliverability of the five year housing land supply. Key Strategic Sites and Proposed Additional Sites identified in the PRDLP have also been thoroughly tested to establish which sites are deliverable between 2016-21, and those which are developable between 2021-2031 (in accordance with the NPPF tests, and the suitability, availability and achievability criteria). Overall this provides an indication of how realistic delivery of identified housing potential might be.
- The SHLAA (Update 2013) identifies unconstrained supply for housing potential of 20,456 units over the 2011-2031 plan period, with potential supply for 4,542 'deliverable' units from 2011-2016 and 15,914 'developable' units from 2016-31.
- When considered against the PRDLP housing provision figures of 17,140 homes over the plan period (based on the Thanet Updated OAN (2016)), this represents a potential over-delivery of 3,406 homes.
- The housing provision in the PRDLP (2017) is for 4,285 dwellings to be delivered for each five year period. The Thanet five year housing land supply in the AMR (2016) is for 4,521 units between 2016-2021, which indicates that the Council's land supply should exceed the draft housing provision by 236 units over this period. However, this housing supply does not take into account the NPPF requirement for the Council to make an allowance for an additional 20% of homes. Therefore the AMR should have



identified a total of 5,142 homes in the five year housing land supply in order to be compliant with national housing policy. **The AMR five year housing land supply therefore represents a shortfall of 621 units (against the NPPF plus 20% buffer scenario). When considered against the HCLG housing need figures plus 20% buffer scenario (6,378 homes), this represents a larger shortfall of 1,857 homes.**

- The Housing Strategy in the PRDLP identifies six strategic sites which support potential housing delivery of 7,350 units over the plan period, 43% of the total 17,140 requirement (Westwood, Birchington, Westgate-on-Sea, Manston Green, Land at Manston Court/Haine Road and Former Manston Airport). The Other Housing Sites (Land at Manston Road/Shottendane Road) and Proposed Additional Site (Eurokent) are identified in the PRDLP as supporting potential housing delivery of a further 800 units. Taken together these key sites are identified in the PRDLP to deliver 8,150 units over the plan period.
- GVA's assessment of the deliverability of the Strategic Sites, Other Housing Sites and Proposed Additional Site indicates that due to a number of site constraints, and lack of implementable masterplans / planning permissions, only 303 units are likely to be deliverable within the five year housing land supply period (excluding development at Former Manston Airport).
- The reliance on the delivery of 225 windfall units per year as part of the Council's housing provision is a risk in terms of deliverability, particularly in light of the Council's underperformance in delivering windfall sites. Windfall units are also included within the Council's five year housing land supply, which raises questions about the deliverability of this element of housing supply.
- GVA consider that based on the NPPG definition of delivery in the housing policy context, **a total of 3,374 homes are considered to be deliverable over the five year period (2016-21)**. This represents an underprovision against the five year housing land supply. Recent appeal decisions have also confirmed that the Thanet District Council do not have a five year supply of housing land.
- Beyond this period GVA consider that **the supply of developable sites between 2021-2031 is estimated to be 7,949 homes (excluding SHLAA Potentially Forced Allocations), or 13,326 homes (if all SHLAA Potentially Forced Allocations are included)**. Therefore in total over the plan period, GVA estimates that between 12,888 and 18,883 homes are deliverable/developable over the plan period.
- Having reviewed Thanet's land supply position and undertaken consideration into the adequacy of identified land supply potential, the next section takes this a step further by understanding the specific alignment between housing need and identified housing land supply, as well as understanding delivery potential when comparing previous delivery levels with housing need figures.

## 5. Alignment Between Need and Supply

- 5.1 This section builds on the analysis from the previous sections to assess the most recent assessments of housing need with the assessed potential land supply identified in the SHLAA Update 2013, the latest Monitoring Report (2016) five year housing land supply and the PRDLP (2016). The alignment between need iterations and recent housing delivery is also considered to add depth to the understanding of how well Thanet has been addressing its housing need in recent years.

### Alignment of Need with Land Supply Potential

- 5.2 Table 13 brings together the figures identified throughout the previous stages of this document to align the assessed housing need figures against the range of assessed housing land potential. This comparison provides a rough indication of whether the SHLAA, AMR, and PRDLP identify sites with sufficient capacity to address the District's identified housing need figures in the Thanet OAN and HCLG assessment.

**Table 13 –Annualised Table Showing How Delivery Levels Based on SHLAA Assessed Potential Meeting Range of Housing Need Figures**

Identified Housing Supply			Objective Assessed Housing Need (GVA, 2016)	Objective Assessed Housing Need (Thanet OAN, 2016)	HCLG Housing Need Figures (2017)
			804 dwellings per annum (4,020 5 yr) 16,080 dwellings in period 2011-31	857 dwellings per annum (4,285 5 yr) 17,140 dwellings in period 2011-31	1,063 dwellings per annum (5,315 5 yr) 21,260 dwellings in period 2011-31
SHLAA 2013 Update Figures	Total Potential Unconstrained Supply (2011-2031)	20,456	3,648	3,316	-804
AMR (2016)	5 Year Supply of Deliverable Housing Land (April 2016-March 2021)	4,521	501	236	-794
	NPPF 5 Year Supply of Deliverable Housing Land (April 2016-March 2021) + 20% buffer	5,142	1,122	857	-173
PRDLP (2017)	Target Housing Provision to 2031 as identified in Draft Revised Policy SP11	17,140	1,060	0	-4,120

<b>GVA Analysis (2018)</b>	Actual Deliverable / Developable SHLAA Supply (up to 2031) (excluding SHLAA Potentially Forced Allocations)	<b>12,888</b>	-3,192	-4,252	-8,372
	Actual Deliverable / Developable SHLAA Supply (up to 2031) (including All SHLAA Potentially Forced Allocations)	<b>18,883</b>	2,803	1,743	-2,377
	5 Year Supply of Deliverable Housing Land (April 2016-March 2021)	<b>3,374</b>	-646	-911	-1,941

Source: Thanet SHLAA 2013 Update, Thanet Local Plan Monitoring Report (2016), PRDLP, Thanet OAN (2016), HCLG Housing Need Figures (2017) and GVA Analysis (2016 and 2018)

- 5.3 This analysis shows that the deliverable 5-year and longer term developable supply of land identified in the SHLAA, AMR, PRDLP and most recent GVA analysis all fall short of the most up to date needs assessed by the HCLG Housing Need Figures (2017).
- 5.4 As identified in Section 2 of this report, there is evidence that Thanet District Council have persistently under achieved in meeting the required delivery of new homes against their annual housing requirements.
- 5.5 Whilst the five year housing land supply identified in the AMR and PRDLP indicate that there are sufficient sites available to meet the Thanet OAN housing need between 2016-21, this does not provide an accurate reflection of the housing supply required to meet the NPPF test which requires an additional supply of 20% of homes to be identified for this period (a total of 5,142 homes). The District is required to identify capacity to deliver an additional 621 homes for the level of supply to be compliant.
- 5.6 GVA's 2017 analysis of genuine housing land supply identifies significant under provision of homes when compared to the supply identified in the SHLAA, AMR and PRDLP. The GVA analysis indicates that there are a number of site constraints for key sites, and a lack of planning permissions. Taken together the result is in an under delivery of 1,941 deliverable homes in the five year housing land supply against the HCLG Housing Need figures, and an under delivery of between 2,377 and 8,372 developable homes over the plan period. It should be noted that the upper level of homes identified as developable in the GVA Analysis would require the allocation of every single Potential Forced Allocation site, therefore this should be considered as an absolute maximum level.
- 5.7 When considered against the NPPF +20% scenario for five year housing land supply, the GVA assessment of housing land supply for this period falls 1,768 homes under the required level (supply of only 65% of the 5,142 target).

- 5.8 This analysis reinforces the assertion that Thanet are not identifying clear ability to meet up to date needs on the basis of recent delivery levels (on top of the concerns regarding land supply previously discussed). The findings from this alignment analysis strengthen the case that Thanet is not adequately identifying or making provision for its full, up to date, objectively assessed housing need.

## Conclusion

- 5.9 This section has considered the alignment of housing need and potential housing supply levels identified for Thanet in previous sections to strengthen the case that Thanet is not adequately identifying or clearly making provision for its full objectively assessed housing need.
- 5.10 The additional alignment of housing need figures with recent delivery levels demonstrates that even if the District were adequately identifying housing need, recent delivery levels challenge the ability to achieve the level of housing delivery required to fully meet need.
- 5.11 We consider that the most relevant and NPPF compliant comparison between need and supply relates to the HCLG housing need figures (21,260 dwellings over the plan period), against a maximum developable supply of 18,883 dwellings identified by GVA over the plan period (assuming that all of the Potential Forced Allocation sites are allocated). In reality we anticipate that the number of developable homes over the plan period would be between 12,888 and 18,883, which would result in a shortfall of up to 8,372 homes over this period.

## 6. Appropriateness of the Former Manston Airport Site

- 6.1 The previous sections confirm that there is a lack of deliverable and developable housing supply sites, and a need to identify additional housing land in Thanet. In this section we review the site at the Former Manston Airport, and its ability to deliver housing to meet the Council's identified housing need.

### Planning Policy and Evidence Base

- 6.2 The site is identified in the PRDLP Draft Revised Policy SP11 as a Strategic Site, which has potential to deliver 2,500 homes over the plan period. The site is also identified in Section 4 (Revised Location of Housing) as a 'Proposed Additional Site' which can deliver 2,500 homes.
- 6.3 PRDLP Revised Policy SP05 specifically relates to the Former Manston Airport Site. The draft policy states that (inter alia):
- 'Land is allocated for a mixed use settlement at the site of the former Manston Airport as defined on the policies map. The site has the capacity to deliver at least 2,500 new dwellings, and up to 85,000 sqm employment and leisure floorspace'.*
- 6.4 Appendix B of the PRDLP assumes the following phasing for housing delivery at the former Manston Airport Site, replicated in Table 11 below.

**Table 11 – PRDLP Appendix B Phasing Schedule for Manston Airport**

Timescale	Total Number of Proposed Dwellings (approx.)
2018-2021	480 homes
2021-2026	876 homes
2026-2031	1,144 homes

Source: PRDLP, Appendix B

- 6.5 The assumed delivery of 480 homes up to 2021 indicates that the Council is dependent on the delivery of the site in order to meet its five year housing land supply.
- 6.6 On Thursday 18 January 2018 Councillors voted not to progress with Thanet's Local Plan, and therefore the PRDLP will not be proceeded to publication stage.

## Availability, Suitability and Achievability of Former Manston Airport as a Housing Site

- 6.7 The site was not assessed in the Council's SHLAA because in 2010 the site would have been in use as an airport at the time and therefore would not have met the SHLAA criteria to qualify for the assessment. It is our view that had the site been assessed as part of the 2013 SHLAA update, that it would have scored highly and therefore should be treated as a preferable site when considered alongside the total unconstrained supply identified in the SHLAA.
- 6.8 We therefore provide our own assessment of the deliverability of the site against requirements in Paragraph 47 of the NPPF.
- 6.9 Sites must be available now to be considered as deliverable. The site is available immediately for comprehensive redevelopment, as demonstrated through the submission of this planning application.
- 6.10 Former airport uses on the site ended when the airport closed on 15 May 2014, and as demonstrated in the Planning Statement and Appendices, there is little prospect of the re-opening of Manston Airport as a commercially viable proposition. The site is a 262ha brownfield site, and the NPPF promotes the effective use of reusing brownfield sites (Paragraph 17). The Draft Revisions to the NPPF give substantial weight to the value of using suitable brownfield land to meet housing needs (Draft Paragraph 118). Accordingly the site is considered to be a suitable location for housing development.
- 6.11 Sites must be achievable with a realistic prospect that housing will be delivered on the site within five years to be considered deliverable. The site has a willing developer in place, and a robust phasing strategy which demonstrates that homes could be delivered on the site within the five year housing supply period. Viability assessments have been prepared to support the submission of the planning application which demonstrates that the proposals are viable and deliverable.
- 6.12 Overall the site is considered to be deliverable and developable to deliver housing which will assist in the Council's housing land supply.

## Former Manston Airport Development Proposal

- 6.13 This report forms part of a suite of documentation that is submitted in support of a planning application for the redevelopment of the former Manston Airport site for mixed use development, which includes up to 3,700 homes.
- 6.14 The illustrative phasing schedule for the development proposal is outlined in Table 12 below.

**Table 12 – Illustrative Phasing Schedule for Manston Airport**

Phase	Timescale	Total Number of Proposed Dwellings (approx.)
Phase 1	2019-2024	1,100 homes
Phase 2	2025-2031	1,400 homes
Phase 3	2032-2037	1,200 homes

*Source: Former Manston Airport Planning Application - Phasing and Delivery Strategy, Appendix B*

- 6.15 Table 11 illustrates that up to 1,100 homes could be delivered in Phase 1 of the scheme, between 2019 and 2024.
- 6.16 The application documentation confirms that the site is suitable for residential development, is available for development now, and has a robust delivery strategy with completions commencing within 2 years. Moreover, the planning application proposals represent a genuinely sustainable development proposition. As a consequence the site should be treated as a deliverable housing site and therefore is capable of forming part of the district's housing land supply.
- 6.17 Taking account of the proven undersupply of deliverable homes up to 2021, the proposals at Former Manston Airport represent a significant addition to the GVA analysis of available housing sites. Table 10 identified 3,374 homes which could be delivered between 2016-2021, and delivering homes at Former Manston Airport could increase this total to 3,924 (which is still a shortfall of 1,391 below the HCLG Housing Need figures over this period).
- 6.18 Looking at housing supply over the plan period, the GVA analysis identifies between 12,888 and 18,883 homes which could be delivered. If planning permission is granted for land at Former Manston Airport, this would increase to between 16,588 and 22,583 homes which under the higher scenario would deliver the required quantum of housing identified in the HCLG Housing Need Figures (21,260 dwellings).

## 7. Conclusion

7.1 This document has reviewed Thanet District Council's key housing need and housing supply evidence papers and the proposed housing policy within the Proposed Revisions to the Draft Local Plan, which they inform. Furthermore, it presents our own objective assessment of housing need in the district and considers the role that the former Manston Airport site could play in meeting that need. We summarise the findings below:

### 1. Historic Housing Delivery Trends

- There were **350** net housing completions in Thanet in 2015/16 (the most recent year reported in the 2016 Annual Monitoring Report). The 2015 AMR forecast the delivery for this period was 499 dwellings.
- Since 2011 the Council have consistently under-delivered against the 600 dwelling per annum requirement. In the 2012/13 period only 200 dwellings were delivered.
- Delivery rates will need to substantially increase if the Council is to meet its five year housing land requirements.

### 2. Housing Need Evidence

- The most up to date objective assessment of housing need (OAN) produced by the Council is the Thanet Updated Assessment of Objectively Assessed Housing Need (2016). This identifies a need of **857 dpa** for the period 2011-31 (total of **17,140**).
- Latest figures of Housing Need as calculated by the Ministry for Housing, Communities and Local Government (2017) indicates a higher need for housing arising in Thanet District (total of **21,260** homes).
- Clearly, the above need figures are well in excess of the medium-term average historic delivery trends referred to above (and two and a half times more than the housing completion rate of 2015/16)

### 3. Housing Land Supply

- The Council's 2016 AMR identifies a 5 year supply of deliverable housing land with capacity to deliver **4,521 dwellings** (2016-2021). This calculation does not account for the required additional buffer of 20% of homes to address the District's persistent under-delivery of housing, and therefore falls below the required housing capacity.
- The Thanet SHLAA Update (2013) identifies an unconstrained capacity for **20,456** dwellings for the period 2011-31, with potential supply for **4,542** deliverable units within the five year period, with **15,914** developable units after this period. The SHLAA did not assess potential capacity at Former Manston Airport.
- The Proposed Revisions to Draft Local Plan (2017) sets out policies to deliver **17,140** homes over the plan period (4,285 dwellings to be delivered within each five year period).
- The PRDLP is also dependent on an unidentified windfall allowance of 2,700 dwellings (15% of planned for supply), which introduces significant uncertainty in terms of the deliverability of necessary supply that Draft Policy SP11 is dependent on.



- GVA have undertaken an assessment of the deliverability and developability of the SHLAA sites to understand genuine supply of housing in the District. A number of the key strategic sites in the PRDLP are subject to development constraints which pose a risk to delivery of site, particularly in the short term.
- The GVA analysis shows that excluding the Former Manston Airport, a total of only **3,374** homes are considered to be deliverable over the five year period (2106-21). The supply of developable sites between 2021-31 is calculated to be **between 7,949 and 13,326** homes.
- Recent appeal decisions in the District have confirmed that the Council does not have a demonstrable five year supply of housing land.

#### 4. Relationship of Need to Supply

- A step-change in housing delivery rates is needed in the district in order to meet objectively assessed needs.
- The Council is unable to demonstrate an NPPF compliant 5-year supply of deliverable housing land supply, therefore in national policy terms there is an-principle need to identify additional deliverable housing land in the district now. The identified five year housing land supply should also be revised to reflect a buffer of 20%.
- The policies set out in the PRDLP (2017) fall short of meeting Thanet OAN in full (GVA estimate that there is a dwelling shortfall of up to 4,252 homes in the period up to 2031, due to the un-achievability of some of the identified supply being delivered, particularly in the short term. Against the HCLG housing need figures the GVA analysis reveals there is an even larger shortfall of up to 8,372 homes. Accordingly, there is a need to identify an additional supply of deliverable and developable land over and above that identified in the PRDLP and AMR.
- The SHLAA identifies an unconstrained land supply sufficient to meet OAN in full, in theory. However, the identified supply of genuinely deliverable sites falls well short of the HCLG housing need.
- Accordingly, there is a clear misalignment between assessed levels of housing need and identified land supply in the district, with a clear need to identify an additional supply of land over and above that identified in the SHLAA in order to meet HCLG requirements in full.

#### 5. The Appropriateness of the Former Manston Airport Site for Housing

- The site was not assessed in the SHLAA and therefore comprises an additional source of potential supply over and above that identified in the SHLAA.
- Had it been assessed in the SHLAA it is our view that it would have scored highly, as justified by the suite of assessment work and supporting material submitted with the planning application. This confirms that the site is suitable for housing development and is available now with a willing developer in place (completions anticipated from 2019, underpinned by a robust business plan). In other words, it is a deliverable site.
- Accordingly, it is our view that the former Manston Airport site should be treated as a preferable site for housing development in principle.

- The site at former Manston Airport could deliver up to 3,700 homes, 2,500 of which could be delivered within the plan period which would provide a significant contribution to meeting the identified housing need in the District.

7.2 The outcome of the above is a well evidenced case for the appropriateness of residential development on the former Manston Airport site, as part of wider mixed use development. The housing case contributes to a 'total place' approach to future development and the clear inter-dependency between the employment, housing, community, cultural, and sport/recreation uses in achieving a truly rounded sustainable development proposition.

# Appendix I

## GVA Calculation of Objectively Assessed Housing Need (2016)

## Introductory Notes

*This GVA OAN (2016) was prepared to support planning application reference OL/TH/16/0550, as it was considered that the existing evidence base at that time (including the East Kent SHMA (2009), KCC (Thanet) Economic and Demographic Forecasts (2013) and the Thanet SHMA (2016)), did not fully and objectively assess housing needs in Thanet.*

*It should be noted that the GVA OAN (2016) was prepared prior to the publication of the Thanet Updated OAN (2016), the Proposed Revisions to Draft Thanet Local Plan to 2031 (PRDTLP) (Preferred Option) (2017), and the HCLG Housing Need Consultation Data (2017).*

# GVA Calculation of Objectively Assessed Housing Need (2016)

The GVA OAN provides an objective assessment of housing needs for the District. The NPPF and PPG requires housing needs to be met at the housing market area (HMA) level, however this re-calculation focuses solely on the need for Thanet District Council. It does however consider the housing stock and active market context of the East Kent housing market area, acknowledging the Manston site as a potential sub-regional housing site which could meet the needs of the wider HMA as well as those solely for Thanet.

This assessment uses a fully PPG compliant methodology with GVA's bespoke demographic and economic model. It uses the latest population and household projections and the latest data which takes account of demographic, housing and economic trends. The methodology will apply the staged approach espoused by the NPPG which is explained in more detail below but which commences with an assessment of DCLG household projections, and tests these projections against the extent to which they support labour force growth, improve or maintain affordability and meet the needs of households unable to access market housing. The staged process results in an objectively assessed housing need for the district which provides a 'policy-off' interpretation of housing needs.

As set out above, the NPPF and NPPG sets out a detailed methodology for undertaking an assessment of housing need in an area. GVA has summarised some of the key requirements and statements from the NPPG which provide some context as to the required approach.

## National Guidance

### The primacy of the up to date SHMA

*"Local planning authorities should [...] assess their **full housing needs, working with neighbouring authorities** where housing market areas cross administrative boundaries. The [...] Assessment should identify the **scale** ... of housing ... that the local population is likely to need over the plan period which:*

- *meets household and population projections, taking account of migration and demographic change;*
- *addresses the need for all types of housing, including affordable housing ...; and*

- caters for housing demand and the scale of housing supply necessary to meet this demand. (Paragraph 159 NPPF)

*"The assessment of housing and economic development needs includes the Strategic Housing Market Assessment requirement as set out in the National Planning Policy Framework" (NPPG Ref. ID 2a-001-20140306)*

### What is housing need?

*The primary objective of an assessment of housing needs is to identify the future quantity of housing needed (NPPG Ref. ID 2a-002-20140306).*

*"Need for housing in the context of the guidance refers to the scale and mix of housing ... that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand." (NPPG Ref. ID 2a-003-20140306)*

*"The assessment of development needs is an **objective assessment of need based on facts and unbiased evidence**. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure, or environmental constraints" (NPPG Ref. ID 2a-004-20140306)*

### What should the assessment include?

The starting point for an assessment of housing need should be the Household Projections (NPPG Ref. ID 2a-015-20140306). Adjustments should then be made to understand the impact of future changes to demographic and migration trends (NPPG Ref. ID 2a-017-20140306) employment growth (NPPG Ref. ID 2a-018-20140306) and market signals (NPPG Ref. ID 2a-019-20140306). The assessment should also consider the implications for affordable housing (NPPG Ref ID 2a-029-20140306) however, as this is focussed on overall need and does not constitute a full strategic housing market assessment, affordable requirement calculations are not undertaken.

### How should historic undersupply be dealt with?

The NPPG cautions that past trends – including undersupply and worsening affordability - may have artificially suppressed household formation rates and therefore could affect future projections. The guidance states:

*"The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. The assessment will therefore need to reflect the consequences of past under delivery of housing. As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply." (NPPG Ref. ID 2a-015-20140306)*

To conclude, an assessment of housing needs must be objective and must identify demand and therefore housing need in full. It should not seek to include metrics or measures which apply restraint. It should be

realistic – that is to say identified supply should meet demand and be based on realistic assumptions about future population and housing change.

The methodology has the following steps:

- Assess the latest household projections and their assumptions to understand if they could be an appropriate measure of future population and household growth in the subject area. This includes an assessment of issues which may have affected past trends such as economic recession, affordability and past housing supply / policies.
- Review past economic performance and employment forecasts to understand if projected working age population can support economic growth in the subject area. If there is projected to be a shortfall, this could provide a justification for increasing housing delivery.
- Assess housing market signals to understand the balance between housing demand and supply. If indicators such as house prices, rents, affordability and overcrowding show that demand for housing is outstripping supply relative to the surrounding area and nationally this could provide a justification for increasing housing delivery.

## ONS/DCLG Projections

The latest full population projections available from the Office of National Statistics (ONS) are the 2010-based Sub-national Population Projections (SNPP) and the 2012-based SNPP. Both projections use different assumptions of fertility, mortality and migration based on trends from the previous five/six years and start from a different base population. The 2012 SNPP was published in May 2014 and takes into account 2011 Census data making it a much more reliable basis for projections – notwithstanding local factors which may have affected past trends and therefore future projections.

The SNPPs are not forecasts and do not take any account of future government policies, changing economic circumstances or the capacity of an area to accommodate the change in population. They provide an indication of the future size and structure of the population if recent demographic trends continue. Projections become increasingly uncertain the further they are carried forward, and particularly so for smaller geographic areas such as districts.

Population projections provide a basis through which to understand future population change. As discussed above, household projections provide a basis through which to understand how that population change affects household formation. This is because as a population changes (both in terms of size and structure) the number of dwellings needed to house that population also changes. For example, a population with a high proportion of people in their late teens is likely to need less housing than a population with a high proportion of 70 year olds. This is because the former demographic often lives with parents and/or in shared houses, whereas the latter is more likely to live as a couple or alone. These probabilities shift over time as a result of cultural changes in the population. For example, divorce amongst 30 and 40 year olds has been increasing over time which has increased the need for housing in this demographic, as when a family or couple splits up you have two households to accommodate rather than one.

The household projections contain assumptions by age and sex about how household formation will change over time. These assumptions are built up through analysis of the Census and Labour Force Survey. As

discussed above, there are three household projections published by DCLG to consider: the 2008-based household projections, 2011-based interim household projections and 2012-based household projections. Further information on each of the projections is outlined in Table 7 with the results for each illustrated in Figures 1-4 and Table 8.

The published 2011-based household projections were interim reflecting known quality issues and hence they only project to 2021. The House of Common Library (Social Policy Section) states that:

“Interim household projections for 2011 to 2021 (based on the 2011 Census) indicate that the number of households grew more slowly than anticipated by the 2008 projections – this is likely to be a reflection of the severity and extent of the post-2008 economic downturn. The 2008-based projections are still regarded as a solid indicator of potential levels of housing demand over coming years.” (Standard Note SN06416)

The 2012-based Household Projections provide an update to the 2011-based interim projections and project over a longer term period (2012 to 2037). As can be seen from Figure 2, they provide a different interpretation of household formation to the 2011-based projections.

Table 7 provides an introduction to the different projections and the assumptions they use to project population and household change.

Table 7 - National Population and Household Projections

Projection	Features
<b>Household</b>	
2008-based household projections	<ul style="list-style-type: none"> <li>Used the 2008-based population projections as a base</li> <li>Household formation rates trended from 1971, 1981, 1991 and 2001 Censuses and Labour Force Survey data.</li> <li>Long-term projection from 2008 to 2033</li> <li>Average annual household growth between 2011 and 2031 = 680 for Thanet</li> </ul>
2011-based interim household projections	<ul style="list-style-type: none"> <li>Used the interim 2011-based population projections as a base</li> <li>Household formation rates trended from 1971, 1981, 1991, 2001 and 2011 Censuses and Labour Force Survey data which resulted in lower household formation rates than the 2008-based household projections.</li> <li>Short-term projection from 2011 to 2021</li> <li>Average annual household growth between 2011 and 2021 = 600 for Thanet</li> </ul>
2012-based household projections	<ul style="list-style-type: none"> <li>Used the 2012-based population projections as a base</li> <li>Household formation rates trended from 1971, 1981, 1991, 2001 and 2011 Censuses and Labour Force Survey data which resulted in lower household formation rates than the 2008-based household projections.</li> <li>Long-term projection from 2012 to 2037</li> <li>Average annual household growth between 2011 and 2031 = 689 for Thanet</li> </ul>
<b>Population</b>	
2010-based SNPP	<ul style="list-style-type: none"> <li>Used demographic trends from 2005 to 2010</li> <li>Long-term projection from 2010 to 2035</li> <li>Included improved migration assumptions making use of administrative data sources to better assign student populations and international migrants to local authorities.</li> <li>Average annual population growth between 2011 and 2031 = 926 for Thanet</li> </ul>
2012-based SNPP	<ul style="list-style-type: none"> <li>Used demographic trends from 2007 to 2012</li> <li>Long-term projection from 2012 to 2037</li> <li>Included improved migration and natural change assumptions taken from the 2011 Census.</li> <li>Average annual <b>population growth</b> between 2011 and 2031 = 1,205 for Thanet</li> </ul>

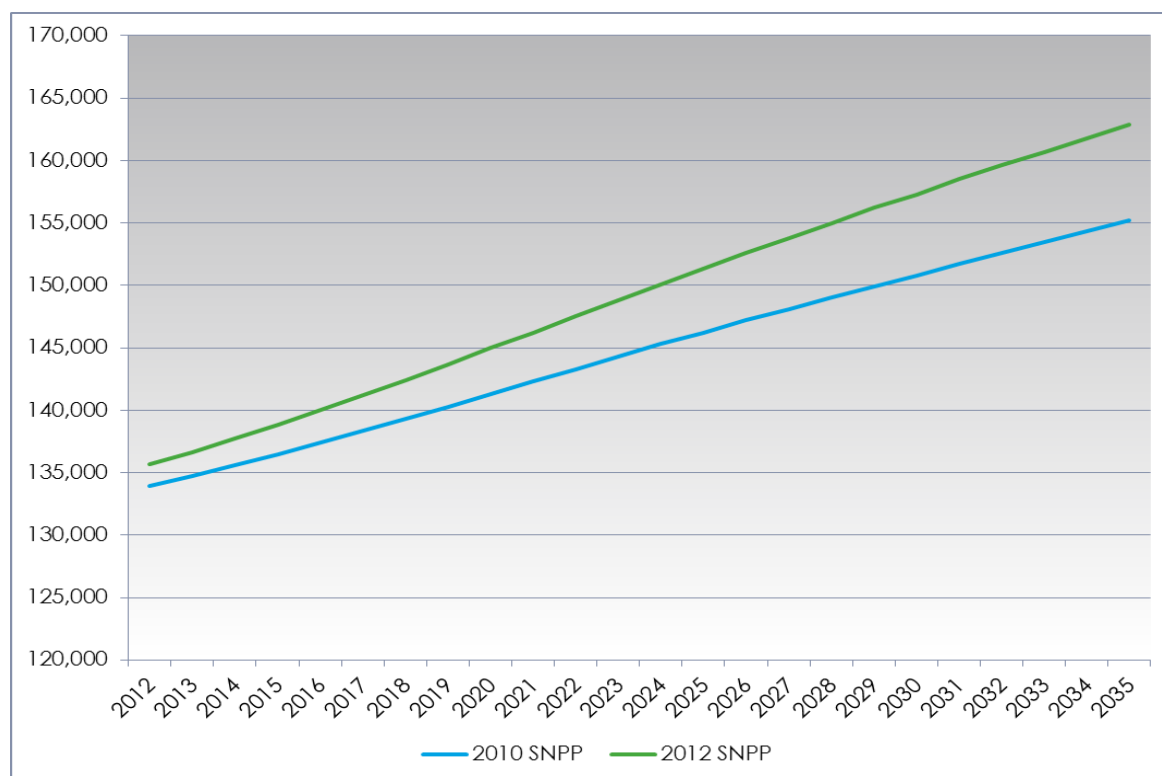
Source: DCLG Live Tables and ONS SNPP

## Population Projections

The latest official projections come from the ONS 2012-based SNPP. Figure 3 provides a comparison between the 2010-based and 2012-based SNPP showing clearly that the 2010-based projection (based on estimates about population growth built up from the 2001 Census) significantly underestimates both the base population in 2012 (which has been updated by the 2011 Census) and then projects that forward with a more depressed growth trajectory over the years to 2035. The 2012-based SNPP (based on estimates about population change built up from the more recent 2011 Census) shows that the population of Thanet is projected to grow at a much faster rate than previously assumed - this is confirmed by Table 7 which shows annual growth rates increasing 28% from the 2010 SNPP to the 2012 SNPP.



Figure 3 - Comparison of the 2010-based and 2012-based SNPP for Thanet



Source: ONS SNPP 2010 & 2012

Population projections are made up of two principal components, natural change (births minus deaths) and migration. Natural change is accurately recorded and more easily projected given the relative predictability of fertility and mortality rates in a given population. Migration however is significantly more difficult to estimate (particularly at the sub-regional/district level) and therefore to project. Table 8 provides a comparison between the SNPP population projections and trends in migration estimates from the ONS mid-year population estimates (MYE) which actually estimate the first year of the 2012 SNPP.

It is clear from the mid-year estimates in Table 8 that the 2010 SNPP is likely to underestimate migration and therefore population change going forward (as the population grows and migration grows with it). The 2012 SNPP appears to be a much better reflection of past net migration particularly once UPC<sup>5</sup> is factored in. Figure 4 sets out the mid-year estimates in more detail and shows in combination with the migration data in Table 8 that due to significant fluctuations in net migration (particularly pre/post-recession) the 2012 SNPP, on the balance of evidence, provides a reasonable set of assumptions about future trends.

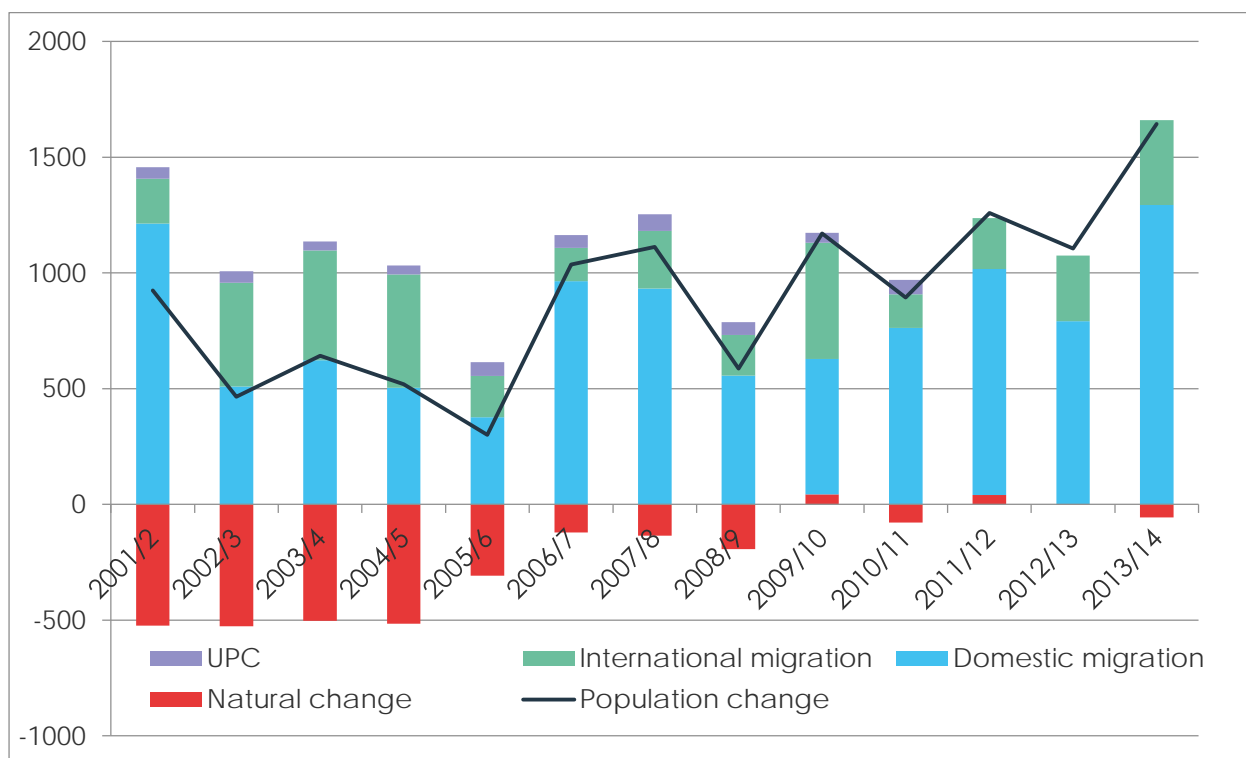
<sup>5</sup> See previous footnote

Table 8 - Comparison of Net Migration between revised Mid-Year Estimates (observed migration), 2010-based and 2012-based SNPP (projected migration) for Thanet

	2001 - 2014	2007 - 2014	2011 - 2015	2016 - 2020	2021 - 2025	2026 - 2030	2031 - 2035
Mid-Year Estimates	1,073	1,120					
MYE (plus Un-attributable change (UPC) <sup>6</sup> )	1,114	1,153					
2010 SNPP			800	840	980	1000	1000
2012 SNPP			1,000	1,080	1,100	1,140	1,120

Source ONS Mid-Year Population Estimates 2002 to 2013 and SNPP

Figure 4 - Components of Change 2001 to 2013



Source: ONS Mid-Year Estimates

## Household Projections

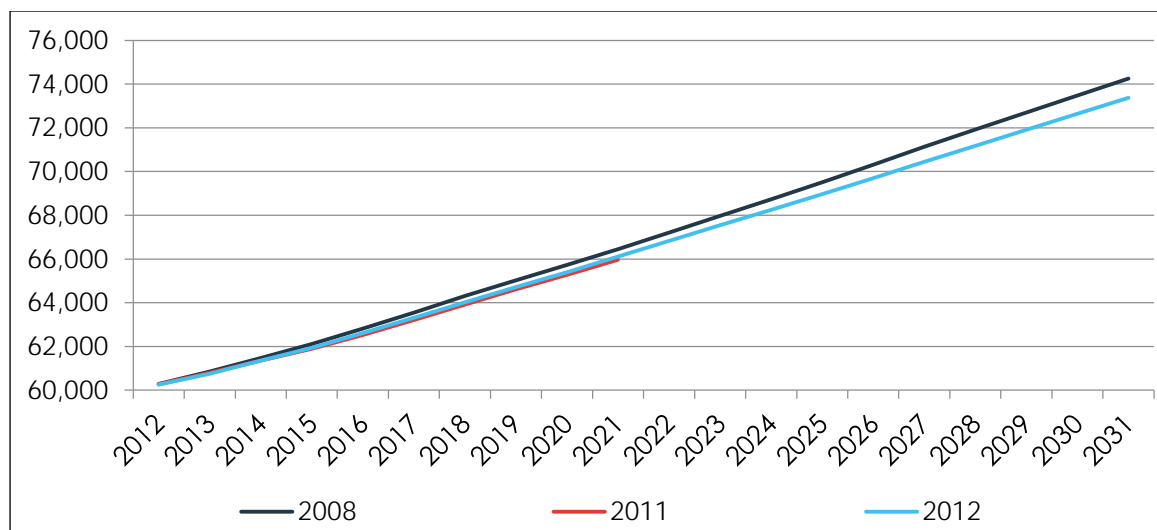
The DCLG 2012-based household projections provide quantitative assumptions about how the population of Thanet will form households over the 25 years from 2012. They are based on Census data from 1971 onwards and include the slow-down in household formation observed between 2001 and 2011. Figure 5 provides a comparison between the 2008, 2011 and 2012 household projections.

It should be noted that the underlying population projections that fed into the household projection are different, with the 2008 household projections having greater levels of household formation but lower levels

<sup>6</sup> Un-attributable population change is population change that occurred between the 2001 and 2011 Censuses but which ONS cannot attribute to either migration or natural change. When looking at past trends this throws up a problem as clearly this change occurred and so to not account for it in any way is to potentially misinterpret past population change. This scenario seeks to include UPC (but only 50% of it) as net migration as ONS has concluded that due to the difficulties in recording international migration at least part of UPC is likely to be this component of population change.

of population growth. Despite this, and as shown in Figure 5, the 2008 HP show lower levels of overall household growth. This shows that when all other factors are the same, the 2008 HP provide more buoyant assumptions about household formation. Notwithstanding, the 2008 HP are still a useful basis on which to understand longer terms household formation rates given the constrained nature of recent household formation which have been overly influenced by the recession and associated economic constraints in the housing market.

**Figure 5 - Comparison between the 2008 and 2011 Household Projections from 2012 – 2033**



Source: DCLG Household Projections

The published 2012 HP project annual growth of 689 households (equating to a dwelling requirement of around 735 per annum) between 2011 and 2031 however since the publication of the 2012 SNPP in 2014, two further sets of mid-year population estimates have been published (2013 and 2014). The demographic model can be constrained so that it tracks for the first 3 years of the projection (2011 to 2014) the mid-year population estimates. When the model is re-ran, it produces an annual requirement of 749 dwellings per annum.

## Alternative Migration Trends

As part of this assessment GVA has reviewed past migration trends on the basis of all data since 2001/2. This is because the 2012 SNPP uses local migration data from principally the last 5/6 years. Some caution has to be observed when challenging the migration assumptions within the SNPP. This is because the SNPP is multi-regional and considers not only past trends but how those trends have and will be influenced by the changing demography in surrounding areas. Notwithstanding this, it is useful to consider the implications of household growth if past trends are to continue. Furthermore, GVA's model takes into account the changes demography and age structure of the UK and its relationship to migration into Thanet. GVA model projects forward alternative migration trends using age specific migration rates (i.e. the number of people of a given age and sex migrating in or out of an area per 1000 of the population at risk<sup>7</sup>).). This method ensures that as the demographic make-up of Thanet and the UK changes, so does its migration flows. The scenarios both

<sup>7</sup> The Population at Risk is either the population of Thanet when considering out-migration or the UK when considering domestic in-migration. International migration is calculated by assuming a constant level of migration with the profile of migrants taken from average migration between 2001 and 2014.

include and exclude UPC which as discussed above, has positively contributed towards past population growth.

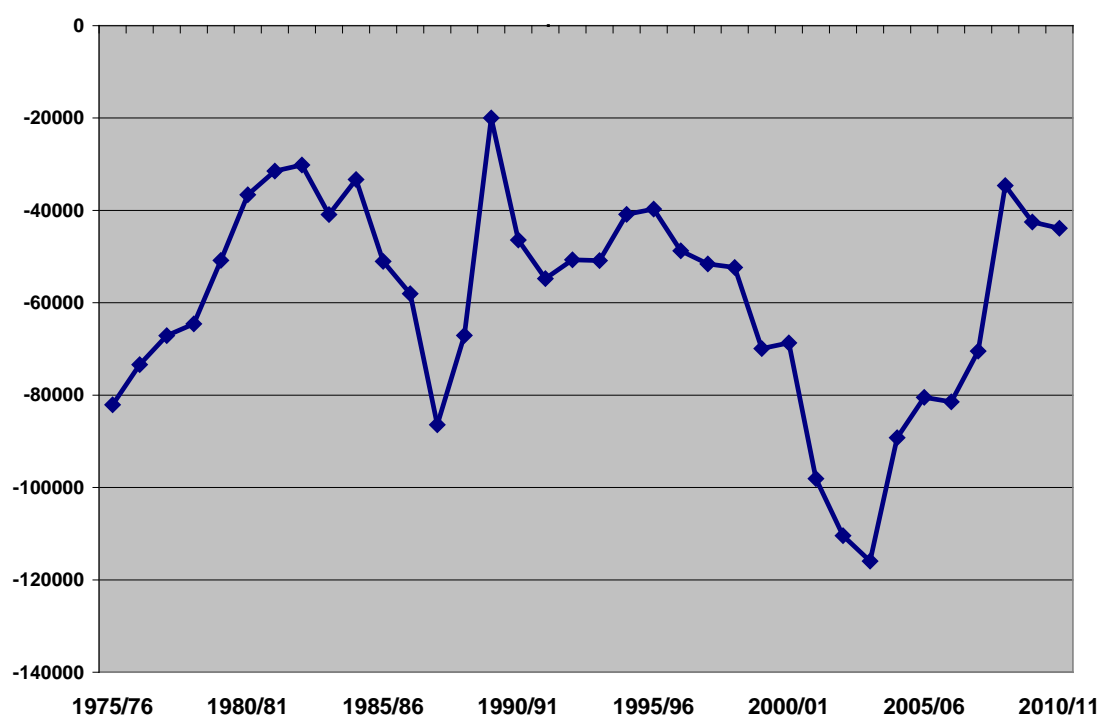
**Table 9 - Annual Housing Needs, Long Term Migration Trends, 2011-31 (2012 HP HRRs)**

	Annual Dwelling Needs 2011 to 2031		
	Without UPC	With UPC	Mid-Point
Long term (2001 to 2014)	776	791	784

Source: GVA / ONS MYE

Table 9 shows that on the whole, long term migration (including recent migration trends post 2012) has exceeded the 2012 SNPP and even more so when UPC is included. The long term scenario covers a period which includes both recession and growth and therefore provides a longer term view of demographic trends through the economic cycle. This is important given the District's proximity to and relationship with Greater London whose migration flows are heavily affected by the economic cycle, as shown in Figure 6. Given the uncertainty around how much of UPC is due to migration error and how much is due to the Census, it is considered that it should be factored into future projections but that a mid-point between the scenarios which include and exclude the UPC (i.e. between 776 and 791 dwellings per annum). This would produce a demographic requirement of 784 dwellings per annum using the 2012 Household Projections HRRs.

**Figure 6 - Net Internal Migration, London Since 1975**



Source: Calculated from NHSCR data for London as defined as GLA area: Tony Champion Newcastle University 2014

The NPPG states that the DCLG household projections should form the starting point for any assessment of housing need. The published 2012 HP project a need for 712 dpa between 2011 and 2031. When these projections are updated with the latest mid-year population estimates for Thanet they increase the annual dwellings need to 749 dpa over the projection period. Taking account of longer term migration trends

increases the annual housing need to between 776 and 791 dpa depending on whether UPC is accounted for. A long term migration scenarios is appropriate as it covers a full economic cycle and given the uncertainty around UPC, it is considered that a mid-point should be assumed between UPC included and excluded. Overall this results in demographic need for 784 dpa between 2011 and 2031. The next stage of this assessment will look at economic growth and whether there is a case for increases to this figure further to achieve economic growth.

## Economic Growth

Economic growth and household growth are inextricably linked. This is because as an economy grows so does the requirement for labour force, and this requirement drives migration and population growth. Furthermore, the PPG states that OAN should take into account the likely change in employment and ensure that the projected labour force is sufficient to meet this employment growth.

GVA's 'The Future Employment Role of the Former Manston Airport' report provides a detailed assessment of future employment growth in Thanet and estimates past job growth and forecast how many jobs might be created in the future.

Future job growth is considered in Table 10. This sets out the anticipated level of job growth that is forecast to occur in Thanet.

**Table 10 – Thanet Forecasted Employment Growth 2013 to 2031 Experian Job Forecasts**

Total job growth	Total percentage change	Annual job growth	Average annual percentage growth
7,032	15.2%	352	0.72%

Source. GVA Employment Forecasts

To understand the relationship between jobs, labour force and population growth, a number of assumptions need to be made, for example, the level of unemployment and economic activity in the local population, and the extent to which the working population is employed locally (commuting rates).

## Unemployment

The level of unemployment over time is important for understanding the link between population growth and job growth. For example, if 100 jobs were created in an area, and unemployment rates were historically high, it is likely that a significant proportion of those jobs would be taken by unemployed residents who are seeking employment. If on the other hand unemployment were at a historic low, more of the 100 jobs would need to be filled by new economically active people moving/commuting into the area to work. If people move to an area for work, this creates a need for more housing.

The unemployment rate in 2011 was 9.9% according to the 2011 Census. The Annual Population Survey recorded a figure of 22.2% and there is therefore doubt about the accuracy of this figure. Unemployment is assumed to fall over the period to 2020 to 7.5% (pre-recession average) where it remains static.

## Economic Activity

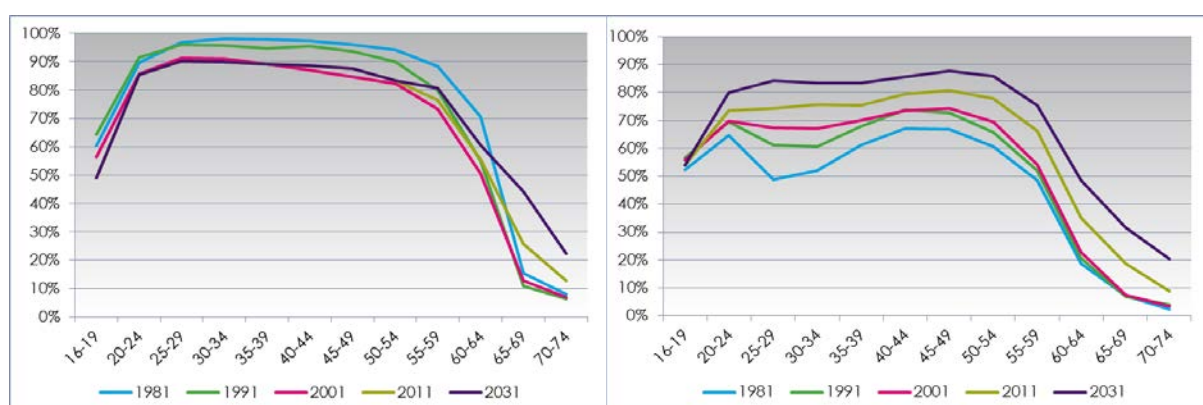
The same principle applies to economically active persons (which are the total number of people in work or looking for work) as unemployment. As the economically active population increases (due to a rising number of older persons supplementing their pension for example, or an increasing number of women working instead of raising families full time) the pool of local labour increases, reducing the need for in-migration to support increases in the number of jobs in a local area. Reduced in-migration means fewer migrants to house.

Economic activity by age and sex is taken from the 2011 Census. This is projected forward using trends from the 1981 Census, as well as assumptions from the 2012 European Union Ageing Report and 2006 Labour Force Projections. The results show continuing increases in economic activity amongst older males (+55 year olds) and females (+20 year olds). The largest increases are observed in those at the current Statutory Pension Age, as this is due to increase in both males and females over the period to 2028. This being the case it is likely that increasing number of males and females will work or seek to work for longer.

Figure 7 provides economic activity rates by age and sex for Thanet from the Census going back to 1981 (the earliest point at which accurate data is available). As is apparent from the data, economic activity in males under 50 has changed little over the past 30 years with the exception of slight fall since 1981. In males over-50 economic activity has increased with the most significant increases in 60 to 74 year olds. These trends in older men are continued in the projection whereas under-50s remain static.

In females economic activity has changed significantly since 1981, principally showing two phenomena. The first is the increasing number of females choosing to work during their most fertile years (20 to 40) and the increasing age at which the family career break takes place. The second is the significant increase in economic activity for older women. This is likely to continue given the changes to the SPA for women and the fact that women on the whole are living longer with potentially fewer pension securities in the future. The purple line shows the projection up to 2031.

**Figure 7 - Economic Activity by Age and Sex Over Time (Males on left, females on right)**



SSource: 1981, 1991, 2001 and 2011 Census.

## Commuting

A commuting rate is the ratio of employed persons to employment in a given area. If an area has a high commuting rate (i.e. a ratio of more than 1 employed person for every job) this means that the area is

accommodating workers from the surrounding area. The converse if true is the ratio is less than 1. If an area has a high and stable commuting rate (because it lies adjacent to a large employment centre for example) then as the economy grows the area will have to accommodate not only indigenous job growth but also the growing number of commuters from the adjacent centre. This increases the level of housing growth needed to accommodate a given level of indigenous job growth.

In 2011 there were 55,589 employed persons living in the District and 47,878 people working in the District. This equates to a commuting ratio of 1.16 working persons per unit of employment. Commuting is dictated by where people can and want to work and where they can and want to live. Economic opportunity drives commuting destinations whereas quality of life (good quality housing or environment/affordability etc...) drives commuting origins.

### Double jobbing

There are no official (i.e. ONS / DCLG) 'workforce' statistics for double jobbing. The Annual Population Survey provides such statistics for residents but not those who are actually employed in the area. The East of England Forecasting Mode does however provide an estimate of double jobbing amongst Thanet's workforce. It concludes that around 1.2% of workers have two jobs. The employment forecast will therefore be reduced to by that amount to take account of this.

### Jobs Growth

The NPPG (Ref ID: 2a-018-20140306) states that employment forecasts should be included in an assessment of housing needs to define the quantum and location of new housing. Table 11 shows that employment growth forecasted by Experian (15.3%) (see Table 10) demonstrates a need for around 716 dwellings per annum up to 2031. Given this, there is no evidence to demonstrate that an uplift to demographic needs is required to accommodate economic growth in Thanet District.

**Table 11 - Annual Dwellings Needs for High and Low Growth Scenario**

	Annual Dwelling Needs 2011 to 2031
<b>GVA Forecast</b>	716

Source: Popgroup / GVA

### Market Signals

The NPPF mandates the integration of different strategies and land uses including, requiring planning authorities to "ensure that their assessments of and strategies for housing, employment and other uses are integrated and that they take full account of relevant market and economic signals" (paragraph 158).

Paragraph 17, which sets out the Core Principles of the planning system states "Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities."

The NPPG provides further advice on what the NPPF means specifically by 'relevant market and economic signals' with regard to the housing market. The guidance (Ref 019-20140306) explicitly sets out six market signals (although it is recognised that these are non-exhaustive):

- land prices;
- house prices;
- rents;
- affordability;
- rate of development; and
- overcrowding.

The NPPG also sets out broadly how these market signals should be interpreted:

*"The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand." (019-20140306)*

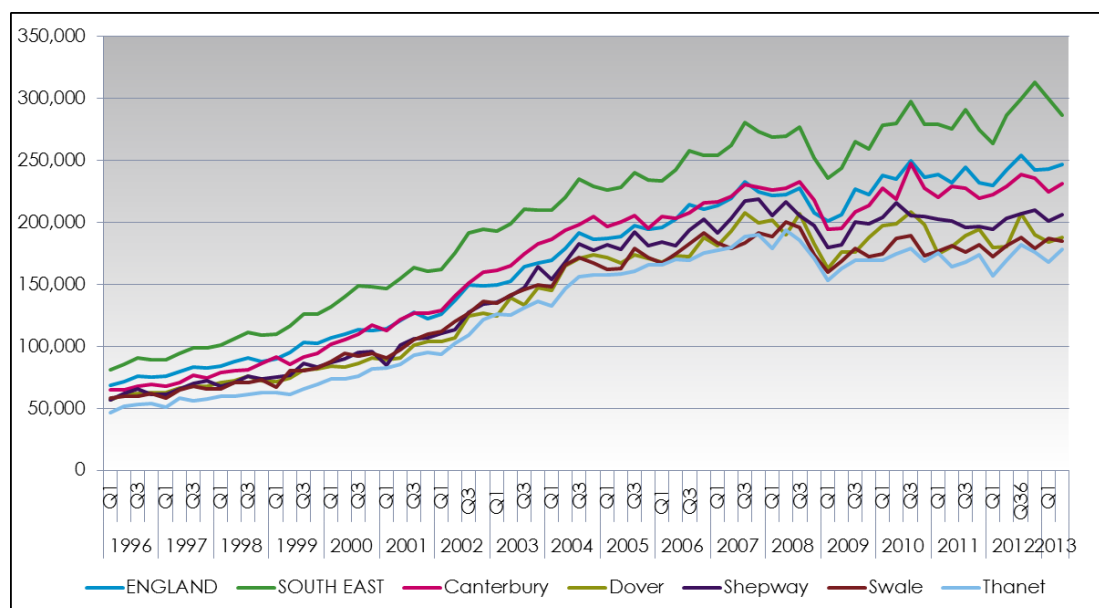
*"Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections. Volatility in some indicators requires care to be taken: in these cases rolling average comparisons may be helpful to identify persistent changes and trends." (020-20140306)*

*"In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable." (020-20140306)*

## Prices

Median house prices in Thanet are £159,500 (2013 Q2), which is lower than the average of £172,050 for the HMA (Thanet, Canterbury, Dover, Shepway and Swale). As shown in Figure 8, median house price in Thanet increased by 230% between 1996 and 2012, against an increase of 219% in England, 225% in Kent and 222% in the HMA.



**Figure 8 - Mean House Prices Over Time Compared to the HMA, Region and England**

Source: Live Table 581

## Rents

Median rental prices in Thanet were £500 per calendar month in 2011 and had increased by 10% over the period to September 2015. This is lower than in Kent (12% increase), the South East (14%) and but comparable to England (10%). This would not indicate a significant relative pressure in the rental market.

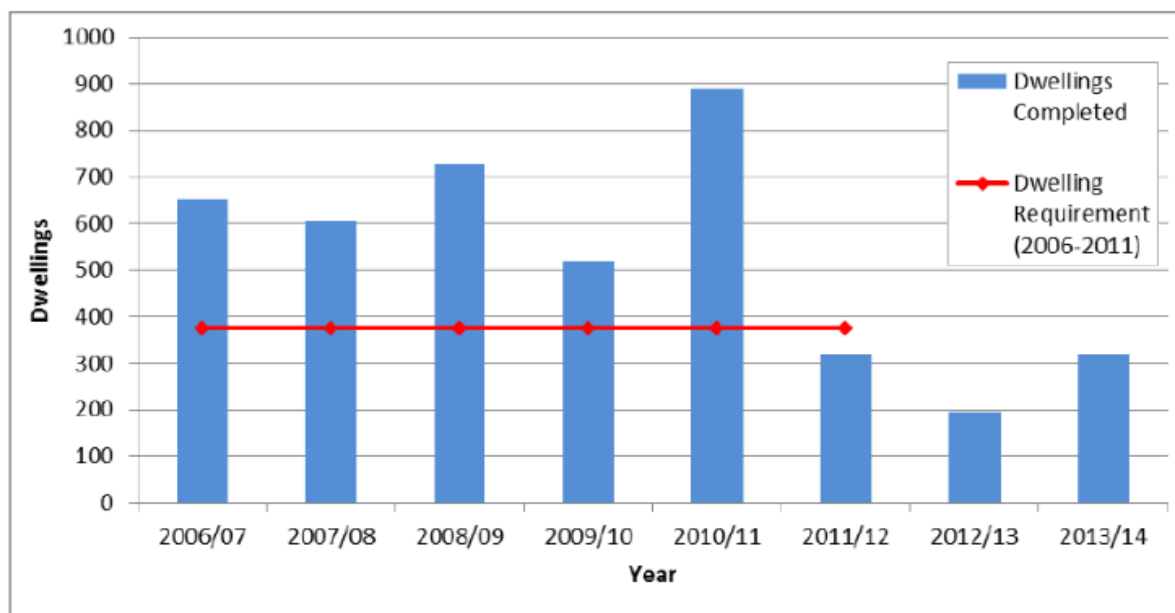
## Affordability

With median house prices 7.27 times median earnings in the District, housing is unaffordable to the average household. Thanet is less affordable than Swale (6.58), Shepway (7.25), Dover (6.25) and England as a whole (6.27) but more affordable than Canterbury (8.17). The affordability ratio has also worsened in Thanet (112%) by a more significant degree than is seen in the HMA (102%), Kent (98%) and England (90%). Thanet is therefore, unaffordable relative to the surrounding area and is also becoming relatively less affordable.

## Rates of development

Rates of development in relation to planned targets are set out in Figure 9. Whilst completions in Thanet have been above planned targets, housing delivery since 2011 has fallen significantly short of what is required. Taken as a whole, the Council has delivered around 20% above its planned target, showing high demand for housing in the district.

Figure 9 – AMR Chart showing Net Housing Completions in Relation to Housing Target

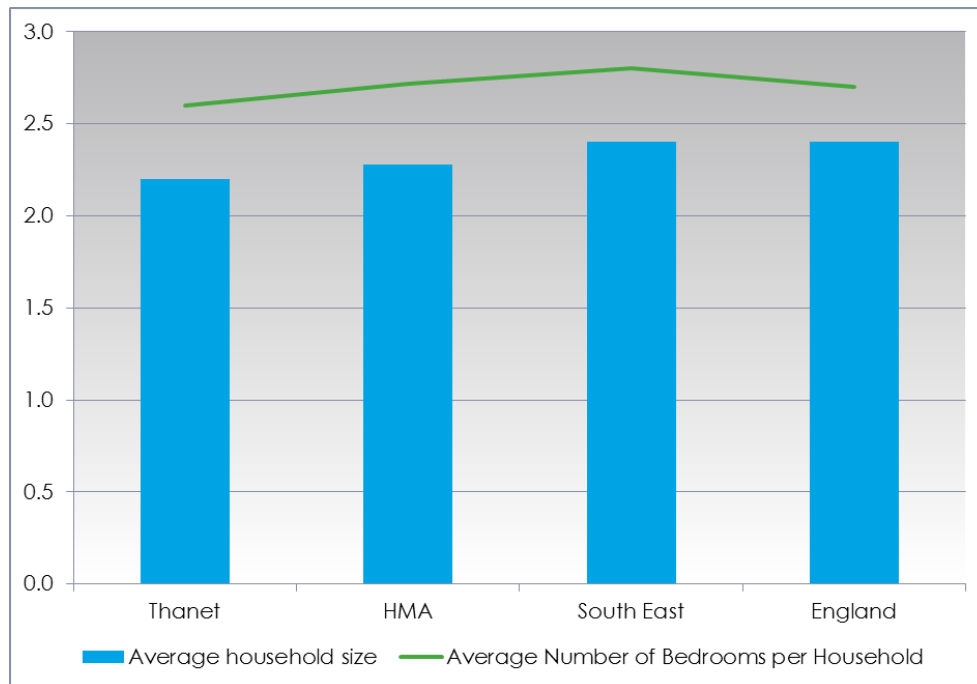


Source: Annual Monitoring Report

## Overcrowding

Occupancy ratings provide a measure of whether a household's accommodation is overcrowded or under occupied. There are two measures of occupancy rating, one based on the number of rooms in a household's accommodation, and one based on the number of bedrooms. The ages of the household members and their relationships to each other are used to derive the number of rooms/bedrooms they require, based on a standard formula. The number of rooms/bedrooms required is subtracted from the number of rooms/bedrooms in the household's accommodation to obtain the occupancy rating. An occupancy rating of -1 implies that a household has one fewer room/bedroom than required, whereas +1 implies that they have one more room/bedroom than the standard requirement.

Figure 10 provides a comparison between the average number of bedrooms and average number of people per household in Thanet, and comparator areas. There is significant comparability across all areas in both variables, with the average number of bedrooms being greater than the average household size. Thanet has the lowest number of bedrooms per household (2.6), but this is only marginally lower than the level for the HMA (2.7), the South East region (2.8) and England (2.7).

**Figure 10 - Average Household Size and Number of Bedrooms (2011)**

Source: Census, 2011

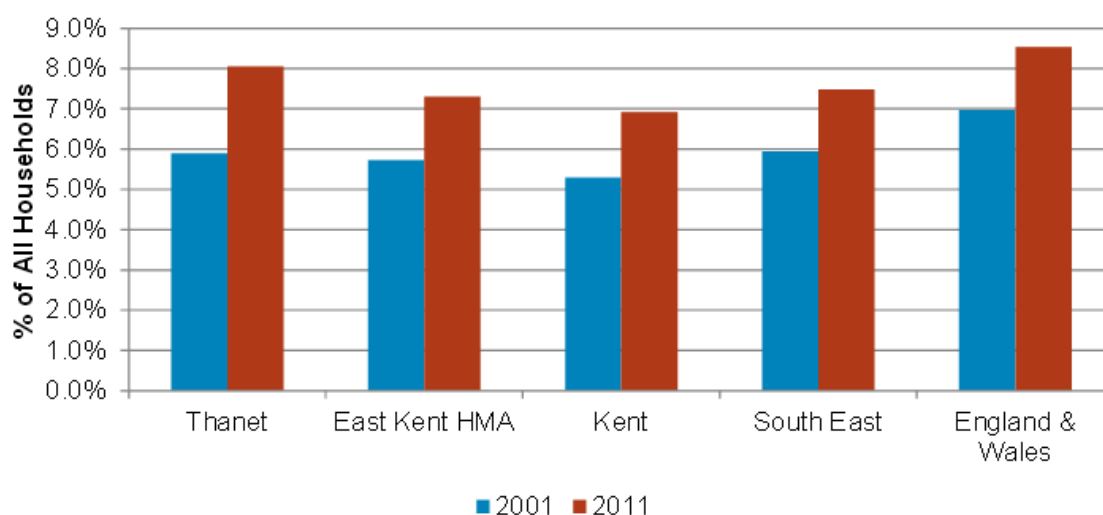
Occupancy rating data based on the number of rooms and bedrooms is shown in Table 12, alongside average household size and number of rooms and bedrooms. To specifically consider overcrowding, Figure 11 then demonstrates the occupancy rating (bedrooms) of -1 or less between 2001 and 2011. This identifies where there are at least one too fewer bedrooms than required for a household based on its size.

Table 12 - Occupancy Ratings and Average Household Size (2011)

	Occupancy rating (rooms) of -1 or less	Occupancy rating (bedrooms) of -1 or less	Average household size	Average number of rooms per household	Average number of bedrooms per household
	Households (%)	Households (%)	Persons per household (No.)	Rooms per household (No.)	Bedrooms per household (No.)
England	8.7	4.6	2.4	5.4	2.7
South East	7.5	3.6	2.4	5.6	2.8
HMA	7.2	3.4	2.3	5.4	2.7
Thanet	8.1	3.6	2.2	5.2	2.6
HMA					
Thanet	8.1	3.6	2.2	5.2	2.6
Canterbury	7.6	3.5	2.3	5.5	2.8
Dover	6.0	3.0	2.3	5.4	2.7
Shepway	8.0	3.4	2.2	5.4	2.7
Swale	6.1	3.3	2.4	5.5	2.8

Source: Census, 2011

Figure 11 - Occupancy Rating (bedrooms) of -1 or Less



Source: Census, 2001, 2011, 2016 SHMA

The occupancy rating for Thanet is approximately 8.1%, meaning that 8.1% of households in the District are at least one room short and therefore considered to be overcrowded. Figure 11 shows that this has increased significantly since 2001. Notwithstanding, it is important to note that this figure does not make allowance for concealed households.

## Houses in Multiple Occupation (HMO)

An HMO is a dwelling which has more than 3 unrelated people living in it. Data on dwellings, household spaces and accommodation type from the 2011 Census indicates that 9% (5,890) of Thanet households live in a flat/masionette/apartment which is part of a converted or shared house (including bedsits). This is a significant increase from the 1% (361) of shared dwellings that was observed in the 2001 Census.

This figure does not solely capture multiple household occupancy, but also includes flats that may not be in multiple occupation. However, this is the only information available which gives some indication of the total amount of HMO stock in the District.

The Council's HMO Register does not provide an accurate indication of the level of houses in multiple occupation, as not all HMO properties are required to be licensed. A license must only be obtained if the building has two or more households sharing basic amenities, is a building or flat, or is converted with one or more non self-contained units, and fits the following criteria:

- Has a height of 3 or more storeys;
- Has 5 or more people living there; and
- Has occupants that make up more than one household (family unit).

## Conclusions

The NPPG states that "a worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections." It is clear from the evidence set out in this re-calculation that the housing market is experiencing a level of stress. This is apparent from levels of affordability. The presence of overcrowding and its rate of increase in Thanet (with 8.1% of households having at least one too few rooms) also demonstrate an element of housing demand.

In line with the provisions of the NPPG the evidence does warrant an increase in OAN based purely on household projections. The 2016 SHMA advocates a return to levels of household for younger age groups (25 to 34 year olds) observed in 2001, which in the SHMA's model takes place over the period 2015 to 2025. Following 2025, the HRRs of this age group follow the trend exhibited by the 2012 HP which shows a gradual decline in household formation. Whilst the principle of returning HRRs to 2001 levels is a sound one, returning to the downward trend of the 2012 HP is not an appropriate response. The 2008 HP trend, which has an upward trajectory from 2025 to 2031 is a more appropriate basis for projecting HRRs as it mirrors the likely behaviour affected by a significant boost to housing supply. The adjustment made by the 2016 SHMA to HRRs leads to an increase of 0.7% above the demographic base. If we assume the 2008 HP trend following 2025 it results in an increase of 2.6%; increasing the mid-point demographic scenario from 784 dwellings per annum to 804 dwellings per annum.

The use of the economic scenario (716 dwellings per annum) decreases this by 11% and there is therefore no justification for an increase in the demographic-led scenario to accommodate employment growth.<sup>8</sup>

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<sup>8</sup> Obviously house prices/affordability is as much as a factor of sub-regional / regional factors as it is about specific supply in one area and therefore a wider 'significant boost' in supply should take place to fully address affordability.

The key findings of this re-calculation of objectively assessed need, following the steps set out in the NPPG, are as follows:

- Assess the latest household projections. The latest household projections and demographic indicate a need for 749 dwellings per annum over the period 2011 to 2031. Further analysis of household migration rates indicates that this should be increased to 784 dwellings per annum to take account of a full economic cycle and UPC.
- Review employment forecasts and whether they could provide a justification for increasing housing delivery. Growth in employment of around 15% has been forecast in the district which can be delivered by projected demographic growth.
- Assess housing market signals to understand if this could provide a justification for increasing housing delivery. Housing market signals indicate affordability problems which could justify an increase to objectively assessed needs in excess of household projections. An increase in household formation in younger age groups results in an adjusted demographic scenario of 804 dwellings per annum.

It is therefore concluded from this re-calculation that 804 dwellings per annum represents the most robust OAN figure for Thanet, which equates to 16,080 homes over the period 2011-31.

This compares to 785 dwellings per annum/15,700 homes over the period 2011-31 identified in the Council's 2016 SHMA (+2.4%).

## Appendix II

PRDLP Appendix B – 80 Sites

Identified for Housing Allocation in  
the PRDLP

# Proposed Revisions to Draft Local Plan (Preferred Options)

## 1. Preferred Options Revisions

## Amendments to Appendix B of the Preferred Options Draft Local Plan

SITE ADDRESS	NOTIONAL DWELLING CAPACITY	NOTIONAL DELIVERY PERIOD																SITE REFERENCE/S	
		2016-17	2017-18	2018-19															
<b>STRATEGIC SITES</b>																			
Westwood	1,450	0	0	50	100	150	110	110	110	110	110	120	120	120	120	120	120	S511, S553, S447	
Birchington	1,000	0	0	50	100	100	70	70	70	70	70	80	80	80	80	80	80	S515, S498, S499,	
Westgate	1,000	0		50	100	100	70	70	70	70	70	80	80	80	80	80	80	ST1, ST2	
Manston Green	785	0	50	50	60	60	60	60	60	60	60	55	55	55	50	50	50	SS33	
Land at Manston Court Road/Haine Road	700	0	0	0	30	60	60	60	60	60	60	60	60	60	60	60	60		
Former airport site	2,500	0	0	160	160	160	160	179	179	179	179	179	241	241	241	242			
<b>SUB TOTAL</b>	<b>7,435</b>	<b>0</b>	<b>50</b>	<b>360</b>	<b>550</b>	<b>630</b>	<b>530</b>	<b>549</b>	<b>549</b>	<b>549</b>	<b>549</b>	<b>574</b>	<b>636</b>	<b>636</b>	<b>631</b>	<b>632</b>			
<b>OTHER HOUSING SITES OUTSIDE URBAN AREA</b>																			
South of canterbury Rd, Ramsgate	27	0	0	0	0	0	10	17	0	0	0	0	0	0	0	0	0	S415	
Land fronting Park lane, Birchington	90	0	0	40	50	0	0	0	0	0	0	0	0	0	0	0	0	ST3	
Land south east of Brooke Avenue, Westbrook	34	0	0	14	20	0	0	0	0	0	0	0	0	0	0	0	0	S505	
Land at Haine Rd & Spratling St, Ramsgate	85	0	0	0	0	0	13	15	15	15	15	12	0	0	0	0	0	SR60	
Land off Nash/Manston Rds, Margate	250	0	0	30	60	60	20	20	20	20	20	0	0	0	0	0	0	S540	
Land west of Old Haine Road, Ramsgate	250	0	0	20	40	40	30	30	30	30	30	0	0	0	0	0	0	S535 & S549	
Land at Manston Road/Shottendane Road	0	0	0	0	0	40	40	40	40	40	50								
<b>SUB TOTAL</b>	<b>736</b>	<b>0</b>	<b>0</b>	<b>104</b>	<b>170</b>	<b>140</b>	<b>113</b>	<b>122</b>	<b>105</b>	<b>105</b>	<b>115</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			
<b>MIXED USE SITES</b>																			
Queen Arms Yard, Margate	24	0	0	0	24	0	0	0	0	0	0	0	0	0	0	0	0	S189	
Cottage Car Park, New Street, Margate	32	0	0	0	0	0	0	0	0	0	0	15	17	0	0	0	0	S411	
Margate Town Centre, (south of New Street, Margate)	27	0	0	0	0	0	0	0	0	0	0	5	10	12	0	0	0	S412	
<b>SUB TOTAL</b>	<b>83</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>24</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>27</b>	<b>12</b>	<b>0</b>	<b>0</b>			
<b>OTHER HOUSING URBAN AREA SITES</b>																			
Adjacent to 9 Minnis Road, Birchington	11	0	0	0	0	0	0	0	0	0	0	5	6	0	0	0	0	S019	
End of Seafeld Road	16	0	16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	S106	
Adjacent to 8 Chapel Place, Ramsgate	6	0	0	0	0	0	0	0	0	0	0	6	0	0	0	0	0	S112	
Adjacent to 21 Royal Road & 9 Townley Street	18	0	0	0	0	0	0	0	0	0	0	9	9	0	0	0	0	S113	
land adj. Westwood Centre - 1000 dwellings	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	S141	
ro 7_10 Marine Gdns - 5 Dwellings	6	0	0	0	0	0	0	0	0	0	0	6	0	0	0	0	0	S158	
Gas Works Boundary Road, Ramsgate	96	0	0	0	0	0	20	20	20	20	16	0	0	0	0	0	0	S168	
Land at Wilderness Hill and Dane Road	14	0	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	S174	



79-85 High Street, Ramsgate	10	0	0	0	0	0	5	5	0	0	0	0	0	0	0	0	S186a	
Gas Holder Station, Addington Street ,Margate	22	0	0	0	0	0	11	11	0	0	0	0	0	0	0	0	S196	
100 Grange Road, Ramsgate	16	0	0	0	16	0			0	0	0	0	0	0	0	0	S200	
WW Martin, Dane Park Road, Ramsgate	14	0	0	0	0	0	7	7	0	0	0	0	0	0	0	0	S215	
10 Cliff Street, Ramsgate	11	0	0	0	11	0	0	0	0	0	0	0	0	0	0	0	S230	
Land at Grant Close/Victoria Road, Broadstairs	9	0	0	0	9	0	0	0	0	0	0	0	0	0	0	0	S260	
Complete Car Sales, Willsons Road, Ramsgate	10	0	0	0	10	0	0	0	0	0	0	0	0	0	0	0	S276	
38, 38a and 42 St Peters Road, Broadstairs	5	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	S295	
5 Hardres Street, Ramsgate	6	0	0	0	6	0	0	0	0	0	0	0	0	0	0	0	S304	
Units 1-4 Monkton Place Ramsgate	5	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	S322	
3 and 7 Northumberland Road	5	0	0	0	0	0	0	0	0	0	0	5	0	0	0	0	S339	
Highfield Road, Ramsgate	25	0	0	0	10	15	0	0	0	0	0	0	0	0	0	0	S393	
Fort Hill, Arcadian	28	0	0	0	10	18	0	0	0	0	0	0	0	0	0	0	S410	
Safari House, Haine Road, Ramsgate	28	0	0	0	10	18	0	0	0	0	0	0	0	0	0	0	S429	
Furniture Mart, Booth Place, Grotto Hill	9	0	0	0	9	0	0	0	0	0	0	0	0	0	0	0	S467	
Eurokent, New Haine Rd, Ramsgate	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	S522	
Laleham School, Northdown Park Road, Margate	72	0	0	0	30	42	0	0	0	0	0	0	0	0	0	0	S527	
Land at Victoria Road & Dane Rd, Margate	35	0	0	0	0	0	0	0	0	0	0	10	10	10	5	0	S529	
Haine Farm, Haine Road, Ramsgate	35	0	0	0	5	0	5	5	0	0	0	10	10	0	0	0	S534	
Land of Northwood Road, Ramsgate	45	0	0	0	20	25	0	0	0	0	0	0	0	0	0	0	S536	
Land at Hundreds Farm, Canterbury Road, Westgate	10	0	0	0	0	10	0	0	0	0	0	0	0	0	0	0	S550	
Dane Valley Arms, Dane Valley Road, Margate	13	0	0	6	0	0	7	0	0	0	0	0	0	0	0	0	SR09	
Builders Yard, The Avenue, Margate	10	0	0	10	0	0	0	0	0	0	0	0	0	0	0	0	SR16	
1 Thanet Road, Margate	5	0	0	0	5	0	0	0	0	0	0	0	0	0	0	0	SR45	
Land at Waterside Drive, Westgate	12	0	0	0	12	0	0	0	0	0	0	0	0	0	0	0	SR65	
Suffolk Avenue, Westgate	14	0	0	0	0	7	7	0	0	0	0	0	0	0	0	0	SR67	
r/o Cecilia Road, Ramsgate	23	0	0	0	0	0	0	0	0	0	0	10	13	0	0	0	SR69	
Margate Delivery Office, 12-18 Addington StreetAddington Street	10	0	0	0	0	0	0	0	0	0	0	10	0	0	0	0	SS16	
Ind Units, Marlborough Rd, Margate	10	0	0	0	5	5	0	0	0	0	0	0	0	0	0	0	SS20	
Former Newington Nursery & Infants Nursery & Infants	49	0	0	0	20	29	0	0	0	0	0	0	0	0	0	0	SS22	
Gap House School, 1 Southcliff Parade, Southcliff Parade,	10	0	0	0	5	5	0	0	0	0	0	0	0	0	0	0	SS23	
Foreland School, Lanthorne Rd, Lanthorne Rd,	14	0	0	0	7	7	0	0	0	0	0	0	0	0	0	0	SS24	
Thanet Reach Southern Part	80	0	0	0	0	10	10	10	20	20	10	0	0	0	0	0	SS34	
Manston Road Industrial Estate (2 sites north & south)	170	0	0	0	80	90	0	0	0	0	0	0	0	0	0	0	SS35	
Part of Pysons Road	26	0	0	0	10	16	0	0	0	0	0	0	0	0	0	0	SS36	
Dane Valley Industrial Estate - Part of national grid land, Northdown Road	60	0	0	0	30	30	0	0	0	0	0	0	0	0	0	0	SS37	
Magnet and Southern, Newington Road, Ramsgate	8	0	0	0	8	0	0	0	0	0	0	0	0	0	0	0	SS43	
<b>SUB TOTAL</b>	<b>1081</b>	<b>0</b>	<b>16</b>	<b>16</b>	<b>352</b>	<b>327</b>	<b>72</b>	<b>58</b>	<b>40</b>	<b>40</b>	<b>26</b>	<b>71</b>	<b>48</b>	<b>10</b>	<b>5</b>	<b>0</b>		
<b>RURAL SITES (in and outside confines)</b>																		
Tothill Street Minster	150	0	0	0	20	20	20	20	25	25	20	0	0	0	0	0	S512/S436/S85	

Land south side of Foxborough Lane	35	0	0	0	10	25	0	0	0	0	0	0	0	0	0	0	ST4	
Land at The Length, St. Nicholas	25	0	0	0	10	15	0	0	0	0	0	0	0	0	0	0	S509	
Land at Manor Rd, St Nicholas	17	0	8	9	0	0	0	0	0	0	0	0	0	0	0	0	S488/R25-146	
Land at Walter's Hall Farm, Monkton	18	0	0	0	9	9	0	0	0	0	0	0	0	0	0	0	ST6	
Builders yard south of 116-124 Monkton Street, Monkton	20	0	0	0	10	10	0	0	0	0	0	0	0	0	0	0	S543	
Site "A" South side of A253, Cliffsend	40	0	0	0	20	20	0	0	0	0	0	0	0	0	0	0	S468/435(1)	
Land north of Cottington Rd (west of Beech Grove)	40	0	0	0	20	20	0	0	0	0	0	0	0	0	0	0	S435(2)	
South side Cottington Rd, Cliffsend.	30	0	0	0	15	15	0	0	0	0	0	0	0	0	0	0	S416/S561	
<b>SUB TOTAL</b>	<b>375</b>	<b>0</b>	<b>8</b>	<b>9</b>	<b>114</b>	<b>134</b>	<b>20</b>	<b>20</b>	<b>25</b>	<b>25</b>	<b>20</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		
<b>CLIFTONVILLE SITES</b>																		
Rear of 59-65 Harold Rd	9	0	0	0	0	0	0	0	0	0	0	9	0	0	0	0	S46	
Adj to 60 Harold Rd and rear of 40-56 Harold Rd	14	0	0	0	0	0	0	0	0	0	0	7	7	0	0	0	S47	
Adt to 14 Harold Rd	10	0	0	0	0	10	0	0	0	0	0	0	0	0	0	0	S48	
Ethelbert Crescent	30	0	0	0	0	30	0	0	0	0	0	0	0	0	0	0	S149	
St George's Hotel, 61 - 75 Eastern Esplanade	87	0	0	0	10	20	20	20	17	0	0	0	0	0	0	0	S165	
<b>SUB TOTAL</b>	<b>150</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>60</b>	<b>20</b>	<b>20</b>	<b>17</b>	<b>0</b>	<b>0</b>	<b>16</b>	<b>7</b>	<b>0</b>	<b>0</b>	<b>0</b>		

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# Appendix III

## PRDLP Section 4 – Deleted Housing Site Allocations

# Proposed Revisions to Draft Local Plan (Preferred Options)

## 1. Preferred Options Revisions

## Section 4 - Revised Location of Housing

### Location of Housing - Proposed additional sites

4.1 Additional sites have been identified as proposed housing allocations in order to meet the new Objectively Assessed Need. Some of these sites are adjacent to existing allocations proposed in the Preferred Options draft Local Plan and should form a comprehensive scheme with those sites. This will ensure the delivery of associated highways and infrastructure requirements which will be set out in policies in the pre-Submission draft Local Plan. The following sites have been identified as additional housing allocations:

Site	Potential Capacity	Policy implications
Land at Manston Road/Shottendane Road	250	New housing policy
Eurokent	Up to 550 (200 additional dwellings)	Policy SP07 to be updated to reflect additional housing capacity as per recent appeal decision
Land at Manston Court Road/Haine Road	700	New strategic housing policy
Former airport site	2,500	New strategic policy for a mixed use development to replace Policy SP05
	<b>Total 4,000 additional dwellings</b>	

4.2 Some sites are no longer available as potential housing allocations as they are not supported by landowners or are being developed for non-residential uses. The following sites have been deleted as housing site allocations (listed in the amendments to Appendix B)

Site	No. Dwellings	Site Ref
1,2, 92-96 Harbour Parade	14	S219
Rear of 102-114 Grange Road	10	S316
St Benedict's Church, Whitehall Road, Ramsgate	12	SR10
Ramsgate Garden Centre, Hereson Rd, Ramsgate	62	SR57
Station Road Minster	5	S088
Tothill Street, Minster		S85
140 – 144 Newington Road	50	SS40
Land at Holy Trinity Primary School, Dumpton Park Drive, Ramsgate	33	S525
86-88 Ellington Road, Ramsgate	9	SR21
Dane Valley Filling Station, Millmead Road, Margate	7	SR34
6 Surrey Road	5	S348
Land adjoining Seafeld Road, Ramsgate	9	SR22

Former Manston Allotments	61	S452
R/O 18-36 St Peters Road	5	SO42
<b>Total</b>	<b>282</b>	

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## Appendix IV

### GVA assessment of Deliverability and Developability of 117 Potential Forced SHLAA Allocations

Source	SHLAA site reference	Site Name & Address	Area	Area (M2)	Previously developed (y/n/Part)	Suitability (Score 1-4)	Availability (Score 1-4)	Achievability (Score 1-4)	Constraints/Impact mitigation needed to render the site suitable	Any known constraints to availability and how and when they may be overcome	Now-2016	2016-21	2021-26	2026-31	Post 2031	Grand Total
Landowners in Green Wedge	S417	Land at Kingsdown Farm	Broadstairs	280045	n	3	3	3			0	0	250	250	0	500
Rural Area Sites	S438	Land south of Monkton rd, Minster	Minster	329138	n	2	3	3			0	400	0	0	0	400
Rural Area Sites	S487	East of Tothill St Land fronting (north side) of Westwood Road	Minster	118182.1	n	3	3	3			0	295	0	0	0	295
Landowners in Green Wedge	S496	Land at Millers Lane, Monkton	Broadstairs	97563	n	3	3	3			0	290	0	0	0	290
Rural Area Sites	S519	Land at Millers Lane, Monkton	Monkton	107012.5	n	3	2	3			0	267	0	0	0	267
Landowners or Developers	S425	Nash Farm, Nash Court Road, Margate	Margate	72880	n	3	3	3	Landscape Impact will need further consideration.		100	164	0	0	0	264
Employment Land Review	SR72	Dane Valley Industrial Estate (developed and undeveloped)	St. Peter's	86067	p	1	1	1			0	0	0	0	255	255
Rural Area Sites	S469	Site 'B' South side of A253, Cliffsend	Cliffsend	90733	n	2	3	3			0	226	0	0	0	226
Sites With Planning Permission	S159	Royal Sea Bathing Hospital, Canterbury Road	Margate	25815	y	4	4	2			0	193	0	0	0	193
Landowners in Green Wedge	S489	Land West of Updown House, Ramsgate	Margate	76518	n	2	2	3			0	180	0	0	0	180
Rural Area Sites	S437	Land west of prospect rd, Minster	Minster	71903.1	n	2	3	3			0	179	0	0	0	179
Landowners or Developers	S497	land east of Harbour Approach Road, Ramsgate	Ramsgate	57999	n	2	3	3	Landscape impact will need further consideration. Impact upon national cycle network and views toward sea from Chalk hill - cannot be mitigated if southern section of site developed - Significant archaeological remains/potential over a large part of the site. Would result in significantly more traffic onto Chilton Lane - highway capacity at this point would need to be considered - Access onto Harbour Approach Road does not appear feasible due to gradient		0	174	0	0	0	174
Rural Area Sites	S520	Land at Willests Hill, Monkton	Monkton	59703.01	n	3	3	3			0	149	0	0	0	149
Rural Area Sites	S531	Land south of Cliffsend railway crossing	Cliffs end	48448.83	n	3	3	3			0	0	121	0	0	121
Landowners in Green Wedge	S56	Land off Nowlands Lane, Broadstairs	Broadstairs	52132	n	3	3	3			0	110	0	0	0	110
Employment Land Review	S539	Ivyolt Road, Industrial Estate, Margate	Margate	25125	y	3	3	3			100	0	0	0	0	100
Rural Area Sites	S470	Site "C" North of railway line, Cliffsend	Cliffsend	40012.21	n	2	3	3			0	100	0	0	0	100
Allocated in 2006 Plan	S145	St Augustine's College Canterbury Road	Westgate	41865	y	4	4	4			97	0	0	0	0	97
2006 Urban Capacity Study	S107	Land adjacent to 12 Kings Road	Ramsgate	8608.6	y	4	3	3			0	0	89	0	0	89
Landowners in Green Wedge	S546	Land at Northdown Road	Broadstairs	61549	n	3	3	3			0	83	0	0	0	83
Rural Area Sites	S518	Land at (north of) The Street, Monkton	Monkton	32593.42	n	3	3	3			0	81	0	0	0	81
Regeneration Sites	S413	The Lido	Margate	The Lido North side	p	2	2	2		Parts of building still occupied, car park pay and display still in use. Optimum use of site still to be resolved.	0	0	80	0	0	80
Landowners in Green Wedge	S545	Land at Hopeville Farm	Broadstairs	29191	n	3	3	3			0	80	0	0	0	80
Landowners or Developers	S420	Land West of Dane Road, Birchington	Birchington	55691.16	n	3	3	3			75	0	0	0	0	75

Planning Permission	Planning History	Under Consideration	Sustainability Appraisal	GVA Estimated Delivery Up to 2021	GVA Estimated Delivery 2021-2026	GVA Estimated Delivery 2026-2031	GVA Estimated Delivery 2031 Onwards
No	None		9		500		
No	None		8			400	
No	None		9		295		
No	None		9		290		
No	None		8			267	
No	Application currently live for 250 dwellings (OL/RH/16/1765) - application has been stalled since August 2017 following 30 public objections.	264	9		250		
No	None		3				255
No	None		8			226	
No	Application for 205 flats undetermined since 2007 (F/RH/07/0311), as well as 80 in 2008 (F/RH/08/0230)	193	10		205		
No	None		7			180	
No	None		8			179	
No	None		8			174	
No	None		9		149		
No	None		9		121		
No	None		9		110		
No	Application for 27 dwellings, and 12 commercial units withdrawn.		9		100		
No	None		8			100	
No	Previous applications are for internal alterations to student accommodation.		12		97		
No	None		10		89		
No	None		9		83		
No	None		9		81		
No	None		6			80	
No	Outline Application for 140 house, 70 unit sheltered housing scheme refused (OL/RH/16/0394)		9		80		
No	None		9		75		

Landowners in Green Wedge	S448	Westwood Lodge, Roadside Lane	Broadstairs	89171	n	3	2	3			0	0	70	0	0	70
Landowners in Green Wedge	S460	Land North of Park Road	Birchington	46229	n	3	3	3			0	70	0	0	0	70
Landowners or Developers	S862	Claydon Land, Vane Rd	Broadstairs	24195	n	2	1	1			0	0	0	0	65	65
Employment Land Review	S538	All Saint's Industrial Estate, Margate	Margate	31232.94	y	3	3	3			60	0	0	0	0	60
Landowners in Green Wedge	S450	Part of Former gas works site, Northdown Rd	St Peters		n	2	3	2			0	60	0	0	0	60
Landowners in Green Wedge	S475	Land at Draper's Mill (former school)	Margate	24571	n	3	3	3			0	60	0	0	0	60
Landowners in Green Wedge	SS27	Land north of Reading Street Road and south of George Hill Rd, Broadstairs	Broadstairs	46094	n	3	3	3			55	0	0	0	0	55
Landowners or Developers	S858	Land at Dane Court School,	Broadstairs	19929	n	1	1	1		Possible requirement to retain as playing field. Need to secure ownership for access.	0	0	0	0	48	48
Allocated in 2006 Plan	S146	St Augustine's Abbey	Ramsgate	14967.6	y	1	1	3	Listed building and wall in site B	Building in site B is occupied as a monastery (2009). Site A is allocated. Trustees indicated in 2010 desire to sell entire site as surplus.	0	45	0	0	0	45
Landowners in Green Wedge	S421	Land West Side of Northdown Hill	Broadstairs	13286	n	3	3	3			0	45	0	0	0	45
Landowners or Developers	S414 & 102	Nethercourt Estate, (north of Canterbury Rd), Ramsgate	Ramsgate	13910.54	p	2	3	2	Suitability in principle and potential dwelling capacity unclear in light of potential existence of significant archaeology.		0	41	0	0	0	41
Landowners in Green Wedge	SS25	Land north of Albert Rd & East of Victoria Avenue, Broadstairs	Broadstairs	16808	n	3	3	3			40	0	0	0	0	40
2006 Urban Capacity Study	S116	Rear of 2-50 Queens Gate Road & 1-51 Wilfred Road	Ramsgate	7653.5	n	2	1	1	Site is not ideal as the living conditions of future occupiers would be poor because of the sense of enclosure overbearing caused by surrounding development. Noise and disturbance due to location of access - would need to create adequate buffer zone to rear of properties. Need to achieve visibility plays of 2.4m x 25m (based on 20MPH). If over 5no dwellings - need to secure suit status prior to definition	Multiple ownership unlikely to become available	0	0	0	0	38	38
Employment Land Review	S541	Prince's Rd Depot, Ramsgate	Ramsgate	8243.9	y	3	3	3			35	0	0	0	0	35
Rural Area Sites	R25-123	Land at 46 Monkton Rd	Minster	13759	p	2	3	3			0	34	0	0	0	34
Rural Area Sites	S58	Land adj Little Orchard, Canterbury Rd, St Nicholas at Warden	St. Nicholas	13287	p	3	3	3			0	33	0	0	0	33
Landowners in Green Wedge	SS26	Land North East of Reading Street and north west of Convent Road, Broadstairs (Parcel B)	Broadstairs	32953	n	3	3	3			30	0	0	0	0	30
Employment Land Review	S542	Whitetail Rd Industrial Estate, Ramsgate	Ramsgate	10200	y	3	3	3			30	0	0	0	0	30
Landowners in Green Wedge	S481	Land at Ramsgate Road	Margate	17716	n	2	2	3			0	30	0	0	0	30
Employment Land Review	S871	Shed & Sheds	Westwood	8913.7	y	1	1	1			0	0	0	0	27	27
Council Owned Site	S377	Ramsgate Lower Esplanade	Ramsgate	3696.9		3	3	3	Physical constraints should be capable of being overcome. Likely to be able to deal with via condition and appropriate structural reports re cliff face. The primary constraints will be the impact of the development on Granville Marina the loss of parking and the provision for new		0	25	0	0	0	25
Rural Area Sites	SS30	Land south of Monkton Street, Monkton	Monkton	14618	n	3	3	3			0	25	0	0	0	25
Council Owned Site	S382	Staffordshire Street car park	Ramsgate	1055.3	y	4	3	2		Dependent on owner's intentions. Popular shoppers car park.	0	0	24	0	0	24

No	None		8			70	
No	None		9		70		
No	None		4			65	
No	Outline Application for residential development refused (OL/10/4/1289) - applications following have all been for industrial uses.		9		60		
No	None		7		60		
No	None		9		60		
No	None		9		55		
No	None		3			48	
No	Works were done in 2016 to improve the existing care facilities (L/16/0522)		5			45	
No	None		9		45		
No	None		7		41		
No	None		9		40		
No	None		4			38	
No	None relating to residential use		9		35		
No	Outline Application for 36 Units Refused by the LPA (OL/16/0654)		8		34		
No	Current Application Live for 30 Units (OL/16/1447)	30	9		30		
No	None		9		30		
No	None relating to residential use		9		30		
No	None		7		30		
No	None		3			27	
No	None		9		25		
No	None		9		25		
No	None		9		24		



Landowners or Developers	S34	77-85 High St	Ramsgate	900.97	y	3	3	2	Existing backland dwelling is set centrally within the site therefore constraining layout and consequently development potential - Only suitable if access can be achieved	Appears 6-7 separate owners due to small number agreement to site assembly may be achieved	0	0	20	0	0	20
2006 Urban Capacity Study	S34	Adjacent to 146 Canterbury Road & rear of 128-146 Canterbury Road	Margate	6926.8	p	2	2	2			0	0	0	0	20	20
Council Owned Site	S381	Coleman Crescent	Ramsgate	7291.7	n	3	3	3		Dependent on clarification of owner's intentions.	0	20	0	0	0	20
Council Owned Site	S387	Hartsdown	Margate	20856	y	2	2	2	Primary leisure facility for Margate. Promoter would need to be able to demonstrate relocation of facilities to appropriate alternative site. It would seem justifiable to require some of the area to be retained as Community Facility	Dependent on clarification of owner's intentions.	0	0	0	0	20	20
Landowners or Developers	S422	Land at Margate station, Margate	Margate	4716.3	y	3	3	2			0	20	0	0	0	20
Landowners or Developers	S861	Land North of Reading Street & East of Convent Rd.	Broadstairs	22671	p	3	3	2			0	20	0	0	0	20
Rural Area Sites	R25-135 and 82%	116 Monkton St	Monkton		n	3	3	3			0	20	0	0	0	20
Landowners in Green Wedge	S428	Focus Store and Land Rear, Pycroft's Road	Ramsgate		p	3	3	3			0	20	0	0	0	20
Rural Area Sites	S531	Land east of Shunt Lane, St Nicholas	St. Nicholas	9981.7	p	3	3	3			0	20	0	0	0	20
Landowners or Developers	S106a	Land a Seaford Rd and fronting Southwood Road	Ramsgate	S106 - 11517.809 4078085	y	3	3	3			0	18	0	0	0	18
2006 Urban Capacity Study	S1	Corner of Dumpton Park Dr. & Honeyuckle Rd	Ramsgate	2293.2	y	3	2	2	Possible need for investigation to ascertain if existing use could have caused ground contamination	Site presently occupied by building still in use. Relocation of business timescale unclear	0	0	0	17	0	17
Employment Land Review	SR73	K Laundry	Ramsgate	5152.241	y	2	2	1			0	0	0	0	16	16
2006 Urban Capacity Study	S5	Rear of 4-28 St Peter's Park Road	Broadstairs	3119.1	y	4	2	2	Loss of public car park - Adjacent to Broadstairs train station (noise and disturbance etc.)	Owners intentions not known.	0	0	0	0	15	15
Rural Area Sites	S474	Adj. Vicarage, Monkton St	Monkton	6278.63	p	3	2	3			0	15	0	0	0	15
Council Owned Site	S389	Dane Park depot	Margate	8782.3	p	3 or 2	2 or 1	3 or less	In light of existing uses may need to consider/remediate possible contamination. Area around lodge and areas of trees has been discounted in assessment.	Dependent on clarification of owner's intentions.	0	14	0	0	0	14
Rural Area Sites	S92	Rear of 1-45 Augustine Road	Minster	5501.765	n	1	1	1		Multiple ownership	0	0	0	0	14	14
Sites With Planning Permission	S221	67, Victoria Road	Margate	1306	y	4	3	2	Based upon suitability for extension only - not demolition and new build		0	0	13	0	0	13
Sites With Planning Permission	SR9	DANE VALLEY ARMS, DANE VALLEY ROAD, MARGATE, CT9 3RZ	MARGATE	1817.8	y	3	2	3			13	0	0	0	0	13
Allocated in 2006 Plan	S150	17-23 Dalby Square	Margate	1478.5	n	4	3	2			12	0	0	0	0	12
Rural Area Sites	S455	Young's Nursery, Aynhoe Road	Cliffsend	4854.8	y	3	3	3			0	12	0	0	0	12
Rural Area Sites	S93	Rear of 19-43 Monkton Road & 16-32 Augustine Road	Minster	4981.122	n	1	1	1		Multiple ownership	0	0	0	0	12	12
Employment Land Review	SS44	St Lawrence Industrial Est, Ramsgate	Ramsgate	1949	y	3	3	3			11	0	0	0	0	11
2006 Urban Capacity Study	S61	Adjacent to 32 Fort Crescent	Margate	11119.7	y	3	3	2			10	0	0	0	0	10

No	None		8			20	
No	None		6				20
No	None		9		20		
No	None		6				20
No			8			20	
No	Application for 30 Dwellings Refused in March 2017 (F/H/16/0924) - Live application Submitted 25th Jan 2018 for 25 Dwellings (F/H/18/0142)	25	8		20		
No	None		9		20		
No	Change of Use Application for Retail to D2		9		20		
No	None		9		20		
No	None		9		18		
No	None		7			17	
No	None		5				16
No	None		8				15
No	None		8			15	
No	None		8			14	
No	None		3				14
No	None		9		13		
No	Application Withdrawn for 23 Unit Scheme (F/H/16/1266) Current Application for 17 Unit Scheme Live (F/H/17/1407)	17	8		13		
No	No Current Applications - However, previous application was in 1994 for Residential Development.		9		12		
No	None		9		12		
No	None		3				12
No	None		9		11		
No	Application for a 7 Unit Scheme Refused on Site (F/H/07/0314)		8			10	

Landowners in Green Wedge	SS18	Land and buildings at Stella Maris Convent, North Foreland Road, Broadstairs	Broadstairs	16216	n	3	3	3			10	0	0	0	0	10
Landowners or Developers	SS21	Haine Lodge, Sprattling Street, Ramsgate	Ramsgate	5457.9	y	4	3	3			10	0	0	0	0	10
Landowners in Green Wedge	S449	Adj Westwood Lodge, Sloe Lane	Broadstairs	5311.9	n	3	2	3			0	10	0	0	0	10
Sites With Planning Permission	S209	44, Canterbury Road	Margate	1490	y	4	3	2		No known major constraints, but planning permission has expired.	0	0	9	0	0	9
Landowners in Green Wedge	SR75	Brazil Brothers Sackett's Hill	Broads tairs		y	2	2	3			0	9	0	0	0	9
2006 Urban Capacity Study	S132	52-64 Park Road	Ramsgate	1635.5	y	3	2	2			0	0	0	8	0	8
2006 Urban Capacity Study	S65	Rear of 2-22 Ethelbert Road	Margate	3046.7	y	3	2	2	No off-street parking seems available judgement on this would need to be based upon traffic generation from current use compared to real.	Market in area may result in site not coming forward in short term	0	0	0	8	0	8
Council Owned Site	S358	22 Cecil Square	Margate	868.98	y	3	3	3			8	0	0	0	0	8
Rural Area Sites	R25-136	Walled garden, Sun Lane	St Nicholas		n	2	3	3			0	8	0	0	0	8
Landowners in Green Wedge	S434	Land Adj Stella Maris Convent, North Foreland Rd	Broadstairs	3364.9	n	2	3	3			0	8	0	0	0	8
Rural Area Sites	S83	Rear of 45-51 Monkton Road & 1-19 Ravenscroft Road	Minster	3257.3	n	1	1	1		Multiple ownership	0	0	0	0	8	8
Rural Area Sites	S86	Rear of 31 Freemans Road	Minster	2961.02	n	1	1	1		Multiple ownership	0	0	0	0	8	8
Sites With Planning Permission	S203	Munro Cobb Ltd, Northdown Road, 223-229	Margate	876.15	y	4	3	2			0	0	0	0	7	7
Sites With Planning Permission	S216	131 - 141 King Street	Ramsgate	604.0632	y	4	3	2			0	0	7	0	0	7
2006 Urban Capacity Study	S140	Corner of Cedric Road & Cuthbert Road	Westgate	1423.1	p	3	3	3	Attractive building in conservation area. Protected trees.		7	0	0	0	0	7
Rural Area Sites	SR33	Land East of High Street, Minster		1700.8		4	4	4			7	0	0	0	0	7
Council Owned Site	S395	Albion Street car park	Broadstairs	3469.1	p	4	3	2	Justification may be needed to support the loss/partial loss of existing car parking		0	0	6	0	0	6
Sites With Planning Permission	S263	56, 56A & 58, Station Road	Birchington	653.8	y	4	3	3			6	0	0	0	0	6

No	None		9		10		
No	Application for a 14 unit scheme Pending Consideration since Jan 2017 (OL/TH/16/1752)	14	10		10		
No	None		8			10	
No	None		9		9		
No	None		7			9	
No	None		7			8	
No	None		7			8	
No	Application for a 5 unit scheme still pending consideration from 2016 (F/TH/16/0832)	5	9		8		
No	None		8			8	
No	Application for a 3 unit scheme withdrawn in 2008 (OL/TH/08/1180)		8			8	
No	None		3				8
No	None		3				8
No	None		9				7
No	None		9		7		
No	3 Planning Applications for 14 Unit Schemes have been refused on the site.		9		7		
No	None		12		7		
No	None		9		6		
No	None		10		6		

Rural Area Sites	S510	Land at Shunt Lane	St Nicholas	5549.356	n	3	3	3			0	6	0	0	0	6
2006 Urban Capacity Study	S111	Rear of 2-26 Ellington Road	Ramsgate	5192.3	y	4	1	1		Public car park. Owner has expressed no intention to dispose of.	0	0	0	0	5	5
2006 Urban Capacity Study	S30	Rear of 11-25 Canterbury Road	Margate	3467.2	p	3	2	2	Main constraint is achieving access onto existing access way additional movements onto Canterbury road. However it is likely to be adequate standard for a small number of units	Owners 11 and 17-25 would need to agree to sale of rear gardens plus the agreement of garage owners to release garages	0	0	0	5	0	5
Sites With Planning Permission	S319	Paragon, Station Road, 100	Birchington	357.97	y	4	3	3			0	5	0	0	0	5
Rural Area Sites	S521	Land at (south of) The Street, Margate	Monkton	2349.817	n	3	3	3			0	5	0	0	0	5
Landowners or Developers	SR73	Land East side of North Foreland Avenue	Broadstairs	5152.241	n	3	3	3			0	5	0	0	0	5
Landowners or Developers	SR74	Land West Side of North Foreland Avenue	Broadstairs	5832.3	n	3	3	3			0	5	0	0	0	5
Rural Area Sites	S532	Land off Sun lane, 5 Nicholas	St. Nicholas	2127.7	n	3	3	3			0	5	0	0	0	5
2006 Urban Capacity Study	S16	Rear of 1-25 Beacon Rd & 1 31 Mayville Road	Broadstairs	1985	n	2	3	3	Main problems is achieving appropriate layout which accords with pattern of development and avoids overlooking may be possible for a small number of units not 30 dwellings per hectare though and also adequate access arrangements being achievable max 3-4 dwellings		0	0	0	4	0	4
Landowners or Developers	S515	Broadstairs Delivery Office, 20 The Broadway, Broadstairs	Broadstairs	566.36	y	3	3	3		Commercially viable alternatives for the relocation of the business would need to be found before any development was considered	0	0	0	4	0	4
Rural Area Sites	S423	Minster Station, Minster	Minster	1685.3	y	2	2	3		Flood risk needs to be overcome	4	0	0	0	0	4
2006 Urban Capacity Study	S71	Between 36-42 Que Lane	Margate	732.53	n	4	3	3			4	0	0	0	0	4
Rural Area Sites	S91	Rear of 84-100 Tothill Street & 2-22 Fairfield Road	Minster	2787.279	n	1	1	2		Multiple ownership	0	0	0	4	0	4
Rural Area Sites	S96	Rear of 10-20 Monkton Road	Minster	1615.3	n	2	2	2		Multiple ownership	0	0	0	4	0	4
Landowners or Developers	S517	Ramsgate Delivery Office, 42 Wilfred Road, Ramsgate	Ramsgate	2359.6	y	4	3	3		Commercially viable alternatives for the relocation of the business would need to be found before any development was considered	0	0	0	4	0	4
Landowners or Developers	S528	Land between 296 & 284 Canterbury Road, Birchington	Birchington	664.69	n	4	3	3			0	4	0	0	0	4
2006 Urban Capacity Study	S24	Rear of 6-12 Queens Avenue	Birchington	3679.6	n	4	2	2			0	0	0	3	0	3
2006 Urban Capacity Study	S33	Rear of 6-22 Craven Close	Margate	1553.9	n	2	2	2	Residents would need to have alternative garden provision	Loss of existing garden space	0	0	0	0	3	3
Council Owned Site	S366	Albion Place car park	Ramsgate	501.97	n	4	2	2			0	0	3	0	0	3
Rural Area Sites	S89	Corner of Coningham Road & Station Approach	Minster	1564.1819 69937915 57.422920 81074	y	3	3	3		Possible flood risk	3	0	0	0	0	3
Landowners or Developers	S514	Ad 5 V & 11 Hevellyn Avenue, Broadstairs	Ramsgate	2198.9	n	3	2	3			3	0	0	0	0	3
Landowners or Developers	S864	Land at Surrey Gardens	Birchington	665.24	y	3	3	3			0	2	0	0	0	2
Landowners or Developers	S473	31 Victoria Road, Ramsgate	Ramsgate	264.42	y	3	3	3			2	0	0	0	0	2
Rural Area Sites	S523	Rear of 59A High St	Minster	1840.3	n	2	3	3			2	0	0	0	0	2
2006 Urban Capacity Study	S7	Rear of 78-92 Bromstone Road	Broadstairs	3712.8	n	2	3	2			2	0	0	0	0	2
Rural Area Sites	S94	Rear of 2-14 Augustline Road & 4-12 Royal Street	Minster	2386.178	n	1	1	1		Multiple ownership	0	2	0	0	0	2
2006 Urban Capacity Study	S12	Corner of Roding & Elmwood Close	Broadstairs	3515.6	n	3	3	2	Site suitable for 1 dwelling in light of highway safety concerns		0	0	0	0	1	1
Council Owned Site	S396	Land at Effingham Street, Ad 8	Ramsgate	254.43	n	4	3	3			1	0	0	0	0	1
Rural Area Sites	R25-131	Chapman's Field	Cliffsend		n	2	3	3			0	0	1	0	0	1
						737	3692	693	311	562	5995					

No	None			9		6		
No	None			6			5	
No	None			7			5	
No	2 Applications for Residential Uses on the site refused.			10		5		
No	None			9		5		
No	None			9		5		
No	Application for a 13 unit scheme refused in 2012 (OL/12/0550)			9		5		
No	None			9		5		
No	None			8			4	
No	None			9		4		
No	None			7			4	
No	None			10		4		
No	None			4			4	
No	None			6			4	
No	None			10		4		
No	None			10		4		
No	None			8			3	
No	None			6			3	
No	None			8			3	
No	None			9		3		
No	None			8			3	
No	Application for 4 Dwellings Refused in 2011 (F/11/0712)			9		2		
No	Application for 3 Dwellings Withdrawn in 2010 (F/10/05/0184)			9		2		
No	None			8			2	
No	Application for 3 Dwellings Withdrawn in 2010 (F/10/05/0184)			7			2	
No	None			3				2
No	None			8				1
No	None			10		1		
No	None			8			1	
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# Contact Details

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### GVA

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