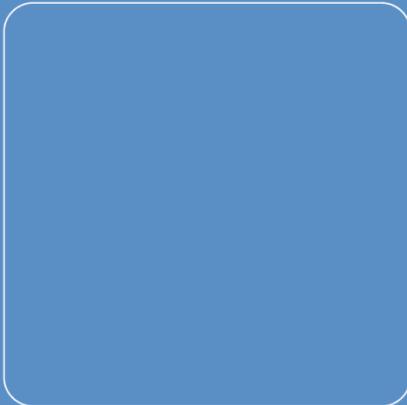
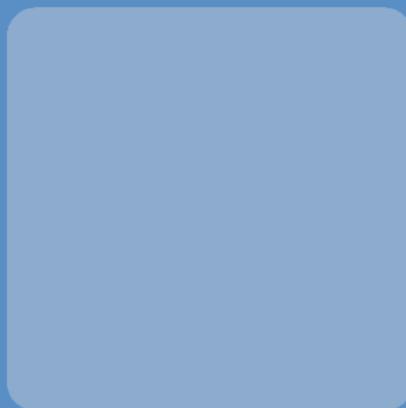


RPS

Thanet District Local Plan: Review of
Future Housing and Employment Growth
and Capacity for Development

On Behalf of RiverOak Strategic Partners
Limited

January 2018



**THANET DISTRICT LOCAL PLAN:
REVIEW OF FUTURE HOUSING AND
EMPLOYMENT GROWTH AND
CAPACITY FOR DEVELOPMENT**

**ON BEHALF OF RIVEROAK
STRATEGIC PARTNERS LTD**

JANUARY 2018

Date : January 2018

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EXECUTIVE SUMMARY

The National Planning Policy Framework (NPPF) requires that Thanet District Council (TDC) makes necessary provision for expected increases in housing and employment growth in the District, which should be made through the production of a Local Plan.

The Council is currently preparing a Local Plan for the period 2011-2031, which has already been through a number of stages of pre-production and is expected to be submitted for Examination in 2018. The latest document, dated January 2017 makes a number of assumptions on the forecast housing need and the availability of housing land in the District including, for the first time, the Manston Airport site to be released for residential development. RPS considers that the Manston Airport site should instead be retained for aviation use, as a key strategic infrastructure site in the sub-region.

In coming to this conclusion, RPS has undertaken an assessment of the Council's likely housing need requirement against what is set out in the Council's 2016 Strategic Housing Market Assessment Update January 2017 (17,140 dwellings) and based on the emerging 'standardised' methodology for calculating housing need as provided by Government (21,260 dwellings).

Set against these potential figures of housing need, RPS has interrogated the Council's sources of housing land supply, including the 2013 Strategic Housing Land Availability Assessment (SHLAA) and new sites submitted as part of the consultation to the Local Plan process to date. In the January 2017 Local Plan consultation, the Council proposes a total housing need of 17,140 units over the period 2011-2031. The assessment by RPS indicates that the potential housing land supply could support a significantly higher figure of 24,736 units. This supply represents 144% of the Council's current housing target, and would also be able to accommodate the housing need figure generated by the emerging methodology proposed by the Government. Consequently, and in removing the Manston Airport site from the available supply of housing land, the amount of housing land that is available could still accommodate 105% of the housing needed when measured against the higher housing growth targets predicted by the Government. It is acknowledged that the Council is preparing an updated SHLAA in 2018 and it is considered that this assessment can assist in the evidence base for that assessment.

RPS has also undertaken an assessment of TDC's employment targets given the relationship of housing growth to employment need. TDC's new Local Plan is one of the Council's key strategic tools in enabling economic growth and regeneration. It helps to deliver the Council's economic strategy as set out in the Council's Corporate Plan – that is to grow and achieve greater economic prosperity for the District; seeking opportunities for inward investment and high quality job creation and working with partners to ensure that the right skills, infrastructure and plans are in place. This is set within the context of the economic growth aspirations for the District as part of the wider East Kent sub-region as promoted by a number of organisations including Kent County Council and the East Kent Local Economic Partnership. RPS considers that the expected forecasts in employment as set out by the Council are out of date and do not reflect the ambitious economic aims for the sub-region including the importance of planning for strategic infrastructure proposals which will stimulate economic growth.

This is an important strategic objective and RPS query whether the Manston Airport site is actually needed by TDC for housing land as part of the proposed Local Plan, given the strategic importance attached to the Airport site and how retaining it in aviation use will contribute significantly to realising the economic potential for the sub-region. The findings prepared by RPS indicate that there is sufficient deliverable housing land capacity in Thanet District, which is capable of delivering the Council's housing need between the period 2011-2031, including a sufficient buffer for flexibility, should the housing need numbers increase as part of the Local Plan Examination. RPS is of the view that there are a number of additional potentially deliverable and sequentially more preferable housing sites in the District which should be explored before proposing the Manston Airport site for housing redevelopment, in order to safeguard the airport as a strategic infrastructure asset.

1 INTRODUCTION

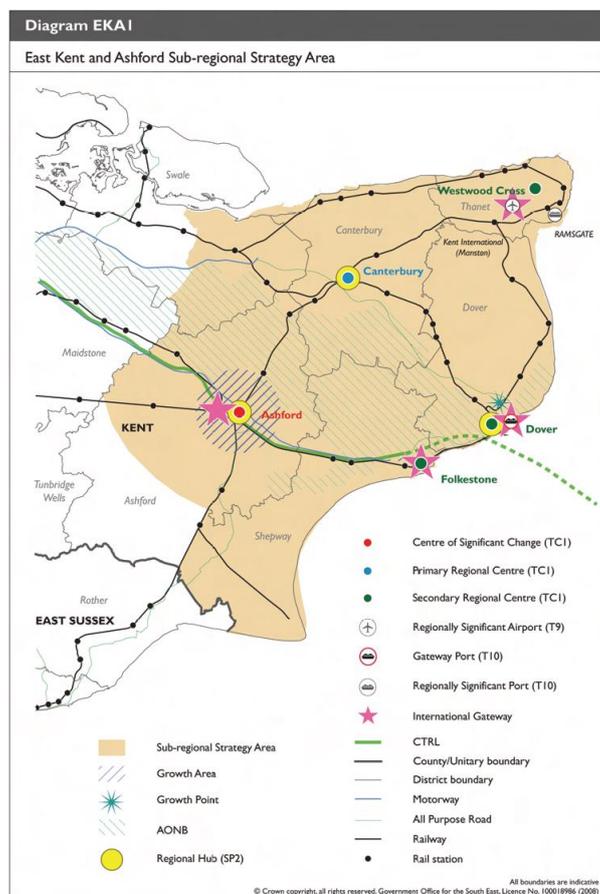
- 1.1 This report has been prepared by RPS Planning and Development (RPS) on behalf of RiverOak Strategic Partners Ltd (RiverOak) and should be read alongside previous work prepared by RPS in respect of the promotion of Manston Airport through the Local Plan process.
- 1.2 The purpose of this report is to consider the current positioning of Thanet in East Kent and what is expected from the District in terms of housing and employment growth. In particular, the report considers the alignment of housing and economic growth, to understand where there might be current irregularities in housing and employment land supply and what impacts this will have for local plan making.
- 1.3 RPS has also undertaken an assessment of the Council's deliverable supply of housing land which, in the absence of an up-to-date Strategic Housing Land Availability Assessment (SHLAA), takes a view on the Council's likely housing land supply. It is acknowledged that the Council is preparing an updated SHLAA in 2018 and it is considered that RPS' assessment can assist with the evidence base for that assessment.
- 1.4 The findings of this assessment are especially important for the consideration of whether the Manston Airport site is needed by the Council for housing land as part of the proposed Local Plan, or whether given the strategic importance of the Airport site, it should be protected for aviation uses and other deliverable sites should instead be utilised to enable the Council to address its housing need as expressed in the emerging Thanet Local Plan.
- 1.5 The findings prepared by RPS indicate that there is currently sufficient deliverable housing land capacity in Thanet District, which is capable of delivering the Council's housing need between the period 2011-2031, including a sufficient buffer for flexibility, should the housing need figures increase as part of the Local Plan Examination. RPS is of the view that there are a number of additional potentially deliverable and sequentially preferable housing sites in the District which should be explored before proposing the Manston Airport site for housing redevelopment, in order to safeguard the airport as a strategic infrastructure asset.
- 1.6 In summary, RPS considers that there is currently a disconnect between the Council's provision of housing and employment supply, that will lead to disproportionate and unsustainable growth. RPS considers that it is necessary for the Council to retain Manston Airport for aviation purposes as this would contribute significantly towards the wider economic growth of the District and to achieving the strategic economic objectives of the sub-regional East Kent Growth Framework.

2 ROLE OF THANET IN EAST KENT

Background

- 2.1 Thanet District is a coastal authority located on the eastern-most tip of Kent County, bounded by Canterbury and Dover to the west and south and the North Sea to the north/east. Thanet District Council (the Council) is currently preparing a new Local Plan for the District. In addition to the current evidence base, it is also worth considering how Thanet has been viewed previously, in a sub-regional context, within the 2009 South East Plan (2009 SEP).
- 2.2 As part of the 2009 SEP, Thanet District has been considered as part of the wider East Kent and Ashford Sub-Regional Strategy Area, alongside authorities of Dover, Canterbury, Shepway and parts of Ashford/Swale. The purpose of this grouping was to provide a framework to support Ashford as a major growth area, whilst also building upon the distinct economic bases of the coastal towns in the Sub-Regional Strategy Area in order to develop their international gateway roles and enlarge their manufacturing base. The map of the Sub-Regional Strategy Area is illustrated in Figure 2.1 below.

Figure 2.1 Plan of the East Kent and Ashford Sub-Regional Strategy Area;



Source: Excerpt from 2009 South East Plan

- 2.3 This map also cross references other policies in the 2009 SEP, highlighting the location of the Kent International Airport (Manston Airport) as part of Policy T9. In terms of what this policy indicated, the 2009 SEP stated that there should be support for an enhanced role for Kent International Airport, as an airport of regional significance. The airport was recognised as an International Gateway.
- 2.4 The 2009 SEP was formally revoked in February 2013 following the move to abolish Regional Government, to be replaced by the National Planning Policy Framework (NPPF) as the strategic direction for local plan making. More recently, Thanet Council has been included within the wider South East Local Enterprise Partnership (SELEP) which acts as the replacement mechanism for the South East Regional Spatial Strategy (SERSS), to drive forward economic growth in the sub-region as part of an interconnected strategy.

Figure 2.2 Extent of South East Local Enterprise Partnership



Source: South East LEP: Growth Deal and Strategic Economic Plan. 2014

National Planning

- 2.5 Following the dissolution of Regional Government, the mandate for strategic growth has been placed back with Local Authorities, following the publication of the NPPF. The NPPF advises that plan makers should prepare a Strategic Housing Market Assessment (SHMA) to “*assess their full housing needs, working with neighbouring authorities were Housing Market Areas (HMAs) cross administrative boundaries*” (paragraph 158) and “*have a clear understanding of business needs within the economic markets operating in and across their area*” (paragraph 160).

2.6 The Government has since published the online Planning Practice Guidance (PPG) which elaborates on how, in practice, each of these functions will be undertaken.

Establishing the Housing Market Area

2.7 The PPG advises that HMAs are geographical areas that are defined by household demand, reflecting areas where people might live and work. There is currently a discrepancy within East Kent as two Local Authorities are presenting different approaches to defining the Housing Market Area (HMA) in their SHMAs, both of which were published in a similar timeframe:

- East Kent HMA = Thanet, Canterbury and Dover (Thanet District Council, December 2016 SHMA); and
- Dover and Shepway HMA (Dover District Council, February 2017 SHMA).

2.8 It is noted that Dover DC has submitted representations to the emerging Thanet Local Plan objecting to Thanet District Council's approach towards the definition of the HMA. In particular, Dover DC and Shepway DC disagree with the findings of the Thanet SHMA and do not consider that there is any shared housing market linkages with Thanet. Dover DC does have discernible links with Shepway. Dover DC has recommended that Dover District is best placed in a Shepway and Dover HMA rather than a Thanet, Canterbury and Dover HMA which has been identified in Thanet Council's SHMA.

2.9 In justifying its approach, Thanet is presenting the case that due to low levels of self-containment, it can only be mathematically improved by adding Dover District and Canterbury City to the HMA - a decision which Thanet considers consistent with the PPG. The PPG identifies the three indicators outlined below, which are used to define the HMAs, which RPS explores in more detail as part of a critique of the HMAs.

House prices and rates of change in house prices

2.10 The assessment provided in the Thanet SHMA indicates that Thanet and Dover share the most similar house prices whilst there are also similarities between Canterbury and Shepway. Although this has not been extensively considered, on the evidence available, RPS would conclude that Thanet and Dover share a functional relationship in terms of similar house prices.

Household migration and search patterns

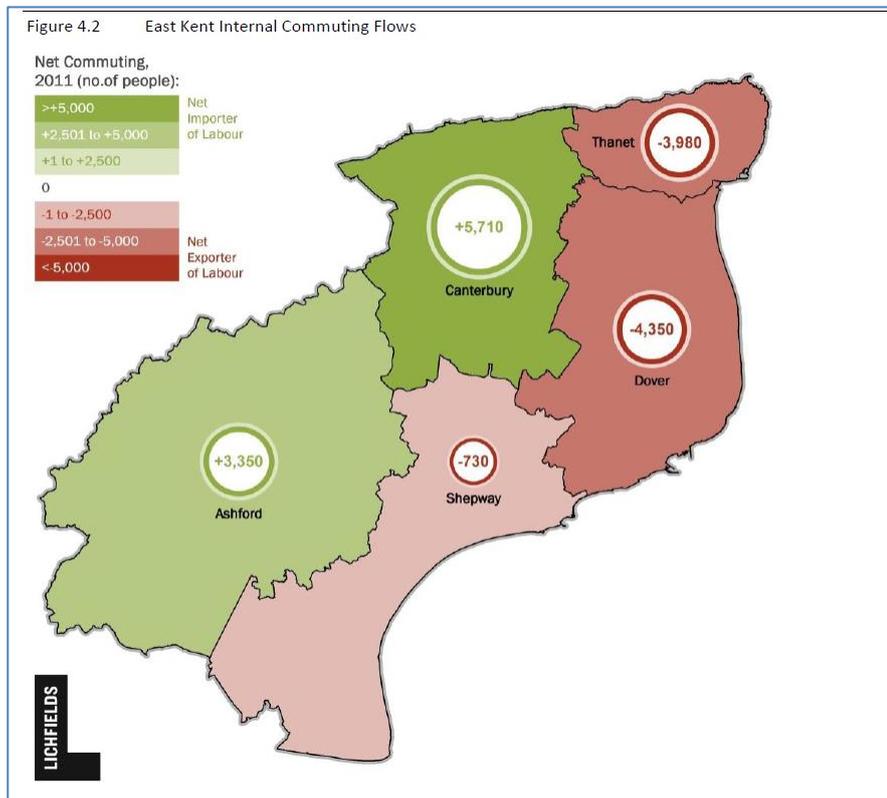
2.11 The PPG advises that plan makers should look towards identifying migration patterns with high proportions of household moves (70%+). The Thanet SHMA notes that the District is relatively self-contained, and indicates that the strongest migration flows within the District are to Dover and Canterbury. In terms of the strongest flows of the Authorities studied, the SHMA indicates that Dover and Shepway have the strongest linkages though and so too do Dover and Canterbury. The Thanet SHMA does not use the PPG methodology explicitly, though evidence does exist that could support this claim. The evidence from Dover follows more closely the PPG methodology, noting that the self-containment between Dover and Shepway is 60%, just below the recommended 70% figure necessary to establish a cogent containment area. Interestingly, though the Dover SHMA is keen to dispel any calls for extending the HMA, it is noted that self-containment would increase if neighbouring authorities were brought into the fold and would

exceed 70% if Thanet were to be added. The evidence here is somewhat inconclusive from both sides, though clearly a larger area of search would support a more cogent HMA based on this indicator.

Contextual data (travel to work are boundaries)

2.12 This evidence has considered Travel to Work Areas (TtWAs) published using 2011 Census data, reflecting commuting flows between Districts. The Dover SHMA helpfully reflects the change in TtWAs between the 2001 and 2011 Census. This indicates that the Ashford and Canterbury HMAs remain relatively stable; however there has been shift in Thanet/Dover/Shepway. In 2001 the Folkestone TtWA broadly followed the Shepway District area, however in 2011 this has been extended into half of Dover District, to become the Folkestone and Dover TtWA. The northern half of Dover District has now been included in the Margate and Ramsgate TtWA (within Thanet District). Though data indicates that there are commuting relationships between Thanet-Dover-Shepway (see Figure 2.3).

Figure 2.3 Net Commuting in East Kent



Source: Excerpt from Dover Economic Development Needs Assessment. 2017.

2.13 RPS considers that both approaches do not reflect the correct HMA. A more appropriate HMA would be to cover a larger area, including the three LPAs in East Kent (Thanet, Dover and Canterbury), Shepway and Ashford – however, this has not been identified. The East Kent HMA is broadly similar to that proposed in the 2010 DCLG research, which defined the HMA based on 2001 data (this exercise has not been updated to account for the 2011 Census). The consequences of this would mean that the above authorities need to collaborate together to

ensure that the OAN for housing is met in full across the HMA. RPS would expect that this is explored to a greater degree as part of the Local Plan process, which will need to more widely consider the implications of growth in the sub-region.

3 FUTURE HOUSING NEED IN THANET

3.1 As indicated above, RPS has concerns over the current setting of the HMA which, under the Government's proposed methodology for the calculation of housing need, would have implications for determining relevant issues for cross-boundary growth.

3.2 Although the East Kent and Ashford Sub-Regional Area (S-RA) has since been abolished, to illustrate how the wider area could grow beyond the proposed HMAs, RPS has provided a summary of the current position of housing and employment need in the wider East Kent Sub-Regional Area. This is presented under the relevant sections below.

Housing Need

3.3 The NPPF requires local authorities to undertake an Objective Assessment of Need for Housing (OAN), through the preparation of a Strategic Housing Market Assessment (SHMA), which considers the OAN for both market and affordable housing. Although the NPPF has set the scene for what authorities should do, the detail of how this should be undertaken is found in the online Planning Practice Guidance (PPG). The PPG advises that plan makers should utilise the latest household projections provided by the Office for National Statistics (ONS), which should be adjusted to account for a number of issues including factors affecting local demography, employment trends, market signals and affordability.

3.4 Although the PPG methodology should be used by plan makers in determining the OAN for the HMA, RPS is also mindful of the Government's intention to update this methodology with a simpler and more streamlined approach. In September 2017, the Government published "Planning for the Right Homes in the Right Places: Consultation Proposals". As part of a raft of measures, this document proposes that authorities still use the household projections prepared by ONS as a starting point, however all other elements are stripped away, other than the accommodation of market signals. In the supporting appendix to the consultation document, the Government has also included a table which presents the implications of the new methodology for each local authority and how this compares against proposed or adopted plan targets.

3.5 The Government's proposed methodology, although subject to change, is expected to be in place by 01 April 2018, to be applied consistently across England. The Government's consultation document does indicate that where plans are sufficiently advanced (submitted to Secretary of State) by the end of March 2018, Councils can continue to rely upon the existing PPG methodology, however those submitted beyond 01 April 2018 should use the new guidance. The consultation methodology does also indicate that whilst Councils should not be planning for growth lower than the standard methodology, Councils can exceed this figure, to align with strategies in Local Economic Partnerships, economic strategies or strategic infrastructure projects.

3.6 To understand how this might affect authorities in the East Kent and Ashford S-RA, RPS has considered current progress in Local Plan production, which has been set against the Government's proposed OAN methodology and the current forecasts of housing need (see Table 3.1).

Table 3.1: Likely Objectively Assessed Need for S-RA

Local Authority	Local Plan Progress	Current Local Plan Targets	DCLG Standardised OAN (dpa = dwellings per annum)	Proposed Targets	Implications for Local Plan Production
Thanet	Pre-Submission Local Plan expected January 2018	857dpa	1,063dpa		Present uncertainty over correct figure to be used, however Council are planning to submit the Local Plan prior to April 2018.
Dover	Limited progress on new Local Plan. Revised trajectory expected towards the end of 2017.	529dpa	594dpa		Application of new OAN methodology.
Canterbury	Local Plan adopted July 2017	800dpa	1,096dpa		Recently adopted plan in place until reviewed.
Shepway	Submission Local Plan consultation in November 2017, submission expected prior to April 2018.	633dpa	490dpa		Document likely to be submitted prior to application of new OAN methodology.
Ashford	Local Plan in latter stages of Examination	989dpa	848*dpa		Local Plan is sufficiently advanced that it will not be caught under the proposed arrangements for OAN.
Swale	Local Plan adopted July 2017	1,054dpa	776dpa		Recently adopted plan in place, which will remain up to date until reviewed.
* Figure taken from proposed Main Modifications to the Local Plan					

3.7

The information above indicates that for Canterbury, Ashford, Swale and Shepway, there are unlikely to be any significant changes in the near future, as these authorities have either recently adopted Local Plans, or sufficiently advanced plans to ward off further changes in their approach to OAN.

- 3.8 Thanet has recently expedited its timetable for the submission of the Local Plan, which is now expected to be submitted to the Secretary of State before 01 April 2018. It still remains to be seen however, whether the currently stated need will be found sound, or whether this will change subject to scrutiny as part of the Local Plan Examination process. It is acknowledged that the DCLG wrote to Thanet DC on 16 November 2017 threatening Local Plan Intervention as the District did not have an up-to-date Local Plan. TDC has until 31 January 2018 to respond. Additionally, there is some concern that the Council does not fully support the new Local Plan which may therefore incur delays to its submission, potentially extending beyond the 31 March 2018 and therefore triggering a change in the way the OAN is calculated.
- 3.9 Under the proposed arrangements, it will be necessary for Dover to utilise the new OAN methodology, as the authority will not have a significantly advanced plan in place before 01 April 2018. In terms of implications, it would appear that growth will increase in Dover, increasing the overall housing need in the East Kent area. This may also lead to increases in growth for Thanet, depending on when the Council submit the plan for Examination. Accordingly, this report will consider the Council's potential housing land supply against the current OAN and the DCLG consultation housing need figure as an additional sensitivity test.

4 HOUSING LAND SUPPLY

- 4.1 For the reasons identified in Sections 2 and 3, many authorities in the East Kent area currently benefit from an up-to-date plan and will not, in the immediate future, need to address any shortfalls arising from the Government's proposed OAN methodology. Table 3.1 above has considered the housing supply for Thanet and Dover, when set against the emerging OAN for the two Districts.
- 4.2 The evidence base underpinning the land supply assessment for Thanet and Dover is dated 2013 and 2009 respectively, although it is understood that updated Strategic Housing Land Availability Assessments (SHLAAs) for both authorities are under review and will be published in Spring 2018.
- 4.3 In addition to the 2013 SHLAA, Thanet District Council has also published its proposed revisions to the Draft Local Plan in January 2017, which presented a view on the allocations needed to meet the 2013 OAN for the Plan. This document included an allocations strategy to provide for 17,837 dwellings across the period 2011-2031, which broadly aligns with the forecast housing need of 17,140 dwellings. When set against this figure it appears that there is a capable supply of housing land which would offer sufficient flexibility in supply should there be a need for additional growth. It is noted that this housing land supply did not include land at Manston Airport.
- 4.4 As set out in Section 3, in addition to the Council's proposed OAN, RPS is also aware of the emerging DCLG standardised housing need figure of 1,063dpa, which would equate to 21,260 dwellings over the same plan period. Given the uncertainty over when the Council could submit its plan for examination, it is appropriate to consider this alternative housing need figure as a sensitivity test against the Council's housing land supply.
- 4.5 As Thanet's SHLAA is now over four years old, there is a need for a sense check on the robustness of the Council's supply to establish whether sites are still available for development and their continued inclusion within the Council's sources of supply.

Assessment of Thanet Housing Land Supply

- 4.6 In order to provide a more up to date understanding of Thanet's potential supply of housing land, RPS has undertaken a capacity assessment of sites in the District, which considers different sources that could contribute towards meeting Thanet's housing need. The principal source of evidence in this regard remains the 2013 SHLAA, although it is recognised that Local Plan consultations since 2013 have yielded additional sites yet to be considered by the Council which also might include legitimate sources of supply. In terms of sites within the 2013 SHLAA, the following typologies are recorded:

Table 4.1: Baseline Capacity of Sites in 2013 Thanet SHLAA

Site Typologies	Now- 2016	2016-21	2021-26	2026-31	Post 2031	Grand Total
2006 Urban Capacity Study	106	12	124	97	88	427

Site Typologies	Now- 2016	2016-21	2021-26	2026-31	Post 2031	Grand Total
Additional Sites with Planning Permission	564	10				574
Allocated in 2006 Local Plan	339	307	280	280	6	1,212
Council Owned Sites	24	86	33	0	20	163
Identified through other sources	0	0	0	0	0	0
Landowner sites in Green Wedge		945	320	250		1,515
Landowner sites in Green Wedge (additional)	135	110	0	0	0	245
Potential key regeneration Sites	16	12	80	59	0	167
Rural Area Sites	44	3,452	122	8	42	3,668
Sites identified from Employment Land Review	0	0	0	0	321	321
Sites identified from Employment Land Review (Additional)	630	0	0	0	0	630
Sites Identified through submissions by landowners and developers (tranche 1)	348	2,960	1,398	509	1,116	6,331
Sites Identified through submissions by landowners and developers (tranche 2)	0	91	47	45	213	396
Sites Identified through submissions by landowners and developers (tranche 3)	970	14	0	18	0	1,002
Sites Identified through submissions by landowners and developers (tranche 4)		1,558				1,558
Sites with Planning Permission	606	451	185	11	7	1,260
Grand Total	3,782	10,008	2,589	1,277	1,813	19,469

Source: RPS assessment derived from the Thanet 2013 Strategic Housing Land Availability Assessment

4.7 Each of the sites in this assessment has been determined by the Council to be deliverable against footnote 11 of NPPF paragraph 47, considering suitability, availability and achievability of each of the sites. This assessment determined that there are sites capable of delivering 19,469 dwellings. 17,656 would come forward before 2031. Of this supply, the largest delivery of sites has been included within years 2016-2021, indicating a significant immediate supply of housing land.

4.8 This figure of 17,656 would broadly correspond with the Council's current housing requirement of 17,140, however it is also necessary to interrogate these sites in more detail to understand what the current position might be in 2017. The 2013 SHLAA also includes a component of deliverable

sites beyond 2031, amounting to 1,813 dwellings. This would be provided with an increased buffer if considered alongside sites deliverable in the Plan Period.

4.9 RPS has not sought to critique each of the sites in the 2013 SHLAA against the Council's deliverability criteria, instead a review of each of the sites has been undertaken to understand if conditions have changed and whether the sites can still be counted as part of the potential supply of housing sites.

a) Committed and Completed Development

4.10 The Council's SHLAA contains two categories of sites with planning permission, to the sum of 1,834 dwellings. It is expected that a number of these planning permissions will have now completed, lapsed or, in the cases of larger sites, still be under construction. For the purposes of this report, these sites have not been considered and have instead been assumed to be part of the Council's recent net additional dwellings.

4.11 Although the Council has not published an up to date monitoring report of completions rates, the Council's Proposed Revisions to the Local Plan (published January 2017) indicated that 1,555 dwellings had been completed since the start of the Plan Period (2011) and there are 3,017 dwellings extant or under construction. Although it is expected that the Council will update this to account for completions/permissions in the 2016/17 monitoring year, this is the most up-to-date information available and is considered an appropriate baseline.

b) Deliverable SHLAA Sites

4.12 Beyond those sites with planning permission, there are 255 sites in the 2013 SHLAA considered by the Council to be deliverable within and beyond the plan period. RPS has considered whether there has been any material changes to the availability of these sites, noting any recent planning applications that have been brought forward.

4.13 Beyond those with planning permission, only 11 sites in the Council's deliverable supply have since been recorded with approved planning status. These sites have brought forward a deliverable capacity of 135 dwellings over 10 sites. The remaining site has instead been developed as A3/A4 uses. This number is slightly less than the expected SHLAA capacity of 160 dwellings, however more generally, this indicates that there remains a significant quantum of undeveloped sites that conform to the Council's test of deliverability and that there has been a low take-up of housing sites by potential developers.

4.14 Our assessment of the capacity of the deliverable SHLAA sites has therefore been adjusted to account for these sites which are no longer part of the Council's deliverable supply of housing and instead will form part of the committed delivery of housing or employment. In total, the 2013 SHLAA identifies 15,648 dwellings that could come forward up to 2031. This extends to 17,449 when considered alongside sites the Council considers to be deliverable beyond 2031.

c) Consideration of SHLAA Sites against Proposed Allocations in the Local Plan

4.15 The Council has used the 2013 SHLAA and the sites promoted within it as the baseline for the sites proposed for allocation in the 2015 Preferred Options Local Plan and the subsequent January 2017 proposed revisions.

4.16 Appendix B of the 2015 Preferred Options includes a schedule of sites proposed for allocation, which forms the basis for the Council's allocations strategy. The 2015 Preferred Options has, however taken a different view in terms of site capacity, deviating from the indicative figures in the 2013 SHLAA. On some sites this variation is quite significant. For example, in terms of the Strategic Sites identified in Appendix B, the Preferred Options proposes growth of 4,150 dwellings across four sites. The size estimate of these sites in the 2013 SHLAA indicates that 5,948 dwellings could be derived from these sites alone, pointing towards a potentially larger capacity from these sites. Thanet DC has not provided any explanation for this change.

4.17 In addition to variations set against the potential site capacities, the 2017 Proposed Revisions include a list of changes to those proposed allocations, including new sites not previously considered in the 2013 SHLAA and changes to the availability of certain sites. In terms of new sites identified, the 2017 Proposed Revisions identifies the following proposals:

- Land at Manston Road/Shottendane Road - 250 dwellings
- Eurokent - Up to 550 dwellings (200 additional dwellings)
- Land at Manston Court Road/Haine Road – 700 dwellings
- Manston airport site - 2,500 dwellings

4.18 These sites amount to an additional capacity of 4,000 dwellings added to the Council's supply. On the opposite end, the 2017 Proposed Revisions includes 14 sites proposed for removal from the allocations strategy, which have either been developed or it has been indicated that they are no longer available. For the purposes of this assessment, these have been removed from the supply.

4.19 Accounting for this additional supply of 4,000 dwellings and removing those sites identified by the Council from the supply, the deliverable SHLAA capacity increases to 19,468.

d) Additional Sites Identified

4.20 Since the 2013 SHLAA was published, the Council has published two stages of consultation for the emerging Local Plan, the most recent being January 2017. This consultation brought forward a number of additional sites yet to be considered within the Council's SHLAA or through the Local Plan process. As these sites have not yet been tested by the Council, RPS has undertaken an initial appraisal of these submissions and how they conform to the Council's settlement hierarchy and deliverability criteria. RPS has considered a number of new sites, sourced from the January 2017 consultation of the Local Plan which appear to be reasonably placed in terms of the existing settlement hierarchy and should be considered by the Council as part of an updated assessment of deliverability. A list of the sites with development potential have been included as part of **Appendix 1**, where RPS has taken an initial view on deliverability, although it is noted that these sites have yet to be tested through the Council's Sustainability Appraisal process and it is expected that these sources are reviewed prior to submission of the emerging Local Plan.

4.21 In total, the sites included within **Appendix 1** indicate a further potential supply of at least 2,028 dwellings of deliverable supply. It is acknowledged that the Council is currently undertaking a review of its SHLAA and it is possible that further sites have been identified by the Council, increasing this figure further, however for the purpose of this report, this wider sieve has not been undertaken.

4.22 RPS is also aware of a submission for a new Garden Village proposed at Woodchurch, capable of delivering around 1,500 dwellings. This is clearly a large site and one which could make a significant contribution towards Thanet's housing supply, however the principles which would guide such a development would differ from that in the SHLAA and as such, this should be considered as part of a separate exercise by the Council to determine the suitability of locations for a new settlement. For the purposes of this report, this site has not been accounted for in the potential deliverable supply of housing, though this should be explored by the Council in more detail as part of the Local Plan.

e) Further Sources of Supply

4.23 The Council's latest iteration of the Local Plan, published January 2017, included a schedule of sites as part of Revised Policy SP11 (Housing Provision). In addition to strategic allocations proposed for development, this also included provisions for additional sources which were expected to make a contribution towards supply:

- Windfall Sites – 2,700 dwellings (was 2,480 in the 2015 Preferred Options Plan); and
- Empty Properties (brought back into use) – 540 dwellings.

4.24 The Council has not published any evidence to indicate how these figures have been arrived at and justified, a matter which is expected to be tested through Examination of the Local Plan. RPS does not however dispute that these can be legitimate sources of supply and although the nature of these sites has not been interrogated, these figures are provisionally accounted as part of the likely supply of housing in the District.

Summary of Supply Sources

4.25 Taking these factors into account, RPS has presented an alternative trajectory of Thanet's potential deliverable supply, which relies upon potential sites that have either been considered deliverable by the Council as part of the 2013 SHLAA or have recently been submitted to the Council as part of the consultation to the 2017 Proposed Revisions. This is illustrated in Table 4.2 below.

4.26 As part of the 2017 consultation, the Council identified a supply of 17,837 dwellings, set against a housing need of 17,140 dwellings. Based on the Council's figures, this represents a 104% supply against the requirement. It is also important to note that this assessment has not accounted for additional capacity that could be achieved from these sites, should a closer consideration to density be given and the potential to maximise yields further on appropriate sites.

4.27 The RPS supply calculation draws upon the collective sources of housing land from the 2013 SHLAA and Additional Sites Identified, which points towards a potential supply of housing that would meet 144% of the Council's current housing requirement. Although not all of the SHLAA

sites may come forward as part of the plan period, there is a significant buffer in the supply, which provides justification to revisit whether the Manston Airport site, as an important strategic asset, could be removed as a housing allocation in the emerging Local Plan and still maintain an appropriate buffer of sites to ensure flexibility. It is also important to consider what the increases in a change to the OAN might mean for the supply of sites. Although the Council is currently planning for housing growth based on figures in the 2013 SHMA, if the current timeframes for submission slip, it may be likely that the higher 'standardised OAN' figures in the DCLG 2017 consultation document need to be adopted.

4.28 Accordingly, RPS has considered two sensitivity tests, which explore the implications of a potentially increased housing need (under the standardised OAN methodology) and the removal of Manston Airport site, reducing the supply by 2,500 dwellings. This is presented below as RPS Sensitivity Tests 1 and 2.

Table 4.2: Summary of Thanet's Housing Land Supply Potential

	Thanet Supply Calculation	RPS Supply Calculation	RPS Sensitivity Test 1 - Increased OAN based on standard Government methodology	RPS Sensitivity Test 2 - Increased OAN; Manston Airport Excluded
Requirement				
Requirement 20 years (April 2011 - March 2031)	17,140	17,140	21,260	21,260
Committed Supply				
Completions Since 2011	1,555	1,555	1,555	1,555
Extant Planning Permissions	3,017	3,017	3,017	3,017
Supply - Thanet Sources*				
Strategic Sites for Allocation	7,350	-	-	-
Other Housing Sites/Areas	2,675	-	-	-
Empty Properties	540	-	-	-
Windfall Sites	2,700	-	-	-
Supply - RPS Sources				
Deliverable Supply from 2013 SHLAA**	-	15,468	15,468	15,468
New Strategic Allocations proposed in 2017 Proposed Revisions	N/A	4,000	4,000	1,500
Additional potential from 2017 Proposed Revisions consultation (minimum figures)	-	2,028	2,028	2,028
Empty Properties	-	540	540	540
Windfall Sites	-	2,700	2,700	2,700
Total Supply	17,837	24,736	24,736	22,236
	104%	144%	116%	105%

* Adapted from 2017 Proposed Revisions

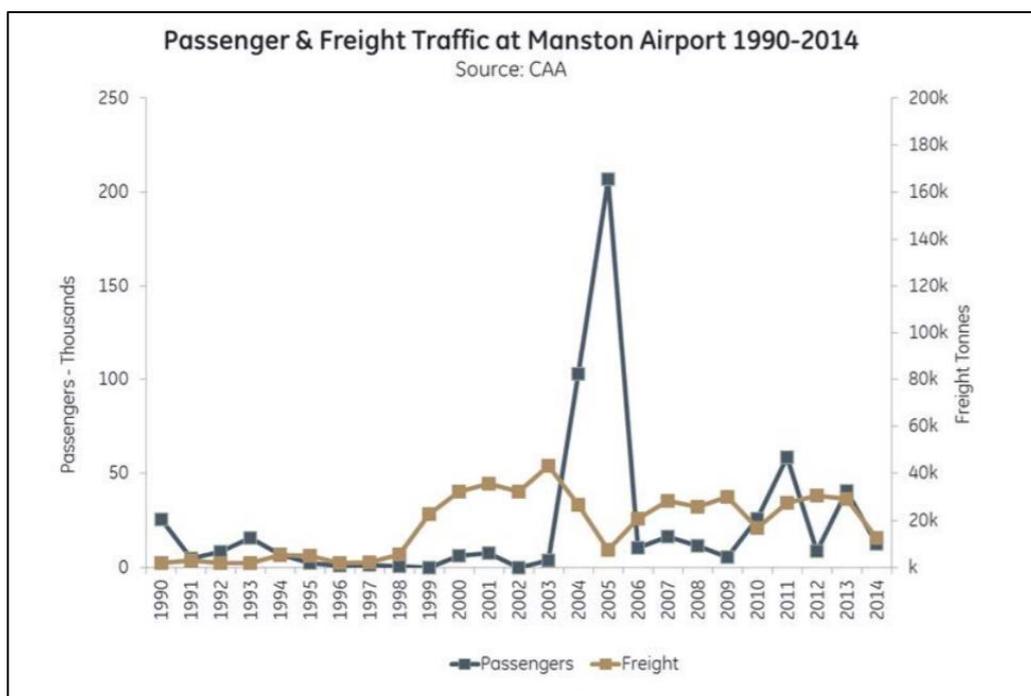
** Updated to account for sites no longer available

- 4.29 These tests indicate that under the Government's proposed 'standardised OAN' methodology, the Council would be able to provide 116% of its housing need against the available land supply. RPS Sensitivity 2 considers a future adjustment to remove Manston Airport from the supply of deliverable housing land and under this option, the Council can demonstrate 105% against the increases housing need targets. This is a sufficient margin above the baseline need, which gives a capable buffer of flexibility in the event of increased need.
- 4.30 Additionally, it is also noted that the total supply figures presented in the three RPS scenarios in Table 4.2 rely on sources of supply yet to be taken through the planning system. As such, the total calculations exclude completions to date and extant planning permissions, which have not been interrogated in detail. It is considered that including these sources would further increase Thanet's supply and ability to meet the OAN without the need for Manston Airport. In total there are a further 4,572 dwellings from this supply source which would increase Thanet's capacity to 171% as part of the RPS Supply calculation and 126% as part of the RPS Sensitivity Test 2. This is a substantial uplift which would indicate that the Council would not have to rely on all of these sources of supply to meet the OAN for this Plan period.
- 4.31 RPS considers that there is evidence of further deliverable housing sites in the District which have not been fully explored by the Council as realistic options for the emerging Local Plan. The Council should explore in more detail whether the wider cache of sites in the SHLAA and those recently put forward to the Council as part of the consultation on the new Local Plan could make a contribution towards the Council's overall housing requirement which would, in turn, eliminate the need to include the Manston Airport site for residential development.

5 BALANCING THANET'S EMPLOYMENT GROWTH

- 5.1 In addition to considering the housing need/supply in Thanet District, it is also important to consider the relationship between housing and employment and what this means for the Local Plan and planning for growth. The NPPF and NPPG place great emphasis on sustainable economic growth, which should remain a focus for the Council as they develop their Local Plan.
- 5.2 In considering the forecast employment growth in Thanet, the Council's latest base on the matter is the Business Intelligence Report: Economic and Demographic Forecasts, prepared in February 2013. This assessment indicated that job growth in Thanet would increase by 1,200 - 5,100 jobs between 2011 and 2031, based on forecasts provided by Experian. The range in these figures has been adjusted by the Council to account for assumptions of developments or risks which may affect the delivery of these jobs. Both of these figures were derived from the baseline forecast of 3,100 jobs across the period 2011-2031.
- 5.3 Although these forecasts are now dated, these figures were appropriated as part of the September 2016 SHMA, which considered the relationship between housing growth and employment need. In addition to the 2013 forecasts, the SHMA also drew upon the East of England Forecasting Model (EEFM), which presented 2015 forecasts, indicating growth of 4,810 jobs in the period 2011-2031.
- 5.4 The 2016 SHMA came to the conclusion that the level of demographic growth in Thanet would support a workforce between 6,050 to 9,700 jobs in the plan period. Taking into account commuting dynamics and double-jobbing, there would be a requirement for an increased 5,600 in the resident workforce to meet this job growth.
- 5.5 It is important to note that the Experian forecasts used by the Council utilise information relating to historical commuting in Thanet which is a measure informing the forecasts of future economic growth. The Commercial Viability Report for Manston Airport undertaken for Thanet Council in September 2016 outlined that airport handled around 30,000 tonnes of freight a year, which is explored as part of Figure 5.1 below. Operations linked to the airport have had a historical economic output in the area, which will have fed into the trend based forecasts of future employment growth, which have been used to draft the emerging Local Plan. Manston Airport is therefore part of the economic baseline of the Local Plan and removing this site will have implications for Thanet's future economic growth that have not been accounted for in the Local Plan and are not fully understood.

Figure 5.1: Historical Passenger and Freight Traffic at Manston Airport



Source: Commercial Viability of Manston Airport, AviaSolutions. FINAL Report for Thanet District Council, September 2016.

5.6 In addition to the forecasts of employment growth, it is important to note that there are wider economic objectives/strategies in the District, which bear relevance to understanding the future growth in Thanet and which rely upon the economic impact of Manston Airport:

- South East Local Enterprise Partnership;
- East Kent Growth Framework; and
- Thanet Economic Growth Strategy.

5.7 The objectives of these economic strategies are explored in more detail below.

South East Local Economic Partnership

5.8 Since the abolition of the South-East RSS, the South East Local Enterprise Partnership (SELEP) has been established, which addresses key strategic priorities in the South East. The SELEP covers a large geographical area including the East Kent authorities and through the 2014 Strategic Economic Plan (SEP) seeks to enable the creation of 200,000 private sector jobs in the SELEP area between 2011 and 2021.

5.9 Of this job growth, the SEP forecasts that the largest projected growth in employment will be in the Business sector, followed by trade, accommodation and transport as the next largest sector for growth. As part of the proposals for Thanet, the SEP extends support to strategic transport initiatives, including the growth corridors along the A2/A229. The SEP also recognises the status of the former Manston Airport site, acknowledging the potential for growth around the airport site

and support for the Manston Airport task force to be established to investigate the future potential for the airport.

East Kent Growth Framework

- 5.10 The August 2017 East Kent Growth Framework (EKGF) outlines a programme for strategic growth in East Kent between 2017 and 2027, as part of the wider objectives to deliver 36,500 new jobs across the sub-region. The EKGF is defined as including the authority areas of Ashford, Canterbury, Dover, Shepway and Thanet which is recognised in the EKGF as a significant economic sub-region.
- 5.11 This is an important growth document for Thanet, as it recognises the importance and geography of the sub-region in delivering the aims of the SELEP and outlines a number of projects to deliver this growth. The key building blocks of this strategy are outlined as:
1. Unlocking growth through infrastructure;
 2. Delivery of business space;
 3. Supporting skills and productivity within business; and
 4. Place making and shaping.
- 5.12 As part of delivering these objectives the EKGF identifies 70 projects across East Kent, regarded as strategically significant. For Thanet, the EKFG has identified 14 projects including, as a priority, the Thanet Parkway Railway station. This passenger railway station will be located on the Ashford International to Ramsgate line, south of Manston Airport and will be served by high speed domestic services, including connections to HS1. This project is expected to support the Council's objectives for employment growth in Thanet and could also provide significantly improved access to Manston Airport, including increased car parking capacity. The EKGF has sought to quantify what the expected growth from the 70 projects will be, and what this will deliver in terms of job growth and support in enabling future housing growth, as indicated in Table 5.1 below:

Table 5.1: Strategic Initiatives for growth as part of the EKGF

Local Authority	EKGF Job Growth	EKGF Enabling Housing Growth	Employment Land Available
Thanet	11,000	15,300	74ha
Dover	3,410	6,250	100ha
Canterbury	16,180	23,750	-
Shepway	2,480	13,562	-
Ashford	12,450	16,869	-

Source: East Kent Growth Framework, Final Draft Report, August 2017; Dover Economic Development Needs Assessment, Final Report; March 2017; Thanet Employment Topic Paper, 2013

- 5.13 The EKGf proposes that there are potential development schemes in the pipeline which could be developed in the next 10 years, which would be over and above the baseline forecasts of employment growth. Beyond the priority schemes listed above, there are a number of other local and strategic projects for Thanet District, including Manston Business Park and improvements to the local transport network.

Thanet Economic Growth Strategy

- 5.14 This strategy document, published in November 2016, presents a vision for the District, building upon the strengths of HS1 to provide sustained economic growth. The strategy indicates that the number of jobs in the District needs to grow, but there is a need to diversify the business base, in order to move away from what is currently a low wage economy, to a high skilled workforce.
- 5.15 In determining the key opportunities for growth in Thanet, the 2016 study recognises that the Manston Airport Site is a serious potential opportunity for the District's future economy, which will impact on the future economic strategy for the District. It is noted that the feasibility of the Airport to remain in aviation use was still under consideration at the time of publishing the document.

Conclusions

- 5.16 The latest forecasts of growth for Thanet points towards growth of 1,200 to 5,100 jobs across the period 2011-2031. It should be noted that these forecasts are dated and have been modelled based on past forecasts of population change and do not account for future projects that have yet to be consented. RPS considers that the current forecasts of economic growth are outdated and not robust or appropriate for the purposes of plan making. RPS would expect that the Council undertakes a review of the Experian forecasts to best inform the strategy for the Local Plan.
- 5.17 Beyond these growth targets, RPS has identified a number of specific policy expectations for employment development in the sub-regional area, including short-term strategic projects for Thanet. In particular, there is a strategic priority to see the development of the Thanet Parkway Railway Station which, alone, would deliver growth in excess of the Council's employment targets. Many of these strategies also rely upon Manston Airport being recognised as an important strategic asset for the sub-region and expect that the future of the site, including as an airport, is given greater consideration. As such, Thanet Council has not taken an appropriate or justified view about the likely employment growth that will occur during the plan period of the Local Plan and the potential requirement for the Manston Airport site to be retained for aviation uses, which would in turn support the local supply chain.

6 IMPLICATIONS FOR THANET DISTRICT

Balancing Housing and Employment Need

- 6.1 As indicated in Section 3, TDC's latest SHLAA from 2013 presents an annual housing need of 857dpa over the period 2011-2031. RPS has additionally considered the Government's emerging methodology, which proposes an increased housing need for Thanet District (1,063dpa) which may be required of the Council if the Local Plan is not submitted for examination before 31 March 2018.
- 6.2 As indicated in Section 2, Thanet is currently a net exporter of labour who, along with Dover and Shepway, export labour mainly to Canterbury and Ashford. As part of the September 2016 SHMA, the Council's evidence indicates that under the current OAN of 857dpa, the forecasts of need would be able to support a workforce growth between 6,050 and 9,700 jobs (paragraph 1.4 the 2016 SHMA refers). The Council's view here is that the forecast change in population would be sufficient to address the expected increases in job growth (between 1,200 to 5,100 jobs).
- 6.3 RPS would recommend that TDC revisit their approach to economic growth in the District, with a view to better considering the alignment between housing and employment growth, particularly in light of the emerging methodology from Government on changes to the way OAN is calculated. Without the necessary employment in locations close to new housing, this will inevitably lead to higher levels of unsustainable commuting outside of the District, which is contrary to the intention of the PPG.
- 6.4 With this in mind, RPS has also undertaken an assessment of the Council's deliverable supply of housing. Presently, the Manston Airport site is included as part of the Council's proposed site allocations strategy for housing, after introducing the site as part of the 2017 Proposed Revisions to the Local Plan for 2,500 dwellings. RPS has reviewed the Council's wider capacity for housing development in the District, considering deliverable land in the 2013 SHLAA and other published sources. In total, RPS calculate that based on current sources, the Council has a potential deliverable supply of 24,736 dwellings over the plan period 2011-2031. This equates to 144% when set against the current housing requirement. This is a significant buffer of flexibility, which is capable of supporting Thanet's increased housing need if the DCLG's emerging methodology on standardised OAN were to be adopted (116%).
- 6.5 When Manston Airport is removed from this assessment, this reduces the overall potential capacity to 22,236 dwellings (105%). This is an overprovision on the Council's higher requirement for OAN, which would increase further under the proposed OAN in the 2013 SHLAA, which indicates that there would still be sufficient housing land available to avoid the need for housing redevelopment of Manston Airport.
- 6.6 The considerations in this report have highlighted the importance of sustained economic growth in Thanet, in order to support not only District-wide employment, but the wider sub-regional economic objectives of East Kent, including in neighbouring Dover district.
- 6.7 RPS consider that the Council's current strategy is too heavily focussed on the need for housing in Thanet, which comes at a cost of losing important strategic infrastructure in the District, which

is necessary to support both the immediate local and the wider economic aims of the sub-region. Whilst it is expected that the Council will provide an updated SHLAA in 2018, the available evidence reviewed in this report demonstrates that Manston Airport is not needed to deliver the Council's housing strategy and would instead be better placed retained as a strategic infrastructure asset as part of the emerging Local Plan.

**APPENDIX 1: ADDITIONAL SITES IDENTIFIED WITH
POTENTIAL CAPACITY FOR DEVELOPMENT (SOURCES
DERIVED FROM REPRESENTATIONS TO THANET LOCAL
PLAN)**

Respondent Name/Company	Representor	Site Address	Comments	Estimated Yield
David Fuller - FA Fuller & Son Agent: Mark Chandler - Finns	n/a	Land to the south of Monkton Street, adjacent to Foxhunter Park, Monkton CT12 4JQ	New site proposed for 50-60 dwellings on land currently used for agricultural purposes. The site is well located to the existing settlement and at 3.2ha in size, and the agents estimate of 60 dwellings appears reasonable.	60
Mr Marks - Montagu Evans LLP	Greenacre (Thanet) Ltd	Land at Manston Court Road/Haine Road	The promoters of this site propose an increase to the overall deliverable size of the site to 47ha, which would increase the potential capacity from 700 dwellings to 925 dwellings. This would increase the potential deliverable capacity of the site by 225 dwellings, which should be tested and accounted for by the Council.	225
Allister Hume - Hume Planning Consultancy Limited	n/a	Land at Summer Road	This 1.8ha site has been proposed for around 6 dwellings. Although this threshold falls under the remit of sites normally considered by the SHLAA, this remains an appropriate site for the Council to consider.	6
St Johns College	n/a	Land at Tothill Street/Land at the Length, St Nicholas-at-Wade	A number of new sites have been promoted for housing by St Johns College. RPS has taken the conservative view that two sites could be delivered. The first being the 14ha site at Tothill Street, which could come forward for around 250 dwellings. The second smaller site at 'the length' at St. Nicholas-at-Wade could come forward for around 25 dwellings.	275
Mark Buxton - CgMs	Tesco	Land north of Millennium Way, Broadstairs	Promoters Tesco has identified an additional supply of housing adjacent to their Tesco Extra store, on land north of Millennium Way. This appears to be a reasonable location for housing, near an existing residential area.	223
V Gill - C/O Hume Planning Agent Allister Hume- Hume Planning Consultancy limited	n/a	Land at Shottendane Farm, Shottendane Road, Margate	The site could be delivered in three years and is in close proximity to two large housing allocations (each 250 dwellings). No delivery estimates have been made.	?
Howard Courtley - Courtley Consultants Ltd	Nick Baxter - Baxter Farms	South west of Sarre Business Park, Canterbury Road, Sarre, Kent	This site has been promoted by Courtley Planning Consultants Ltd for either housing or mixed use development on the 0.9ha brownfield site. The developer considers that the site is capable of supporting between 10 and 20 dwellings on the site, which appears to be reasonable. A figure of 15 dwellings has therefore been appropriated for the purposes of this assessment.	15
Jane Scott	n/a	Land at corner of Manor Road & Canterbury Road, St Nicholas-at-Wade	Promoter considers that 1.38 hectares could deliver around 31 dwellings as part of current Local Plan. Provisionally included in supply.	31
Kentish Projects Ltd - Hume Planning Agent: Allister Hume - Hume Planning Consultancy Limited	n/a	Manston Park Bungalows	The site is sandwiched between the existing former RAF housing in Esmonde Drive and an adjoining site further to the west (outlined in blue on the attached plan) which is nearing completion.	20
R MCDonagh	n/a	Land at corner of Manor Road and Canterbury Road, St Nicholas-at-Wade	Site promoter considers that land could deliver around 30 units and measures around 1.4ha	30
Nick Baxter	n/a		Advice on proposed new developments - Land at Walters Hall Farm yard, Monkton. Land at Chantry Park, Sartre, Birchington. Land east of Sartre Court, Sartre.	n/a
Linda Samme	n/a	Ridings at Cliftonville.	No delivery estimates have been made.	n/a
Mark Adams- NHS Property Services	n/a	Site known as Lanthorne Court, Broadstairs, CT10 3PB	This 1.88ha has been proposed by the NHS for potential redevelopment. Although the site is currently in operation as a support centre, this may be on the list of potential disposals from the NHS and should be considered as a new housing site.	56
Shakeel Ahmed- East Kent Construction	n/a		Extension to employment land- the vacant almost derelict land north of the Dane Valley Enterprise Centre for employment use. No delivery estimates have been made.	n/a
Mark Chandler-Finns	Robert Montgomery LLP	land at Manston between Manston Road, Preston Road and a solar farm	Promoters of this 6ha site expect that around 180 dwellings could be delivered on this site.	180
Allister Hume - Hume Planning Consultancy Limited	Sedgefield Properties	Former cross channel service station, Mount Pleasant, Minster Ramsgate	This 0.25ha site has been submitted by Sedgefield Properties for residential development. No delivery estimates have been made.	?
Jonathan Hoban- Deloitte	Church Commissioners	Sarre Windmill. 200m east of the centre of Sarre.	The Church Commissioners have submitted this 0.22ha site for potential allocation. The site could be deliverable for housing, however as yet, no figures have been assigned for delivery.	n/a
Jonathan Hoban- Deloitte	Church Commissioners	Land off Pudding Mill Lane, to the west of Birchington	Part of this site has already been included as 'deliverable' in the Council's SHLAA for 75 dwellings, the remainder of the site was included in the 'reserve sites' which was not assessed at the time. As part of this consultation the Church Commission for England promoted the wider site for development, with a potential capacity of 756 dwellings at 35 dwellings per hectare (dph). RPS consider that this is in a sustainable location for new growth and taking a conservative view of development at 30dph. This could yield a potential 648 dwellings. The 2013 SHLAA has already included part of the site for 75 dwellings, therefore, it is proposed that 573 dwellings are taken forward as a further site capable of being taken forward as deliverable in the SHLAA.	573
Jonathan Hoban- Deloitte	Church Commissioners	Land to the west of Minnis Road	Site promoted by the Church Commissioners measures 3.1ha Site could accommodate 35 dwellings per hectare	109
Martin Goodard	Martin Rigden		Site extension to the southern boundary of Land at Manston Court Road/Haine Road. Additional 8.15ha providing 205 units at 35 dwellings per hectare and 20 bungalows at 25 units per hectare	225
TOTAL				2028