

Thanet District Council Matter Statement

**Matter 9 - Meeting Housing Needs
(Policies SP19-20, QD04-QD05, HO20-
HO26)**



Issue 1 – Type and Size of Dwellings – Policy SP19

Q1. How does Plan address the need for different types of housing and the needs of different groups in the community? Is the Plan consistent with paragraph 50 of the Framework?

Policy SP19 addresses the need for different types of housing and the needs of different groups in the community. The supporting text, paragraphs 3.26 - 3.33 explains the findings from the Strategic Housing Market Assessment that there will likely be demand for attractive housing for higher earners and for local young families, and that there will likely be an increase in demand for smaller homes for young single people and for older single people. It also identifies an over provision of smaller flats and flatted buildings and shortage of larger homes. The SHMA provides more detailed evidence on this. It is considered that the Plan is consistent with paragraph 50 of the NPPF.

Q2. Is it clear to developers, decision-makers and local communities what the “SHMA recommendations” consist of for the purposes of Policy SP19?

The SHMA recommendations are set out in paragraph 3.32 and Table 5. The policy could be amended to reflect this if it would make the policy clearer.

Q3. Is Policy SP19 sufficiently flexible to react to changing circumstances over the plan period, and to reflect the different characteristics of sites, such as smaller, town centre developments?

The policy is not restrictive in its requirements for the type and size of dwellings. It is an expectation to address the SHMA recommendations - in this respect, the reference in the policy to the SHMA recommendations provides flexibility should the SHMA be revised due to changing circumstances over the plan period. The supporting text in paragraph 3.33 acknowledges that the characteristics of some sites may not allow for the SHMA recommendations to be met.

Q4. What is the justification for encouraging proposals that incorporate a higher proportion of houses than recommended in the SHMA? Is Policy SP19 justified and consistent with the evidence base in this regard?

The recommendations set out in the SHMA are considered to be justified and reasonable and based on proportionate evidence. However, the historic over-provision of flats has been associated with negative impacts in both a built and social context.

The decline in UK tourism during the 1980s and 1990s hit parts of Thanet particularly severely. Much of Thanet (particularly Margate and Cliftonville) was predominantly populated with hotels and tourist accommodation. However as tourism declined, many hotels and B&Bs closed down and became vacant, leaving an abundance of properties ideally suited for conversion into flats or Houses of Multiple Occupation, and cheaper property prices instigated numerous conversions to flats, bedsits and HMOS. Some of these conversions have been to small, poor quality flats.

Many of these flats are owned by landlords who are not local, some of whom are not therefore concerned about the quality, appearance or standard of their properties. Poor quality properties, and properties which are not properly maintained, create an inferior environment and detract from the sense of place and community pride. This is compounded by the fact that very often those renting flats do not generally stay long term resulting in a highly transient population in heavily flatted areas, making it difficult to engender improvement in the local urban or suburban area.

This continued development and concentration of small flats undermines the attractiveness of the residential and social environment which a more varied and integrated approach would be better able to engender. It is common for buildings being converted to flats to also be extended to accommodate more residential units – these extensions often take up rear garden space. In some areas where there is a preponderance of flats, residents will socialise outside on the street as there is no available communal garden space for them. This can be disruptive, and can also be perceived as threatening or intimidating in some cases. Flats share communal areas such as gardens (where provided), stairways and hallways and can result in tenants having to endure clutter, untidiness or unruly behaviour.

This has been a particular issue in Cliftonville West and Margate Central wards, which in previous local plans had been designated as ‘holiday areas’, as explained in paragraph 3.30 and in the Cliftonville Development Plan Document (CD 7.7). Because the situation in these wards has been so severe, there was sufficient evidence to support the policies in the Cliftonville DPD which included restricting the development of one bedroom flats, and requiring the provision of family dwellings in new developments. There are other areas in Thanet that have experienced similar issues (for example King Street in Ramsgate which was included as an Area in Need of Special Action in the 2006 Local Plan), however these areas have tended to be smaller areas and extending any specific policy requirements to these areas would be more difficult to justify with proportionate evidence. The evidence in the SHMA provides a largely quantitative assessment of the mix of housing and future requirements based on needs. The aim of the policy in encouraging a higher number of family houses than recommended in the SHMA reflects the qualitative evidence that supports the Cliftonville DPD.

(Please also see response to Matter 9, Issue 10 - Fostering Homes - HO26)

Q5. What is a dwelling house “suited to modern living requirements” for the purposes of Policy SP19? Is this sufficiently clear to decision-makers, developers and local communities? Is the policy effective?

This part of the policy aims to distinguish between types of single household residential properties. There are properties that are currently in use as (or capable for being used as) family homes - this is what is meant by ‘suited to modern living requirements’ and it is these properties the policy seeks to protect from subdivision. There are other residential properties in Thanet that may now be considered too large to function as a single family household. Thanet has a historical legacy of three or four storey residential properties dating back to Victorian/Georgian times. These properties would be more suited to appropriate conversion to smaller residential units as accommodation needs have changed significantly since then.

Q6. In what circumstances might there be conflict between the Local Plan and the Cliftonville DPD as expressed in Policy SP19?

Paragraph 3.32 explains that the SHMA recommends a 10-15% provision of 1 bed properties that are needed for market housing. The Cliftonville DPD includes Policy CV1 - One Bedroom Flats which restricts the provision of one bedroom flats in new development or redevelopment of existing properties.

Issue 2 – Provision of Affordable Housing – Policy SP20

Q1. What is the justification for requiring at least 30% of dwellings to be affordable on all qualifying sites? Is the requirement consistent with, and justified by, the evidence contained in the *Thanet District Council Local Plan and CIL Viability Assessment*?

The Local Plan Viability Assessment offered three options for setting an affordable housing requirement:

- 1) Differential targets between the range of 20-30%
- 2) Single target at 25%
- 3) Single target at 30%

It goes on to say that the Viability Assessment does not dictate the policy direction for affordable housing requirement, rather informs it along with other information and delivery experience available to the Council.

The SHMA identifies a backlog of affordable housing provision. The policy requirement of ‘at least’ 30% seeks to ensure that the maximum amount of affordable housing that is considered viable (by the viability assessment) is achieved wherever possible, and the final sentence allows for the negotiation of a lower level of provision where necessary.

Q2. What effect will the requirement for proposals to provide 30% affordable housing have on the deliverability of housing, especially for proposals on previously developed land?

It may be appropriate for some sites on previously developed land to provide a lower percentage of affordable housing due to higher development costs. Viability assessments can be submitted alongside planning applications to demonstrate viability, and affordable housing provision negotiated on a case by case basis.

Q3. Is it clear to decision-makers, developers and local communities under what circumstances a lower amount of affordable housing is acceptable?

The policy does not suggest that a lower amount will be acceptable under any circumstances, but acknowledges that 30% may not always be realistic and viable. This would be determined through the planning application process and on a case by case basis.

Q4. What is the justification for the proposed affordable housing split in Policy SP20? What is this based on, and will it be appropriate for all qualifying development proposals across the District?

The SHMA identified the affordable housing split in Policy SP20. At the time of writing, the government was undertaking a consultation on proposed changes to national planning policy including a proposal to broaden the definition of affordable housing to include Starter Homes. The affordable housing split included in the Local Plan included starter homes on that basis. However the definition of Affordable Housing has not been amended, therefore the split of affordable housing should be amended accordingly, as also identified in the SHMA. There was also a typo in the trigger for affordable housing which is also amended below:

Proposed Modification for Inspectors' consideration:

Policy SP20 - Affordable Housing

Residential development schemes for ~~more than 10~~ or more dwelling units, including mixed use developments incorporating residential shall be required to provide at least 30% of the dwellings as affordable housing in the following proportions:

- ~~17% Starter Homes~~
- ~~18% Affordable Rent~~
- ~~65% Social Rent~~
- **16% Intermediate Housing**
- **84% social/affordable rent**

The above requirements will only be reduced if the required provision would make the proposed development unviable.

Issue 3 – Housing Standards – Policies QD04 and QD05

Q1. The PPG⁶ states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. In doing so local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans. Has this been carried out? What is the justification for the standards in Policies QD04 and QD05?

Access: Paragraph 13.31 of the Local Plan (CD1.1), sets out the evidence for the future need for accessible accommodation by referring to the future age profile of the District. Based on the 2014 sub-national population projections indications are that the population of the 60+ age group will grow from 41,000 in 2014 to 57,000 in 2031. As a result of the growth in this age group it is likely that there will be an increase in need for adaptable and specialist accommodation. This is supported by the findings of the SHMA Update (CD4.1 section 3). The SHMA shows that the change in population aged 75+ would result in a potential need for 1,522 units of specialist accommodation for older persons over the plan period - equating to 76 units pa. By ensuring that an element (10%) of development satisfies at the least M4(2) accessible and adaptable accommodation, this goes some way to meeting future needs.

For specialist wheelchair user dwellings, this has been related to specific local need as evidenced by the Council's housing register. Paragraph 13.31 of the local plan (CD1.1) states that at September 2016, there were 51 households on the register who are dependent on a wheelchair and further 73 households who use a wheelchair for part of the day. However, the latest situation as at February 2019, the Council's housing register identifies that 28 households are categorised as mobility level 1 - requiring full time wheelchair use, a further 54 households are categorised as mobility level 2 - requiring wheelchair use for some of the day and a further 408 households are categorised as mobility level 3 - households with current mobility issues which may worsen leading to a wheelchair dependency in the future. By relating this policy to evidence on the council's housing register, this ensures that requirements are based on the latest available evidence of

need.

Water: Due to its geographical location, Thanet is in a water stressed area as identified in the Environment Agency's publication "Water Stressed Areas Final Classification" July 2013. This is one of the evidence sources listed in PPG paragraph: 016 Reference ID: 56-016-20150327. In the interests of sustainable development and managing water demand, the council believes that it is appropriate for the water efficiency standard of 110 litres per person per day to be required. This is part of a proactive strategy to adapt to climate change by taking into account the balance of future water supply and future demand.

Footnote 12 of CD1.3 Local Plan and CIL Viability Assessment states that the extra over costs of attaining water efficiency standards of 110lpppd are in the region of £6-£9 per dwelling according to the DCLG Housing Standards Review Cost Impacts Study (September 2014) and this would have such a marginal impact on scheme viability.

Space standards: During the consultations involved in the preparation of the Cliftonville Development Plan Document (CD 7.7), the size of flats was consistently raised as an issue of significance. The Conversion to Flats Guidelines (1988) were (and still are) being used to apply room size standards to flat conversions. Comments during consultations for the DPD suggested that some developments were not meeting the standards set in the Guidelines, or that the standards set were not sufficient to provide comfortable living spaces. Consultation comments suggested that this in turn contributed to the problems the area was experiencing - these are discussed in the response to Matter 9, Issue 1, Q4. At the time the DPD was being prepared, it was decided that it would be inappropriate to introduce new space standards as part of the DPD since the amount of research necessary to determine a new set of reasonable and practical space standards would unreasonably delay the progress of the DPD. However it was considered appropriate to review the Guidelines as a new Supplementary Planning Document which would (as the Conversion to Flats Guidelines) be applicable to the whole district, not just the DPD area, especially since there are other areas in the district where this has been considered an issue (such as those identified in the 2006 Local Plan as Areas in Need of Special Action).

The government's introduction of the National Space Standards superseded the review of the Conversion to Flats Guidelines so the Councils review of the Guidelines as a new SPD is no longer relevant. The standards aimed to set a national, recognised standard in place of numerous standards being applied by both public and private sectors.

Many of the issues relevant to the Cliftonville DPD area are applicable to other parts of the district, for example, cheap properties, large properties that may have previously had a tourism use that have subsequently closed etc. There have also been instances where retail units have been converted to residential units under Prior Notifications with unacceptably small living spaces which the Council is unable to control. It is therefore considered important for the Council to be able to apply the nationally recognised space standards to ensure higher standards of accommodation.

Paragraph 13.27 of the Local Plan CD1.1, states that the requirement for a minimum space standard for new units can add to the attractiveness and marketability of the development. This is seen as a means of regenerating the weak housing market in Thanet and improving the attractiveness of Thanet as a location. In addition, if the housing units are of a sufficient size this in turn aids any adaptability requirements needed to meet the future needs of occupants in response to, for example, mobility issues.

Q2. The PPG⁷ also states that local planning authorities should consider the impact of using optional Building Regulation requirements and the nationally described space standard as part of their Local Plan viability assessment. Has this been carried out? Have the standards in Policies QD04 and QD05 been tested to ensure that new residential development will remain viable?

The Local Plan and CIL Viability Assessment (CD1.3) has considered the impact of using the optional requirements and space standards.

Water efficiency standard - para 3.9.1 to 3.9.3 sets out that the viability assessment has assumed all dwellings to be built to former Code for Sustainable Homes level 4 equivalent standards for energy and water usage efficiency (110 litres per person per day). This approach has been supported by the Environment Agency and Southern Water.

Access: Para 3.6.7 of CD1.3 suggested that the Council should have an open / aspirational approach to policies rather than a fixed requirement. M4(2) and M4(3) are independent criteria as only one of these may be applied per dwelling. Although it has been acknowledged that there is unavoidably a viability influence from such policies, and the impact of allowing for M4(3) in particular can be significant, the standards are unlikely to have an impact on viability. The potential influence on viability was considered through sensitivity testing as part of reviewing the cumulative costs of development. Alongside the Council weighing up the nature of its approach, it was recommended also consideration could be given to aligning provision to the affordable housing content of schemes for example.

Space standards - para 3.8.2 dwelling sizes meeting the Nationally Described Space Standard have been assumed throughout the study and the findings support the use of standards across all dwellings, which should not produce an obstacle to viability.

In addition, paragraph 44 of the Local Plan Strategy builds in an element of flexibility so that where there are area viability concerns around individual developments, the review and consideration of these are supported by evidence in independent viability appraisals.

Q3. Is it clear to decision-makers, developers and local communities what proportion of affordable dwellings need to be wheelchair accessible? Is the policy effective in this regard?

The policy QD05 states that 10% of new build developments will be expected to be built to the building regulations M4(2) standard. However for the wheelchair accessible homes this will be provided as part of the affordable housing element of the scheme and will be related to the needs identified on the housing register for suitable locations.

The Council agrees that the policy could be clearer and suggests a modification to the wording for your consideration, as follows:

Policy QD05 - Accessible and Adaptable Accommodation

Accessibility provision in new developments as required by Building Regulations Part M4 shall be provided as follows:

- 1) 10% of new build developments will be expected to be built in compliance with building regulation part M4(2) **accessible and adaptable dwellings**;
- 2) **5% of the affordable housing units on housing developments will be expected to be**

built in compliance with building regulations part M4(3) wheelchair user dwellings. ~~Within new build developments which are affordable, a proportion of wheelchair accessible homes; complying with building regulations part M4 (3) will be required. The exact proportion will be dependent on the number of households identified as requiring accessible homes on the Council's housing register, in suitable locations. This should be provided as part of the affordable element of the scheme.~~

The above requirements will only be reduced if it would make the proposed development unviable.

The viability assessment carried out sensitivity testing for 5-20% requirement for wheelchair accessible units section 3.6 of CD1.3. It recommended that a flexible approach may be more appropriate, thereby guiding or targeting provision in the particular circumstances, towards meeting any identified needs. The proposed 5% threshold is at the lower end of the sensitivity testing based on current evidence from the housing register which suggests 3% of the register currently have mobility levels 1 and 2 (full time and part time wheelchair use). The Council is therefore future proofing this requirement in light of future demographic changes.

Q4. Is Policy QD05 consistent with guidance contained in the PPG, which makes the distinction between wheelchair accessible dwellings (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable dwellings (a home that can be easily adapted to meet the needs of a household including wheelchair users)?

Paragraph 9 (Reference ID: 56-009-20150327) of the PPG states that Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Therefore policy QD05 is consistent with this advice as it only applies to the affordable housing element of the scheme.

Issue 4 – Accommodation for Gypsy and Travelling Communities – Policy HO22

Q1. The SHMA (paragraphs 8.75-8.77) refers to the *East Kent Gypsy, Traveller and Showpeople Accommodation Assessment (2014)* which concluded that there was no need for any residential pitches. Does the assessment provide a robust and up-to-date assessment of need in the District that is consistent with national guidance and policy?

The most recent published GTAA is the East Kent Gypsy, Traveller and Showpeople Accommodation Assessment (2014).

However, this is now considered out of date and the Council has, as part of a coordinated Kent review, has commissioned work to update the 2014 GTAA. This work is being carried out by Arc4, who are also carrying GTAA updates for a number of other Kent authorities. This work is not yet completed.

Q2. How has the situation changed in Thanet since publication of the East Kent Assessment? Has there been any increase in unauthorised developments? If so, what does this demonstrate?

Over the last two years, there has been an unprecedented and significant increase in

unauthorised encampments and traveller activity in the district. From January 2018 to September 2018 (according to the Council's Community Safety Unit), there was a total of 40 incursions in 15 different locations. This is largely associated with the activity of two related family groups.

The Council's Planning Teams and Community Safety Unit are working with other statutory bodies (such as KCC and Kent Police), and the families currently in the district to establish what their precise needs are and how they can best be met in a way that will be effective and practical. This information is also helping to inform the GTAA update.

Q3. Based on the 2014 Assessment, the Plan does not make any specific provision for Gypsy, Traveller or Travelling Showpeople accommodation. Is this appropriate and justified by the evidence? Will the Plan make suitable provision for accommodation to meet the need for gypsy and traveller communities?

It is the Council's intention, once the GTAA update is complete, and the needs of the community are clear, to consider how to make provision for that need at an appropriate scale and in suitable locations.

This may be by encouraging/supporting planning applications in suitable locations, and in the longer term, to make any additional provision in a separate development plan document. The Council has recently established a Traveller Task and Finish Group (including the Housing & Planning Service and the Community Safety Unit) to address the issues arising over the last two years and to determine the most effective way of bringing forward suitable sites at the earliest opportunity.

It is not the intention to make specific provision in this draft Plan, as the GTAA update has not been completed.

Q4. Are the criteria for determining planning applications in Policy HO22 justified, clear and appropriate? Is the policy effective?

Under the current circumstances, the Council is of the view that draft Policy HO22 as worded provides adequate guidance for applicants as to appropriate locations for suitable sites. The draft Policy needs to be read with other relevant policies in the Plan (SP25 - international wildlife designations; SP22 - Green Wedges; CC01 - Flood Risk Zones).

Issue 5 – Care and Supported Housing – Policy HO20

Q1. Is the reference to “good quality accommodation” in Policy HO20 sufficiently clear to decision-makers, developers and local communities? Is the policy effective?

Paragraph 11.28 explains that for the purposes of planning policy, proposals for retirement homes, sheltered housing and extra care housing will be regarded as residential dwellings and subject to usual planning policies for residential development. Proposals that meet the

requirements of other local plan policies for residential development, in particular, the policies in Chapter 13 - Quality Development, would be considered 'good quality accommodation'. A Modification could be made to Policy HO20 cross-referencing this if the Inspectors' consider this would provide more clarity.

Issue 6 – Non Self-Contained Residential Accommodation - Policy HO21

Q1. What is the justification for the thresholds provided in Policy HO21? Is the policy supported by appropriate local evidence?

The Policy was developed from the Council's adopted Housing Strategy, which seeks to deliver good quality and affordable homes across all tenures in support of sustainable communities and economic development aspirations. Existing HMOs in the district are often low quality accommodation and particularly when poorly managed can result in neighbourhood disturbance, fear of crime, transience and a community imbalance.

The Housing Strategy identifies the need for greater emphasis on delivering more family homes, and creative solutions to tackling the substantial need for affordable housing.

While recognising that cheaper housing in the private rented sector fulfils a housing need, the strategy proposes to drive up standards of such accommodation, vigorously tackling poor quality accommodation where necessary.

In June 2011, to provide planning support for the implementation of the Housing Strategy, the Council confirmed an Article 4 direction that covers the whole district, that requires planning permission for a change the use of a dwelling house to a HMO for up to 6 unrelated people.

The thresholds in the draft Policy are designed to ensure that only a small proportion of dwellings are converted to HMOs; that those that are permitted are subject to consideration of the quality of accommodation; and that there should not be a concentration of such uses in any locality.

Issue 7 – Residential Use of Empty Property – Policy HO23

Q1. What is the justification for Policy HO23?

The council is committed to reducing the amount of empty property in the district to increase the number of homes available, and to improve the local area. In May 2017, Thanet District Council committed additional resources to its empty homes work by appointing a new Empty Property Officer. The existing Empty Property Support Officer will continue to focus on offering advice and support to the owners of empty homes, together with facilitating empty homes loans in partnership with Kent Council Council. The new Empty Property Officer will be tackling the most difficult and dilapidated properties with a view to taking robust action to bring these back into use. 2.76 The outcomes from this programme will need to be regularly monitored, and is dependent on the Council's Empty Homes programme continuing through at least the Plan period. Policy HO23 supports council initiatives to bring empty properties back into use and return them to the housing market.

Q2. What are the reasons for only supporting the residential re-use of buildings in the urban areas and villages? Is the policy consistent with paragraph 55 of the Framework in this regard?

Properties within the urban and village confines will likely be within built up areas, be located in sustainable locations and have the necessary highways and other infrastructure to support their return to the housing market. The Policy does not suggest that properties outside of the urban and village boundaries cannot be brought back into use - Paragraph 55 of the NPPF would apply to any such properties.

Issue 8 – Retention of Existing Housing Stock - Policy HO24

Q1. Does Policy HO24 seek to restrict proposals for the change of use from residential to tourist accommodation? Is this clear to decision-makers, developers and local communities?

No. The last sentence of the Policy states that proposals for tourism uses may be permitted subject to policies E07 (serviced tourist accommodation) and E08 (Self catering tourist accommodation). These policies set out the criteria under which such proposals will be permitted.

Issue 9 – Ancillary Accommodation for a Family Member – Policy HO25

Q1. What is the justification for requiring ancillary residential accommodation to have a “functional connection” with the main dwelling and be in the same ownership?

The requirements for a functional connection with the main dwelling and being within the same ownership is to ensure that the granting of planning permission for ancillary accommodation is not abused, and the ancillary accommodation later becomes a separate, individual dwelling or other unauthorised use. As stated in clause 3 of the Policy, any such development should be capable of being part of the main dwelling house when it is no longer needed for independent occupation.

Issue 10 – Fostering Homes – Policy HO26

Q1. What is the justification for Policy HO26? Which evidence-based documents support the restriction of foster homes in the Cliftonville West Ward?

Q2. What are the reasons for restricting foster homes in this location only?

Response to Q1 and Q2:

Draft Policy HO26 is based on research carried out by the Thanet Leadership Group (comprising the Thanet District Council, Kent Police, Thanet Clinical Commissioning Group, Kent Fire and Rescue Service and Kent County Council) in relation to looked-after children in the district.

This is entitled “Thanet Leadership Group: Out of Area - Vulnerable Placements, Thanet District Briefing Pack” has been added as new Core Document CD4.6. This also sets out the reasons for applying the policy to this specific area of the district.

The evidence indicates that a concentration of such placements in this area of the district could lead to:

- The children placed in these facilities being at increased risk;
- Significant impact on, and diversion of, the resources of key agencies, undermining the delivery of core services in the area; and
- Harm to the area in which these homes are located.

The Thanet Leadership Group has produced a Joint Statement of Support for the draft Policy, which is attached to this Statement at Appendix 1.

Q3. Is it clear to decision-makers, developers and local communities what constitutes “similar facilities” for the purposes of Policy HO26?

The Policy wording is intentionally flexible in order to deal with the impacts of residential uses that would raise the same issues as those set out in para 11.46.

The phrase “similar facilities” is to recognise the fact that there are different forms of residential accommodation, which could include a range of C2 or C3 uses, some of which are controlled by an Article 4 Direction.

Appendix 1: TLG Statement of Support for draft Policy HO26

Thanet Leadership Group Statement of Support for Draft Thanet Local Plan - 2031 - Regulation 19 Fostering Homes Policy (HO26)

Parts of Thanet are characterised by large Victorian properties, some of which have been neglected whilst others have been developed for other types of residential provision. As a result, the residential care sector in Thanet attracts large numbers of people from outside of Thanet to be placed into residential care in the area.

Parts of Margate and Cliftonville experience multiple layers of risk and significant deprivation and are the subject of substantial inter-agency efforts to improve the environment and lives of people already resident in the area.

The Margate Task Force (MTF) was set up in 2010, and is a multi-award-winning, integrated team, co-located at the Council's offices, made up of 14 different agencies and 30 staff, working in two of the most deprived wards in Kent (Margate Central and Cliftonville West). MTF aims to identify the most complex social issues and deliver a joint 'street level' service to respond to risk and vulnerabilities.

There is evidence from Kent Police, Thanet Clinical Commissioning Group, Kent County Council and other Public Agencies to suggest that a concentration of these premises in this area could cause a range of problems, including:

- Significant impact on, and diversion of, the resources of key agencies, undermining the delivery of core services in the area; and
- The children placed in these facilities being at increased risk;
- Harm to the area in which these homes are located.

The Thanet Leadership Group (which comprises of representation from Thanet District Council, Kent Police, Thanet Clinical Commissioning Group, Kent Fire and Rescue Service and Kent County Council), is concerned about the impact of new foster homes, or similar facilities, being located in the district, and in particular, in the Cliftonville area and is supportive of the proposed Fostering Homes policy which applies to proposals which include more than 6 residents (including staff).

Final version agreed by the Thanet Leadership Group on 4 December 2019.