

Craig Solly

Response to new information (28-OCT-2019):

**5 Year Land Supply
Sustainability Assessment update
Heritage Assets.**

5 Year Land Supply

5 year land supply

Point 1: Document not in the evidence base:

Thanet Council has published a Home Delivery Test action plan in August 2019, some information is taken from this document in this representation. This is not in the evidence base but it does contain useful information on HDT and reasons for poor delivery. The full document is located at:

<https://www.thanet.gov.uk/wp-content/uploads/2019/08/Housing-Delivery-Test-Action-Plan-2019.pdf>

Because of poor delivery (Thanet being in the top 10 for the worse performing) as well as a 20% buffer its also has to provide an action plan (this is because housing delivery is below 95% to the HDT).

Point 2: Difference in information (AMR data)

It is noted that the updated data is different when we consider completed housing. The table shown below is different to the data from many other sources. The previous 3 years of completions are different and shows a further shortfall.

	2016/17	2017/18	2018/19	Total
Annual requirement	600	600	600	1800
Completions	478	305	366	1149
Shortfall	122	295	234	651

Table 3: shortfall against housing requirement

Inspectors note for the local plan examination (5 year land supply)

In the AMR 2018 its is shown that the housing completions for the 3 years is shown below:

ANNEX 2 Figures used in housing trajectory

Table of Figures used in calculating the 2016 housing trajectory

	Year	Annualised Strategic Requirement	Actual Dwelling Delivery	Predicted Completions
2006 Adopted Local Plan	2006/07	375	651	
	2007/08	375	606	
	2008/09	375	726	
	2009/10	375	520	
	2010/11	375	889	
2015 Preferred Options Local Plan	2011/12	600	320	
	2012/13	600	194	
	2013/14	600	321	
	2014/15	600	380	
	2015/16	600	350	
2018 draft Local Plan	2016/17	900	389	
	2017/18	900	238	

AMR 2018 (Thanet Council)

In the action plan for HDT (Housing Delivery Test) it is shown as

Monitoring Year	Total Completions	Completions on Allocated sites	Completions on Windfall sites	Requirement at monitoring year
2011-12	307	30	277	375
2012-13	217	26	191	375
2013-14	322	73	249	375
2014-15	380	128	252	600
				HDT Requirement
2015-16	350	20	330	703
2016-17	389	79	310	709
2017-18	238	58	180	793

HDT Action plan (Thanet Council)

The HDT stated by government figures shows:

	2015/ 16	2016/ 17	2017/ 18	Total	HDT 2018 Measurement	HDT 2018 Consequence
No. of homes required	703	709	793	2204	44%	20% Buffer Action Plan
No. of homes delivered	350	389	238	944		

Government figures in HDT action plan (Thanet Council)

It is not clear why the report shows a difference in these figures. From working the difference between Annual Monitoring Report (AMR) 2018 and the report for exam there is a difference of 156 dwellings less in the AMR figures in total. This shows a shortfall over the remaining 12 years to be 67.25 a year (807 in total) than 54 in the report. The table shows below the differences.

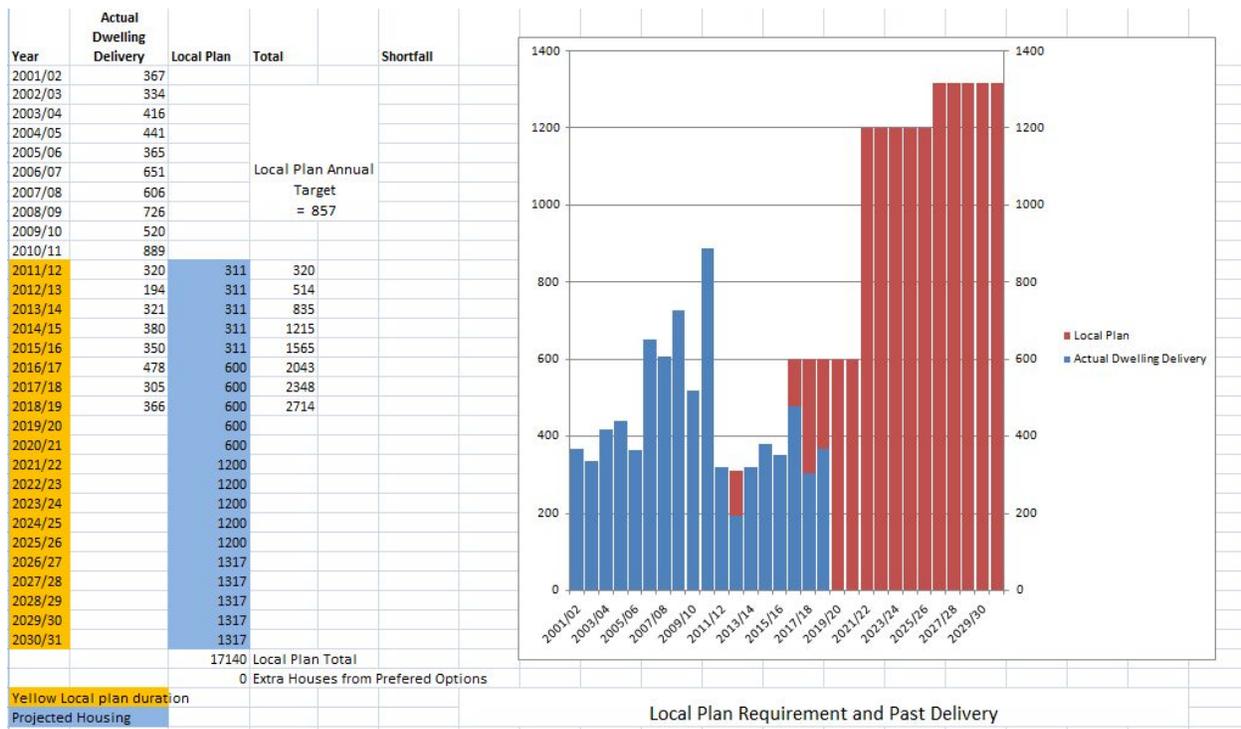
	AMR 2018 Comparison				Shortfall	PA
	2016/17	2017/18	2018/19	Total		
Annual Requirement	600	600	600	1800		
AMR 2018 + 2019 Figure	389	238	366	993	807	67.25
TDC LP Statement	478	305	366	1149	651	54.25
Difference					156	

Point 3: Current Housing Delivery Performance.

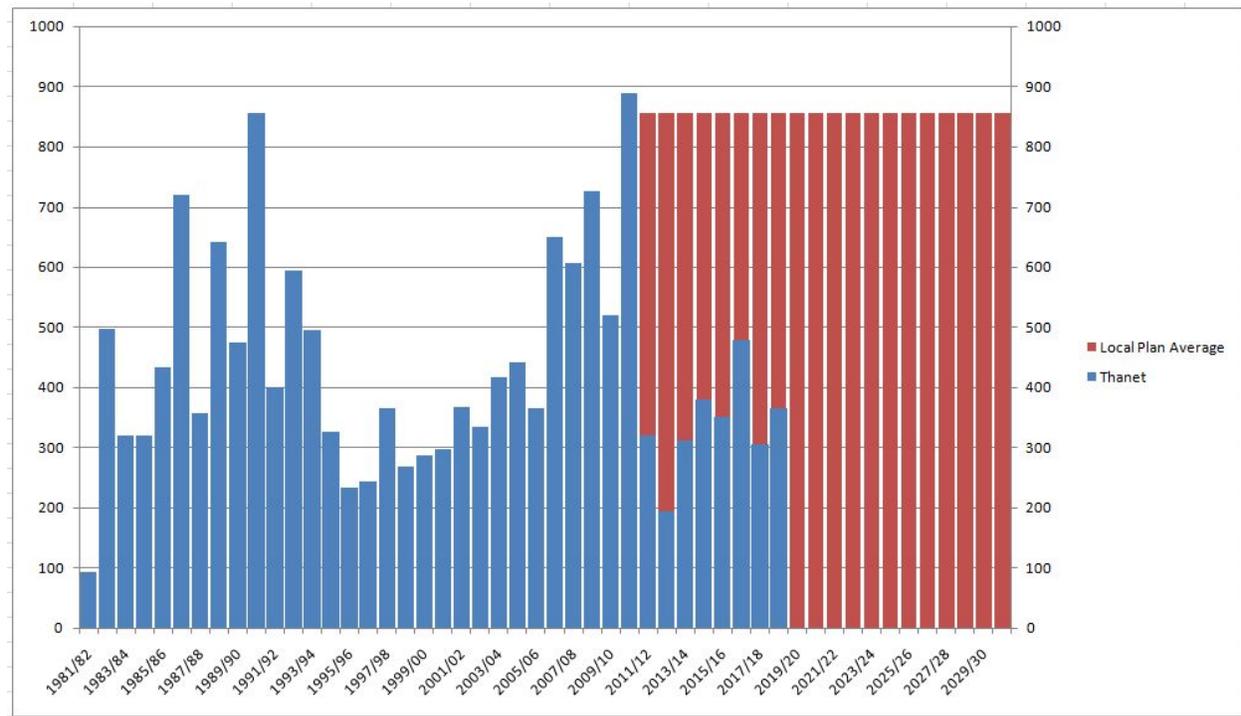
It has been found that the councils delivery figures have not met the yearly requirement which as an equal requirement year on year, is calculated as 857 dwellings a year. In the Local plan 2006 the requirement was 375 dwellings a year. From the start of the local plan in 2011 average dwelling delivery has been 338 dwellings a year (see table below). Dwelling completions are currently underperforming (based on 857PA) and will need an average of 346 dwellings extra a year for the rest of the plan period.

Shortfall based on standard 857 PA					
	2011-2016	2016/17	2017/18	2018/19	Total
Annual requirement	4285	857	857	857	6856
Completions	1555	478	305	366	2704
Shortfall	2730	379	552	491	4152
Shortfall per annum (12 years)					346
Average completion					338

However historically over many decades housing delivery has been on this scale. The graph below shows housing delivery since 2001 and against the new Local plan requirement



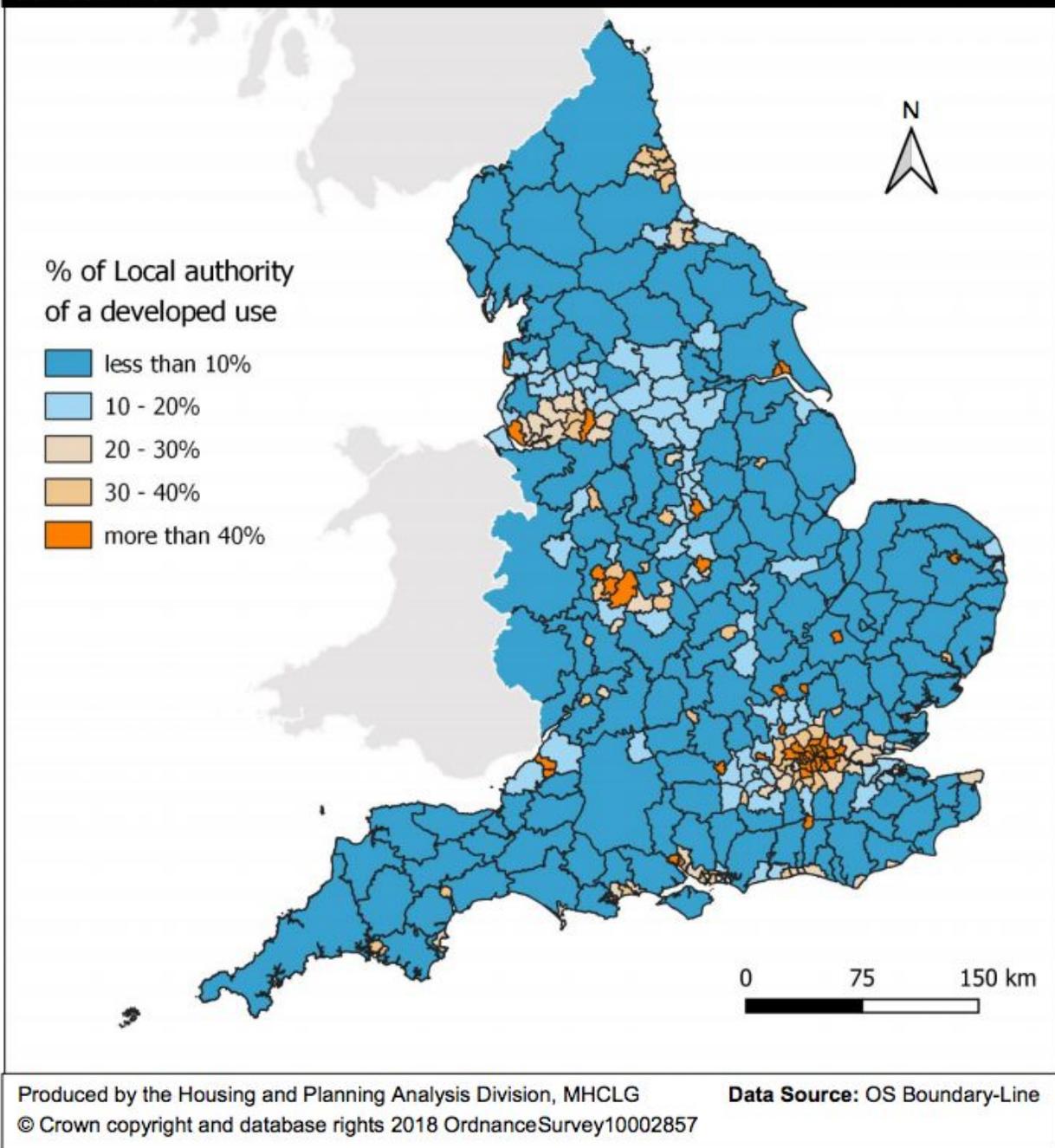
Thanets hills of growth are mountains in comparison to the huge local plan requirement. Here is another graph with Historical delivery data since 1981 and the local plan average requirement of 857 dwellings per year which shows more focus on how delivery rates have performed and a flat requirement.



From 1981 to 2018/19 16243 dwellings have been built in 38 years, giving an average of 427 houses on average a year. This also shows that housing delivery has never been over 900 in any given year, the highest year was year 2010/11 which delivered 889 dwellings, from this peak housing delivery has average 338 dwellings a year until the current time (2018/19). Housing delivery expectations are incredibly high to reach a consistent level of 1200 per year in 2021-2026 and 1317 a year in the period 2026-2031, and has never been tested at this level at least in relatively recent times. The shortfall in the whole plan period so far is on average double what the current delivery rate at the moment.

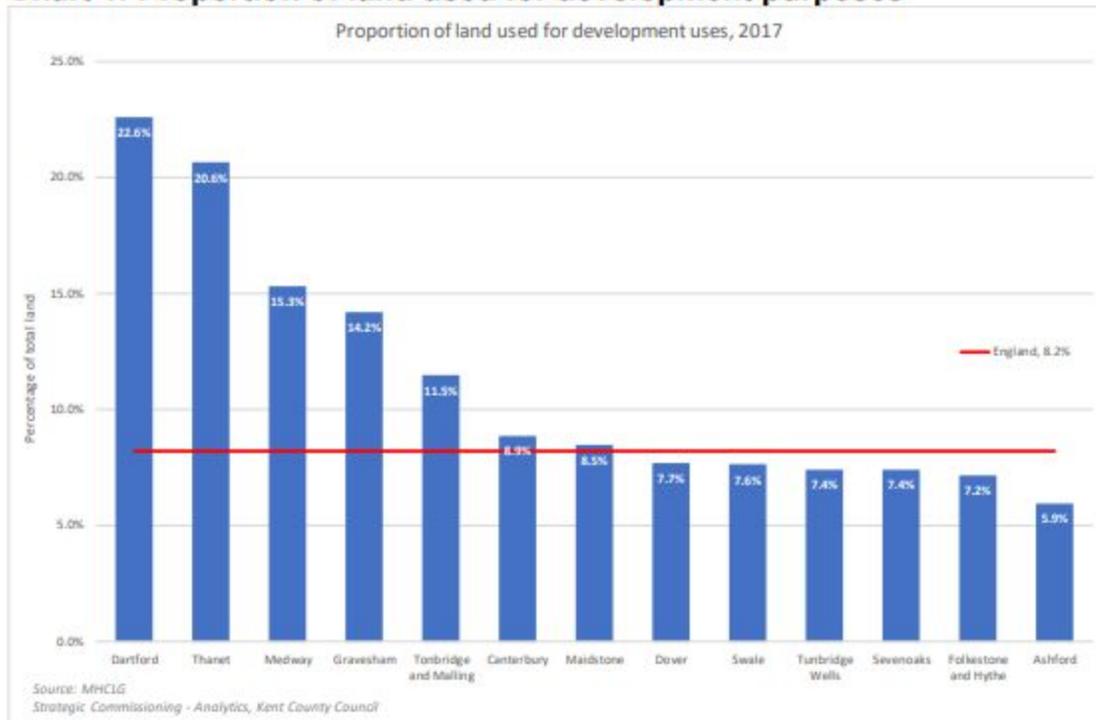
It is also worth pointing out that Thanet is 27% (University of Sheffield, Corine) (20.6% KCC/GOV experimental data) land developed already and shows this is quite unique for Kent if Thanet is still deemed to be an area known for farming and agriculture. This does indicate that Thanet as a district is one of the densest areas in Kent for the built environment but what land remaining is high quality agricultural land which is rated as Class 1/2 ALC and very little at lower grade (which is in flood risk areas). Please see information from the 2017 Land use data compiled by the UK government (MHCLG).

Map 1: Developed Land use in England – the percentage of the local authority land area that is of a developed use.



Land use 2017 (UK Government)

Chart 1: Proportion of land used for development purposes



Land use 2017 (KCC)

Point 4: Shortfall in the first 8 years of the local plan

Housing delivery from the draft plan which was set at 600 dwellings per year has not met that expectation so far. The local plan being in the first 8 years is currently 4152 dwellings deficient based on a standard average of 857 dwellings a year.

Shortfall based on standard 857 PA					
	2011-2016	2016/17	2017/18	2018/19	Total
Annual requirement	4285	857	857	857	6856
Completions	1555	478	305	366	2704
Shortfall	2730	379	552	491	4152
Shortfall per annum (12 years)					346

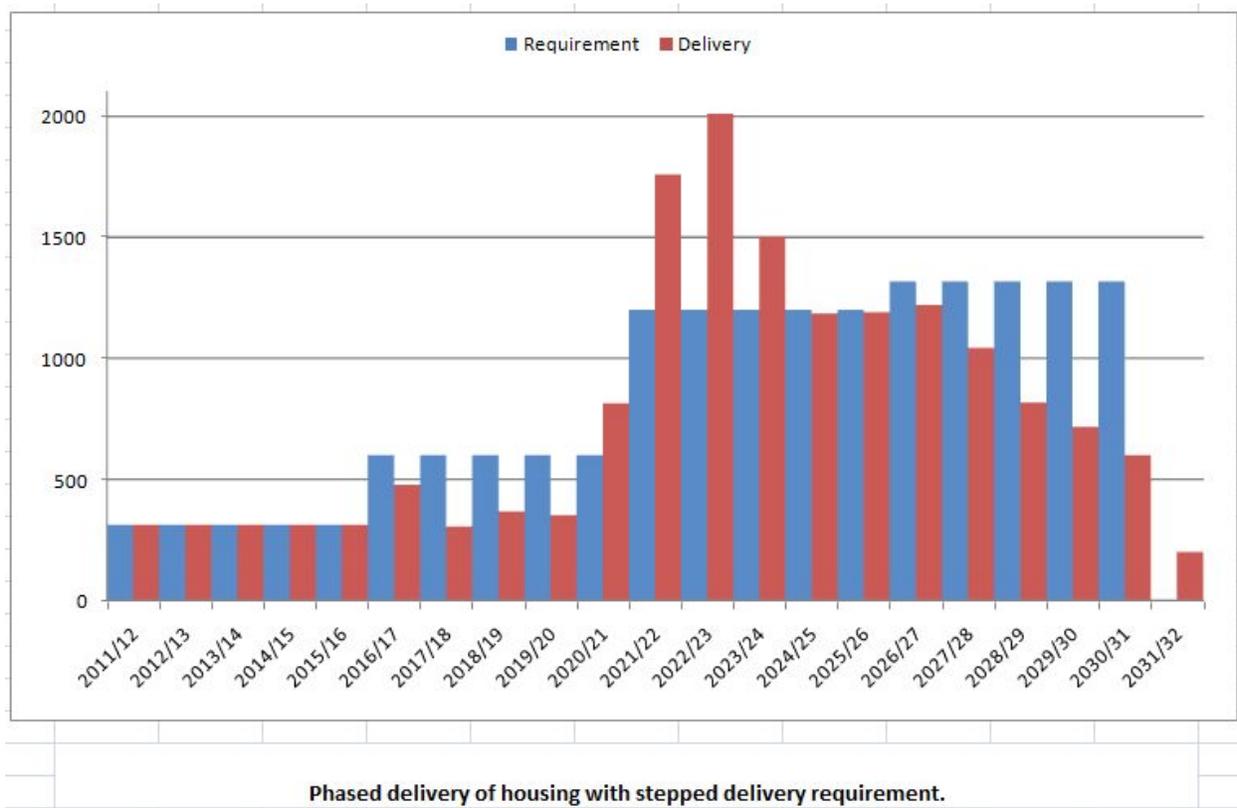
Development of shortfall over 8 years

I have concerns that the local plan does not have enough time to deliver within an appropriate horizon. Paragraph 157 states: Crucially, Local Plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date. This was also stated by myself at the Local Plan Examination as the delivery of highways are imperative to the strategy of the plan, and that build out in full may extend past 2031.

Given the plan has 12 years upto 2031 and that there is a significant shortfall to make up, delivering the plan is at risk at not achieving the level of housing that the OAN dictates. Thanet council has not fully assessed the risk of a stepped delivery and if it is possible. In my view it is running out of options (balanced delivery/Sedgefield) and has chosen the “Liverpool” stepped requirement as a last resort. The councils newly published action plan for housing delivery states that assessment and further study is needed to understand the many issues that the district faces in improving housing delivery Issues, such as Market perception, a reliance mainly on windfall development, land ownership, the economic area and its poor performance, and house market pricing and affordability for local residents. I understand that the local plan has to be positively prepared but it also should be realistic and deliverable. In my view the plan is past a tipping point to deliver the homes in full given how much we know the performance in 8 years of the plan period so far.

Point 5: Delivery and Population.

The updated delivery and requirement figures have been updated and shows the differences between the Liverpool stepped approach and the yearly totals of housing delivery together. It can be seen that projected delivery will peak just above 2000 dwellings in the year 2022/23.



However, population estimates have not met the population projections, against the ONS 2012, 2014, and 2016 projections. There is a difference of shortfall of 1506 people on the estimates

figures (2011-2018) and the 2014 projections. The housing projections also does not show peaks and troughs across the plan period.

Population Figures (Estimates and Projections)										
Year		2011	2012	2013	2014	2015	2016	2017	2018	
Estimates		134402	135687	136792	138526	139822	140828	141337	141819	
2016 Projection							140828	142034.6	143325.5	
2014 Projection					138410	139650.7	140937.5	142236.5	143582.5	
2012 Projection			135661	136601.3	137700	138838.5	140021.8	141212.2	142439.2	
Estimates change from 2012 Projection				190.7	825.97	983.55	806.18	124.78	-620.2	
Estimates change from 2014 Projection						171	-109	-899	-1,763	
Estimates change from 2016 Projection							0	-697.643	-1506.52	
Change in Population			1285	1105	1734	1296	1006	509	482	

ONS data, with estimates and projections

482 people came to Thanet in 2018, with natural change being negative (deaths over births). This poses a challenge in housing delivery given the main component of population change is migration (internal and international). With a housing requirement of 600 (at the moment), and less people coming into Thanet, this reduces ability on housing completions and relies on the local population to purchase homes (point 11 raises this issue).

MYE3: Components of population change for local authorities in the UK, mid-2018															
Code	Name	Geography ¹	Estimated Population mid-2017	Births	Deaths	Births minus Deaths	Internal Migration Inflow	Internal Migration Outflow	Internal Migration Net	International Migration Inflow	International Migration Outflow	International Migration Net	Other	Estimated Population mid-2018	Change
E07000114	Thanet	Non-metropoli	141,337	1,597	1,771	-174	5,718	5,338	380	664	411	253	23	141,819	482

Components of population change in Thanet (ONS)

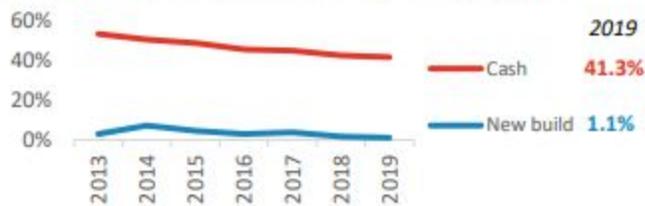
Housing transactions in Thanet are also going down generally as can be seen on June 2019 figures for transactions. This also shows that new build housing is a minor part of the housing market in Thanet at this present time.

Transactions (June 2019 data)

There were 2,301 transactions in Thanet during the 12 months to June 2019. This is 66% of the average from 2001-05 and suggests activity is significantly below pre-downturn levels.

Transactions in Thanet have fallen by 21.6% since 2014, compared to changes of -19.6% for the South East and -10.8% for England.

Cash and New Build Sales as % of Total, by Year



Note: These transaction counts do not include those identified as transfers under a power of sale/repossessions, buy-to-lets (where they can be identified by a mortgage), and transfers to non-private individuals.

Thanet area data for housing transactions Jun 2019 (Builtplace)

Another view to take is that the local plan at its peak is looking to deliver 2010 houses in the year period 2022/23. Looking at the amount of transactions in 2018 Thanet sold 2344 properties. With roughly 2000 sales on existing builds (366 was new builds 2018/19) this shows that house transactions are based on existing developments. Looking at the table below, Thanet for once is a good performer in Kent for transactions. Crucially, people in Thanet are buying houses (see table below), but not new build housing (which is more expensive) and the abundance of existing stock.

Table 3: Total number of property sales by type of property: 2018

	Total Sales	Detached		Semi-detached		Terraced		Flat / Maisonette	
		Number	% of total	Number	% of total	Number	% of total	Number	% of total
England & Wales	856,892	219,851	25.7%	247,602	28.9%	237,833	27.8%	151,606	17.7%
South East*	193,081	51,244	26.5%	51,358	26.6%	49,313	25.5%	41,166	21.3%
Kent	24,473	6,007	24.5%	6,910	28.2%	7,101	29.0%	4,455	18.2%
Ashford	2,050	682	33.3%	615	30.0%	522	25.5%	231	11.3%
Canterbury	2,240	750	33.5%	632	28.2%	483	21.6%	375	16.7%
Dartford	2,314	261	11.3%	564	24.4%	788	34.1%	701	30.3%
Dover	1,903	445	23.4%	564	29.6%	674	35.4%	220	11.6%
Gravesham	1,254	211	16.8%	350	27.9%	516	41.1%	177	14.1%
Maidstone	2,688	729	27.1%	877	32.6%	681	25.3%	401	14.9%
Sevenoaks	1,705	513	30.1%	438	25.7%	466	27.3%	288	16.9%
Folkestone & Hythe	1,953	489	25.0%	476	24.4%	512	26.2%	476	24.4%
Swale	2,236	491	22.0%	667	29.8%	835	37.3%	243	10.9%
Thanet	2,344	476	20.3%	643	27.4%	655	27.9%	570	24.3%
Tonbridge & Malling	2,077	543	26.1%	628	30.2%	558	26.9%	348	16.8%
Tunbridge Wells	1,709	417	24.4%	456	26.7%	411	24.0%	425	24.9%
Medway U.A.	3,951	431	10.9%	1,133	28.7%	1,836	46.5%	551	13.9%

Source: HM Land Registry Open Data Standard Reports

Presented by Strategic Commissioning - Analytics, Kent County Council

*The Land Registry "South East" region consists of the GOR South East region plus Hertfordshire and Essex

2018 house prices annual bulletin (KCC)

The table below the differences between new and old house prices on sales

Table 5: Overall average price paid per *New and Older properties: 2018

	Overall average price paid	**New Properties	Older Properties	% difference between New and Old average price
England & Wales	£297,220	£348,974	£289,784	17.0%
South East*	£379,717	£395,579	£377,496	4.6%
Kent	£339,689	£371,591	£335,289	9.8%
Ashford	£328,503	£358,337	£324,751	9.4%
Canterbury	£335,028	£372,589	£332,789	10.7%
Dartford	£330,196	£339,621	£325,422	4.2%
Dover	£274,428	£287,732	£272,304	5.4%
Gravesham	£318,419	£372,353	£314,048	15.7%
Maidstone	£341,924	£427,062	£327,475	23.3%
Sevenoaks	£519,211	£488,490	£523,410	-7.1%
Folkestone & Hythe	£283,199	£323,983	£277,729	14.3%
Swale	£272,062	£315,942	£267,917	15.2%
Thanet	£260,030	£281,528	£259,676	7.8%
Tonbridge & Malling	£394,086	£396,181	£393,736	0.6%
Tunbridge Wells	£473,905	£549,969	£468,006	14.9%
Medway U.A.	£264,526	£338,279	£259,904	23.2%

Source: HM Land Registry Open Data Standard Reports

Presented by Strategic Commissioning - Analytics, Kent County Council

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** newly built property but not a conversion of existing residential property, e.g. a residential house converted into flats.

2018 house prices annual bulletin (KCC)

The local plan is expecting a large change in the way people will be buying a home in the area (is this evidenced?), as can be seen in 2018 just 1.6% of sales was on new properties, with 98.4% buying older properties. This would seem very unlikely to happen and if the case the new build market would need to reduce pricing to be competitive which could in return challenge viability.

Table 8: Number of sales of *NEW and OLDER properties: 2018

	Total Sales	**New Properties		Older Properties	
		Number	% of total	Number	% of total
England & Wales	856,892	107,655	12.6%	749,237	87.4%
South East**	193,081	23,706	12.3%	169,375	87.7%
Kent	24,473	2,966	12.1%	21,507	87.9%
Ashford	2,050	229	11.2%	1,821	88.8%
Canterbury	2,240	126	5.6%	2,114	94.4%
Dartford	2,314	778	33.6%	1,536	66.4%
Dover	1,903	262	13.8%	1,641	86.2%
Gravesham	1,254	94	7.5%	1,160	92.5%
Maidstone	2,688	390	14.5%	2,298	85.5%
Sevenoaks	1,705	205	12.0%	1,500	88.0%
Folkestone & Hythe	1,953	231	11.8%	1,722	88.2%
Swale	2,236	193	8.6%	2,043	91.4%
Thanet	2,344	38	1.6%	2,306	98.4%
Tonbridge & Malling	2,077	297	14.3%	1,780	85.7%
Tunbridge Wells	1,709	123	7.2%	1,586	92.8%
Medway U.A.	3,951	233	5.9%	3,718	94.1%

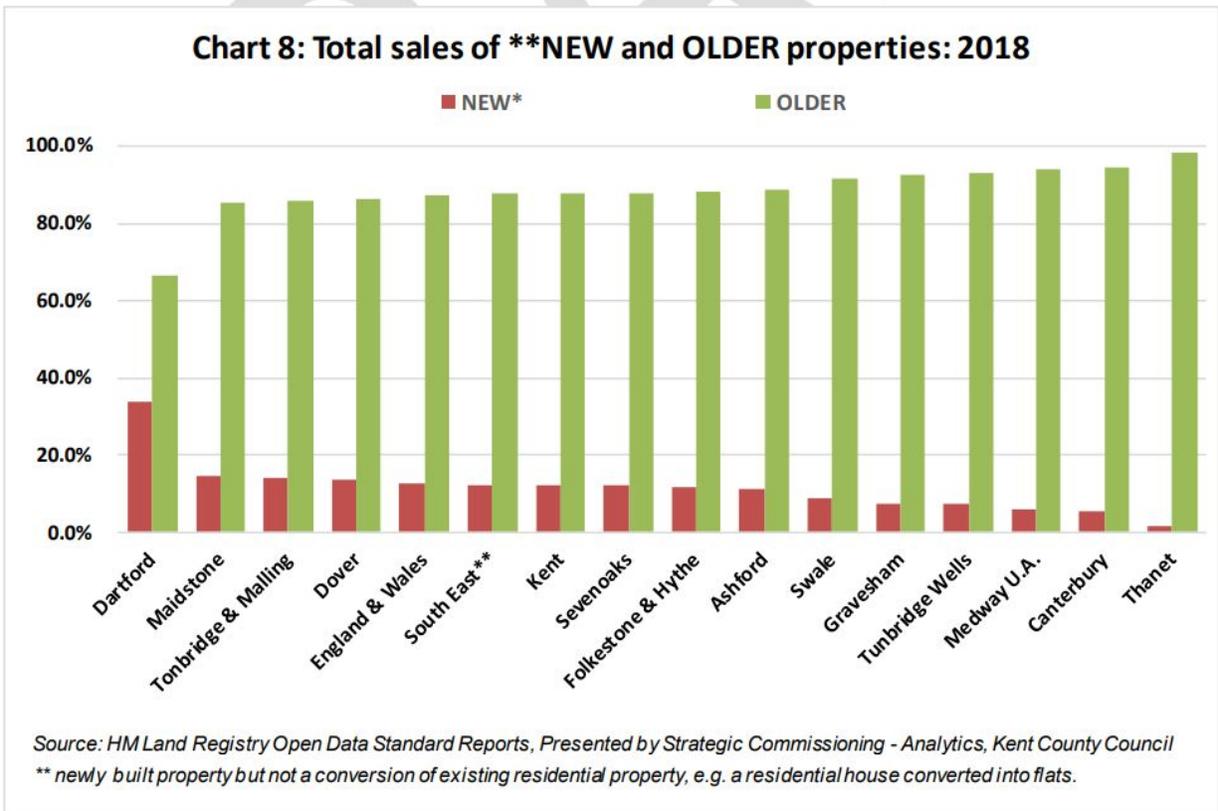
Source: HM Land Registry Open Data Standard Reports

Presented by Strategic Commissioning - Analytics, Kent County Council

*The Land Registry "South East" region consists of the GOR South East region plus Hertfordshire and Essex

** newly built property but not a conversion of existing residential property, e.g. a residential house converted into flats.

Thanet is actually is the top of the table in Kent in the number of older properties sold in 2018.



2018 house prices annual bulletin (KCC)

Thanet is also the 3rd highest district for total dwelling stock together with one of the higher turnover of properties than most districts in Kent. The graph above also shows complete difference in home buying habits in comparison to Dartford for which presumably Ebbsfleet garden city is the reason for high new build purchases (with distance to London being a selling point). However the delivery of Ebbsfleet is at around 600 completions in the past year (hundreds and not thousands) and shows later in point 10. The table below shows Thanets high housing stock it currently has and listed by type.

Table 1: Total dwelling stock, estimates by local authority 31st March each year

Total Dwelling Stock							1 yr % chg		5 yr % chg	
	2013	2014	2015	2016	2017	2018	1 yr % chg	5 yr % chg	1 yr chg	5 yr chg
Ashford	50,660	50,800	51,210	52,230	52,920	53,520	1.1	5.6	600	2,860
Canterbury	65,010	65,550	65,880	66,180	66,590	67,730	1.7	4.2	1,140	2,720
Dartford	41,970	42,570	43,130	44,100	45,270	46,300	2.3	10.3	1,030	4,330
Dover	51,920	52,110	52,470	53,210	53,620	54,070	0.8	4.1	450	2,150
Gravesham	42,280	42,410	42,660	42,840	43,000	43,280	0.7	2.4	280	1,000
Maidstone	67,030	67,450	68,040	68,560	69,700	70,990	1.9	5.9	1,290	3,960
Sevenoaks	48,700	48,930	49,130	49,550	49,870	50,260	0.8	3.2	390	1,560
Folkestone & Hythe	49,980	50,080	50,400	50,720	51,380	51,820	0.9	3.7	440	1,840
Swale	58,680	59,040	59,580	60,170	60,730	61,310	1.0	4.5	580	2,630
Thanet	65,510	65,830	66,220	66,570	66,960	67,190	0.3	2.6	230	1,680
Tonbridge and Malling	50,810	51,380	51,850	52,770	53,600	54,760	2.2	7.8	1,160	3,950
Tunbridge Wells	49,130	49,110	49,440	49,880	50,340	50,790	0.9	3.4	450	1,660
Kent	641,680	645,260	650,000	656,760	663,970	672,010	1.2	4.7	8,040	30,330
Medway	111,560	112,140	112,620	113,170	113,820	114,500	0.6	2.6	680	2,940
Kent & Medway	753,240	757,400	762,620	769,930	777,790	786,510	1.1	4.4	8,720	33,270
England	23,236,000	23,372,000	23,543,000	23,733,000	23,950,000	24,172,000	0.9	4.0	222,000	936,000

Note: Figures may not sum due to rounding

Source: Ministry of Housing, Communities & Local Government: Live Table 125

Presented by: Strategic Commissioning - Analytics, Kent County Council

Housing stock 2018 (KCC)

Point 6: Liverpool and Sedgefield delivery methods.

Firstly the issue raised by me on several occasions has been understanding deliverability (land should be available now, suitable and achievable).

It is not clear if each site has been assessed as, available, suitable and achievable in the 5 year period as shown in the report. There are some sites for which is not clear and this will be covered in my next point (Point 7). Windfall has also been a large aspect of delivering sites in Thanet, this will be covered in Point 8.

The determination of housing requirements has been made difficult as land supply to fulfill a standard 857 per year average has now made a shortfall over the whole plan period to be (as stated in point 4) to be 4152 so far (stated in point 4)

Two methods have been shown as good examples for historic under-supply. Please see below

2.5 Accounting for historic under-supply of housing

There have previously been two different methods for how historic shortfall of housing should be put compensated for in a local plan. The differences come in the time period over which the shortfall should be spread.

The Department for Communities and Local Government research document, [Land Supply Assessment Checks](#), May 2009 used case studies from Liverpool and Sedgefield about how these authorities calculated housing figures in their (now abolished) regional spatial strategies. In particular it highlighted Liverpool and Sedgefield as being “good examples” for calculating historic undersupply of housing in a “clear and transparent manner”.

The **Sedgefield** method of calculating land supply involves adding any shortfall of housing in the local plan from previous years over the next five years of the plan period, whereas the **Liverpool** method spreads the shortfall over the whole remaining plan period.

An article from the specialist publication, *Planning*, in 2013 highlighted a shift towards the Sedgefield method being required by Planning Inspectors:

Experts says there has been a shift towards the Sedgefield method, shown in appeal decisions, since the NPPF. Savills director Chris Rees says: “This ensures the current housing shortfall is

Local authorities with a record of persistent under delivery of housing should compensate for this in their local plan.

made up quickly, and not simply averaged out over a much longer time frame."

Barton Willmore senior partner Ian Tant says: "A lot of councils recognise that housing need cannot wait until 2026."

But the Sedgefield method is not always upheld, as an appeal decision in January on a 91-home scheme in Groby, Leicestershire, shows.²³

From March 2014 the PPG has provided the following guidance on how to deal with historic under-supply of housing, which favours the Sedgefield method:

How should local planning authorities deal with past under-supply?

The approach to identifying a record of persistent under delivery of housing involves questions of judgment for the decision maker in order to determine whether or not a particular degree of under delivery of housing triggers the requirement to bring forward an additional supply of housing.

The factors behind persistent under delivery may vary from place to place and, therefore, there can be no universally applicable test or definition of the term. It is legitimate to consider a range of issues, such as the effect of imposed housing moratoriums and the delivery rate before and after any such moratoriums.

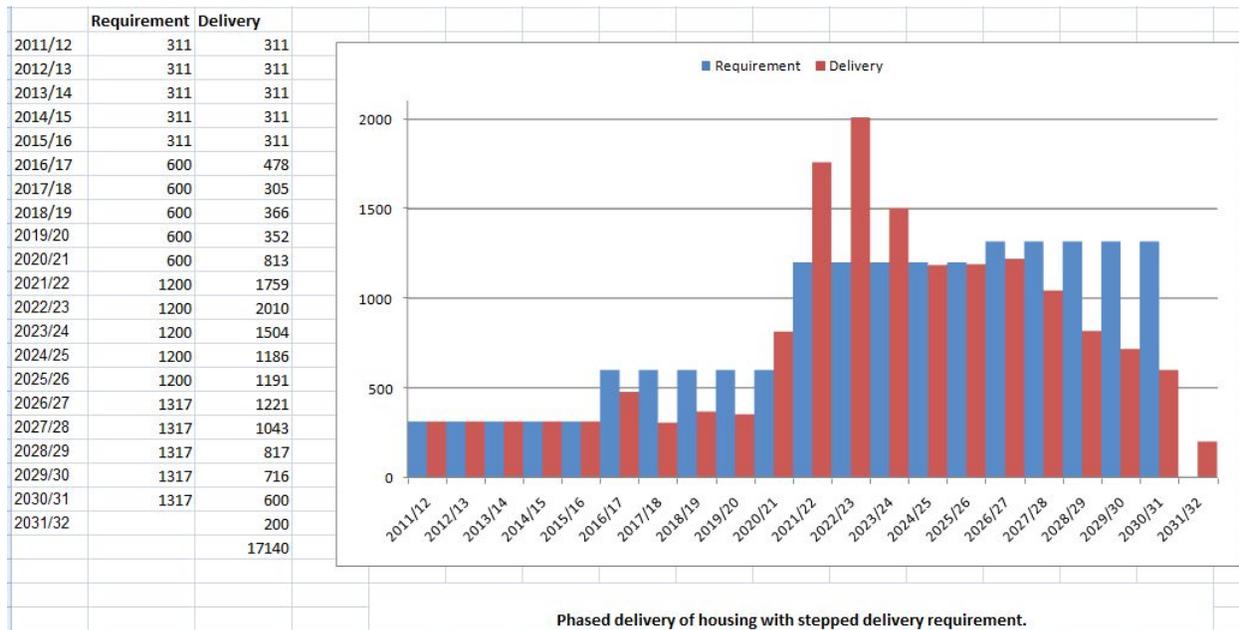
The assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.

Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the '[Duty to Cooperate](#)'.

Revision date: 06 03 2014²⁴

Planning for housing, 2017 (MHCLG)

MHCLG (as above) states that work with neighbouring authorities should happen if the first 5 years under duty to cooperate. To restate what was said at examination it was not clear why Canterbury and Dover are not linked with Thanets housing market area and so Thanet is a separate housing area. I have also not seen any evidence to suggest that the 5 year land supply problem (as a priority) has been discussed with neighbouring authorities under a duty to cooperate and how boarding authorities could support available land in their districts. (Canterbury, Dover and Ashford, has considerably less developed land as a proportion to Thanet).



Delivery peaking in 2022/23

Thanet council is using the Liverpool method, however looking at the phasing of delivery, the peak of 2010 dwellings is phased in year 2022/23, This does suggest a Sedgefield example could be sought, especially when dwelling delivery goes down (and below requirement from 2028/29 to the end of the plan.

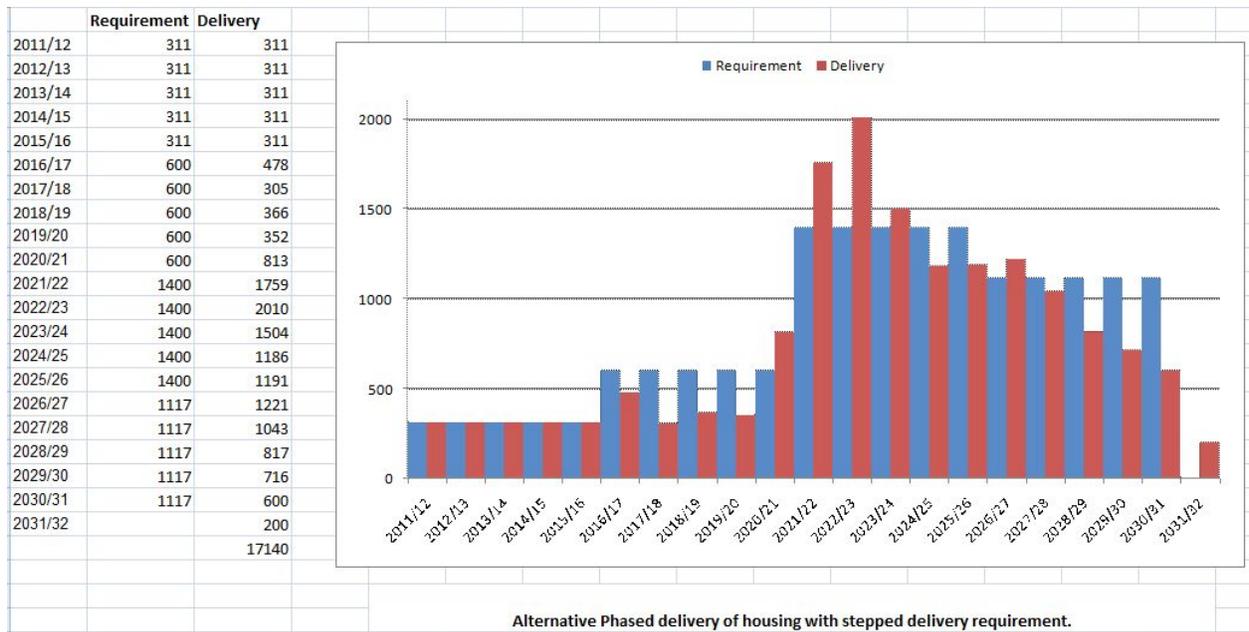
Looking at the numbers for a Sedgefield approach it was found that 5 year cannot be made with a 5% or 20% buffer As can be seen below by example. It also suggests that housing completions at the peak delivery (2021 -2025) will not make up the shortfall generated so far, and presumably relying on windfall.

Sedgefield			
Local Plan POD requirement 2011-31(857pa)	17140		
2011-16	1555	Completed	
2016-21	3000	Equates to annual requirement of	600
2021-26	8300	Equates to annual requirement of	1660
2026-31	4285	Equates to annual requirement of	857
Total completions to date 2016-19	1,149	Shortfall to date against requirement of 1800 (1,800-1,149)	651
		5% Buffer	20% Buffer
Requirement for 5 year period 2019/20-23/24 (600x2)+(1200x3)	6180	Requirement for 5 year period 2019/20-23/24 (600x2)+(1200x3)	6180
Shortfall 2016-2019 =651 (Sedgefield)	651	Shortfall 2016-2019 =651 (Sedgefield)	651
Requirement including shortfall for 2018-23	6831	Requirement including shortfall for 2018-23	6831
5% buffer of 5 year requirement including shortfall	341.55	20% buffer of 5 year requirement including shortfall	1366.2
5 year requirement + shortfall + 5% buffer	7172.55	5 year requirement + shortfall + 20%	8,197
annual requirement + shortfall + 5% buffer	1434.51	annual requirement + shortfall + 20% buffer	1639.44
5 year supply 01/04/19 to 31/03/24		5 year supply 01/04/19 to 31/03/24	
Strategic and other new allocations	3145	Strategic and other new allocations	3145
Planning permissions up to 31/03/19	3285	Planning permissions up to 31/03/19	3285
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	7015	Total Supply	7015
Surplus - /shortfall +	157.55	Surplus - /shortfall +	1,182
District wide 5 year supply (7015/1434.51)	4.890172	District wide 5 year supply (7015/1639.44)	4.2789

Applying a sedgefield approach to the requirements

An alternative approach:

Alternative plan for 5 year supply			
Local Plan POD requirement 2011-31(857pa)	17140		
2011-16	1555	Completed	
2016-21	3000	Equates to annual requirement of	600
2021-26	7000	Equates to annual requirement of	1400
2026-31	5585	Equates to annual requirement of	1117
Total completions to date 2016-19	1,149	Shortfall to date against requirement of 1800 (1,800-1,149)	651
	17,140		
5% Buffer		20% Buffer	
Requirement for 5 year period 2019/20-23/24 (600x2)+(1200x3)	5400	Requirement for 5 year period 2019/20-23/24 (600x2)+(1200x3)	5400
Shortfall 2016-2019 =651/12 = 54pa (Liverpool) 54x5	270	Shortfall 2016-2019 =651/12 = 54pa (Liverpool) 54x5	270
Requirement including shortfall for 2018-23	5670	Requirement including shortfall for 2018-23	5670
5% buffer of 5 year requirement including shortfall	283.5	20% buffer of 5 year requirement including shortfall	1134
5 year requirement + shortfall + 5% buffer	5953.5	5 year requirement + shortfall + 20%	6,804
annual requirement + shortfall + 5% buffer	1190.7	annual requirement + shortfall + 20% buffer	1360.8
5 year supply 01/04/19 to 31/03/24		5 year supply 01/04/19 to 31/03/24	
Strategic and other new allocations	3145	Strategic and other new allocations	3145
Planning permissions up to 31/03/19	3285	Planning permissions up to 31/03/19	3285
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	7015	Total Supply	7015
Surplus - /shortfall +	-1061.5	Surplus - /shortfall +	-211
District wide 5 year supply (7015/1354)	5.891492	District wide 5 year supply (7015/1548)	5.155056



Alternative requirement and delivery and calculation

The Liverpool approach does have an issue in the last 5 years of the plan the requirement steps up but delivery on the information we have at the moment trails downwards. The alternative approach which keeps a Liverpool approach which provides a “Sedgefield” advancement in a 5 year period earlier (driven by the peak of delivery in 2022/23). This drives the requirements mostly from years 10 to 15 of the plan and trails down on the last 5 years. Having an arrangement like this promotes early delivery rather than at the end (as delivery data suggests). It would also be easy to see earlier if the peak of delivery was realized in the year 2022/23. and to make 5 year land supply requirement would manage this better (shortfalls

are addressed sooner). It also provides as seen above that with a 20% buffer that the land supply at the moment would be 5.15 years. This also promotes windfall sites to boost the supply of land earlier in the plan using the 5 year supply mechanism (windfalls show a strong indicator in past housing delivery).

Point 7: Deliverable sites

It is to me unclear on what applications are accepted, deliverable (as stated below), in pre planning, at application stage or what information to support the deliverability of a site.

5.1 The definition of "deliverability" set out in the PINS guidance includes the following:

- *"Be available – the site is available now*
- *Be suitable – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities*
- *Be achievable – there is a reasonable prospect that housing will be delivered on the site within five years."*

Land supply assessment checks (MHCLG)

An example of a report showing this is shown below.

APPENDIX 2 - PPS3 Dwellings deliverability (Page 1)

Larger sites of 10 or more dwellings						Data at 31/03/07			Deliverability			Assumptions				
Planning application reference	Expiry date if relevant	Address	Parish	Hierarchy	PDL / Gfied	Total No of dwellings	Under construction at end of period	Extant	Available	Suitable	Achievable	Year 2007-08	Year 2008-09	Year 2009-10	Year 2010-11	Year 2011-12
A/2003/0028		Tyelow Meadows	Shilbottle	SVC	GF	112	0	1	✓	✓	x	discounted		1		
A/2002/0620		Column Mews & Stott St, Creamery Waggonway Rd	Alnwick	MSC	PDL	16	14	0	✓	✓	✓	14				
A/2006/0665		Land at Park View	Alnwick	MSC	PDL	61	14	47	✓	✓	✓	14	47			
A/2008/0657		The Maltings and Bolam Mill Dispensary Street	Alnwick	MSC	PDL	33	0	33	✓	✓	✓	12	21			
A/2004/0405		Clive Nurseries (new) Alnwick	Alnwick	MSC	PDL	30	25	5	✓	✓	✓	16	14			
A/2006/0170		Belvedere Court Turner St	Amble	MSC	PDL	10	10	0	✓	✓	✓	10				
A/2004/0528		Rivergreen (Garage & bungalow The Wynd)	Warkworth	MSC	PDL	12	1	0	✓	✓	✓	1				
A/1998/0379		Land S & E of Addycombe Gds	Rothbury	SSC	GF	97	28	58	✓	✓	✓	28	30	28		
Various		Lordenshaws Drive (S of Wagtail Lane)	Rothbury	SSC	GF	21	1	0	✓	✓	✓	1				
A/2006/0660		Old Mart Site Station Rd	Rothbury	SSC	GF	19	0	19	✓	✓	✓	9	10			
A/2006/0211		Wellfield 38	Alnmouth	SVC	PDL	10	0	10	✓	✓	✓	4	6			
A/2002/0204		The Farm Steading High Town Farm	Longframlington	SVC	GF	22	7	4	✓	✓	✓	7	4			
A/2003/0706		East Moor (Land to rear 46/48 N End phase 2)	Longhoughton	SVC	GF	40	17	4	✓	✓	✓	16	5			
A/2003/0669		Builders yard Wellfield	Warkworth	SVC	PDL	26	7	0	✓	✓	✓	7				
A/2002/0709		Land at Mauldin Farm (incl. 4 x conversions)	Warkworth	SVC	GF	12	1	4	✓	✓	✓	5				
A/2006/0627		Site W of Pringle Garage	Christon Bank	LNC	PDL	12	0	12	✓	✓	✓	6	6			
A/2002/0656		Land adj Crawley View	Powburn	LNC	GF	27	0	27	✓	✓	✓	0	27			
A/2006/0410		Rock Farms Ltd, Rock	Rennington	C	GF	19	0	19	✓	✓	✓	5	5			
Totals						579	125	243				155	175	29	0	0

Total dwellings under construction or extant	368
Number discounted	1
Discounted	367

Example of a deliverability report, Land supply assessment checks (MHCLG)

5.18 A good site schedule should be very clear, easy to understand and explicit about assumptions. The information should be in a common format and capable of easy extrapolation for wider generic assessment of the issues facing housing deliverability. A balance needs to be achieved between information required to unpick delivery issues and commercial sensitivities. This could be achieved if wording is agreed with the developer.

Good Practice, land supply assessment checks (MHCLG)

It is not clear on what sites meets the criteria of a deliverable site, the report does not provide details of this. Thanet Council is looking to improve this information in the recently published HDT action plan 2019 as seen below. Having more detailed monitoring would help in determining deliverability.

Detailed Annual Monitoring

4.14 The Council has for the last three years carried out a more in-depth survey, with developers and agents of sites of 10 or more units, of projected delivery rates for housing sites together with a request for information on any known constraints or problems hindering the delivery of housing.

4.15 Furthermore, the annual survey of all sites, has for the last 2 years, refined the under construction category into 7 stages as set out below.

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

4.16 This has allowed greater accuracy in predicting completions on site and help inform future phasing and completions rates. The Council intends to carry out further analysis on this to build up a picture of completion rates by site typology. This work is intended to

supplement further root cause analysis utilising the PAS (Planning Advisory Service) recommended guidance and methodology. The Council has taken part in the PAS workshops on the Housing Delivery Test and Action Plans to ensure that it is adopting best practice in this area.

HDT Action Plan 2019 (Thanet Council)

There are instances where certain sites are not clear on their delivery from what has been presented to the examination. Some examples below:

Westgate Policy SP15 (2000 houses). Phasing data suggests that 25 dwellings may not be developed in the year 2020/21. There is no planning application as yet, No local plan adopted (summer 2020), S106 agreements, Funding for the road requires more certainty on the bid (Transport for south east) and due in 2021. Detailed Archaeological surveying. Preparation of the site including waste water first. Wintering bird assessments (which are time dependant) The preferred options consultation in 2017 stated that delivery would start 2018/19 (1000 dwellings at this time), see table below. Is the site deliverable now?

Birchington Policy SP14 (1600 houses), The preferred options consultations stated that delivery would start 2018/19 (1000 dwellings at this time), please see table below. CD9.31 suggests further work required on Archeological and Heritage assets especially around Gore Farm. Further planning required on roads in the phasing of the development, and when contributions will come through on the inner road circuit and build out of that infrastructure. There is also a parcel of land which is owned by the church commissioner for which no agreement has been made (from what I can see) with the other landowners in SP14 Is all of the site deliverable now?

Manston Green 14/0050 (785 houses) has an application to remove a condition (aircraft noise) which is currently being considered, this could be affected by the outcome of the DCO for Manston airport. Unknown timescale of road delivery which is a condition of development in later phases, this affects the Haine road corridor. Further clarification required if aircraft noise would affect the build out of the development.

The application was decided in 13th July 2016 and has been slow to progress. The Preferred options consultations stated that delivery would start 2017/18, see table below

SITE ADDRESS	NOTIONAL DWELLING CAPACITY	NOTIONAL DELIVERY PERIOD					
		2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
STRATEGIC SITES							
Westwood	1,450	0	0	50	100	150	110
Birchington	1,000	0	0	50	100	100	70
Westgate	1,000	0		50	100	100	70
Manston Green	785	0	50	50	60	60	60
Land at Manston Court Road/Haine Road	700	0	0	0	30	60	60
Former airport site	2,500	0	0	160	160	160	160
SUB TOTAL	7,435	0	50	360	550	630	530

Thanet Local Plan preferred options 2017.

Tothill Street, (250 houses) Consultation been made but unsure if an application has been received, constraints on this site include protection of groundwater sources, which may not reflect all housing onsite is deliverable. A reduction of dwelling number could be suggested.

Pleasurama Amusement Park 03/1200 (107 dwellings), Unclear on status as developer went into liquidation, and unsure on discussions to progress the site to be delivered. Application was granted in 2004. Is the development open to a flooding assessment if application was reapplied and is suitable? Does the area meet the conditions of the NPPF and LP if a new application is made?

Land And Buildings On The North Side Of Boundary Road (Boundary Road Gas works) (96 Dwellings). Application is still under consideration. A new application F/TH/19/0644 which applies for 70 dwellings (not 96).

Large history on this application which may have lapsed as an application was made in 2004.

Property History

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200002463876 | Land And Buildings On The North Side Of Boundary Road RAMSGATE Kent

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Address **Property History (19)** Constraints (0) Map

Planning Applications (15)

- Erection of 2no. 4-storey blocks and conversion of existing building to provide 63no. one and two bedroom self-contained flats, and erection of 7no. 3-storey dwellings, with associated access, parking and amenity space
Ref. No: F/TH/19/0644 | Status: Pending Consideration
- Erection of a retail unit of 1,838 sqm (use class A1) with associated works, access and parking
Ref. No: F/TH/19/0709 | Status: Pending Consideration
- Application for Listed Building Consent for the demolition of boundary wall and external fire escape
Ref. No: L/TH/19/0710 | Status: Pending Consideration
- Application for Listed Building Consent for internal and external alterations/repairs to facilitate the change of use to residential (use class C3)
Ref. No: L/TH/19/0753 | Status: Granted
- Application for Listed Building Consent for re-pointing of brickwork, making good of coping covering and painting of railings
Ref. No: L/TH/15/0327 | Status: Granted
- Application for Listed Building consent for internal and external alterations in connection with the change of use of the existing buildings to residential use, together with part demolition of existing boundary wall
Ref. No: L/TH/07/1240 | Status: Granted
- Application for approval of design, siting, external appearance and landscaping, pursuant to outline planning permission OL/TH/01/0260 for residential development and change of use of existing buildings to provide 96no. residential units
Ref. No: R/TH/07/1200 | Status: Pending Decision
- RETENTION AND CONTINUED DISPLAY OF A NON-ILLUMINATED CONJOINED SIGNBOARD IN ACCORDANCE WITH THE PROVISIONS OF REGULATION 13 (2) (C)
Ref. No: A/TH/96/0972 | Status: Granted
- INSTALLATION OF REPLACEMENT SODIUM WALL LIGHTS TO REAR CAR PARK
Ref. No: L/TH/94/0169 | Status: Granted
- OUTLINE APPLICATION FOR RESIDENTIAL DEVELOPMENT INCLUDING THE CHANGE OF USE AND CONVERSION OF EXISTING BUILDINGS TO RESIDENTIAL USE, WITH ASSOCIATED ACCESS AND PARKING
Ref. No: OL/TH/01/0260 | Status: Granted
- RETENTION OF A TEMPORARY OFFICE BUILDING
Ref. No: R/TH/96/0309 | Status: Granted
- (1) STORAGE AND DISTRIBUTION OF NATURAL GAS (2) DISTRICT OFFICES
Ref. No: HZ/TH/93/0823 | Status: DMC
- INSTALLATION OF BALUSTRADING/HANDRAIL TO ENTRANCE STEPS
Ref. No: L/TH/93/0871 | Status: Granted
- RENEWAL OF TEMPORARY CONSENT FOR USE OF LAND FOR THE STORAGE OF EMPLOYEES CARAVANS
Ref. No: F/TH/90/0159 | Status: Granted
- ERECTION OF A TEMPORARY BUILDING
Ref. No: F/TH/91/0131 | Status: Granted

Jentex Oil Depot Canterbury Road West Ramsgate (56 dwellings)

This has been acquired by RiverOak to return as a fuel facility, see announcement below.

RiverOak Strategic Partners completes Jentex acquisition

Published on September 18th, 2018

Today (18 September 2018) RiverOak Strategic Partners (RSP) completed the acquisition of the Jentex site on Canterbury Road West in Ramsgate, which is designated in our proposals as the location of the airport fuel facility.

The Jenkins family, which has operated the site for many years as a fuel oil business, will continue to do so until the conclusion of the DCO – after which they will become the operators of the new fuel facility

As a condition of the sale of the land to RSP, the Jenkins family required us to help them ensure the planning permission for an extra-care sheltered housing scheme on the land remained current, which RSP is happy to do and has worked with them to submit a new planning application to replace the previous consent. This condition will fall away when the DCO is granted.

George Yerrall, Director of RSP, said: "The Jenkins family is a pleasure to deal with and I am delighted we are building a long term relationship with them. We have always been clear that we want local businesses to share in the success of reopening Manston and I hope this is the first of many such relationships we will forge with businesses across Thanet and East Kent."

Added Tony Jenkins: "We have always been huge supporters of Manston and look forward to seeing it reopen. I take real pride in the knowledge that our family will be able to apply our 55 years of experience, in running Jentex, to the challenges of building and operating the new airport fuel facility – and I look forward to the next steps in the DCO."

Former Club Union Convalescent Home, North Of Reading Street Broadstairs (24 Dwellings)

This site has a large planning history and has been rejected on appeal a number of times, history shown below:

Property History

Help with this page

100062281747 | Land Formerly Used As Club Union Convalescent Home Reading Street BROADSTAIRS Kent

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Print

Address	Property History (18)	Constraints (0)	Map
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Planning Applications (15)

- Erection of 30 dwellings together with associated access and landscaping following demolition of 30 Convent Road
Ref. No: F/TH/16/0924 | Status: Refused
- Erection of 25no. dwellings, with associated vehicular access from Reading Street and Convent Road, pedestrian access from Astor Road, with off street parking and landscaping
Ref. No: F/TH/18/0142 | Status: Refused
- Erection of 24no. dwellings with associated vehicular access from Reading Street and Convent Road, pedestrian access from Astor Road, parking and landscaping
Ref. No: F/TH/19/0813 | Status: Pending Consideration
- Application for extension of time of planning permission OL/TH/10/0283, for the redevelopment of the site with thirteen detached dwellings and garages, with associated access road and landscaping
Ref. No: F/TH/12/0875 | Status: Granted
- Application for extension of time of planning permission OL/TH/02/0484, for outline application for the redevelopment of the site with thirteen detached dwellings and garages, with associated access road and landscaping
Ref. No: OL/TH/10/0283 | Status: Granted
- Application for approval of reserved matters for the erection of thirteen detached dwellings and garages with associated access pursuant to outline planning permission OL/TH/02/0484
Ref. No: R/TH/08/0406 | Status: Granted
- Renewal of outline planning permission OL/TH/02/0484 for the redevelopment of site with 13 no. detached dwellings and garages with associated access road and landscaping
Ref. No: RN/TH/08/0059 | Status: Refused
- Submission of details pursuant to conditions relating to landscaping and the new entrance attached to planning application reference OL/TH/02/0484.
Ref. No: S1/TH/02/0484 | Status: Pending Consideration
- ERECTION OF 16 DETACHED DWELLINGS WITH GARAGES, CONSTRUCTION OF ACCESS ROAD AND DRIVES, TOGETHER WITH ASSOCIATED LANDSCAPING, FOLLOWING DEMOLITION OF EXISTING BUILDINGS (OUTLINE APPLICATION) (AMENDED PLANS)
Ref. No: OL/TH/01/0407 | Status: Application Withdrawn
- ERECTION OF EXTENSION TO EXISTING GARAGE
Ref. No: F/TH/90/0187 | Status: Granted
- ERECTION OF A DETACHED BUNGALOW
Ref. No: OL/TH/91/0689 | Status: Refused
- OUTLINE APPLICATION FOR THE REDEVELOPMENT OF THE SITE WITH THIRTEEN DETACHED DWELLINGS AND GARAGES, WITH ASSOCIATED ACCESS ROAD AND LANDSCAPING
Ref. No: OL/TH/02/0484 | Status: Granted
- DEMOLITION OF EXISTING BUILDING
Ref. No: DM/TH/00/1072 | Status: Application Withdrawn
- ERECTION OF DETACHED TWO STOREY DWELLING HOUSE WITH SWIMMING POOL, GYM AND STORE AT BASEMENT LEVEL AND ACCOMMODATION WITH THE ROOF SPACE AND DETACHED SINGLE STOREY RIDGED ROOF DOUBLE GARAGE AND STORE
Ref. No: F/TH/00/0330 | Status: Application Withdrawn
- CHANGE OF USE AND CONVERSION FROM CONVALESCENT HOME TO 34 SELF-CONTAINED 2/3 BEDROOM FLATS, INCORPORATING ALTERATIONS AND EXTENSIONS AT GROUND, FIRST, SECOND AND THIRD FLOOR LEVELS INCLUDING NEW PITCHED ROOFS; ERECTION OF SINGLE AND TWO STOREY PITCHED ROOF BUILDINGS TO PROVIDE ANCILLARY INDOOR SWIMMING POOL, GYMNASIUM, ASSOCIATED FACILITIES AND GARAGE BLOCK; TOGETHER WITH THE PROVISION OF ASSOCIATED PARKING
Ref. No: F/TH/98/1080 | Status: Application Withdrawn

Planning Appeals (2)

- Erection of 30 dwellings together with associated access and landscaping following demolition of 30 Convent Road
Ref. No: 17/00017/REF | Status: Appeal dismissed
- Erection of 25no. dwellings, with associated vehicular access from Reading Street and Convent Road, pedestrian access from Astor Road, with off street parking and landscaping
Ref. No: 18/00053/REF | Status: Appeal dismissed

There is currently a consultation on modifications on the Broadstairs Neighbourhood plan by Thanet Council, and this consultation has been rejected by Broadstairs Town council as the plan has been independently examined and was due to go to referendum to be adopted. This is now being contested by Broadstairs town council and may be called in to the Secretary of state. One of the issues is to do with a local green space which is associated with the Club union site. The deliverability of this site is not clear and a planning application is currently being considered and could be refused again.

News article:

<https://theisleofthanetnews.com/2019/09/03/broadstairs-st-peters-town-council-takes-local-green-fight-against-thanet-council-to-government/>

Land At Wilderness Hill And Dane Road (14 dwellings) the SA update (Section 3.1) report has said the application has now expired.

Gas Holder Station, Addington Street, Margate (22 or 49 dwellings), The planning applications states 49 dwellings as stated in the SA update Section 3.18

In my view there is some clarity required on the sites in the report and it is hard to judge if they are available, suitable and achievable, or even expired.

Point 8: Windfalls

Windfalls has been the source of most of the delivery of sites in the past 10 years including the first 8 years of the local plan and has provided a considerable supply of housing.

Table 1: Summary of Windfall Completions

	Windfall and allocated (all comps)	Allocated	Windfalls	Windfall sites <10	Windfall sites of 10 or more	All windfalls as % of comps	Windfalls <10 as % of all comps
2006-07*	651		564			86.64	N/A
2007-08*	606		551			90.92	N/A
2008-09	726	97	629	367	274	86.64	50.55
2009-10	520	30	490	182	312	94.23	35.00
2010-11	788	46	742	496	386	94.16	62.94
2011-12	307	30	277	214	63	90.23	69.71
2012-13	217	26	191	76	115	88.02	35.02
2013-14	322	73	249	123	126	77.33	38.20
2014-15	380	128	252	120	132	66.32	31.58
2015-16	350	20	330	151	179	94.29	43.14
2016-17	389	79	310	183	127	79.69	47.04
2017-18	322	58	264	229	35	81.99	71.12
TOTALS	5578	587	4849	2141	1749		

SHLAA 2018 (Windfall completions)

The SHLAA identifies this and shows windfalls was as high as 94% for housing delivery in the year 2015/16. The allowance has been calculated as 2250 for the local plan.

Monitoring Year	Total Completions	Completions on Allocated sites	Completions on Windfall sites	Requirement at monitoring year
2011-12	307	30	277	375
2012-13	217	26	191	375
2013-14	322	73	249	375
2014-15	380	128	252	600
				HDT Requirement
2015-16	350	20	330	703
2016-17	389	79	310	709
2017-18	238	58	180	793

HDT Action Plan, (Completions of Windfall sites)

What is unknown at this stage is the effect of windfall sites when strategic sites are planned and delivered in the plan period. Will Windfall sites affect the delivery of the strategic sites or vice versa? (any evidence to look at this?). It is not understood from the evidence seen so far if viability is affected of windfall sites (which contains brownfield sites) when the larger greenfield sites are phased in the plan. How does the plan address the NPPF paragraph 111 "Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land".

Windfall sites contain most of the Brownfield register (which appears to be updated recently) and Thanet council should ensure that Brownfield sites are developable and delivered certainly as a priority over greenfield development which also a NPPF policy.. Thanets success could be with the redevelopment of the area and is showing a small supply of new homes.

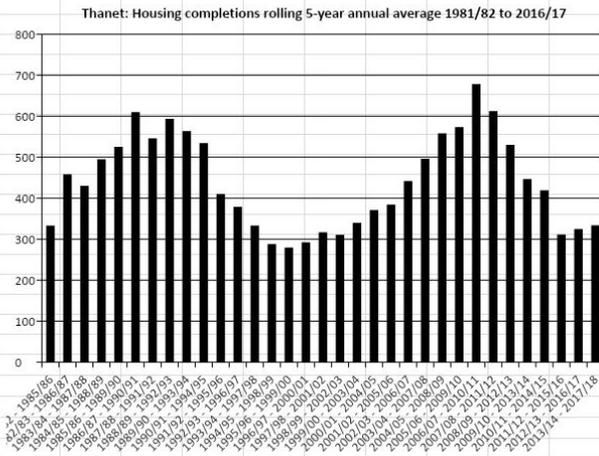
Point 9: Past performance of 5 year land supply.

It is unclear to understand from the Annual monitoring reports what levels of buffer was provided and how many years land supply has been achieved (AMR 2018). The examination report shows a 5 year land supply, however planning applications are given weight because of a lack of 5 year land supply, a recent application which was called in and heard on 18th september 2019 stated that there was not a 5 year supply. Thanet council is not being clear on when 5 year supply has been made.

Point 10: General housing Delivery performance.

Thanet over the past 36 years has shown it follows the variability of national economic performance as can be seen below. This shows that housing markets are variable in nature and may not align with the stepped delivery.

Thanet Dwelling Completions			
All sites	Annual		5-year average
1981/82	93		
1982/83	497		
1983/84	320		
1984/85	320		
1985/86	434	1981/82 - 1985/86	333
1986/87	720	1982/83 - 1986/87	458
1987/88	357	1983/84 - 1987/88	430
1988/89	642	1984/85 - 1988/89	495
1989/90	474	1985/86 - 1989/90	525
1990/91	856	1986/87 - 1990/91	610
1991/92	400	1987/88 - 1991/92	546
1992/93	594	1988/89 - 1992/93	593
1993/94	495	1989/90 - 1993/94	564
1994/95	327	1990/91 - 1994/95	534
1995/96	234	1991/92 - 1995/96	410
1996/97	244	1992/93 - 1996/97	379
1997/98	366	1993/94 - 1997/98	333
1998/99	268	1994/95 - 1998/99	288
1999/00	286	1995/96 - 1999/00	280
2000/01	297	1996/97 - 2000/01	292
2001/02	367	1997/98 - 2001/02	317
2002/03	334	1998/99 - 2002/03	310
2003/04	416	1999/00 - 2003/04	340
2004/05	441	2000/01 - 2004/05	371
2005/06	365	2001/02 - 2005/06	385
2006/07	651	2002/03 - 2006/07	441
2007/08	606	2003/04 - 2007/08	496
2008/09	726	2004/05 - 2008/09	558
2009/10	520	2005/06 - 2009/10	574
2010/11	889	2006/07 - 2010/11	678
2011/12	320	2007/08 - 2011/12	612
2012/13	194	2008/09 - 2012/13	530
2013/14	311	2009/10 - 2013/14	447
2014/15	380	2010/11 - 2014/15	419
2015/16	350	2011/12 - 2015/16	311
2016/17	389	2012/13 - 2016/17	325
2017/18	238	2013/14 - 2017/18	334
36 years			
20 year	8714		
5 year	1624	20 year equiv	6496
10 Year	4685	20 year equiv	9370



CPRE Kent, Thanet Completions (on a 5 year average)

The housing market in Thanet is showing a decline in housing transactions, prices and with the general trend found nationally. New Builds are shown as a very small part of housing transactions. A recent housing market report shows this below and market trends.

October 2019 Housing Market Report

Thanet

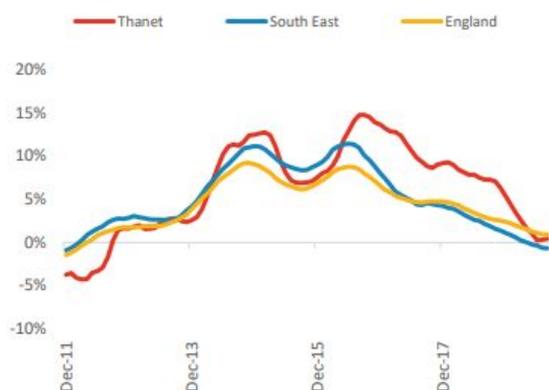
Powered by: **BuiltPlace**



	Current level	3 month	Annual	5 year	10 year
House prices	£242,839	0.5%	0.4%	44.5%	66.7%
Transactions	2,301	-3.8%	-17.7%	-16.6%	61.1%

House Prices (August 2019 data)

Annual Change in House Prices

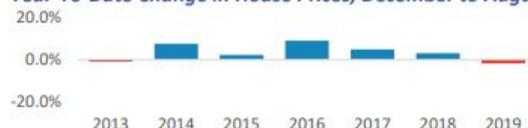


House prices in Thanet grew by 0.4% in the 12 months to August 2019 (based on 6-month smoothed data). By comparison national house prices grew by 0.9% and prices in the South East fell by 0.7% over the same period.

Thanet house prices are now 35.4% above their previous peak in 2007, compared to +35.5% for the South East and +27.0% across England.

Local prices have fallen by 1.7% in 2019 so far, compared to growth of 3.2% over the same period last year.

Year-To-Date Change in House Prices, December to August

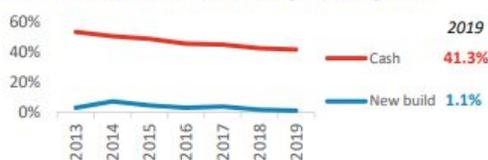


Transactions (June 2019 data)

There were 2,301 transactions in Thanet during the 12 months to June 2019. This is 66% of the average from 2001-05 and suggests activity is significantly below pre-downturn levels.

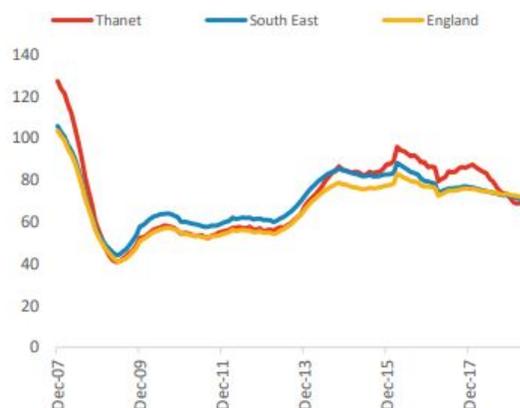
Transactions in Thanet have fallen by 21.6% since 2014, compared to changes of -19.6% for the South East and -10.8% for England.

Cash and New Build Sales as % of Total, by Year



Note: These transaction counts do not include those identified as transfers under a power of sale/repossessions, buy-to-lets (where they can be identified by a mortgage), and transfers to non-private individuals.

Annual Transactions, Indexed (2001-05 average = 100)



Contact: **Nick Gregori**
nick@canal-street-research.com



Source: UK House Price Index, Contains HM Land Registry data © Crown copyright

Ebbsfleet Garden City performance

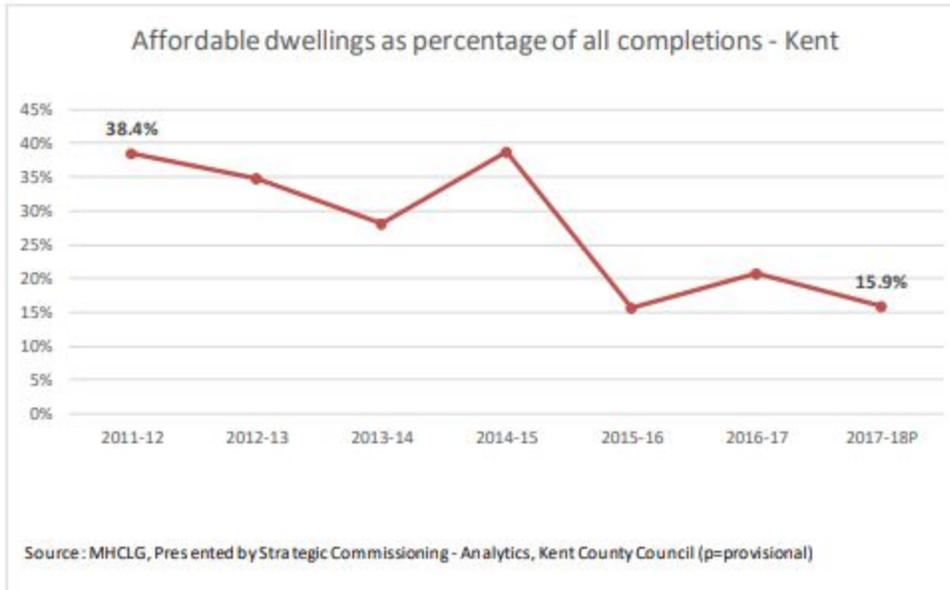
HOUSING STARTS AND COMPLETIONS						
1. Housing Starts & Completions within the Red Line Area						
Year	Developer Forecast		Actual		EDC Forecast	
	Starts	Complete	Starts	Complete	Starts	Complete
2014-2015	-	-	15	40	-	-
2015-2016	-	-	63	60	-	-
2016-2017	-	-	549	141	-	-
2017-2018	-	-	547	312	-	-
2018-2019	-	-	590	613	-	-
2019-2020	553	625	239	306	-	580
2020-2021	659	829			-	1063

Ebbsfleet Housing Delivery Dashboard – Oct 2019

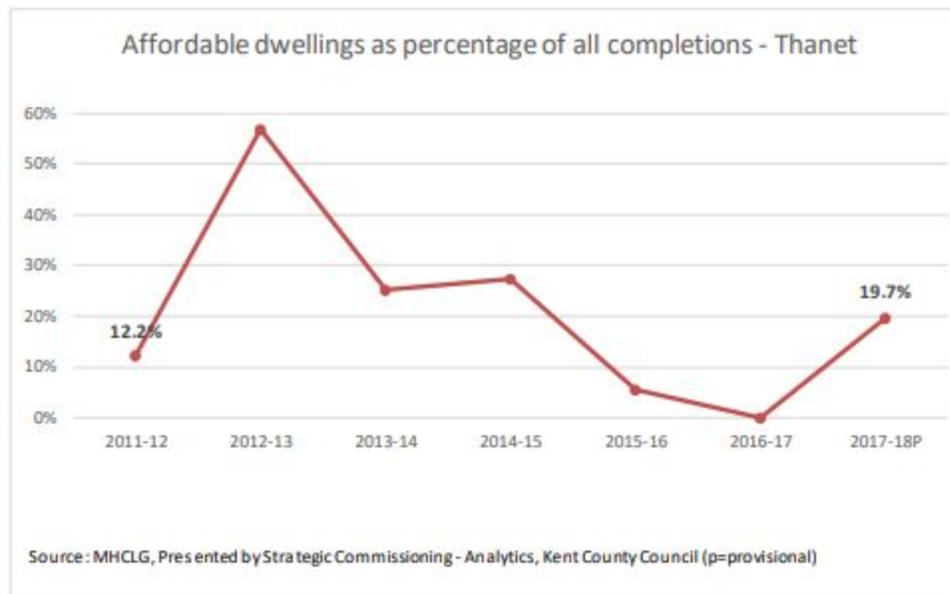
Ebbsfleet Garden City is fully supported by the UK government and the Ebbsfleet development corporation (EDC) was setup to plan and deliver 15000 homes.. The corporation handles its own planning matters and performance in housing delivery was 613 in the period 2018/19. Ebbsfleets location to roads, rail (18 minutes to East London), and support for new infrastructure and funding from Homes England, should show that housing delivery is as optimised as possible. If we compare the delivery forecasted in Thanet the amount of homes delivered will peak to 2010 dwellings in 2022/23. Thanet has many constraints to consider to deliver this volume of housing and the distance and travel times to London even with the Parkway station are not as attractive to homebuyers who would want to commute to London. Whilst house prices are cheaper in Thanet it is more expensive and less reliable (due to distance) to travel to London by rail. The road network does not encourage the use of a car either and planning should prioritise sustainable transport.. This is the reason why Thanets location may not be the most optimal to commute. It is more likely that people from neighbouring areas will move to Thanet who would have employment in Dover, Canterbury and Ashford. Other districts in Kent will be more attractive to commuters for instance the service from Ashford to east London is all high speed railway (HS1) and offers considerable time saving. Thanet is looking to improve the time to London but is not regarded as high speed on the entirety of the journey. Also we should consider that the parkway station adds further delay in that the site will be accessed mainly by the road network (especially if you live in North Thanet) if it's believable that the parkway station will promote all of Thanet to use rail transport.

Point 11: Constraints

One of the issues which is identified in the local plan is the price of affordable housing. This remains a challenge of providing homes in the local plan. Across Kent affordable dwellings on housing completions has been low in recent years, and the same can be said for Thanet.



Affordable housing in Kent 2017-18 (KCC)



Affordable housing in Thanet 2017-18 (KCC)

This graph shows that affordable housing is not being provided especially in Thanet where poverty is the highest in the region. Affordability in 2017 was at 9.35 in Thanet whilst across Kent it is 9.91.

Table 5: Affordability Indicator: House price to income affordability ratio: 2002 to 2017

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
England	4.51	5.20	6.25	6.81	7.16	7.21	6.91	6.48	6.86	6.72	6.58	6.57	6.91	7.11	7.16	7.26
South East	6.24	7.30	7.88	8.18	8.42	8.66	8.48	7.50	8.23	8.14	8.00	8.20	8.60	9.05	9.82	10.30
Kent	5.51	6.58	7.42	7.72	8.14	8.24	8.19	7.04	7.75	7.41	7.40	7.63	8.11	8.62	9.28	9.91
Ashford	5.92	7.51	7.97	8.37	8.83	9.74	7.93	7.35	8.84	8.22	7.38	7.94	8.99	9.42	9.15	9.31
Canterbury	6.40	7.27	8.09	8.82	9.29	9.59	9.31	8.03	8.65	8.16	8.09	8.27	8.54	8.83	10.12	10.97
Dartford	5.08	6.45	6.95	7.54	8.26	8.55	<i>8.21</i>	6.41	7.37	7.15	7.39	7.36	7.78	8.55	8.90	11.28
Dover	4.83	5.58	<i>6.78</i>	7.20	7.13	7.26	7.19	6.17	6.40	6.22	6.04	6.83	7.64	<i>7.67</i>	8.89	<i>8.13</i>
Folkestone & Hythe	5.34	6.41	6.94	6.88	7.01	7.36	7.50	6.13	6.51	6.61	6.81	7.48	8.34	9.07	9.68	10.66
Gravesham	6.26	7.47	7.83	7.90	8.44	8.34	8.63	6.78	7.20	7.31	7.42	8.05	8.17	8.75	9.15	10.09
Maidstone	7.75	8.34	8.90	9.31	9.22	8.95	9.10	7.81	9.49	9.27	9.86	10.18	9.56	11.91	13.37	13.34
Sevenoaks	5.37	6.20	7.35	6.93	8.33	8.72	8.69	7.92	8.17	7.92	7.04	7.53	7.72	7.66	<i>8.34</i>	8.87
Swale	5.18	5.92	6.46	6.91	7.42	6.97	7.46	6.00	6.24	6.23	6.60	6.61	<i>6.78</i>	7.44	8.50	8.75
Thanet	5.39	6.70	7.26	7.78	8.23	8.66	8.64	7.69	8.47	7.58	7.52	7.37	7.76	8.18	8.58	9.35
Tonbridge & Malling	7.13	7.72	8.31	<i>9.10</i>	8.73	9.02	9.62	7.39	8.58	8.04	8.20	8.92	10.33	9.72	11.21	11.68
Tunbridge Wells	7.09	7.93	8.94	9.10	9.47	10.34	9.83	7.70	<i>9.30</i>	8.95	8.58	8.65	8.91	10.04	11.71	11.84
Medway	4.60	5.69	6.45	6.98	6.84	7.29	6.42	5.57	6.54	6.37	6.11	6.34	6.77	7.13	8.66	9.30

The lower the ratio the more affordable the housing

Source: Office for National Statistics

Table 2c; 4c and 6c: Ratio of lower quartile house price to lower quartile gross annual (where available) residence-based earnings by country, county & local authority district, 2002 to 2017
Table presented by Strategic Commissioning - Analytics, Kent County Council

Notes:

1. House price data are taken from ONS House Price Statistics for Small Areas for the year ending September.
2. Earnings data are taken from the Annual Survey of Hours and Earnings. These figures are estimates of gross workplace-based individual full-time annual earnings where available.
3. Data for annual earnings are not available before 1999 and for some areas since 1999. For these areas the ratio of house prices to earnings has been calculated using annualised weekly earnings. These are recorded in bold grey italics.
Annualised weekly earnings are not produced on an identical basis to annual earnings and are therefore not directly comparable.

Affordable housing in Kent (KCC)

Thanets action plans describes further the issues of lower wages in the district as shown below

3.13 Although market values may be increasing and this may benefit the market, it does not assist in addressing the affordability issue. Previous analysis by the housing team show that an average house price of £241,000, is 10 times the average work based earnings. Therefore to purchase an average lower quartile house in the cheapest postcode areas of Thanet, residents would need a weekly household income of £732 (£38,000p.a.), plus savings of around £25,000. Currently 19,471 households or 29% of the population are on a low income, which is defined as less than £15,988 per annum. Mean district earnings are £462.50 per week, £24,050 per annum and median district earnings are £479 per week which is £21,554 per annum. This is within the bottom 20% of the whole of England. Only 19.12% of households are in the lower managerial and professional occupations. This presents the

challenge that more than 80% of the population in Thanet, cannot afford an averagely priced terraced house.

Paragraph 3.13 Thanet HDT action plan 2019 (Thanet Council)

Affordable need has also been explained in inspectors report CD9.17 which shows the level of local need and the amount of affordable housing required is unrealistic. If 80% of the population in Thanet cannot afford to buy an average home, and with a theoretical calculation of 37'518 homes to resolve the issue of housing need. The local plan does not do enough to supply local housing need, especially to the existing residents who live in Thanet. It seems very clear that most housing transactions are people who migrate to the area for which the level of affordability to them is unknown. Strategic Priority 3 should address the imbalance and provide affordable housing to meet local need (Plan for sufficient new homes to meet local community need so that, irrespective of income or tenure, people have access to good quality and secure accommodation.)

A) Delivery to meet affordable need in full

- 1.11 The 2016 SHMA suggests a need for 397 affordable homes per annum. Notionally this would be 7,940 homes over the 2011-31 period, assuming that the 397 is appropriate to use for the whole period (which it may not be given that the affordable needs analysis took a base period of 2015 and therefore the 397 is only appropriate thereafter). For the purposes of the discussion below a 7,940 figure has been used as a benchmark.
- 1.12 Over the 2011-31 period, the Local Plan has set a housing requirement of 17,140 dwellings and therefore the affordable need (as an arithmetic calculation) accounts for 46% of this figure. However, in reality, the Local Plan would expect to deliver less than this. For example, based on the assumption that 30% Affordable Housing is achieved through developer contributions on the requirement of 17,140 this gives a potential delivery figure of 5,142 affordable housing units.
- 1.13 If the AH percentage was reduced to 20% (which looks to be the approximate current level of delivery) this would only achieve delivery of 3,428 affordable units. Therefore, to achieve the 7,940 affordable housing need in full at a rate of 20% the housing requirement figure would have to increase to 39,700 (20% of 39,700 = 7,940).
- 1.14 This level of delivery is clearly unrealistic and would represent the provision of 37,518 homes from 2018 to 2031 (taking account of delivery 2011-18) or over 2,200 per annum. There is no evidence that such a level of housing could be delivered and nor is there any evidence that there is a market demand for the non-affordable units this would provide. Therefore, it is concluded that there is no reasonable basis to consider a specific further uplift to meet the affordable need.

Inspectors note CD9.17 (affordable need)

Conclusion

Thanet Council has tried to show a robust 5 year land supply, however it is not clear on how reliable land supply is in Thanet, and HDT2018 results have been calculated at 44% (in the top 10 worst performers in the country). The first 5 years of the local plan has not provided deliverability performance to meet the requirements and the local plan is trying to catch up. 4152 houses have not been delivered so far if we look at plan average of 857 dwellings a year, 2701 dwellings have been completed in 8 years of the plan period. There is a shortfall forming in years 5 to 10 which is 610, and a stepped approach has the task of delivering the remaining 14436 dwellings. The stepped approach does show an issue where the delivery of homes is lower than the requirement in the last 5 years of the plan (and therefore reliant on windfall completions). The peak of completions is 2010 dwellings in a given year (2022/23) but population estimates does not show this level of growth. Affordability is an issue with local people and is an issue in local homebuyer accessing the market for new build homes. I am concerned there is 12 years left in a plan period when a plan horizon should be at least 15 years. The amount of housing to be completed will need a complete change in trends to deliver 17140 houses in the plan period. The information so far doesn't allow a standard requirement of 857 dwellings PA to be sound and the Sedgefield method does not provide 5 year supply either. The only chance left is the Liverpool approach, which raises a requirement of completions never seen at least in 36 years in any given year, but not a number of years as the plan is expecting. It remains to be seen if large greenfield sites are the solution to improving new

housing performance. It should not be forgotten that there are many old brownfield sites which need redevelopment which should be a priority of the plan.

Despite the poor performance of delivery of new homes, it can be seen that Thanet does have one of the higher areas in Kent for the amount of housing transactions in a year which does show that people are buying homes in Thanet but maybe not new build housing. The local plan appears to suggest that this will turn around but not evidenced in the market data, but it does show people are buying homes in Thanet much in line to the rest of Kent.

Sustainability Assessment update

My comments on the SA update will look at some of the objectives. As can be appreciated there isn't much time to comment on the document in full, but here are my observations first.

Point 1: Section 2

Firstly there seems to be a confusion on what the omission sites are. Section 2 contains sites with policies in the local plan and is part of the Local Plan. It has been hard to separate the omitted site from the sites in the local plan. Section 2 states "To conclude, none of the sites outlined in section 2 were considered as reasonable alternatives and did not meet the criteria for allocation" this seems to me to be a mistake.

Point 2: Constraints map

The map appears to be an old allocation map, as it can be seen that Westwood village is not fully shown, and the Birchington and Westgate sites are reflecting 1000 dwellings.

The report also shows a constraints map which appears to be a new addition to assessment of sites which has not been done before. Manston airport (which is not in policy at reg 19) and the Haine road corridor. This is confused as Manston Green (which has permission) but is clear should not have been in the plan if this constraint was used. There is an issue with Manston green at present as there is an application to remove the condition relating to aircraft noise, and it was clear that the site was not considered as a constraint given that the site is in the area of manston airport and the Haine road corridor. The earlier drafts of the plan and the SA at that time did not include these constraints. This highlights to me that site selection has not been justified or effective. I cannot see any evidence in the SHLAA 2018 that shows constraints as seen in the map. Please note the SHLAA has the same date as the cabinet decision which is appendix a so did this inform the SHLAA. Also I do not see a policy in the local plan to constrain development in the areas contained in the constraints map. It is also unclear for what reason this constraint will apply at least to the north field of the airport which from what I understand will contain the Inner Road Circuit and will contain buildings to support the airports business. Do these constraints apply to windfall sites?

There is a new road and roundabout planned at Manston Green, the inner road circuit will also relieve the Haine road corridor with a new road through Westwood Village. Does this constraint need to be applied given planning policies are to provide mitigation.

Point 3: SA objectives

My general comments on SA objectives is below:

1. To provide a sustainable supply of housing including an appropriate mix of types and tenures to reflect demand.

- As been stated in the examination so far is that there are rural area development sites which encourage no affordable housing and detached houses with 4+. The site at Field House Orchard (Section 2.1) has recently been approved with 9 dwellings with 4 bedrooms each. This development does not provide a mix of housing for rural settlements, but has been granted regardless of this even with an emerging plan.
- It is noted for large sites such as Westgate and Birchington to have 14.5/ha and 18/ha respectfully the density of the site is disclosed. The overall density will need to be balanced on other developments in Thanet which may offer higher densities and there for a more effective use of land.

Section 2.32 Land North and South of Millennium Way, Broadstairs site is currently at 36 dwellings per ha, This could provide higher density housing given the area it is in and is close to services.

Section 4.3 HO6 Land south of Brooke Avenue, Garlinge, this rating is wrong as affordable housing was deemed to make the site unviable (unviable after the initial application was granted). As a result Thanet council has removed the condition for affordable housing. So no affordable housing will be delivered on this site.

2. To maintain appropriate healthcare provision and access to healthcare facilities for all sectors of society.

This objective appears not to be informed by Thanets CCGs representation (ID 1484). There is no clarity if existing surgeries will be built or expanded or if the future needs are addressed by Primary Care Homes (listed as Broadstairs, Ramsgate, Margate and Quex). Some surgeries cannot be expanded as commented by CCG below:

“The CCG has reviewed the physical quality of surgeries in its area. Of the 14 sites still operational, 2 are in the “Red” category, ie the premises are considered unsatisfactory with an identified need to improve facilities. 6 are graded “Amber”, ie premises are considered satisfactory but some areas of potential improvement have been identified. Premises in the “Red” and “Amber” category account for 57% of the total sites in Thanet CCG’s area. There is therefore a defined need to further improve the quality of the premises from which primary care is delivered and to increase capacity to cope with existing need. The expected rise in demand for primary care services from the growth in new housing developments will inevitably add further strain to the ageing estate.”

and

“Although this response concentrates primarily on the physical premises requirements needed to cater for the additional patients expected in each locality, it is also important to note the current crisis facing GP recruitment and retention in Thanet as a whole. Many GP practices have unfilled healthcare professional vacancies, and without a sustainable workforce, the future delivery of primary care services remains at risk.”

This issue to me applies to all sites in Thanet where it is unknown on how future medical provision will be catered for and does not explain the strain of existing services and how that could be mitigated given what what the CCG has said.

It is noted that some sites was showing negative effects purely based on location only, the issue of providing medical provision isn't simply addressed by locating near an existing surgery. The NHS is looking at centralising new GP practices in 4 areas in the future but is unclear on its delivery or need.

Sites identified for negative scores which are allocated in the local plan

Section 2.6 “land at shottendane farm”

Section 2.14 “Land at Manston Green”

Section 2.21 “Field adjacent to St. Peter’s Road” however the site is close to a number of primary schools and has spare capacity

Section 2.29 “Westwood Village 2”

Section 2.32 Land North and South of Millennium Way

Section 3.12 British Gas Site, Boundary Road, Ramsgate

Section 3.30 Lanthorne Court, Broadstairs
Section 3.31 Thanet Reach Southern Part, Broadstairs
Section 4.1 HO3 Land on west side of Old Haine Road, Ramsgate
Section 4.2 HO4 Land fronting Nash Road and Manston Road, Margate
Section 4.4 HO7 Land at Haine Road and Spratling Street, Ramsgate
Section 4.7 HO12 Land at Tothill Street, Minster
Section 4.10 HO15 Land south side of A253, Cliffsend

3. To provide access to appropriate educational facilities for all sectors of society including focus on training vulnerable and welfare dependant workers with skills necessary to ensure year round employment.

The provision of education is consulted to KCC where a contribution is made, both in land and in S106 agreements. It is unclear if the SA explains if education provision can be made unless there is land to develop new facilities (which is also policy on by assumption). The location of schools is not always a consideration in providing educational services as there is unmet need in existing schools. I am not sure the SA would be informed on the yearly changes in school places and capacity. In respect to adult education, this is primarily provided in existing facilities in the Main towns in Thanet, so transport options are probably more of a consideration. Would the assessment also include university education which is served locally at the University of Kent and Canterbury Christ church which are both located in Canterbury?

Sites identified for negative scores which are allocated in the local plan

Section 2.6 "Land at shottendane farm"
Section 2.29 "Westwood Village 2"
Section 3.30 Lanthorne Court, Broadstairs
Section 3.31 Thanet Reach Southern Part, Broadstairs (This is disputed as the site is close to a number of primary and secondary schools, all within walking distance)
Section 4.1 HO3 Land on west side of Old Haine Road, Ramsgate
Section 4.2 HO4 Land fronting Nash Road and Manston Road, Margate
Section 4.4 HO7 Land at Haine Road and Spratling Street, Ramsgate
Section 4.7 HO12 Land at Tothill Street, Minster
Section 4.10 HO15 Land south side of A253, Cliffsend

4. To increase public safety and reduce crime and fear of crime.

Im not sure the comment stated in some sites is true. "On larger sites, construction activity is likely to result in short term anxiety amongst existing residents due to site security and potential anti-social behaviour. However, new housing provides opportunities to create modern secure dwellings that offer people safe and comfortable homes."

All housing development should follow secure by design principles and is consulted by Kent police.

The application for Manston Green development was approved even when Kent Police had no contact from the developer to discuss concerns on the design.

It appears when determining planning applications this objective does appear to be considered.

5. To provide appropriate key facilities to support vulnerable people and reduce the level of deprivation identified across the wards

This is unclear in that KCC is reducing facilities in the area and bus services. Thanet council is also reducing local services. It is maybe possible that contribution may need to mitigate the effects of the development of the site. It cannot be simply assumed that existing services in towns are of a good standard.

6. To create vibrant balanced communities where residents feel a 'sense of place' and individual contribution is valued.

This is not fully understood especially with the larger strategic allocations in the plan. Westgates development will need to create a new centre for the development as the distance to the town centre could be too far by walking (especially for the elderly). Car parking could be an issue here also.

Westwood has a problem in a sense of place as the site doesn't appear to have a centre of town unless the shopping centre is what the Council thinks is the centre. The developments towards salmstone and Westwood village are separate areas of development, and it's not clear what Westwood is as a place to live. There seems to be some confusion if Westwood is actually a new town or an extension to Margate, Broadstairs and Ramsgate, whilst Manston Parish council parish area covers a large area on Westwood.

The south west site (the quex park side) of Birchingtons allocation could be isolated by the link road and the larger development at Minnis, it is not understood how these sites will interact in the masterplanning.

7. To provide access to employment opportunities for all sectors of society ensuring that everyone who wants to work has the opportunity to secure appropriate paid employment.

This is unclear as the impact of Manston airport will make a large change to the employment evidence and this has not been evidenced on the effect of this. Thanet Parkway station is a key priority but to what effect for all of Thanet. Thanet also has a number of train stations which currently exist and is a path already to improve employment opportunities. The balance between new jobs and population suggests that most people will have to work outside Thanet.

8. To ensure the sustainable development of the proposed economic growth and encourage employment development at key sites within the District to support priority regeneration areas.

It is not clear on the effect on regenerating old brownfield sites and could risk their viability. The use of greenfield land could undermine this.

9. To protect and enhance the areas natural, semi-natural and street scene to support the tourist economy.

It is not clear on the effect on regenerating old brownfield sites and could risk their viability. The use of greenfield land could undermine this. The urban areas are increasing, and it's unclear on how new development will produce a net gain to biodiversity and the rural feel of Thanet in the new allocated areas. The tourist economy is based on the regeneration of Margate, it's also unclear how new sites will deliver

this. In Ramsgate it is not known how the pleasurama site will be developed, and this does have an effect on the tourist economy. The wetherspoons pavillion regeneration has created a large positive effect for the area.

10(a). To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.

Section 2.3 Land at Westgate The proposed allocation is for a relatively low – medium density development on a greenfield site, currently in agricultural use. As such it is a relatively inefficient use of land.

Section 2.20 Land South and West of Birchington The proposed allocation is for a relatively low – medium density development on a greenfield site, currently in agricultural use. As such it is a relatively inefficient use of land.

Section 2.32 Land North and South of Millennium Way, Broadstairs site is currently at 36 dwellings per ha, This could provide higher density housing given the area it is in and is close to services.

Regeneration of old sites and significant buildings would

10(b). To reduce the impact of development on Best and Most Versatile agricultural land

The cumulative effects of all sites allocated is not a consideration, and economic losses to agricultural activities are not considered. No general assessment of BMV has been made evidenced against ALC classification.

Section 2.20 Land South and West of Birchington, shows loss of agricultural land between .5% and 2% (1.42%)

Section 2.3 Land at Westgate, shows more than 2% (3.17%) of the loss of agricultural land
Between these 2 sites 4.5% of Best and most versatile agricultural land is lost. Thanet is already 27% developed and there has been significant loss to agricultural land to the district, especially compared to bordering authorities. Agricultural land is becoming more scarce in Thanet and is a finite resource. Thanet council has made no assessment of the economic losses of agricultural land.

There has been no assessment on the sites used for growing biofuels which are sustainable forms of energy generation which does mitigate the use of fossil fuels in power generation. The loss of this resource is unknown and is lacking in strategic priority 4. (Use natural resources more efficiently) Thanet council has recently also declared a climate change emergency.

Section 2.23 "Land at Little Brooksend Farm" Is close to a flood area but is not known for land quality in comparison to other sites.

Another positive benefit is the agricultural land in landscape:

(3) Importance of sea and agricultural land in local landscape

The sea forms a particularly striking feature of the Thanet landscape. The Survey revealed, and in some cases confirmed, its importance as a backcloth to the urban and agricultural areas, and as a very significant landscape feature in its own right. This particularly true since the character of the sea alters with seasons and weather conditions.

Isle of thanet Landscape survey 1993

11. To ensure that a sustainable pattern of development is pursued.

This can be secured by good design principles which may not be site dependant.

12. To conserve and enhance the character and quality of the area's landscape and townscape particularly associated with town centres and coastal areas.

This can be secured by good design principles which may not be site dependant.

13. To preserve and enhance sites, features and areas of historic archaeological or architectural importance, and their settings.

Section 3.27.5 Haine Farm, Haine Road (adjacent to Eurokent Business Park), Ramsgate. This site contains a historical asset and is grade 2 listed. Entry number 1068554 (HAINE FARMHOUSE, HAINE ROAD)

Section 3.23 Part of Pysons Road Industrial Estate, Broadstairs. This site may contain the remains of a former Ramsgate Municipal Airport, one building is still standing as part of this site. Whilst the building may not have a visual presence it is part of an early airfield.

Section 3.4 Margate Delivery Office, 12-18 Addington Road, Margate. Its unclear if this site is on a local list and if the current building should be protected for architectural style. The SA does not suggest this.

14. To improve air quality in the District's Air Quality Management Areas.

Section 2.20 (Land South and West of Birchington) does not describe the effect of development at Birchington square. It should be commented that alternative road links is pivotal to mitigating the poor air quality. It is unclear if these objectives are policy on or not.

15. To provide a sustainable public transport network that allows access to key facilities, services and employment opportunities without reliance on private vehicles.

Thanet currently has a number of train stations across the district and generally connected to public transport. However Thanet does generally create a large amount of car traffic, especially for tourism and this doesn't seem to be considered, only to build more roads towards Westwood and Margate.

16. To develop key sustainable transport links between Thanet and the wider Kent region and beyond, including road, rail and air.

The constraint of the Haine road corridor does not appear to have been commented on Section 2.14 "Land at Manston green" and there are no red negative scores in relation to this, only to healthcare.

17. To reduce waste generation and disposal and achieve the sustainable management of waste

No comment

18. To ensure development within the District responds to the challenges associated with climate change.

No comment

19. To ensure appropriate development control procedures in place to manage the risks of coastal erosion, coastal and fluvial flood risk, in accordance with NPPF.

20. To conserve and enhance biodiversity.

Site survey does not appear to consider functional land, and wintering birds which needs to be assessed. There is no mention of wildlife corridors and bat and other ecological factors which could be significant to the site. Large sites may attract more mitigation especially on the urban edges.

Section 3.29 The Foreland School, Lanthorne Road (14 dwellings). Biodiversity should be enhanced and density of development should be lower as the site may have biodiversity and ecological benefits existing and could be part of an existing wildlife corridor for the area. Personally i would like to retain this as a open space or as a community area/garden. Im not sure full urban development of this site is desirable.

21. To protect and improve the quality of fluvial and coastal water resources, including European designated sites

No comment

22. To reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products.

It can be argued that the loss of agricultural land shows a loss to this objective generally with no mitigation in this effect.. This doesn't seem to be assessed in this way in the objective.

23. To increase energy efficiency and the proportion of energy generated from renewable sources in the area.

This comment appears in most of the sites, "New development at this scale provides opportunities for energy efficiency, such as those associated with current Building Regulations, to contribute towards a

reduction in energy consumption in Thanet. Effects would be further enhanced if small scale renewable energy technology could be employed on site.”

However it's not commented on the orientation of the site to fully assess PV cells, and if there are other schemes such as district heating or solar farms nearby.

Design of housing is important on this objective.

The site at (Section 2.12) Land to the rear of Flete Lodge rates as neutral but is close to one of Thanets solar farms.

Section 2.22 382 Northdown road, this development could encourage higher density and also communal facilities, encourage PV cells and combined heating systems. This site could possibly have a better score.

Other bespoke comments:

- 1) Section 2.20 (Land South and West of Birchington): Shows dwellings of 1500 and not 1600 under SP14. It is stated that “The proposed development is large and will consist of low density housing” is this the most effective use of land, especially when the land is listed on ALC as Grade1/2 and will be lost.
- 2) Section 2.53 Former Gasholder Station Site whilst planning history has deemed this unsuitable. The site itself should be available to be developed as it will be reusing previously developed land. Thanet council maybe should look at this site to assess if this site is viable and if external funding could be used.
- 3) There are sites where they may affect the Haine corridor which has been shown as a constraint “Further development would overload the Haine Road corridor and impact the functional operation of Parkway Station.” At what point is the parkway station affected by an increase of traffic? Other questions on this.:
 - is the station at the right location?
 - What is the effect of traffic from the large sites at the north of Thanet (SP13/14) in that the parkway station is deemed to a positive effect for people from these sites to commute to London?
 - Doesn't the inner road circuit provide relief and mitigation for the Haine corridor?
 - Does the new link road and roundabout at Manston green improve the Haine corridor or not.
 - Does the development at Manston Green and at Westwood unsustainable from a Highways point of view on the Haine Corridor
 - Is walking routes to the parkway station an ineffective path from Cliffsend.
 - It appears that the site on section 2.66 “land west of Chilton School”, “Outline consent has been granted for a small development of 14 dwellings (OL/TH/16/1416). Any further development would have a detrimental impact on the Haine corridor”. The site is for 100 dwellings. Looking at the map there are a number of developments which are not on the constraints area but would use the Haine corridor. What is the highways assessment of the Haine corridor? why isn't there a policy to put the constraint to stop windfall sites? Also at what point will the road be constructed from Westwood village to mitigate the development in that area and what contributions will be made to make that link funded. There is no mention of pinch points in the inspectors report CD9.33 on the haine corridor or how development will affect the road network. How will the roundabout replacement at Manston green affect the Haine corridor, and what time and phasing?

- 4) Birchington Medical Centre has been inspected recently and is rated as "Needs Improvement" Report available at: <https://www.cqc.org.uk/location/1-570707811/inspection-summary#overall>
- 5) Section 3.20.1 Land at Queens Arms Yard, Duke Street/Market Street, Margate, Is this site deliverable in the plan period. An application has expired.
- 6) Section 3.21 Former Club Union Convalescent Home, north of Reading Street, Broadstairs (24 Dwellings) Site is allocated but has a large history of applications refused and appeals failing. The SA does not cover the history of this site. This site is also under a current consultation for the Broadstairs Neighbourhood plan and the green local space issue may be called into the secretary of state. Further information is required on why this site is allocated, is the site deliverable? Section 3.21.5 is not correct on the description of consideration. I am concerned that this site has been predetermined and hindering neighbourhood plan making.
- 7) Section 3.28 Land off Northwood Road, Ramsgate (45 dwellings), this site has been allocated in the Local Plan S536, but the site Land North and South of Millennium Way has been omitted (section 2.32). The SA should read much the same objectives as the sites are linked together. The objection in examination by the land owner appears to be justified. SA objective 2 seems to show a different rating between the 2 sites. Healthcare facilities for the entire plan should be effective and the sites should be listed as part of a strategic objective to ensure that the migration is made. SA objective 4, 8, 9, 10a, 10b, 13, 16 and 23 rates better on the larger site. Omitted site under section 2.32 should be considered as an allocated site, a site which could afford a higher density. The two sites would complement each other and should be considered together in the overall design/masterplan. Section 3.31 (Thanet reach southern part) is part of one of the sites and has an additional section of land on the map. It appears that the 3 sites should be considered together as a single allocation or policy specific to the area. Health care and education rate badly, however the sites are near primary and secondary schools, there is a large inconsistency on the SA on these sites, some of these sites are rated as negative (red) St Georges school is a primary and secondary school both built recently and the location would be high on access to those locations. The northern site under section 5.2 Thanet Reach is also listed for employment use. I presume the negative rating on SA objective 1 is due to the fact that the site should be deemed for housing and not for employment use.
- 8) Section 4.4 HO7 Land at Haine Road and Spratling Street, Ramsgate, an application has been applied for and granted, and is directly on the Haine road corridor. The application was granted in October 2018 after the cabinet decision as shown in appendix a of the SA. Planning committee decisions are not taking on the advice by cabinet or the Local Plan manager. This does suggest that windfall sites will be treated differently in the future and may create highway issues if not determined correctly, this does potentially undermine strategic objectives and policies.
- 9) Section 4.7 HO12 Land at Tothill Street, Minster (250 Dwellings). It is understood that there is a issue with protection of groundwater sources which may limit the sites capacity for development. Does the SA look at the issues of groundwater source protection zones? MAP 5 of the local plan shows these areas. This site sits directly over a Zone 1 (inner protection zone) This can affect the suitability of delivering a site, and so should be part of the site selection process, it appears

the SA has not identified this as an issue, however it mentions that policy HO12 would mitigate this, the wording should be stronger on this issue and consultation with the environment agency must be taken. The policy HO12 does not appear to be effective.

- 10) Section 5.3 the SA only covers the sustainability from an employment land perspective and not of one for housing. The site is also partly in the haine road corridor constraint map, its unclear what effect this whole site will affect on the road corridor.
- 11) In regards to the Haine corridor as highlighted on appendix a, the determination of the haine corridor was unknown in that the inner road circuit has been planned across the northern site of the airport and what effect this would have had on Policy SP18 and transport modelling. It is unclear to me if the inner road circuit will improve the capacity of the haine road corridor. The constraint of the Haine road corridor is unclear on how effective this will be in the plan.
- 12) Section 2.17 Land at former Laleham Gap school, shows 10 dwellings but the planning application states 70 dwellings and has been granted.

Comments on ecological advice appendix B:

In respect to KCCs ecological report:

The statement of common ground with Natural England is noted and SP27 will be amended to look at farmland (groundnesting) and wintering birds. Natural England has removed the 400m distance from development sites. It has been found that functional land can vary due to cropping patterns and comment from Natural England is that they are happy with SP12 and SP27. However I do welcome the recommendation to provide a strategic mitigation strategy. From the HRA it can be seen that Golden Plover and lapwings are sighted on or near the strategic sites, to monitor to gain more information on the effect development may have and mitigation can be improved for the future.

The site "Land at Westgate" may take time to understand from an ecological perspective what the effect of development will cause. The phasing of the site as highlighted from the 5 year land supply contained in this document is due to start 2020/21. Considering that bird surveying can take place in certain parts of the year its possible that this could take some further time to complete the survey. It is possible that the first delivery of housing at Westgate could be too soon in the phasing timetable.

Likewise the "Land South and West of Birchington" could suffer a similar time constraints and design of the housing may need to reflect the presence of bats and reptiles (bats are witnessed in my location often).

Section 2.17 Land at former Laleham Gap school shows 10 dwellings, permission for a possibility much larger site has been granted for 70 dwellings. The KCC ecology reports (in the SA report) shows below:

Land at former Laleham Gap school, Northdown Park Road, Cliftonville Margate, CT9 2TP (Clifton Primary School site)		Amenity grassland field which is adjacent to an area of unmown grassland and there are hedgerows along the eastern and western boundaries. Part of this site had previously been proposed to be used as a reptile receptor site so any development will have to demonstrate that it will not impact on the reptile population and will retain and enhance it. Ecological surveys required.	2
Land at former Laleham Gap school, Northdown Park Road, Cliftonville Margate, CT9 2TP (Laleham Gap School Site)		Unmown grassland field with hedgerows along the eastern and western boundaries adjacent to a known receptor site so reptiles may have colonised the site since it has been left unmown. Ecological surveys required.	3

Planning application F/TH/14/0518 has released condition 8 which is summarized below.

- v) Initial aftercare and long-term maintenance (where relevant).

Playing field receptor site

There is no requirement to enhance the slow-worm area in relation to the reptile mitigation strategy. The small population found on the current planning permission will be relocated off site to a suitable receptor site located at North Down Park.

External receptor site

Initial aftercare would be by ecologists working, on behalf of Herpetologic Ltd, with the community garden volunteers to provide advice, training and support in survey, habitat management and enhancements for the first two seasons.

Long term maintenance would be achieved by the community garden volunteers and staff taking on the role of monitoring the relocated slow-worm population with guidance and help, from staff and contractors, from Herpetologic Ltd.

This part of the reptile mitigation strategy ensures that reasonable effort has been taken to avoid harm (killing or injury) to a small proportion of the slow-worm population at the former Laleham Gap school. In order to provide a conservation gain from the strategy areas of reptile habitat need to be maintained for the foreseeable future.

External habitat compensation

To provide a conservation net gain arrangement have been made with the Thanet Countryside Trust to manage reptile habitat at two locations – Monkton Nature Reserve and Dene Valley Woodland Project. Agreement has been reached with the Trust. Further meetings are planned to agree where management will take place.

Suitable habitat will be managed over the winter months in 2017, 2018 and 2019. In conjunction with Thanet Countryside Trust and following their management plan for the Dene Valley Woodland.

A contribution will be made to the Thanet Countryside Trust by Herpetologic Ltd on behalf of the applicant through the agreed follow up management and monitoring strategy fund.

*Herpetologic Ltd
October 2017*

What appears to be unclear is what net gain has been made on the local site? it appears to have been moved to an existing site in Monkton which is an area miles away from the site and the impacts on the overall area Cliftonville is unknown. It also appears that this decision was not made by KCC or concluded

by them. What appears is that the ecological site has not been expanded for the long term future in the Cliftonville area for which connections to the various parks (Nature Corridors) may have been lost.

Furthermore the local plan does not appear to understand the loss of ecological land and what would be required by a net gain, how is this measured and monitored. Thanet is a densely populated area and the plan appears not to look at the movements of our natural wildlife within the urban areas. The development of the former Laleham Gap school (for which KCC was the former land owner) appears to have lost local biodiversity which may have been gained by using a local receptor site which would have been managed by KCC. It is unclear why KCC was not used in this application process or was part of the consultation on what would have been suitable.

In respect to Southern waters consultation:

Land at Westgate, may require time to prepare the site for upgrades and installation of new sewers and to be informed by the Design of the site layout, there is also a consideration on how the site is phased which could also be affected by the building and expansion of the transport infrastructure. This is another concern that the delivery of housing maybe too soon in the phasing.

In respect to Land South and West of Birchington, SP14 may need to be updated to be effective to take on the 15 meter gap for the pumping station at Minnis road as it is site specific.

Conclusion: There has been some issues in the rating of the SA as I have listed above. The SA does highlight issues with healthcare provision (objective 2) and education (objective 3). This has included sites that have been granted permission, and maybe an allocated site or a windfall site. It appears that objective 2 and 3 requires some further work on policy and consultation on what can be done to mitigate these issues.

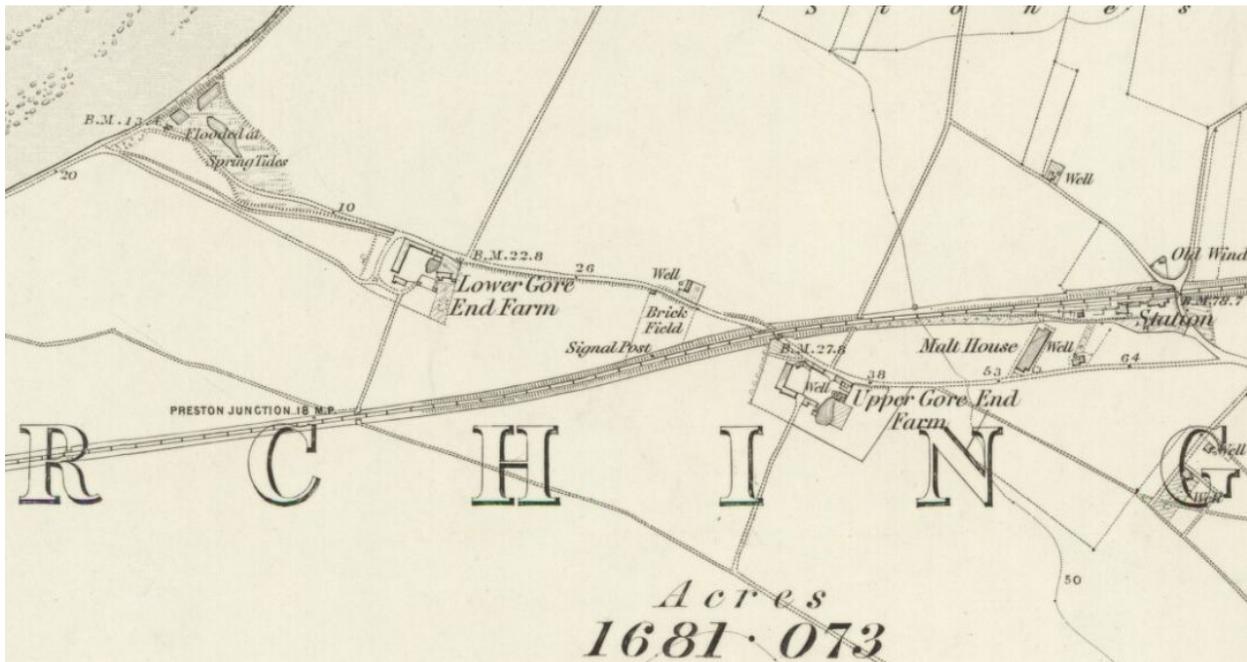
The SA objective for agricultural land (10b) and redevelopment of land (10a) is a useful indicator but unfortunately assesses the losses site by site. The local plan does promote the use of greenfield development and the loss of the best and most versatile agricultural land is still unknown cumulatively across the whole plan. ALC has not been considered to determine if lesser land quality is available (which could determine a sites suitability) and the economic benefits of the agricultural economy is unknown. Thanet council has not assessed the loss of farmland, and considering Thanets heritage is rich in agriculture it is an important element in people's sense of place as well as the climatic benefits sustainable farming and carbon retention. It is unclear to me in how NPPF 112 is applied in the site selection process and also in phasing. 112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality". The sites of Birchington and Westgate are used extensively for growing all kinds of crops and biofuels,

Heritage Assets.

Comments from the inspectors note on heritage assets.

SP14:

It is unclear what Gore Court is, I have asked Birchingtons Heritage centre on this and Gore Court is not known either. However the history of the 2 farms (Lower and Higher) is regarded as the first settlement in the area, this can be seen in the map below which was published in 1877. The setting of Upper Gore Farm as it stands today needs to be respected for the landscape and the heritage asset itself (listed as grade 2 entry number 1390632). The PROW was linked to the lower Gore farm (as can be seen in the map) and I will presume this PROW is what the access track refers to.



Map Published 1877

Looking at an old landscape survey the viewpoints look outwards from Gore farm which may indicate the open countryside which is referred to in the report.



Landscape view points 1993 Isle of Thanet Landscape survey (Thanet Council)

Further comment on

From The History and Topographical Survey of the County of Kent: Volume 10. Originally published by W Bristow, Canterbury, 1800.

“NORTHWARD from Minster lies the parish of Birchington, adjoining to the sea. It is said to have been antiently called, sometimes Birchington in Gorend, and at other times Gorend in Birchington, from a place called Gorend, in this parish, where it is reported the church formerly stood, though the most usual name was always, as it is at present, Birchington only.”

Gore end does have an importance to the area and should be respected in the design of SP14 including the landscape qualities. Gore end was formerly protected as can be seen below.

POLICY CL3

ANY LANDSCAPE IMPACTS WHICH BECOME APPARENT IN DEALING WITH NEW DEVELOPMENT PROPOSALS NOT LOCATED IN THE SPECIAL LANDSCAPE AREA WILL BE TAKEN FULLY INTO ACCOUNT. WHERE LOCAL OR OTHER IMPORTANT LANDSCAPES OR LONG VIEWS ARE LOST OR INTERRUPTED AS A RESULT OF SUCH DEVELOPMENT, PLANNING CONSENT WILL NOT NORMALLY BE GRANTED.

THIS POLICY WILL BE APPLIED WITH PARTICULAR EMPHASIS IN THE FOLLOWING LOCAL LANDSCAPE AREAS:

- (1) GREEN WEDGE POLICY AREAS;
- (2) SHOTTENDANE VALLEY MARGATE;

- (3) GORE END BIRCHINGTON;
- (4) DENT-DE-LION WESTGATE;

IN SUPPORT OF THIS POLICY, THE DISTRICT COUNCIL WILL, IF NECESSARY, CONSIDER THE USE OF ARTICLE 4 DIRECTIONS TO RESTRICT PERMITTED DEVELOPMENT RIGHTS WITHIN LOCAL LANDSCAPE AREAS.

Isle of Thanet Landscape assessment (1993)

H02: As seen above reference to the area known as Shottendane Valley may refer to the setting of Shottendane farm.