


Thanet District Council

Matter Statement

Matter 8 - Housing Land Supply

Issues 1-6 – Five-Year Housing Land Requirement, Supply Methodology, Components of Supply, Windfall Allowance, Future Supply and Flexibility

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Matter 8 – Housing Land Supply

Introduction

The primary issue affecting housing delivery in Thanet, is the nature of local housing market conditions. Thanet's geographical position at the most easterly point of East Kent, and the public perception of a deprived area, have contributed to a weak housing market.

The draft Local Plan identifies sufficient land to meet the OAN for the Plan period to 2031. The Council has provided ample opportunity to enable housing delivery through land allocations and the granting of planning permission on suitable non-allocated sites (windfalls). Despite this, delivery has not kept pace with changes to the annual housing requirement. For example, an outline application for 153 dwellings was granted on appeal in February 2017, on the basis that it would "be a significant benefit in a District with a substantial shortfall of housing" – to date no details have been submitted and the application has not progressed.

The creation of a Parkway station (expected to open in 2022) which will reduce journey time to London to just over an hour, should improve market conditions and boost local delivery. The Council has recently commissioned Wessex Economics to consider the impact of the Thanet Parkway Station on housing delivery which should be available in due course. Early indications show that, currently Thanet has the weakest new homes market in Kent and Medway as based on the sales value of new homes, relative to the prevailing values of existing residential properties. It is suggested that as most of the major new strategic allocations will be easily accessible to the new Thanet Parkway Station together with the shorter journey times which can be used in the marketing of these new developments, this should improve housing delivery.

The Council is acutely aware of the issues of delivery and has considered the actions recommended for consideration in the Planning Practice Guidance (Paragraph: 072 Reference ID: 3-072-20180913). With the exception of using CPO powers, the Council is already actively engaged in all the activities listed as set out in the table below.

Suggested Actions (Planning Practice Guidance)	TDC position
Revisiting the Strategic Housing Land Availability Assessment (SHLAA) / Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development, including public sector land and brownfield land	Being addressed through Local Plan process
Working with developers on the number of houses on site, including whether sites can be subdivided	Being addressed through Local Plan process.

Offering more pre-application discussions to ensure issues are addressed early	Council's Planning Applications Team already undertakes pre-application discussions on housing proposals. The Team also has regular meetings with local agents to discuss service issues
Consider the use of Planning Performance Agreements	Council's Planning Applications Team already does this
Carrying out a new Call for Sites, as part of plan revision	There have been 3 "Calls for Sites" and 3 consultation stages when sites have been proposed through Local Plan process.
Revising site allocation policies in the development plan, revising existing policies acting as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies	Addressed through Local Plan process
Reviewing the impact of any existing Article 4 directions for change of use from non-residential uses to residential use	N/A
Engaging regularly with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how these can be addressed	Addressed through Local Plan process; annual Housing Information Audit; AMR; post-application discussions.
Establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standardised conditions reviewed	A review of conditions, including pre-commencement conditions, undertaken in 2017/2018. The Council already has a dedicated conditions officer whose sole role is to discharge conditions within the shortest timescale possible.
Ensuring evidence on a particular site is informed by an understanding of viability	Undertaken at both Local Plan stage and where appropriate, at planning application stage.
Considering compulsory purchase powers to unlock suitable housing sites	Council is currently developing a more pro-active approach to the CPO of stalled sites (see additional actions below).
Using Brownfield Registers to grant permission in principle to previously developed land	Unable to apply PIP because of Habitats Regulations requirements.
Encouraging the development of small sites and higher site densities	Local Plan already does this. Historically good level of "windfalls" on small sites. No objection to higher density as long as that does not compromise other key policy objectives (eg: housing mix as identified in the SHMA; open space provision)

Moreover, the Council is also:

- Actively supporting the delivery of Parkway Station and rail journey time improvements from London to Thanet, to invigorate the local housing market (including a commitment of £2m towards the cost of Parkway);
- Refining the annual monitoring process to provide additional clarity on “stalled sites”, by introducing “under construction” stages to monitor progress more closely;
- Combining Housing and Planning Teams in single Service to promote closer working;
- Corporate accreditation to the Housing Business Ready Programme;
- Working with Homes England in district to assist with the delivery of some key sites and release of publicly owned land;
- Delivery of the Council's 150-home Housing Revenue Account development programme;
- Council officers (and KCC officers) involved in various grant funding applications to support the delivery of new infrastructure (Housing Infrastructure Fund; Local Growth Fund);
- In November last year, the Kent & Medway Leaders Group agreed to “proceed with a Kent and Medway-wide proposition...with East Kent defined as the growth area within Kent and Medway”. In return for significant new infrastructure investment and planning flexibilities, the Kent & Medway proposition would deliver an acceleration in housing delivery. Work has continued to develop the proposition with MHCLG and Homes England and locally with Leaders and Chief Executives, in particular from East Kent. The proposition will feature the potential for acceleration and growth in Otterpool Park and in Thanet in particular. We continue to work towards a full agreement with Government in September.

The Council is already working on a Housing Delivery Action Plan to address these issues and is also developing a more pro-active approach to Compulsory Purchase. In addition, the Council is working on setting up a Housing Company to deliver housing directly.

More recently, the Council has met both Homes England, and different Departments from MHCLG, to develop these ideas, with a view to accelerating housing delivery in the district.

As a responsible authority, the Council has also, over the last few years, granted planning permission on a number of non-allocated sites to boost housing supply, where those proposals were considered suitable and acceptable. Hence the Council has a high windfall rate (see Council response to Issue 4).

There has been under delivery and applying Government guidance, normally a 20% buffer would be applied to the requirement and shortfall. However, given the circumstances of the local housing market it is not thought appropriate to apply a 20% buffer to the shortfall as it would not assist in improving delivery. It is also more appropriate to apply the Liverpool method to the under delivery i.e. to redistribute the shortfall across the plan period, as it is

highly unlikely that the district would achieve the higher build out rates that would be proposed under the Sedgefield method, in the shorter term.

The nature of the housing market together with infrastructure requirements required to serve the strategic allocations eg parkway station, the inner circuit and social infrastructure, necessitate the use of the Liverpool method and the use of a stepped requirement rather than a flat annual rate. It is necessary to apply a realistic approach to delivery so that the housing strategy is not founded on unrealistic shorter term targets -perpetuating a five year supply target- that will not be met.

Therefore the Council is seeking a pragmatic and structured approach to the delivery of housing in a difficult market and is taking all actions it can to support housing delivery.

Issue 1 – Five-Year Housing Land Supply

Q1. What is the basic five-year housing land requirement, what is it based on and how has it been calculated?

The basic five-year housing land requirement for the period 2018/19 to 2022/23 is 4900 units. This is based on the stepped requirement approach of (see Matter 2 Issue 5):

2016-21 = 4,500 (900pa)

2021-26 = 5,500 (1100pa)

2026-31 = 5,585 (1117 pa)

As the 5 year period straddles the 5 year bands of the stepped approach, there are different annual requirements for the last 2 years of the requirement. The 4900 units is calculated as follows:

2018/19 = 900pa

2019/20 = 900pa

2020/21 = 900pa

2021/22 = 1100pa

2022/23 = 1100pa

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

Paragraph 47 of the Framework states that to boost significantly the supply of housing, local planning authorities should identify and update annually a deliverable five-year supply of housing, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and completion in the market for land. Where there has been a record of persistent under delivery this should be increased to 20% to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.

The five year requirement represents a significant increase in the annual requirement which to date has not been met by completions in the market. Previous annual requirements range from 375pa from the SE Plan (2006-13) where completions were slightly below; to 600pa in the Preferred Option Local Plan 2015; to 785pa as detailed in CD4.2 SHMA based on 2012 projections, to 857pa in the Preferred Option Revisions SHMA update (2017) (CD4.1) based on 2014 sub-national population projections, to a stepped approach of 900 pa for 2016/17 and 2017/18 in the submission local plan (CD1.1). The table below details the completions since 2011 which shows that, as the target increases i.e. more than doubling from that used at the start of the plan period, this step change has not been met by the development industry, even when permission for non-allocated sites are granted on appeal (15/0788 Westwood Lodge granted on appeal 13/02/17). The stepped requirement of 900 units pa represents 140% increase on previous SE Plan target of 375pa.

Year	Completions	Requirement at monitoring year
2011-12	307	375
2012-13	217	375
2013-14	322	375
2014-15	380	600
2015-16	350	600
2016-17	478	900
2017-18	305	900

(Note to table: 375pa relates to the SE Plan requirement, 600pa relates to the Preferred Option requirement and 900pa relates to the Submission Plan stepped approach)

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%?

The Council is aware that delivery is a problem in this District due to its physical location at the most easterly point of Kent and the southeast, together with the perception of an area of deprivation. It is this reason why the Council has had meetings with MHCLG to discuss the problem of delivery and how to try and encourage improved delivery rates.

The table below sets out the completions against the requirement for that monitoring year redistributed from 2016.

Monitoring Year	Annual Completions	Annual Requirement at monitoring year	Yearly shortfall against monitoring year's requirement
2011-12	307	375	68
2012-13	217	375	158
2013-14	322	375	53
2014-15	380	600	220
2015-16	350	600	250
2016-17	478	900	422
2017-18	305	900	595

The table above highlights that delivery has not kept pace with the annual requirement despite more than enough land supply being available either through consents or allocations. Therefore, the Council recognises that in applying the guidance, the buffer should be 20%. Having accepted this, however, the Council remains concerned that the under-delivery appears not to have been a function of land supply.

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

The NPPF 2012 is not explicit on this issue. Common practice appears to have accepted that the buffer should be applied to the 5 year requirement and the undersupply. However, because of the nature of the weak local housing market, the Council remains concerned that if the 20% buffer were to be applied to the 5 year requirement and any undersupply, this could further undermine confidence by flooding the market and weaken it further. Moreover, as each year passes, if the backlog increases, then there will be a point where it becomes virtually impossible to regain a five year land supply as the annual housing requirements increases particularly if the market does not or cannot respond.

To give the market a chance to meet the higher requirement without undermining it and taking a realistic approach to delivery, it is proposed that the 20% buffer should exceptionally in the case of Thanet only be applied to the basic requirement.

The tables below set out the implications of a 20% buffer being applied to 1) the basic 5 year requirement and then adding the shortfall; and 2) the 5 year requirement plus any undersupply. The tables compare this to a 5 % buffer. The shortfall for the 2016/18 period against a 900pa requirement is 1017 units (422 for 16/17 and 595 for 2017/18. If this is redistributed across the remaining 13 years of the plan (Liverpool method – 1,017/13) then this gives an annual figure of 78 units per annum to be added to the requirement resulting in a total additional 390 units over the 5 year period. It should be noted that any shortfall pre 2016 has already been accounted for in the stepped housing requirement approach.

1) The basic 5 year requirement including buffer plus shortfall (Liverpool)

Requirement for 2018-23	4900	(900*3)+(1110*2)	4900
No. of units annually for basic 5 year requirement	980		
5% buffer 4900x5%	245	20% buffer 4900x20%	980
5 year requirement with 5% buffer	5145	5 year requirement with 20% buffer	5,880
shortfall for 5 year period (5x78)	390	shortfall for 5 year period (5x78)	390
5 year requirement + 5% +shortfall	5535	5 year requirement + 20% + shortfall	6,270
New annual requirement including 5% buffer + shortfall	1107	New annual requirement including 20% buffer + shortfall	1254
5 year supply 01/04/17 to 31/03/21		5 year supply 01/04/17 to 31/03/21	
Strategic and other new allocations	2743	Strategic and other new allocations	2743
Planning permissions	2420	Planning permissions	2420
Empty Homes @27 units pa (5 year supply = 135)	135	Empty Homes @27 units pa (5 year supply = 135)	135
Windfall allowance of 225 units pa 225x2*	450	Windfall allowance of 225 units pa 225x2*	450
Total supply	5748	Total supply	5748
Surplus - /shortfall +	-213	Surplus - /shortfall +	522
District wide 5 year supply	5.19	District wide 5 year supply	4.58

2) The 5 year requirement including shortfall (Liverpool) plus buffer

Requirement for 2018-23	4900	(900*3)+(1110*2)	4900
Add in shortfall (Liverpool) 78*5=	390	Add in shortfall (Liverpool) 78*5=	390
5 year requirement + shortfall	5290	5 year requirement + shortfall	5290
Annually requirement including shortfall	1058	Annually requirement including shortfall	1058
5% buffer 5290x5%	265	20% buffer 5290x20%	1058
5 year residual requirement plus shortfall with 5% buffer	5555	5 year residual requirement plus shortfall with 20% buffer	6,348
New annual requirement including any shortfall + 5% buffer	1111	New annual requirement including any shortfall + 20% buffer	1270
5 year supply 01/04/17 to 31/03/21		5 year supply 01/04/17 to 31/03/21	
Strategic and other new allocations	2743	Strategic and other new allocations	2743
Planning permissions	2420	Planning permissions	2420
Empty Homes @27 units pa (5 year supply = 135)	135	Empty Homes @27 units pa (5 year supply = 135)	135
Windfall allowance of 225 units pa 225x2*	450	Windfall allowance of 225 units pa 225x2*	450
Total supply	5748	Total supply	5748
Surplus - /shortfall +	-194	Surplus - /shortfall +	600
District wide 5 year supply	5.17	District wide 5 year supply	4.53

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?

At the start of the local plan process in 2011 the annual requirement was 375pa this has increased to 600pa (60% increase on the 375 figure), 857pa in SHMA update (CD4.1) to a stepped approach of 900pa for period 2016-21 (140% increase on 375 figure).

SHMA update (2017) (CD4.1) identified that the OAN should be 17,140 for the plan period (2011-31). However, as this was a marked step change in the requirement figure and part of the plan period had already passed, together with the infrastructure requirements of the strategic sites including school provision and major road infrastructure (inner circuit), a stepped requirement for the remaining plan period was proposed based on the advice of the advisory planning inspector in Autumn 2017. This stepped approach reflected the

completions to date for first 5 years of the plan, thereby any shortfall was redistributed over the remaining plan period to meet the OAN of 17,140.

This reflects a substantial increase on historic requirements and unfortunately completions have not responded to this step change of annual requirement. In addition as a result of this significant increase in requirement a substantial amount of infrastructure needs to be provided to accommodate the development.

The Council's view is that to address the shortfall in the first 5 years (Sedgefield method) on an already high annual requirement would be to impose an unrealistically high expectation about delivery in the first five years and does not acknowledge the structural issues that make delivery problematic. The Council believes that any shortfall should be spread across the remaining plan period as this would allow the market to adjust to the higher completion requirements.

If Sedgefield were to be used to address the shortfall, it is unlikely that any increase in completions would be before years 4 or 5 at the earliest and it would result in an even higher annual requirement, the levels of which have never been seen in the Thanet market. The proposed trajectory already shows a significant increase in completions in years 3 to 5

The Council's supply consists of a number of large strategic sites which would have a slower delivery in the short term due to the infrastructure requirements compared to smaller sites. The Council allocates land to meet the full OAN of 17,140 over the plan period. The Liverpool approach has been supported by various inspectors at Local Plan Examination where there are large strategic sites that require the provision of infrastructure eg Fenland 2014, Canterbury 2017. The PPG allows the possibility that a method other than Sedgefield could be used paragraph 35 by stating undersupply should be dealt with in the first 5 years *where possible*.

The Council believes that in this case the need for a realistic approach points to the Liverpool method as the most appropriate means of addressing the past shortfall.

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

Based on the tables in Issue 4, the five year requirement should be 6,270 with a 20% buffer or 5,535 with a 5% buffer. This applies the buffer to the 5 year requirement of 4,900 units and then adds in the proportioned shortfall.

Issue 2 – Supply Methodology

The PPG⁴ states that planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide clear evidence to support the deliverability of sites, ensuring that judgements on deliverability are clearly and transparently set out.

The PPG⁵ also advises that the size of sites will be an important factor in identifying whether a housing site is deliverable within five years. Plan

makers should consider lead-in times and build-out rates to ensure a robust five-year housing land supply. Taking this into account:

Sites with Planning Permission

Q1. What evidence is there to indicate that the sites with planning permission will come forward as illustrated in the housing trajectory?

As part of the monitoring for the last 2 years (2016/17 and 2017/18) the Council has written to developers and agents of sites of 10 or more units with planning permissions, requesting views on the Council's estimated phasing of their site. The phasing survey also invited them to amend the phasing if they were not in agreement and to identify any known constraints that were hindering the development of the site. If no response was received the Council assumed they were in agreement. Each year as part of the housing survey each site is visited to establish progress. This year the Council has sought to clarify/refine the level of under construction:

- 1 = no visible progress - site has stalled
- 2 = site cleared
- 3 = footings
- 4 = walls
- 5 = roof/building shell
- 6 = internal works
- 7 = nearing completion

It is hoped that this further refinement will help inform the future phasing and completions rates.

Q3. Have the same lead-in times and build-out rates been used for sites across the District, and for sites with outline and full planning permission? If so, is this appropriate and justified?

The phasing is based on a number of factors and varies according to the information that is available for each site. Information from developers/agents as part of the HIA phasing survey is used to inform the phasing of the sites. However, where this is not available then the general approach considers the following:

- site characteristics i.e. ranging from whether the site is relatively straightforward (18 months - 2 years before completions) or has more complex/physical problems and issues eg existing uses, buildings on site, detailed S106 agreement requiring infrastructure provision (3-5 years lead in). Other factors could include any doubts regarding intention to develop/sell in short term (e.g. where the consent was old), economic viability/market capacity constraints.
- Whether the site has outline, full or reserved matters consents. If outline then generally completions will not be phased until year 4 or 5 depending on the available information. Full and reserve matters then completions could be phased for 18

months to 2 years which is line with the Lichfield report¹ for sites of less than 500 units

The build out rates depend on the site and available information. If no information then these will be estimated according to a variety of factors ranging from the overall capacity of site, any known constraints for the site to the delivery history of the developer. Usually a 2-3 year lead-in time unless there is information to the contrary from the developer. Completions are usually lower in the first year as the site becomes established and then gradually increases. Other sources of information on the progress of sites can be based on information from other colleagues in housing, development management and building control teams. These teams together with the Strategic Planning team have fairly regular meetings with developers where any issues can be discussed.

Q4. Are there any sites in the trajectory which have a resolution to grant planning permission subject to the completion of a planning obligation? If so, how has this been considered in determining deliverability?

Only sites with full planning permission have been included in the planning permissions table in the appendix to this statement which inform the land supply. There are, however, some sites that have been allocated that now have a live application with a resolution to grant pending the completion of a S106. E.g. HO4 land off Nash and Manston Roads and Walter's Hall Farm. For these, the agent has been contacted for the latest delivery rate.

Q5. How has the trajectory considered that some sites may not come forward due to unforeseen circumstances? Has a lapse-rate or allowance for non-deliverability been applied? If so, has it been applied to all sites?

The Council has not made any provision for the possibility that some existing planning permissions may lapse. Although there is no requirement for this in either the 2012 Framework or the associated PPG, the Council recognises that a small number of permissions will lapse without development. Available evidence for the last 3 years shows that the lapse rate has been very low at an average of 2.3%. This low rate together with a conservative assumption about windfalls i.e. they are discounted for the first 3 years, the Council is of the opinion that a specific estimate of lapsed permissions is not necessary under NPPF 2012 and associated guidance.

Lapse rates over last 3 years

EXPIRED	No. of units	No. of units expired as a % of extant units	Total no. of extant units
HIA 2016	70	2.26	3102
HIA 2017	63	1.60	3944
HIA 2018	136	3.06	4439

¹ Lichfield From start to Finish November 2016

Sites without Planning Permission

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

The annual HIA phasing survey also includes contacting the agents for the allocations where there is information. In addition prior to the examination the Council held a further meeting (January 2019) with the developers of the strategic sites including the Manston Green site which has planning permission (14/0050), to clarify delivery rates and as a result this was revised - see revised phasing schedule in the appendix to this statement which replaces Appendix B of the submitted local plan.

Q7. Have the same lead-in times and build-out rates been applied to sites without planning permission? How do they vary?

Some of the information is based on that available from the developer or landowner as set out above. Some of the sites listed as allocations have received either planning permission or are the subject of applications since 31st March 2018 i.e. after the latest HIA, or are in pre-application discussions. For these a 3 year lead in period has generally been applied. For other sites without planning permission, if the sites have few constraints these have been phased towards the end of the 5 year period but for the more constrained sites these have generally been phased beyond the initial 5 year period.

Where there is no information this has been phased for much later in the plan period unless the Council is of the opinion that the site can come forward as there are few constraints.

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 trajectory has changed since the publication of the Submission plan and is set out in the appendix to this statement. This is based on the information received from the developer as part of the HIA phasing survey and confirmed in their Regulation 19 comments. An outline application is expected October 2019.

The housing trajectory for Birchington SP14 is as follows:

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
			50	100	150	150	200	200	200	150	150	150	100

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 trajectory has changed since the publication of the Submission plan and is set out in the appendix to this statement. This is based on the information received from the developer as part of the HIA phasing survey and confirmed for the developer meeting January 2019

The housing trajectory for Westgate-on-Sea SP15 is as follows:

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
		25	75	100	150	200	250	250	250	250	250	200	

Q3. What evidence is there to support the housing trajectory for Westwood (Policy SP16)? Does this adequately reflect the time it will take to bring development forward and the necessary infrastructure requirements for the site?

The trajectory has changed since the publication of the Submission plan and is set out in the appendix to this statement. This is based on the information received from the developer as set out in their Regulation 19 comments.

The housing trajectory for Westwood SP16 is as follows:

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
			50	150	150	150	150	150	150	150	150	100	100

Q4. How has the development of land fronting Nash Road and Haine Road (Policy SP17) been considered in the housing trajectory?

This site is now covered by planning permissions and early phases (1 to 3b) are complete. The phasing for the remaining surveys has been confirmed by the agent (February 2019) as follows:

17/0726 Land North of Haine Road Broadstairs and West of Nash Road Margate Phase 3C – 97 units.

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
		20	30	30	17								

The phasing of the other phases are set out below:

14/0320 Land North of Haine Road Broadstairs and West of Nash Road Margate Phase 4 – 204 units.

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
		50	50	50	54								

15/0250 Land North of Haine Road Broadstairs and West of Nash Road Margate Phase 5 – 469 units

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
			50	50	75	75	75	75	69				

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 trajectory has changed since the publication of the Submission plan and is set out in the appendix to this statement. This is based on the information received from the developer as part of the HIA phasing survey and confirmed by the developer by email following the developer meeting in January 2019.

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
		90	110	120	130	140	130	120	110	50	100	100	

Issue 4 – Windfall Allowance

Paragraph 48 of the Framework states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling

evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens. Taking this into account:

Q1. What allowance has been made for windfall sites coming forward over the first five years, and thereafter throughout the plan period?

The Council has adopted a pragmatic and conservative assumption about windfalls based on previous windfall rates (see answer to Q2 below). The windfall allowance has been calculated at 225 units a year, and this is discounted for the first 3 years of the 5 year period to avoid any potential double counting with windfall planning permissions already in the supply. This approach was supported by the Inspector at the Canterbury Local Plan Examination.

Therefore there is an allowance of 450 units in the 5 year period and then 225 units a year for the remaining plan period.

Q2. What is this based on and is it justified on appropriate available evidence?

To inform the Revisions to the draft Local Plan Preferred Options January 2017, the Council assessed the windfall rate, based on the available evidence at the time. This has been carried forward into the submission plan. The approach looked at an average windfall rate for the period 2008/9 to 2014/15 for sites of less than 10 units which equates to 225 units pa. A 10 units threshold was chosen as the Council has had a history of smaller sites coming forward of up to 10 units.

Monitoring Year	Windfalls on sites of less than 10
2008-09	367
2009-10	182
2010-11	496
2011-12	214
2012-13	76
2013-14	123
2014-15	120
Total	1578
Annual average	225

No allowance is made for large windfall sites of 10+ units which have made a significant contribution to supply in the past. The district has had a high windfall rate for the last 10 years which is set out below.

	WINDFALL + ALLOCATED (all comps)	ALLOCATED	WINDFALLS	WINDFALL SITES OF less than 10	WINDFALL SITES OF 10 +	All windfalls as % of comps	Windfalls <10 as % of all comps	Windfalls >10 as % of all comps	Windfalls <10 as % of all windfalls	Windfalls >10 as % of all windfalls
2008-09	726	97	629	367	262	86.64	50.55	36.09	58.35	41.65
2009-10	520	30	490	182	308	94.23	35.00	59.23	37.14	62.86
2010-11	788	46	742	496	246	94.16	62.94	48.98	66.85	52.02
2011-12	307	30	277	214	63	90.23	69.71	20.52	77.26	22.74
2012-13	217	26	191	76	115	88.02	35.02	53.00	39.79	60.21
2013-14	322	73	249	123	126	77.33	38.20	39.13	49.40	50.60
2014-15	380	128	252	120	132	66.32	31.58	34.74	47.62	52.38
2015-16	350	20	330	151	179	94.29	43.14	51.14	45.76	54.24
2016-17	478	79	399	261	138	83.47	54.60	28.87	65.41	34.59
2017-18	305	58	247	212	35	80.98	69.51	11.48	85.83	14.17
TOTALS	4393	587	3806	2202	1604					

Using the data in the table above the average percentage of windfalls over the past 10 years was 86.64% of which 50.13% was on sites less than 10 units. Therefore the table above demonstrates that windfall sites have been consistently available in the District since the adoption of the 2006 local plan, and will continue to be a reliable source of supply and should be included in the supply. Over the last 10 years completions on large windfalls, sites of 10+ units, has averaged 160 units. If this were to be replicated in the future, and the same methodology is applied as for small sites i.e. discount for the first 3 years, this has the potential of providing a further 320 units for the five year supply.

Issue 5 – Future Supply

Paragraph 47 of the Framework states that local planning authorities should also identify a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, years 11-15.

Q1. How has the Council arrived at the figures in the Housing Trajectory for years 6-10 and 11-15?

As set out above in the previous questions, the Council has arrived at the figures in the housing trajectory based on information from the developers, known constraints on sites, infrastructure delivery and local knowledge. The more difficult sites have been phased for later in the plan period.

Q2. What factors were considered in arriving at the figures in the Housing Trajectory? Are they justified and based on appropriate available evidence?

This is a combination of the factors set out in the previous questions ranging from developer engagement, to where the sites are in the application process, to constraint and local knowledge.

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

The plan shows a future supply of 15,555 (200 of these units are phased for 2031/32) which together with the number of completions to date provides a supply of 17,893 which exceeds the OAN. Since the base date of 31st March 2018 a further 620 units have been granted planning permission up to September 2018.

In addition, the number of windfalls coming forward is at a much higher rate than the conservative figure allowed for in the calculations. As previously mentioned in Issue 4 question 2, large windfalls continue to come forward and have contributed an average of 160 units over the last 10 years.

Issue 6 – Flexibility

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

The draft Local Plan identifies a housing land supply to meet the OAN. If some of the larger sites do not deliver at the intended rate, sites can be moved forward from later in the Plan period (NPPF, para 47). Although Appendix B provides an expected trajectory, the Local Plan does not specify that sites cannot come forward ahead of their phasing, and the Council will not place unnecessary constraints on the consenting of housing applications.

Whilst the Council has identified a number of large strategic allocations there are also a range of sites allocated of varying capacities. For example out of the 68 allocations listed in the allocations table in the appendix to this statement, 62 have capacities less than 300 units with 59 of 100 units or less. This range of size of site provides flexibility across the plan period. In addition the plan identifies various opportunity sites within Margate and Ramsgate which could provide additional residential capacity which are not included in the supply at the moment

See also response to Q2 below in relation to Local Plan review.

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?

As the Inspectors will be aware, the Secretary of State has directed the Council to carry out an early review, primarily to assess whether housing land supply is sufficient. This being the case, there is already an effective review mechanism in place.

A review mechanism for the delivery progress of sites is already in place through the annual monitoring of housing completions and phasing consultation survey with developers. The Council is currently looking at how it can improve its monitoring systems to improve accuracy and to identify the reasons for slow progress on sites as part of annual phasing survey.

Where the market fails to deliver, the Council will consider what further actions are required based on the approach set out below based on the Planning Practice Guide.

The Council is aware that the development market has been slow to respond to rapidly-rising OAN figures, which is set out elsewhere in the Matter Statement.

The Council has met both Homes England, and more recently with different Departments from MHCLG, to develop these ideas, with a view to accelerating housing delivery in the district.

The Council is of the opinion that it would be beneficial to suggest a modification to the plan, based on the introductory paragraphs to this matter statement, to set out the housing delivery issue and the steps the Council is taking to address housing delivery. This could form a modification to the section on Plan Implementation and Infrastructure, for example, the inclusion of additional supporting text to Policy SP01.

APPENDIX

This will replace Appendix B in the local plan. Planning permissions have a base date of 31/03/18.

The delivery timescales reflect the results of the HIA Phasing survey Autumn 2018 and has been updated to reflect the latest information from developers and landowners, where this is available. Some sites are zeroed as they have planning permission and are included in the planning permission table.

ALLOCATIONS

Allocation ref number	Postal address	Total allocated	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
	STRATEGIC SITES															
S511, S553, S447	Westwood policy SP16	1450	0	0	0	50	150	150	150	150	150	150	150	150	100	100
S515, S498, S499,	Birchington Policy SP14	1600	0	0	0	50	100	150	150	200	200	200	150	150	150	100
ST1, ST2	Westgate Policy SP15	2000	0	0	25	75	100	150	200	250	250	250	250	250	200	
SS33 Has PP 14/0050	Manston Green	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	land at Manston Court Road / Haine Road (Westwood village) SP18/HO3	1200	0	0	90	110	120	130	140	130	120	110	50	100	100	
	NON STRATEGIC SITES OUTSIDE URBAN AREA															
S415 policy HO8	South of Canterbury Rd, Ramsgate	14	0	0	7	7	0	0	0	0	0	0	0	0	0	

Allocation ref number	Postal address	Total allocated	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
S505 policy HO6	Land south east of Brooke Avenue, Westbrook	43	0	0	10	13	20	0	0	0	0	0	0	0	0	
SR60 policy HO7	Land at Haine Rd & Spratling St, Ramsgate	100	0	0	20	40	40	0	0	0	0	0	0	0	0	
S540 policy HO4	Land off Nash/Manston Rds, Margate	250	0	0	20	70	70	70	20	0	0	0	0	0	0	
S535 & S549 Policy HO3 and some overlap with SP18	Land west of Old Haine Road, Ramsgate	250	0	0	20	60	100	70	0	0	0	0	0	0	0	
	land adjacent to former Manston Allotments Manston Road Ramsgate	80	0	0	20	30	30	0	0	0	0	0	0	0	0	
Policy HO2	land at Manston Road & Shottendane Road	550	0	0	30	90	90	90	90	90	70	0	0	0	0	
	MIXED USE SITES															
S189	Queen Arms Yard, Margate	24	0	0	0	0	0	24	0	0	0	0	0	0	0	
S411	Cottage Car Park, New Street, Margate	32	0	0	0	0	0	0	0	0	15	17	0	0	0	
S412	Margate Town Centre, (south of New Street, Margate)	27	0	0	0	0	0	0	0	0	5	10	12	0	0	
	NON STRATEGIC URBAN AREA SITES															
S019	Adjacent to 9 Minnis Road, Birchington	11	0	0	0	0	0	0	0	0	5	6	0	0	0	

Allocation ref number	Postal address	Total allocated	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
S106	End of Seafield Road	16	0	0	0	16	0	0	0	0	0	0	0	0	0	
S112	Adjacent to 8 Chapel Place, Ramsgate	6	0	0	0	0	0	0	0	0	6	0	0	0	0	
S113	Adjacent to 21 Royal Road & 9 Townley Street	18	0	0	0	0	0	0	0	0	9	9	0	0	0	
S158	ro 7_10 Marine Gdns - 5 Dwellings	6	0	0	0	0	0	6	0	0	0	0	0	0	0	
S168	Gas Works Boundary Road, Ramsgate	96	0	0	0	30	50	16	0	0	0	0	0	0	0	
S174	Land at Wilderness Hill and Dane Road	14	0	0	0	0	14	0	0	0	0	0	0	0	0	
S186a	79-85 High Street, Ramsgate	14	0	0	4	5	5	0	0	0	0	0	0	0	0	
S196	Gas Holder Station, Addington Street, Margate	22	0	0	0	11	11	0	0	0	0	0	0	0	0	
S215	WW Martin, Dane Park Road, Ramsgate	14	0	0	0	7	7	0	0	0	0	0	0	0	0	
S230	10 Cliff Street, Ramsgate	11	0	0	0	0	11	0	0	0	0	0	0	0	0	
S276	Complete Car Sales, Willsons Road, Ramsgate	10	0	0	0	0	10	0	0	0	0	0	0	0	0	
S295	38, 38a and 42 St Peters Road, Broadstairs	5	0	0	0	0	5	0	0	0	0	0	0	0	0	
S322	Units 1-4 Monkton Place Ramsgate	5	0	0	0	0	5	0	0	0	0	0	0	0	0	

Allocation ref number	Postal address	Total allocated	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
S393	Highfield Road, Ramsgate	25	0	0	0	10	15	0	0	0	0	0	0	0	0	
S410 has PP	Fort Hill, Arcadian	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
S467	Furniture Mart, Booth Place, Grotto Hill	9	0	0	0	0	9	0	0	0	0	0	0	0	0	
S522 Has PP	Eurokent, New Haine Rd, Ramsgate	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
S527 Has PP	Laleham School, Northdown Park Road, Margate	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
S529	Land at Victoria Road & Dane Rd, Margate	35	0	0	0	10	15	10	0	0	0	0	0	0	0	
S534	Haine Farm, Haine Road, Ramsgate	35	0	0	0	15	20	0	0	0	0	0	0	0	0	
S536	Land of Northwood Road, Ramsgate	45	0	0	0	20	25	0	0	0	0	0	0	0	0	
SR09	Dane Valley Arms, Dane Valley Road, Margate	13	0	0	0	7	6	0	0	0	0	0	0	0	0	
SR16	Builders Yard, The Avenue, Margate	10	0	0	0	0	10	0	0	0	0	0	0	0	0	
SR45	1 Thanet Road, Margate	5	0	0	0	0	5	0	0	0	0	0	0	0	0	
SR65	Land at Waterside Drive, Westgate	12	0	0	0	0	12	0	0	0	0	0	0	0	0	
SR67	Suffolk Avenue, Westgate	23	0	0	0	11	12	0	0	0	0	0	0	0	0	

Allocation ref number	Postal address	Total allocated	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
SR69	r/o Cecilia Road, Ramsgate	23	0	0	0	0	0	0	0	0	10	13	0	0	0	
SS16	Margate Delivery Office, 12-18 Addington Street Addington Street	10	0	0	0	0	0	0	0	0	10	0	0	0	0	
SS20	Ind Units, Marlborough Rd, Margate	10	0	0	0	5	5	0	0	0	0	0	0	0	0	
Policy HO9	Former Newington Nursery & Infants Nursery & Infants	49	0	0	0	20	29	0	0	0	0	0	0	0	0	
SS23	Gap House School, 1 Southcliff Parade, Southcliff Parade,	10	0	0	0	5	5	0	0	0	0	0	0	0	0	
SS24	Foreland School, Lanthorne Rd, Lanthorne Rd,	14	0	0	0	7	7	0	0	0	0	0	0	0	0	
SS34	Thanet Reach Southern Part	80	0	0	0	20	40	20	0	0	0	0	0	0	0	
SS35 has pp 15/0187 & 16/1715	Manston Road Industrial Estate (2 sites north & south)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
SS36	Part of Pysons Road	26	0	0	0	10	16	0	0	0	0	0	0	0	0	
SS43	Magnet and Southern, Newington Road, Ramsgate	8	0	0	0	0	8	0	0	0	0	0	0	0	0	
	Shottendane Farm, Margate	8	0	0	0	8	0	0	0	0	0	0	0	0	0	
	Lanthorne Court Broadstairs	56	0	0	0	20	36	0	0	0	0	0	0	0	0	

Allocation ref number	Postal address	Total allocated	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
	Former Club Union Convalescent home, north of Reading Street Broadstairs	24	0	0	0	10	14	0	0	0	0	0	0	0	0	
	RURAL SITES (in and outside confines)															
S512/S436/S85	Tothill Street Minster	250	0	0	30	60	60	50	50	0	0	0	0	0	0	
ST4	Land south side of Foxborough Lane	35	0	0	0	10	25	0	0	0	0	0	0	0	0	
S509	Land at The Length, St. Nicholas	25	0	0	0	10	15	0	0	0	0	0	0	0	0	
S488/R25-146	Land at Manor Rd, St Nicholas	39	0	10	10	10	9	0	0	0	0	0	0	0	0	
ST6	Land at Walter's Hall Farm, Monkton	20	0	0	10	10	0	0	0	0	0	0	0	0	0	
S543	Builders yard south of 116-124 Monkton Street, Monkton	20	0	0	0	10	10	0	0	0	0	0	0	0	0	
S468/435(1)	Site "A" South side of A253, Cliffsend	65	0	0	20	22	23	0	0	0	0	0	0	0	0	
S435(2)	Land north of Cottington Rd (west of Beech Grove)	41	0	0	15	15	11	0	0	0	0	0	0	0	0	
S416/S561	South side Cottington Rd, Cliffsend.	23	0	0	10	13	0	0	0	0	0	0	0	0	0	
	CLIFTONVILLE SITES															
S46	Rear of 59-65 Harold Rd	9	0	0	0	0	0	0	0	0	9	0	0	0	0	

Allocation ref number	Postal address	Total allocated	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32
S47	Adj to 60 Harold Rd and rear of 40-56 Harold Rd	14	0	0	0	0	0	0	0	0	7	7	0	0	0	
S48	Adj to 14 Harold Rd	10	0	0	10	0	0	0	0	0	0	0	0	0	0	
	SUB TOTAL	8949	0	10	351	1002	1380	936	800	820	866	772	612	650	550	200

Planning Permissions table as at 31st March 2018

Application Number	Postal Address	Total extant units	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
/031200	Pleasurama Amusement Park Marina Esplanade Ramsgate	107						20	30	30	27				
/040700	Royal Sea Bathing Hospital Canterbury Road Margate	100		20	30	30	20								
/050018	St Georges Hotel Eastern Esplanade Margate	87						20	20	20	27				
/050158	The Forge The Length St Nicholas at Wade	1	1												
/060177	10-14 Vicarage Crescent Margate	5			4	1									
/080929	2 & 3 St Mary's Road Broadstairs	7	7												
/081367	47 Lanthorne Road Broadstairs	2	1	1											
100041	10-14 Vicarage Crescent Margate Margate	2			2										
100248	Cliff Cottage Herschell Road Birchington	5			5										
100573	Former Police Station Cavendish Street Ramsgate Ramsgate	82						10	10	20	20	22			
110540	Land Rear Of 19 To 23 Harold Road And 9 To 15 Albion Road Margate	3			3										
110602	31 High Street Minster Ramsgate Minster Ramsgate	2		1	1										

Application Number	Postal Address	Total extant units	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
110615	19 High Street Margate Margate	1			1										
110910	Land At New Haine Road (Eurokent) Ramsgate	496			50	50	50	50	70	70	70	70	16		
120005	31 High Street Minster Ramsgate	2		2											
120158	16 The Vale Broadstairs	3				3									
120210	Former Allotment Gardens Manston Road Ramsgate	64						20	20	24					
120270	Land At 34 To 36 Bellevue Road And 25-27 Bellevue Avenue Ramsgate	5		5											
120473	2 Westcliff Terrace Mansions Pegwell Road Ramsgate	1			1										
120537	167 Pegwell Road Ramsgate	5			3	2									
120707	169-171 Pegwell Road And Land Rear Of 2-6 & 16 Downs Road Ramsgate	8			4	4									
120765	Land Adjacent 30 And 32 High Street And 9 Cavendish Street Ramsgate	2			2										
121003	Land Rear Of 122 Grosvenor Place Margate	1	1												
130072	51 Central Road Ramsgate	2	2												

Application Number	Postal Address	Total extant units	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
130132	The Acorn Inn 6 Park Lane Birchington	2			2										
130147	Land Adjacent St Mildreds Church Plumstone Road Birchington	1	1												
130254	33 Belmont Road Ramsgate	3	3												
130656	Naldera Cliff Promenade Broadstairs	1	1												
130694	Bown Of London 1 Archway Road Ramsgate	11		11											
130701	19-21 Harbour Street Ramsgate	2	2												
130787	Land Adjacent To 39 High Street Minster	1	1												
130887	Land Adjacent 71 Eaton Road Margate	3		3											
131013	30 Dalby Square Margate	3		3											
131023	Garage Block 34-36 St Peters Road Broadstairs	6			6										
131046	19 Arthur Road Margate	4		4											
140050	Land East And West Of, Haine Road, Ramsgate	785			105	105	105	105	105	105	105	50			
140087	Garages Adj 82-90 Chichester Road Ramsgate	3	3												

Application Number	Postal Address	Total extant units	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
140091	Garages Adjacent 34 Prince Andrew Road Broadstairs	2	2												
140093	Garages Adjacent To 1 Norman Road Broadstairs	2	2												
140096	Garages At Kingston Close Ramsgate	9		9											
140118	Land Adjacent Haine Lodge Spratling Lane Ramsgate	6	2	2	2										
140178	Land Between 26 And 30 Princes Gardens Margate	1	1												
140241	Land Adjacent 4 Oakdene Road Ramsgate	1		1											
140242	Land Rear Of 1 To 7 Coronation Close Broadstairs	3		3											
140244	Garage Block Prince Andrew Road Broadstairs	3	3												
140252	Garages Adjacent 70 And 72 Perkins Avenue Margate	2	2												
140320	Land North Of Haine Road Broadstairs And West Of Nash Road Margate Phase 4	204			50	50	50	54							
140404	Land Adj Clifftop & Redriff North Foreland Avenue Broadstairs	12		4	4	4									
140480	8-12 High Street Broadstairs	12		6	6										
140518	Laleham School Northdown Park Road Margate	70		10	20	20	20								
140616	36-42 Marine Terrace Margate	3	3												

Application Number	Postal Address	Total extant units	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
140636	Former Builders Yard Rear Of 28 High Street Broadstairs	4		3	1										
140639	Land West Of 33a Alexandra Road Broadstairs	5		2	3										
140698	4 Bellevue Road Ramsgate	1	1												
140837	1 Knights Avenue Broadstairs	2	2												
140847	140 King Street Ramsgate	6		3	3										
140875	31 Eastern Esplanade Margate	4	4												
140880	Rear Of 37 Palm Bay Avenue Margate	1	1												
140934	Land Rear Of 31 Royal Road Ramsgate	1		1											
140976	2a Park Road Ramsgate	8	4	4											
141024	47 Dumpton Park Drive Ramsgate	12		6	6										
141051	38-40 Eaton Road Margate	2		2											
141066	Lord Nelson 11 Nelson Place Broadstairs	5	5												
141085	Sopers Yard Store King Street Margate	25			12	13									
141115	135 Minnis Road Birchington	1		1											
141146	23 Mayville Road And Land To Rear Broadstairs	4	4												

Application Number	Postal Address	Total extant units	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
150020	Jentex Oil Depot Canterbury Road West Ramsgate	56							10	10	20	16			
150029	Mount Lavina 195 Canterbury Road Birchington	2	2												
150087	139-141 High Street Ramsgate	6		6											
150098	10 Effingham Street Ramsgate	2			2										
150142	Cambay Lodge 91 Kingsgate Avenue Broadstairs	9	9												
150185	62 High Street Minster	0	0												
150187	Flambeau Europlast Ltd, Manston Road, Ramsgate,	120			30	60	30								
150202	1 Godwin Road Margate Margate	2		2											
150207	40-46 Sweyn Road Margate	6		6											
150237	270 Northdown Road Margate	1	1												
150238	4 Wrotham Road Broadstairs	2		2											
150246	Land Adjacent To 5 Westfield Road Margate	1		1											
150250	Land North Of Haine Road Broadstairs And West Of Nash Road Margate Phase 5	469				50	50	75	75	75	75	69			
150278	44 Canterbury Road Margate	13	13												

Application Number	Postal Address	Total extant units	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
150291	41-43 Victoria Road Margate	8		4	4										
150299	16-22 Godwin Road Margate	12						6	6						
150305	59 Sweyn Road Margate	1		1											
150310	Garages To Rear Of 55 Newington Road Ramsgate	2	2												
150537	42 Chatham Street Ramsgate	1			1										
150373	The Lodge Canterbury Road Margate	7	7												
150431	Land Adjacent To 34 St Mildred's Avenue, Ramsgate	1	1												
150532	Land Adj To 12-14 Fort Road Margate	8			4	4									
150537	Cliffsend Farm Cottages Cliffs End Road Ramsgate	31		28	3										
150566	50 High Street Margate	1	1												
150571	161 High Street Ramsgate	9	4	5											
150646	Land Adjacent 4 Alma Cottages Station Road Birchington	1		1											
150648	39 - 41 High Street Margate	3		3											
150699	145 Canterbury Road Margate	0													
150770	Land Rear Of Manor Hall And Heritage Park Manor Road St Nicholas At Wade	17		5	5	7									

Application Number	Postal Address	Total extant units	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
150788	Westwood Lodge Poorhole Lane Broadstairs	151			20	50	50	31							
150809	9 Western Esplanade Broadstairs	1	1												
150827	123 Margate Road Ramsgate	1		1											
150854	4c York Street Ramsgate	0	0												
150917	98 - 100 Albion Road Broadstairs	4		2	2										
150956	Land Adjacent Holy Trinity School 99 Dumpton Park Drive Broadstairs	28				10	18								
150961	8 Westleigh Road Westgate On Sea	5	5												
151064	101 High Street Broadstairs	2	2												
151110	Bartletts Farm Cottage Potten Street St Nicholas At Wade	2	1	1											
151127	G And W Gardner Building And Decorating Contractors 85 Dane Road Margate	3			1	2									
151156	Land At Booth Place Margate	5			2	3									
151256	Land At Redhouse Farm Manston Court Road Margate	40			10	20	10								
151261	8 Beach Avenue Kent Birchington	11			5	6									

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151293	Land Rear Of 33 Summerfield Road Margate	4	2	2											
151297	Lvor Thomas Amusements Limited 100 Grange Road RAMSGATE	4	4												
151303	St Lawrence College College Road Ramsgate	166			20	30	50	66							
151335	Thalasa Cliff Road Birchington	0	0												
160066	144 Grange Road Ramsgate	1		1											
160084	Little Barn Callis Court Road Broadstairs	2	2												
160092	Land Adjacent Old Bungalow Egbert Rd Minster	1		1											
160104	Crown And Sceptre The Street Acol	3	2	1											
160140	47 Albert Road Ramsgate	1		1											
160171	Land Rear Of 1a Minster Road Ramsgate	1		1											
160194	6 Albion Place Ramsgate	1		1											
160214	Land Rear Of 10 To 16 St Mildreds Avenue Ramsgate	1	1												
160224	E Saunders Ltd 241 Northdown Road Margate	2		2											
160236	Land Adjacent 28 Princess Anne Road Broadstairs	2	2												

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160280	45 - 51 Sea Road Kent Westgate on sea	29	29												
160284	Kingsgate Newsagents Parwood George Hill Road Broadstairs	1		1											
160300	Land Adjacent 2 Shaftsbury Street Ramsgate	1	1												
160315	171 Westwood Road Broadstairs	1		1											
160340	(Land Adj To) 62 Princess Margaret Avenue Ramsgate	0													
160377	125 Southwood Road Ramsgate	6		6											
160383	79 High Street Ramsgate	3		3											
160412	125 Canterbury Road Westgate on sea	13	6	7											
160424	Sheridans Cliff Road Broadstairs	14		14											
160465	39a High Street Ramsgate	1		1											
160502	Bradford House 74 Ellington Road Ramsgate	1	1												
160512	Land Rear Of 25 To 27 Buckingham Road Margate	1	1												
160517	Land Rear Of 18 Saxon Road Westgateonsea	1		1											
160536	7 Grange Road Broadstairs	1		1											

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160540	46 Canterbury Road Margate	1	1												
160545	101- 103 High Street Margate	2		2											
160568	58 Park Road Ramsgate	1	1												
171652	36 Grange Road Ramsgate	1		1											
160638	Land Adjacent 2 Linden Avenue Broadstairs	1		1											
160647	Shottendane Nursing Home Shottendane Road Margate	11			11										
160654	66 Monkton Road Minster	35			10	10	15								
160718	Cliff Cottage Coastguard Cottages Pegwell Road Ramsgate	1				1									
160733	White Stag 70 Monkton Street Monkton Monkton Ramsgate	4		2	2										
160746	5 Ramsgate Road Broadstairs	1		1											
160758	Land Adjoining 3 Northumberland Avenue Margate	3	1	2											
160759	Land Rear Of Orchard House 17 Church Street Broadstairs	5			2	3									
160800	Hoo Farm 147 Monkton Road Minster	2		2											

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160835	5 Chatham Street Ramsgate	1	1												
160837	9 Augusta Road Ramsgate	0	0												
160842	Land Rear Of 10 Freemans Road Ramsgate	1		1											
160856	Haine Lodge Spratling Lane Ramsgate	1		1											
160890	The Last House Westcliff Gardens Margate	-1		-1											
160934	43 Star Lane Margate	12		6	6										
160948	Albion Cafe 10 Kent Place Ramsgate	1	1												
160952	131- 137 King Street Ramsgate	18			18										
160967	Land Adjacent 15 Southall Close Minster	12		12											
160974	98 King Street Ramsgate	10		10											
160993	Land Rear Of 6 To 8 Parkwood Close Broadstairs	3		3											
161020	1 Dellside Wayborough Hill Minster	1	1												
161037	51 Carlton Avenue Broadstairs	1		1											
161047	Land At Junction Of Sowell Street Broadstairs	2		2											
161067	22-23 Marine Terrace Margate	4			4										
161091	1 Booth Place Margate	1		1											

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161101	Land Adjacent To 191 Ramsgate Road Broadstairs	1	1												
161102	Land Rear Of 13 And 15 Albion Street Broadstairs	1		1											
161105	Land Rear Of 24 Devon Gardens Birchington	1		1											
161109	Land On The East Side Of Leicester Avenue Margate	5		5											
161151	7 Paragon Ramsgate	2		2											
161157	23a Canterbury Road Margate	1		1											
161160	Disused Railway Line College Road Margate	10		5	5										
161203	48 Foads Hill Ramsgate	1	1												
161209	31 Grosvenor Place Margate	1			1										
161232	Mizuri Norman Road Broadstairs	1		1											
161239	Land Adjacent 61 Northdown Road Broadstairs	1	1												
161240	Land Adjacent 12 To 14 Fort Road Margate	0													
161241	41 Crescent Road Ramsgate	1		1											
161289	5-6 Mansion Street, And 5-7 Fort Road, Margate	11			5	6									
161290	Thornton Bobby Ltd 240 - 242 Northdown Road Margate	10			7	3									

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161295	102 Park Avenue Broadstairs	0		0											
161299	10 Sparrow Castle, Margate	1		1											
161322	15 - 16 The Broadway Broadstairs	1		1											
161354	40 Canterbury Road West Ramsgate	1		1											
161361	7 Arthur Road Margate	1		1											
161387	2-6 Station Approach Birchington	2		2											
161403	59 Camden Road Broadstairs	1		1											
161407	Post Office 22-23 Cecil Square Margate	1	1												
161418	Yard Rear Of 8 Arnold Road Margate	3			3										
161471	17 Parsonage Fields Monkton	1		1											
161473	Land South Of Briary Close Margate	24		15	9										
161517	Barn Owls Preston Road Ramsgate	1		1											
161551	28 Ethelbert Crescent Margate Kent Margate	2			2										
161579	Disused Railway Line Between Nash Court Gardens And Nash Road Margate	7			7										

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161628	Land Adjacent 84 Tivoli Road Margate	1		1											
161629	93 Victoria Road Margate	1		1											
161636	The Paddock Hengist Road Birchington	5	5												
161638	18 Artillery Road Ramsgate	-1		-1											
161641	Land Adjacent 34 Brooke Avenue Margate Kent Margate	1		1											
161648	11 Northdown Road Broadstairs	1	1												
161650	Land Adjacent To 11 Northdown Road Broadstairs	1	1												
161681	Building Adjacent To Sheriffs Court Farm Sheriffs Court Lane Minster	1	1												
161705	Garages Adjacent Pikes Lane, Susses Street Ramsgate	8			8										
161715	Land South Of Manston Road Adjacent To The Beacon (Former Car Storage Site) Manston Road Ramsgate	48				10	20	18							
161716	Garage Block Between 108 And 110 Clements Road Ramsgate	2		2											
161756	Rear Of 44 Canterbury Road Margate Kent Margate	3	3												

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161766	Land Adjacent To Mallisden Haine Road Ramsgate Kent Ramsgate	5	5												
170004	72 High Street Margate	1		1											
170029	Land Adjacent Apple Garth, Green Road Birchington	1	1												
170127	Bown Of London 1 Archway Road Ramsgate	3	3												
170149	3 North Avenue Ramsgate Kent Ramsgate	-5		-5											
170165	2 Alma Road Ramsgate	1	1												
170195	Land Adjacent 12 To 14 Fort Road Margate	3		3											
170209	51 Central Road Ramsgate Kent Ramsgate	4	4												
170212	5 Beach Houses Royal Crescent Margate	3		3											
170223	4 St James Avenue Ramsgate	0		0											
170253	42 Crescent Road Birchington	1	1												
170257	Land Adjacent Wild Thyme Bramwell Court Minster	1		1											
170270	32 Ramsgate Road Margate	-1	-1												
170286	49 - 50 Hawley Square Margate	9				9									

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170295	Plots 5, 6 And 7 Youngs Nursery Arundel Road Ramsgate	3		1	2										
170303	9 Augusta Road Ramsgate Kent Ramsgate	1	1												
170305	Land Rear Of Ashbre Manor Road St Nicholas At Wade Birchington	2		1	1										
170307	10 Chandos Road Broadstairs	2		2											
170314	Land East Side Of Summer Road St Nicholas At Wade	6		6											
170321	Court Stairs Country Club Pegwell Road Ramsgate	14		7	7										
170364	Margate Royal British Legion Club Legion House 18 St Johns Road Margate	4			4										
170400	46 St Mildreds Road Westgate On Sea	2		2											
170403	46 Hereson Road Ramsgate	-1		-1											
170415	Winchmore Guest House 8 Grosvenor Place Margate	4		4											
170447	The Yard St Annes Gardens Margate	3		3											
170454	32 Sea View Road Broadstairs	0		0											

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170497	3 Northumberland Avenue Margate	3		3											
170507	Cadet Centre Willsons Road Ramsgate	5	5												
170544	Land Rear Of 10 To 16 St Mildreds Avenue Ramsgate	1	1												
170572	Green Lawns 16 Sowell Street Broadstairs	3		3											
170617	6 Shakespeare Passage Margate	1		1											
170621	5 Clifton Gardens Margate	1		1											
170650	Malvern Hotel And The Blues Grill 29 Eastern Esplanade Margate	1		1											
170715	16/16a Cuthbert Road Westgate On Sea	1	1												
170726	Land North Of Haine Road Broadstairs And West Of Nash Road Margate Phase 3C	97			20	30	30	17							
170768	Land Adjacent 49 Manston Road Ramsgate	1		1											
170788	3-4 Chatham Place Ramsgate	8		8											
170792	3 Carlton Avenue Broadstairs	7		7											
170829	Haine Lodge Spratling Lane Ramsgate	1		1											

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170834	Former Nurses Home Royal Sea Bathing Hospital 38 Canterbury Road Margate	1	1												
170842	64 Edgar Road Margate	15		15											
170852	Land Rear Of 15 Victoria Avenue Westgate On Sea	1	1												
170892	85 Dane Road Margate	2			2										
170903	124 High Street Ramsgate Kent Ramsgate	1		1											
170916	Garages Between 22 And 26 Nash Court Gardens Margate	1		1											
170931	Post Office 48 High Street Ramsgate	2			2										
170941	18 Western Esplanade Broadstairs	5		5											
170973	3 Augusta Road Ramsgate	-1	-1												
170991	160a Northdown Road Margate	1				1									
171005	Land Adjacent 4 Victoria Road Margate	1		1											
171008	12 Weigall Place Ramsgate	4		4											
171020	7 First Avenue And 2 Eastern Esplanade Margate	5			5										

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171026	Public Conveniences Westbrook Promenade Margate	1		1											
171047	The Forge Bedlam Court Lane Minster	1		1											
171054	Land Adjacent 7 Southwood Gardens Ramsgate	1		1											
171064	16 Harold Road Birchington	1	1												
171065	Land Rear Of 154 Grange Road Ramsgate	1		1											
171079	83 Sea Road Westgate On Sea	1		1											
171081	62 Princess Margaret Avenue Ramsgate	2		2											
171090	27 Elm Grove Westgate On Sea	1		1											
171100	7 Arklow Square Ramsgate	-1	-1												
171112	17 Upper Dumpton Park Road Ramsgate	3			3										
171115	Barclays Bank 107 Station Road Birchington	1	1												
171124	44 Royal Esplanade Margate	0	0												
171125	7 - 9 Addington Road Margate	12		6	6										

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171127	14 The Parade Margate	2			2										
171138	Land Rear Of Walters Hall Oast Monkton Street Monkton	1		1											
171159	Westcliff House 37a Sea Road Westgate On Sea	31		10	21										
171176	53 Canterbury Road Margate	2	2												
171205	7 Roman Road Ramsgate	1	1												
171216	Primark 46a - 48 High Street Margate	11			5	6									
171219	59 - 61 High Street Margate	9		9											
171231	Fard Industries Limited 237 Ramsgate Road Margate	14			14										
171237	33 Beresford Gardens Margate	7	7												
171245	26 - 27 Marine Terrace Margate	7		7											
171257	61 Norfolk Road Margate	1		1											
171271	Emmanuel Church Victoria Road Margate	1			1										
171291	Former Builders Yard Rear Of 28/30 High Street Broadstairs	2			2										
171313	1 Ethel Road Broadstairs	1		1											
171319	Land At 57 59 61 63 And 67 Eaton Road Margate	6		6											
171324	10 Birds Avenue Margate	1		1											

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171359	Homebasics 25 - 27 Queen Street Ramsgate	1		1											
171366	156 King Street Ramsgate	1		1											
171426	174 Canterbury Road Margate	1	1												
171427	32a King Street Ramsgate	1	1												
171485	Land At New Haine Road Ramsgate	54			10	20	24								
171515	2 - 4 Arthur Road Margate	3		3											
171519	34-40 Harbour Street Ramsgate	2	2												
171535	78 Canterbury Road Margate	0		0											
171554	21 The Retreat Ramsgate	1		1											
171581	2a Addington Street Ramsgate	-1	-1												
171610	7 Westbrook Road Margate	3		3											
171616	Safari House Haine Road Ramsgate	7	7												
171652	157 Grange Road Ramsgate	1		1											
171664	Stone Cottage Haine Road Ramsgate	1		1											
171670	Land Adjacent 89 St Johns Avenue Ramsgate	1		1											

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171691	White Lodge 44 - 46 Madeira Road Margate	9		4	4	1									
171699	146 Northdown Road Margate	1				1									
171703	Lagny Plumstone Road Acol	1			1										
171704	7 Wellington Crescent Ramsgate	2	2												
171708	Grummant Heating And Plumbing Services Limited 109 Grange Road Ramsgate	1	1												
171729	The Knot 20 Beach Road Westgate On Sea	10	10												
171736	43 Fitzroy Avenue Broadstairs	1		1											
171755	6 No Foreland Road Broadstairs	8		2	3	3									
171772	145 Canterbury Road Margate	1		1											
171779	3 Royal Esplanade Margate	1		1											
171782	63 - 65 King Street Ramsgate	1		1											
171790	Basement And Ground Floor Flat 10 Adrian Square Westgate On Sea	1		1											
180027	38 Sweyn Road Margate	-3		-3											
180057	Euro Parts 188 Northdown Road Margate	2		2											

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180074	1-3 Alma Rd Ramsgate	1		1											
180098	Cedarholme Eppe Bay Avenue Birchington	0		0											
180150	38 Rockstone Way Ramsgate	1		1											
180158	29 King Street Ramsgate	2			2										
	Total	4305	236	447	618	597	522	452	296	304	290	227	16	0	0