

# Canterbury District Local Plan Review Public Examination

## Topic Paper 2: Housing



## Canterbury District Local Plan Review – Examination Topic Paper

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## LOCAL PLAN HOUSING STRATEGY

### 1.0 INTRODUCTION

- 1.1 This Paper sets out the Council's approach to housing land in the Canterbury District Local Plan Publication Draft 2014. It details the objectively assessed housing need for the District as set out in the Development Requirements Study (2012) (CDLP 1.6) prepared by Nathaniel Lichfeld and Partners. It also sets out the identified land supply and trajectory or phasing to meet this need for the plan period 2011-2031 and the methodology employed. More detailed information on the various scenarios considered and the reasons for the approach adopted, are contained in Topic Paper 1: Strategy (CDLP 1.14).
- 1.2 This paper also details the council's approach to affordable housing, student accommodation including the proposed approach to Houses in Multiple Occupation (HMOs), and accommodation needs of Gypsies and Travellers.

### 2.0 NATIONAL POLICY CONTEXT

- 2.1 **National Planning Policy Framework** requires local planning authorities to "meet the development needs of their area" and local plans should "meet objectively assessed needs" unless it would cause an adverse impact that outweighs the benefit of development, or specific policies such as SPA/SAC or AONB, indicate development should be restricted (Paragraph 14).
- 2.2 Paragraph 47 states that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. The City Council has significantly boosted the supply of housing in this plan by allocating large urban extensions to levels well above that previously identified in the South East Plan even though the District has over provided by approximately 1000 units against the South East Plan.
- 2.3 The NPPF at para 47 provides that Local Planning Authorities should also identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement with an additional 5% buffer moved forward from later in the plan period to ensure choice and competition. Where there is persistent under-delivery the buffer should be increased to 20%. For the last eight years, the number of completions in the District has been consistently high in all but three monitoring years which was mainly due to the recession.
- 2.4 The national Planning Practice Guidance ('the PPG') gives further advice on identifying the objectively assessed need stating that the national household projections provide a starting point. However, paragraph 2a-15 of the PPG states that the household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and

household formation rates which are not captured in past trends. Paragraph 2a–17 states that plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest ONS population estimates. Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence. The PPG states that issues may vary across areas and could include demographic structure that may be affected by local circumstances or policies (eg: expansion in education). This has happened within the district in recent years.

- 2.5 The PPG at paragraph 2a-15 states that the household projections should provide the starting point for assessing overall housing need. However, it does also state that the household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence. PPG paragraph 2a -18 also states that issues will vary across areas and the demographic structure may be affected by local circumstances or policies such as the education sector.
- 2.6 The City Council has had reason to believe for many years that the population projections for its area and therefore the household projections have been over-inflated. Both CCC and Kent County Council (KCC) have expressed concerns about the validity of ONS population data at a localised level for Canterbury District. This is linked principally to the issue of migration flows relating to overseas students as Canterbury has a high proportion of foreign students based at the City's Universities.
- 2.7 This is evidenced by considering the mid-year estimates for 2001 on a rolled forward basis (i.e. rolled forward using the annual mid-year estimates from 1991 to 2000) would have been 6.1% higher than the 2001 Census based mid-year estimate of 135,300. This highlights that in the intervening period between the 1991 Census and the 2001 Census, mid-year estimates for Canterbury had overestimated population by over 8,250 persons. This is speculated by KCC and CCC to be, at least in part, driven by the student population of Canterbury District and the use of GP registration and deregistration data within the mid-year estimates for estimating migration. Many students fail to re-register with their GP for some years after having left university, creating a lag effect in the migration estimates. Similarly, and more critically, many international students fail to de-register with their GP altogether when leaving the UK to return home, and thus, in statistical terms, remain part of the resident population in Canterbury, when in-fact they are not. Therefore although ONS mid-year estimates provide one methodology of estimating current population and past change, for Canterbury there is considered to have been past margins of error in this data.

### 3.0 THE LOCAL HOUSING MARKET

#### Housing Strategy 2012-16

- 3.1 The Council's recent housing strategy produced by the Council's former Housing Strategy and Enabling Team, sets out the Council's approach to housing issues and identifies the main issues facing the District. It considers the housing need and the appropriate type of housing and mix of tenure required. It recognises that housing has an important role in supporting economic prosperity.
- 3.2 It identifies affordability as one of the main issues facing the District. This is supported by the Strategic Housing Market Assessment guidance (SHMA) (2009) which recommends that for a market property to be affordable, it should cost no more than 3.5 times gross household income for a single earner and 2.9 times for a dual income household. Average gross weekly pay in September 2011 was £512/per week which is below the regional average of £556pw. Low incomes limit choice and ability to afford a home. The SHMA identified that a home in the cheapest 25% of properties costs 9 times lower quartile earnings. Therefore housing is very unaffordable in the District. In September 2011 the average house price in the district was £230,700, compared to £223,000 in 2007, property prices are on average £33,000 higher than neighbouring districts. The average house price for the District for the second quarter of 2014 is now £248,634 (Source HM land Registry) compared to £194,778 in Thanet where the number of sales was higher than Canterbury, and £207,825 in Dover. The housing strategy identifies that 52% of first time buyers are priced out of the market. Therefore it states that there is a need for low cost market homes.
- 3.3 The housing strategy states that existing affordable homes meet only 23% of housing needs, with 53.5% of those in housing need being families with children. Many affordable homes built in recent years have been one- and two-bedroom flats, largely on city centre brownfield sites such as the former Tannery and BT sites Rheims Way. The SHMA recommended that families with children should live in houses, rather than flats. Therefore, the supply needs to be rebalanced towards family houses as there is a shortage as set out in Table below.

Recommended property types for new affordable homes	Annual Need	Proportion
1-bedroom flats	132	23%
2-bedroom flats	0	0%
2-bedroom houses	117	20%
3-bedroom houses	260	46%
4 +-bedroom houses	61	11%
<b>Total</b>	<b>570</b>	<b>100%</b>

- 3.4 The housing strategy is therefore encouraging housing associations/RSLs to build more family homes and is attempting to free up existing family homes

where there is under-occupation by tempting existing tenants to down size to more suitable property.

- 3.5 The private rented sector has also been highlighted by the Shelter Report: Private Rent Watch (October 2011) as “very unaffordable” as they are £20 higher than neighbouring districts with the average rent for a 2 bed property £173/week. There is fierce competition in the private rented market from students due to the presence of 4 higher education facilities in the City.
- 3.6 The housing needs survey (2009) suggested that there was a need for 1104 new affordable homes a year. This is largely due to a significant unmet need for homes for local people because of the high housing cost and low income ratio. A large proportion of this 1104, is due to the backlog of unaddressed need which is demonstrated by the fact that between 2006-10 3192 homes were built and only 480 were affordable. The adopted Local Plan has a requirement of 35% affordable housing and in reality only 22% has been achieved through s106 agreements.
- 3.7 The backlog of affordable need has changed recently due to the government producing a new Allocations Code of Guidance in 2012 relating the Housing Register. This was followed by additional statutory guidance at the end of 2013. From 2003 local authorities maintained an “open” waiting list whereby anyone could apply to go on any local authority waiting list, this included anyone from outside the local authority or adjacent local authority areas. The introduction of open waiting lists coincided with a rise in waiting list numbers. The statutory guidance in 2013 changed this approach as the Secretary of State strongly encouraged all housing authorities to include a residency requirement. The S of S recommended that a reasonable period of residency would be at least two years.
- 3.8 As a result of this guidance most local authorities reviewed their allocation policies and the result has been a sharp fall in the number of households on the housing register in need of accommodation. For example, figures for 2012 and 2013 were 4,588 and 4,708 respectively whereas following the change to guidance the figure is now 1,734 in 2014. This dramatic change in the numbers has been replicated in most of the other Kent local authorities. The Council regards this as the most up-to-date and robust evidence regarding locally-derived affordable housing need, and this has a significant effect on the overall housing numbers required.
- 3.9 The other main issue highlighted in the housing strategy is the impact of students on the housing market particularly the private rented market. The presence of four Higher Education institutions – University of Kent, Canterbury Christ Church University, the University for the Creative Arts and the Girne American University - not to mention Canterbury College and numerous language schools, create competition for the more moderately priced dwellings and rented properties. It can also alter the balance of communities creating concerns about safety and anti-social behaviour.

- 3.10 Out of the District's total percentage of households, 88% are private sector households. The private rented sector is large equating to 15% of the stock. Student demand for private rented sector reduces the number of family sized homes as they become shared student houses. This competition for accommodation from students creates inflationary pressures on rents and house prices and therefore makes it difficult for many local people, particularly those families with children, to find suitable accommodation to buy or rent. The Housing strategy stresses that increasing the amount of purpose-built student accommodation is vital to reduce the pressures on the housing market and release family-sized homes for occupation by families. This view was shared by the City Council's Student Impact Scrutiny Review (2006/07). On average it takes the provision of 3.65 student bedspaces to remove a single shared student house from the private rented market. Therefore the housing market needs to be rebalanced to provide more houses that local families can afford.
- 3.11 There are additional advantages of purpose built student accommodation for the students themselves such as, easier budgeting; the universities set standards for construction, layout, maintenance and management; and students are protected from unscrupulous landlords.

#### **4.0 OBJECTIVELY ASSESSED HOUSING NEED**

- 4.1 The City Council has two studies which provide the background evidence for the objectively assessed housing need. The first is the Strategic Housing Market Assessment produced in 2009 for the East Kent Authorities of Canterbury, Thanet, Dover, Shepway and part of Swale ('the SHMA'). This document underpinned most of the early work on what was then the draft Core Strategy in 2009/2010. Following on from this early work the City Council commissioned Nathaniel Lichfield and Partners (NLP) to undertake a Development Requirements Study for the District 2012 ('the NLP report'). The NLP report took as its starting point the SHMA and further developed a range of scenarios based on different levels of growth taking into account the Council's reservations concerning mid-year estimates and population growth as detailed previously.
- 4.2 In 2013 the City Council had an Advisory Visit from the Planning Inspectorate. The advice received in relation to the 2009 SHMA was not to delay preparation of the draft Local Plan waiting for a revised SHMA as the City Council had recently carried out the Development Requirements Study which set out levels of housing development higher than that previously provided by the Regional Strategy South East Plan.

#### **Strategic Housing Market Assessment for the East Kent Sub-Region June 2009**

- 4.3 Ecotec were appointed by the East Kent Districts of Canterbury, Dover, Thanet, Shepway and part of Swale to undertake a Strategic Housing Market Assessment of the East Kent Sub Region in 2009.

- 4.4 The study sets out a number of findings and recommendations some of which have been addressed by the local plan. The Study identified 21 local housing markets across the sub-region some of which straddle District boundaries. It identified one of the critical challenges as tackling the impact of an ageing population while addressing the loss of younger age groups and therefore the economically active population. The role of housing is seen as essential to improve the housing offer for younger households through the provision of more affordable family accommodation, as well as meeting the need of an ageing population through applying a Lifetimes Homes standard subject to a viability assessment. The SHMA recommended that on developments of 15 or more units and 100% affordable housing units, at least 20% of market units be developed to Lifetime Homes standards.
- 4.5 Linked to the above, the SHMA recognised the role that housing can play to improve economic performance of the sub-region, by providing an appropriate mix of housing products for higher earners and local young families. This needs to meet both the affordable and market housing needs.
- 4.6 East Kent wages are generally lower than the Kent and South-East averages and reflects the reliance on lower paid low skilled elements of the economy. Skill and wage levels will need to be improved if the ambition of diversifying the economy around knowledge based industries is to be achieved.
- 4.7 The East Kent sub-region has substantial rural areas and the study identified that this has advantages and disadvantages. It creates high values of land and houses with an attractive physical environment whilst at the same time creating severe affordability problems for low-waged locally employed residents. The younger population are unable to find suitable accommodation and so leave the area creating unbalanced communities which are increasingly made up of older and wealthier residents. The SHMA suggests measures to encourage appropriate affordable housing such as a reduced threshold for rural areas whilst providing rural exception sites for 100% affordable housing. It also suggested considering the encouragement of commuted payments.
- 4.8 The SHMA found that the housing stock in the area was characterised by an over provision of smaller flat development and subdivision of former family homes. It recommended that future development policy prioritised rebalancing this stock through providing incentives for the provision of family homes and control the subdivision of larger of homes into flats. It recognised the impact that the larger student population has on the Canterbury market.
- 4.9 With regards to meeting the housing need, the SHMA recognised that with the rising housing need together with the large backlog of unmet demand, it is inconceivable that this will be met. Even if all the homes to be provided were affordable there would still be a substantial element of demand unmet.
- 4.10 The SHMA also recommended that the Districts develop further policies to balance housing markets through intervening to maximise the potential of existing stock. This has been addressed through the housing strategy's



approach of seeking to encourage smaller households in family units to downsize to more appropriate housing units.

**Canterbury Development Requirements Study - Nathaniel Lichfield and Partners (NLP) (2012)**

4.11 NLP were appointed to identify the future development requirements of the District. The study also assessed the level of infrastructure required to support the levels of development. Ten potential scenarios were identified which fell into 4 main bands – Band 1 Lower end: 80-150 dwellings pa Scenarios A and H; Band 2 Lower mid-range: 500-650 dwellings pa Scenarios B, C and D; and 3 Upper mid-range: 650 – 800 dwellings pa Scenarios E, G and I; and Band 4 Upper end: 1,100-1,200 dwellings pa Scenarios F, J and I. The scenarios considered were as follows:

<b>Scenario</b>	<b>Description</b>	<b>No. of dwellings pa</b>	<b>Summary of Potential Outcomes</b>
Scenario A:	Existing Supply	150 dwellings pa	Decline in population; decline in workforce
Scenario B:	Trend based Completions	617 dwellings pa	Increase in population through net in-migration; moderate level of growth
Scenario C:	South East Plan Requirements	510 dwellings pa	Increase in population; constrained housing choice; constrain future economic growth
Scenario D:	East Kent Strategy	655 dwellings pa	Increase in service growth particularly support service sector
Scenario E:	Futures “Preferred Scenario”	780 dwellings pa	Higher levels of development than previously observed; expansion of local labour force particularly in office based sectors reflecting the Futures work.
Scenario F:	Travel for Work	1167 dwellings pa	Shift in role from place to work to a place to live generating higher need for housing; lower employment opportunities.
Scenario G:	Updated Economic Forecast	679 dwellings pa	Would not meet the scale of need and demand in District. Economic growth in line with past trends.
Scenario H:	Zero Net Migration	80 dwellings pa	Decline in population and negative impact on the local economy with a decline in the number of jobs.
Scenario I:	Past trends	1140 dwellings pa	Result in a shift in population

	Demographic led		structure with increasing demand for housing. Significant job growth
Scenario J:	Housing Need	1149 dwellings pa	This would require 402 affordable dwellings pa to be built resulting in significant job growth.

### Sustainability Appraisal of Development Requirements (2012) AMEC

- 4.12 The City Council employed AMEC in 2012 to undertake a Sustainability Appraisal of the Development Requirements Study to ensure that the appropriate level of development was identified.
- 4.13 To ensure consistency with the sustainability appraisal of Local Plan documents in Canterbury, each of the development scenarios was assessed against the sixteen objectives detailed in the 2010 Sustainability Appraisal Scoping, using updated baseline information to inform the appraisal.
- 4.14 Each scenario was assessed as to the extent it would contribute to addressing the environmental, social and economic issues of the area. Both positive and negative effects were identified with all of the development scenarios. These can be summarised as follows:
- 4.15 **Scenarios A and H** – which required development on currently committed land only – were identified as not providing enough homes for the current population, resulting in out-migration as people look for homes, a reduction in jobs and the labour force over time and a long term reduction in the viability of shop, service and community facilities. These options therefore had a significantly negative score for housing, economy, and sustainable community/quality of life options. However, developing current commitments only minimises any negative effects on environmental objectives.
- 4.16 **Scenarios B, D and G** would have similar impacts on all of the sustainability objectives. Land take is broadly consistent with previous trends in the district. However, it remains unclear whether the environmental effects will be significant as this is dependent on the location of development and whether sites will be adjacent or close to sensitive and important biodiversity, geological, landscape and cultural sites.
- 4.17 **Scenario C** was identified as a missed opportunity for economic growth and was unlikely to meet housing needs. There were potential benefits to providing more homes to militate against the outmigration of working age population. Initiatives encouraging the retention of university leavers or to promote Canterbury as a place that would attract young workers could improve scores under this scenario without further negatively affecting environmental objectives.
- 4.18 **Scenario E** was identified as having the potential for significantly negative impacts on biodiversity and countryside/historic environment as it requires 446

ha of land although it also has a significantly positive effect on the local economy. The negative effects on the natural environment could be minimised or reduced by avoiding siting development in, adjacent to or close to existing sensitive and important nature conservation and cultural heritage sites.

- 4.19 **Scenarios F, I and J** with high number of new dwellings (1,000+dwellings pa) have a significantly positive impact on economy objectives. However the SA found that Scenario F would have an increase in out-commuting which would place additional pressure on transport infrastructure. Significant investment in the transport infrastructure could reduce these negative impacts. This would limit the economic benefits that will accrue to the district. The concentration of development around Canterbury I Scenario F neglects objectives within rural and coastal areas, including affordable housing targets and contributing to viability and vitality in these areas. Scenarios I and J reduce negative impacts within the urban fringes, but they spread the significantly negative effects to rural and coastal areas.
- 4.20 Overall the SA found that a level of compromise needs to be reached across the sustainability objectives, as scenarios which score highly on economy have significant negative effects on environmental objectives (i.e. - scenarios F, I and J) whereas scenarios that score more favourably on environment and resource use have a negative effect on the economy (i.e. – scenarios A and H). The SA recommended that at this stage scenario E offered the greatest potential to achieve the appropriate balance (to optimise growth and minimise detrimental environmental effects). However, it recommended careful consideration of the proposed location of development to avoid sensitive sites, to optimise positive community effects and to take the opportunity to maximise the benefits of innovative sustainable design (by ensuring efficient use of land and resources) to mitigate any potentially significant negative impacts.
- 4.21 The SA recommended that at this stage scenario E offers the greatest potential to achieve the appropriate balance (to optimise growth and minimise detrimental environmental effects). However, careful consideration of the proposed location of development envisaged in the scenario to avoid sensitive sites would be required, to optimise positive community effects and to take the opportunity to maximise the benefits of innovative sustainable design (by ensuring efficient use of land and resources) to mitigate any potentially significant negative impacts.

### **Comparison of future population and household trends**

- 4.22 The “What homes where” website (<http://www.howmanyhomes.org>) indicates that based on past trends, Canterbury will have an additional 16,611 households between 2006 and 2026 which equates to 831 new households per annum. By comparison using the interim household projections 2011 base identifies 840 dwellings pa for the District. As set out in paragraph 2.26 – 2.27, the City Council together with Kent County Council, has for many years contested that the population projections have been over inflated due to the high number of students in the District, who do not appear to be being deducted when the studies are completed in f the district. This is reflected to some

extent, by recent amendments to the subnational population projections as set out below.

Year base of projection	Time period	Projected Population
2010 based subnational Population projections	up to 2021	159,900
2011 based subnational Population projections	up to 2021	164,463
2012 based subnational population projections	up to 2021	158,600
	up to 2031	169,200

- 4.23 It can be seen from the above table that the figures for Canterbury District have been reduced in the 2011 based projection up to 2021 was 164,463 and the latest 2012 based projections has been reduced to 158,600 which is also lower than the original 2010 based sub national population projection for the same time period. It is therefore likely that the 2013 based projection will also be lower and this is likely to have a significant impact on the next round of household projections. It is therefore highly likely that the Council's household projections (2012, KCC) will be significantly lower than the current CLG projection of 840 (2011-based).
- 4.24 In comparison the 2013 ONS mid-year estimate for the population of Canterbury district is 155,307 including students at their term time address. If this is compared with the 2011 Census figure of 151,145 this gives an annual average population growth of 2081, which seems very high.
- 4.25 The Council believes that, despite improvements to the calculation of the migration figures, the impact of students in the general population is still over-estimated and this needs to be recognised in calculating the Objectively Assessed Need for Canterbury district.
- 4.26 Household projections published by CLG should provide the starting point estimate of overall housing need (PPG, para 2a-015). The current published interim household projections (CLG, 2011-based) indicate 840 per annum up to 2021. The new CLG household projections are not expected to be published until 2015. However, when they are published, the Council anticipates that there is likely to be a significant fall in household projections. This is based on initial analysis of the recent Sub-National Population Projections (2012) by Kent County Council.
- 4.27 The proposed economic strategy in the draft Local Plan suggests 780 dwellings per annum, above the standard economic forecast of 679 dwellings per annum (NLP, 2012). Bearing this in mind, and taking into account market signals and the need to align housing provision with the economic strategy for the area, and known housing need, **the Council considers that 780 dpa is the Objectively Assessed Need for which it should be planning.**

- 4.28 Although the Strategic Housing Market Assessment (2009) indicated a high level of affordable housing need which might affect the level of OAN, the Council has undertaken a full review of its housing register and has identified a total need for 1,734 dwellings to meet local need in 2014, compared to 4,708 in 2013. The Council considers that this is the most reliable and up-to-date information available on affordable housing need, even making an allowance for an element of hidden affordable housing need. The revised affordable housing figures, taken with the other evidence, means that figure of 780dpa is robust.
- 4.29 The Council has in fact taken this OAN figure of 780dpa as its housing requirement figure, without applying further environmental and other policy constraints that exist. The Council considers that the evidence base (such as the Sustainability Appraisal; SHLAA assessments; draft Infrastructure Delivery Plan) demonstrates that this level of development can be delivered, despite environmental and other constraints (AONB; international wildlife sites; traffic congestion in Canterbury and other infrastructure constraints).

### **Strategic Housing Land Availability Assessment (SHLAA)**

- 4.30 The SHLAA started in 2008 with an initial call for sites and further submissions were invited in 2010 and 2011. A total of 211 sites were received. The assessment of these sites led to the inclusion of the suite of sites now in the draft Local Plan. As part of this process the existing allocations in the Adopted Local Plan 2006 were re-evaluated and those that did not have a reasonable prospect of coming forward during the plan period, were not carried forward into the publication version of the draft Local Plan 2014. This process has led to the suite of sites now included in the 2014 local plan.

## **5.0 HOUSING NEED**

- 5.1 The NLP report together with the Council's Housing Strategy both state that affordability is an issue within the District, with the cheapest 25% of properties costs 9 times lower quartile earnings (Source: SHMA 2009).
- 5.2 The Council has revisited its approach to affordable housing in line with the SHMA and housing strategy. The SHMA recommended that there was a good case for increasing the affordable housing target to 35%, however, is up to local authorities to determine the percentage contribution. The adopted local plan has a target of 35%, however, the City Council has decided to lower this to 30% in this plan but lower the threshold to 7 or more units as there has been evidence of developers artificially reducing the capacity of sites to below the threshold. In addition the Council has opted to have a policy of commuted sums for those sites below the threshold, in the view that this should provide more affordable housing units overall (policy HD2). The SHMA also recommended that affordable housing should be split between 30% intermediate housing and 70% affordable rented homes.

### **Houses in Multiple Occupation (HMOs)**

- 5.3 As previously stated, students can have an impact on the local housing market and the local community. The impact of students was raised as part of the Core Strategy consultation in 2010 and to address this issue the City Council consulted on draft Supplementary Planning Document (SPD): Balanced Housing Provision from 16/09/10 to 29/10/10. A sustainability appraisal of this document was also consulted on at the same time. During the consultation the Government made changes to the consent regime whereby smaller HMOs no longer required planning permission for a change of use as it was now regarded as permitted development. To address this issue and following on from the SPD consultation, the City Council consulted on a proposed Article 4 Direction from 01/12/10 to 21/01/11. When this was reported by HMO Scrutiny Review, to the meeting of the Executive on 26<sup>th</sup> July 2012, the Council, based on the evidence gathered and assessed during the Review, resolved to not confirm the Article 4 Direction and agreed that the control of HMOs be considered through the Local Plan process.
- 5.4 The Council is now proposing an Article 4 Direction covering the urban area of the City of Canterbury and the wards of Sturry North, Sturry South, Barton, Wincheap and Blean Forest, to require planning applications to be sought for small Houses in Multiple Occupation, which primarily serve the student population. It is intended to apply draft Policy HD6 in the area of the Article 4 Direction, that was previously consulted on in 2012, but was not confirmed.
- 5.5 The evidence gathered over the last few years indicates that the level of student accommodation in the open market distorts the local market to some degree and also results in the loss of small family accommodation, which the SHMA indicated was a key area of housing need. This approach seeks to redress the housing balance and also responds to comments received during public consultations on the Article 4 Direction and draft Local Plan.
- 5.6 The Council, through the draft Local Plan and other means, supports the growth of the Universities, and is seeking to encourage the Universities to prepare long-term masterplans for their sites to meet their needs for teaching, business and residential accommodation (draft Policies EMP7 and EMP8) and to seek to meet their residential accommodation needs on site, wherever possible (draft Policy HD7).
- 5.7 It is the intention of the Council to move forward with an Article 4 Direction if the Examining Inspector supports the broad approach to student accommodation.
- 5.8 In addition to the HMO approach, the City Council is also encouraging the Higher Education Institutions to build purpose built Student Accommodation as detailed in policy HD7. The Council is also requiring all future increases in academic or administrative floorspace which results in an increase in student numbers, to be matched by a corresponding increase in purpose-built student accommodation.

## Gypsies and Travellers

- 5.9 An initial Gypsy and Traveller Accommodation Assessment was carried out in 2007 for the East Kent authorities of Canterbury, Dover, Shepway and Thanet by De Montford University. This has been subsequently updated in April 2014 by Salford University’s Housing and Urban Studies Unit to provide up to date information and data regarding the needs and requirements of the Gypsy, Traveller and Travelling Showpeople communities. The timing of this study and to avoid delaying submission of the local plan, has meant that it was not possible to include allocations for gypsies and travellers within this local plan. Instead the Council has included a criteria based policy (policy HD10) for assessing individual planning applications. There has been a preference within the Gypsy and Traveller community for more family owned and run plots rather than publicly provided sites.
- 5.10 The City Council is committed to progressing the production of a separate DPD on Gypsy and Traveller Sites and this will start once the local plan has been submitted. The partner local authorities in the study are all progressing this issue to different timetables. Dover District Council is progressing with work on preparing a Gypsy and Traveller Local Plan in accordance with the timetable in their Local Development Scheme <http://www.dover.gov.uk/Planning/Planning-Policy/PDF/Local-Development-Scheme-April-2014.pdf> The Local Plan will allocate sites(s) to meet the 17 pitches that was identified in the East Kent Gypsy and Travellers, Travelling Showpeople Assessment (GTAA). The Council has appointed URS to prepare a Sustainability Scoping Report and has recently undertaken a ‘Call for sites’. Officers are now assessing all of the sites that have been put forward and are aiming to go to Cabinet in January 2015 with a draft Local Plan. The timetable for this may, however, vary depending on other work priorities/commitments.
- 5.11 Shepway District Council is preparing a Places and Policies Local Plan options document for consultation in January 2015 which will include a ‘call for sites’ for all allocations including Gypsies and Traveller sites. Thanet Council will be including a criteria based policy in their new local plan as the GTAA did not identify a need for pitches. If Dover District Council’s timetable were to alter there may be an opportunity for Canterbury and Dover to produce a joint DPD, subject to the respective timetables coinciding and this will be kept under review. Each District has indicated that they will meet their own need.
- 5.12 The Member Local Plan Steering Group has agreed the following timetable at its meeting on 15<sup>th</sup> October 2014 which will be included in the Council’s Local Development Scheme (LDS).

Stage	Date
“Call for sites” and engagement with local Gypsy & Traveller community (continuing through whole process)	Nov 2014 – Jan 2015
SA scoping report work	Jan-Mar 2015
Options consultation and engagement	May-July 2015
Publication	February 2016
Examination	June 2016

Adoption	November 2016
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5.13 The Government has recently issued a consultation in relation to Gypsy and Traveller sites, which proposes a change in the definition of Gypsies and Travellers. This might result in some changes to the findings of the Gypsy & Traveller Accommodation Assessment carried out earlier this year and the City Council will need to be mindful of any changes to the guidance in preparing the proposed DP.

## 6.0 HOUSING LAND SUPPLY METHODOLOGY

6.1 The base date of the publication draft local plan is April 2011. The plan used the land supply figures as set out in the housing information audit 2013, however, the 2014 HIA is now available and the figures in this topic paper use the latest study and therefore update the land supply situation included in the local plan.

6.2 The approach to housing land supply is one that has been used by the Kent local authorities in conjunction with Kent County Council, for many years. Until recently it was a joint study between each individual District and the County, however, local government restructuring at the county level has meant that there is now limited input. The County Council for the last couple of years has no longer taken part in the actual survey and now only has responsibility for pulling together the results for the District reports and the County overview. The HIA studies provide a level of cooperation and consistency across Kent. Each District uses a core approach to the survey but includes additional elements to meet specific local circumstances, for example, some local authorities include SHLAA sites and care homes within their supply, some include a 5% buffer and others include a 20%.

6.3 The land supply consists of several components – extant planning permissions, allocations and windfalls. Extant permissions are sites with planning permission for residential development that are either not started or under-construction at 31<sup>st</sup> March in the survey year. Allocations are those sites identified in a local plan which have a reasonable chance of coming forward for development as indicated by the landowner or developer. These sites usually come forward via the SHLAA process.

6.4 Finally, there are windfall sites. The NPPF (paragraph 48) states that local planning authorities may include an allowance for windfall sites in the five year supply subject to:

- Compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.
- The allowance being realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends where applicable.
- The allowance should not include residential garden land.



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- 6.5 The purpose of a windfall allowance is to account for housing development on sites where it is not possible to identify sites in advance. These can be one off developments where for example, a factory closes and the site is redeveloped for housing or they can be small sites where one dwelling is replaced with 2 or 3 on the same plot.
- 6.6 As part of the recent planning reforms there is now an additional source of residential units – permitted development involving a change of use from commercial uses such as offices or retail space above a shop to residential i.e. planning permission is not required in some circumstances. The City Council is picking up some of these through the prior approval process where possible.

### Windfalls

Monitoring year	Small site	Large Site	Total windfalls	All comps	Small site as % of all comps	Large site as % of all comps	All windfalls as a % of all comps
1993/94	139	107	246	314	44.3	34.1	78.3
1994/95	184	79	263	506	36.4	15.6	52.0
1995/96	121	98	219	383	31.6	25.6	57.2
1996/97	87	80	167	521	16.7	15.4	32.1
1997/98	76	32	108	489	15.5	6.5	22.1
1998/99	124	93	217	610	20.3	15.2	35.6
1999/00	108	35	143	540	20.0	6.5	26.5
2000/01	90	140	230	615	14.6	22.8	37.4
2001/02	119	96	215	501	23.8	19.2	42.9
2002/03	25	113	138	305	8.2	37.0	45.2
2003/04	33	131	164	377	8.8	34.7	43.5
2004/05	91	135	226	775	11.7	17.4	29.2
2005/06	58	78	136	532	10.9	14.7	25.6
2006/07	96	292	388	638	15.0	45.8	60.8
2007/08	291	361	652	1284	22.7	28.1	50.8
2008/09	129	330	459	965	13.4	34.2	47.6
2009/10	91	106	197	305	29.8	34.8	64.6
2010/11	192	153	345	361	53.2	42.4	95.6
2011/12	88	361	449	624	14.1	57.9	72.0
2012/13	81	282	363	524	15.5	53.8	69.3
2013/14	85	200	285	475	17.9	42.1	60.0
<b>TOTAL 1993 to 2014</b>	<b>2592</b>	<b>3453</b>	<b>6045</b>	<b>11,884</b>	<b>21.0</b>	<b>27.9</b>	<b>48.9</b>

- 6.7 In the national Planning Policy Guidance (the PPG) the Government sets out how housing land supply should be assessed in relation to a windfall calculation. Windfalls are those sites which are not allocated in a local plan and receive planning permission. The NPPF and the PPG both state that local authorities may make an allowance for windfalls in the 5 year supply if they have compelling evidence that such sites have consistently become available in

the local area and will continue to provide a reliable source of supply. Any allowance should be realistic and have regard to the SHLAA, historic windfall delivery rates and expected future trends and should not include residential gardens.

- 6.8 Canterbury District has historically had a high windfall completions rate. The table below shows historic windfall completions over the last 20+ years 1993-2014.
- 6.9 As can be seen from the above table the Council has had a consistently high windfall completion rate with average percentage for 1993 to 2014 being just under 50% of all completions. Therefore the Council has the historical evidence to justify the inclusion of a windfall allowance in the land supply.
- 6.10 The approach taken for calculating the windfall projection is realistic and pragmatic, for the draft 2014 Local Plan. The previous Adopted Local Plan (2006) was underpinned by an in-depth urban capacity study which identified potential large sites that were deliverable. The majority of these were carried forward into the 2006 local plan and many have come forward. Therefore as windfalls will continue to come forward, it is proposed to heavily discount the windfall calculation to be more realistic to only include small sites i.e. less than 5 units, and to base the annual average on the figures since the last adopted local plan 2006. Garden land has also been excluded from the calculations. Therefore the windfall allowance has been calculated as an average of the small sites windfall over the past 7 years:

Total Small site windfall (968) / No. of years 2006 – 2013 (7) = 138pa

- 6.11 As windfalls will continue to come forward – both large and small – the council has projected the estimated 138 units a year forward for the remaining 17 years of the plan period giving a potential supply of 2,484 units. It should be noted that the windfall calculation predates the 2013/14 HIA and therefore excludes the windfalls for this year’s survey.

<b>Post adoption of CDLP First Review 2006</b>	<b>Small</b>	<b>Large</b>	<b>All windfalls</b>
2006/07	96	292	388
2007/08	291	361	652
2008/09	129	330	459
2009/10	91	106	197
2010/11	192	153	345
2011/12	88	361	449
2012/13	81	282	363

<b>Total</b>	<b>968</b>	<b>1885</b>	<b>2853</b>
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**National Planning Policy Framework - 5% or 20% Buffer**

- 6.12 The NPPF recommends that “To boost significantly the supply of housing, local planning authorities should... identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land” (paragraph 47).
- 6.13 The table below sets out the completion rates since the start of the plan period of the South East Plan in 2006. It can be seen that in all but 2 years at the height of the recent recession, completions were higher than the South East plan requirement of 510 per annum with particular peaks in 2007/08 and 2008/09. In fact over the period 2006-2014 there was an oversupply of 1096 units. Although an under supply has to be carried forward into the new plan period, advice based on the PPG is that an oversupply cannot be simply taken into account in the same way unless it is based on a properly assessed need. Therefore this oversupply of 100+ units has not been carried forward into this draft Plan’s supply.

<b>Monitoring year</b>	<b>Completions</b>	<b>Annualised requirement SE Plan</b>
2006/07	638	510
2007/08	1284	510
2008/09	965	510
2009/10	305	510

2010/11	361	510
2011/12	624	510
2012/13	524	510
2013/14	475	510
<b>Total</b>	<b>5176</b>	<b>4080</b>

### Land Supply

- 6.14 The tables overleaf set out the land supply which has been updated since the publication draft local plan to present the most up to date and available information and to reflect the results of the Housing Information Audit 2014.
- 6.15 The Council has calculated a residual requirement which takes into account the shortfall from the previous years and has spread this across the remaining plan period. This is because there are a number of large infrastructure requirements associated with some of the strategic sites and therefore delivery may be slightly slower in the early years of the plan. This is compensated for, to some degree, by the list of other allocations and smaller unidentified sites that will come forward for development. The Council believes this is a genuine deliverable housing trajectory. There are already a number in the pipeline associated with the new office to residential permitted change of use – some 72 units since April 2014. It should also be noted that the City Council does not include student accommodation in the form of halls of residence or C2 care homes in these calculations. Student flats are however included.
- 6.16 The phasing is informed by the HIA phasing survey that is carried out each year. Developers of sites with planning permission and also those allocated in the local plan, are consulted on the Council’s proposed phasing of their site. The Council has carried this out as part of the HIA for last 5 years and this has influenced the phasing of sites.
- 6.17 The table below shows that the Council has an oversupply of 629 units over the plan period against a residual requirement of 13,977units.

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<b>Local Plan supply 2011-3031</b>	
<b>Local Plan 2014 requirement 2011-31</b>	<b>15600</b>
Completions from 01/04/11 to 31/03/14	1623
Residual requirement	13977
Number of units required 2014-2031 (remaining 17 years) pa	822
5% buffer 4110 x5%	206
<b>Total committed supply</b>	
Allocations	11356
Planning permissions	904
<b>Total land supply Allocations + PPs</b>	<b>12260</b>
Windfall allowance of 138 units pa 138x17 (remaining years of the plan)	2346
<b>Total supply</b>	<b>14606</b>
<b>Oversupply over the plan period</b>	<b>629</b>

6.18 In the short term the Council can also demonstrate a healthy 5 year supply with identified sites meeting 122% of the 5 year land requirement which equates to 6.4 years. The detailed phasing and of the strategic sites, other allocations and sites with planning permission can be found in the appendix to this report.

<b>5 year supply 2014/15-2018/19</b>	
<b>Local Plan 2014 requirement 2011-31</b>	<b>15600</b>
completions from 01/04/11 to 31/03/14	1623
Residual requirement	13977
Number of units required 2014-2031 (remaining 17 years) pa	822
5 year residual requirement 5x 822	4110
5% buffer 4110 x5%	206
<b>Residual requirement + 5 % buffer</b>	<b>4316</b>
<b>5 year supply 01/04/14 to 31/03/19</b>	
allocations	3651
Planning permissions	904
<b>total 5 year supply</b>	<b>4555</b>
Windfall allowance of 138 units pa 138x5	690
<b>total supply</b>	<b>5245</b>
<b>District wide 5 year supply</b>	<b>6.4 years</b>
Percentage of requirement	122%

## **7.0 CONCLUSIONS**

- 7.1 In this paper the Council has set out the evidence that underpins the local plan and the objectively assessed housing need as detailed in the NLP Development Requirements Study. The pressures and characteristics of the local housing market and how the local plan is aiming to address these issues.
- 7.2 Finally, the paper sets out the land supply situation in relation to residual land requirements which updates that information in the 2014 plan and provides evidence that this is in line with Government guidance.
- 7.3 This paper has demonstrated that the plan is in line with the Government's aim of boosting significantly the supply of housing, by setting out a requirement far higher than that previously considered in either the Kent and Medway Structure Plan or the South East Plan. This represents a step change in the delivery of housing for the district which supports the Council's corporate aim to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 7.4 Canterbury City Council therefore asks the Inspector to support the overall approach to housing as set out in the Canterbury District Local Plan 2014.

**Housing Allocations**

**Strategic Allocations**

Site name	No. of units	2014-15	2015-16	2016-17	2017-18	2018-19	2019-24	2024-29	2028-31
Site 1 Land at South Canterbury	4000			200	200	240	960	1200	1200
Site 2 Land At Sturry/Broad Oak	1000			50	100	100	375	375	
Site 3 Land at Hillborough, Herne Bay	1300		50	50	100	100	350	350	300
Site 4 Land at Herne Bay Golf Course, Herne Bay	600		50	50	50	50	200	200	
Site 5 Land at Strode Farm, Herne Bay	800		50	50	50	50	200	250	150
Site 6 Land at Greenhill, Herne Bay	300				50	50	200		
Site 7 North of Thanet Way, Whitstable	400		65	65	65	65	140		
Site 8 Land North of Hersden	500			50	50	50	150	200	
Site 9 Land at Howe Barracks, Canterbury	400	0	0	50	100	100	150		N/A
Site 10 Land at Ridlands Farm / Hospital site, Canterbury	810				100	100	160	300	150
St Martin's Hospital , Canterbury	200			40	40	40	80		
Land at Bullockstone Road, Herne Bay	190		50	50	50	40			
Spires, Land at Bredlands Lane, Sturry	81		40	41					
Barham Court Farm, Barham	25		25						
Land at Baker's Lane, Chartham	20		20						
Kingsmead Field	15					15			

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**Other Housing Allocations**

Ref No	Site	Town	Total Units	Y1 2014-15	Y2 2015-16	Y3 2016-17	Y4 2017-18Yr5 2018-19	2019-24	2024-29	2029-31
CA503	BT Car Park, Upper Chantry Lane	Canterbury	20				20			
CA488	White Horse Lane, Land East of	Canterbury	10				10			
CA483	Canterbury East Sta (South side), Land at, Gordon Road	Canterbury	11		11					
CA482	Canterbury East Station (North side) Car Park	Canterbury	24				24			
CA481	Canterbury West Station, Adj	Canterbury	40			20	20			
CA479	Car Park adj Registry Office	Canterbury	5				5			
CA282	St Johns Lane Employment Exch.	Canterbury	24						24	
CA554	8-12 Pilgrims Way	Canterbury	12			12				
CA507	Castle Street Car Park	Canterbury	54				54			
CA500	Sea Cadets Centre	Canterbury	9		9					
CA477	Holmans Meadow Car Park	Canterbury	20			20				
CA347	Ivy Lane North	Canterbury	10		10					
CA286	St John's Lane Car Park	Canterbury	5		5					
CA281	Hawks Lane	Canterbury	9			9				
CA278	Northgate Car Park	Canterbury	21				21			
CA047	St Radigund's Place	Canterbury	7		7					
CA043B	Rosemary Lane Car Park	Canterbury	20		20					
CA480	Kingsmead depot	Canterbury	40				40			
CA559	Rough Common Rd	Harbledown	16			16				
CA514	181 Sea Street, Adj	Herne Bay	14				14			
CA491	Herne Bay Station, Land at	Herne Bay	35				35			
CA426	Canterbury Rd/Victoria Rd, Corner of	Herne Bay	5				5			
CA340	Garage Site, Kings Road	Herne Bay	43				43			
CA375/H	Herne Bay Bus Depot	Herne Bay	30				30			



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Ref No	Site	Town	Total Units	Y1 2014-15	Y2 2015-16	Y3 2016-17	Y4 2017-18Yr5 2018-19	2019-24	2024-29	2029-31
B3										
HB1	Central Development Area (Herne Bay Area Action Plan)	Herne Bay	80				4040			
HB2	Beach Street (Herne Bay Area Action Plan)	Herne Bay	20		20					
CA530	Ladysmith Grove (UCS Site W17), Land at	Whitstable	31		15	16				
CA527	Builders Yard r/o 3 Belmont Road	Whitstable	23				23			
CA310	Beresford Road North and South	Whitstable	20					10	10	
CA309	Sea Street (Green's Warehouse)	Whitstable	5		5					
CA308	124 & adjoining Middle Wall	Whitstable	7				7			
CA305	15 Hamilton Rd, Adj	Whitstable	10					10		
CA524	Tankerton Rd car park & (garage - CA/03/0364)	Whitstable	17		17					
CA299	37 Essex Street	whitstable	7				7			
CA297	Adjacent to 100 Albert street	whitstable	11					11		

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**Extant Planning Permissions as at 31/03/14**

Application No	Address	Address2	Locality	No. of units NET	Year 1 2014-15	Year 2 2015-16	Year 3 2016-17	Year 4 2017-18	Year 5 2018-19	5 year Total
CA0400497	St Mildreds Tannery		Canterbury	19	10	9				19
CA0601531	Land rear of 43 Joy Lane		Whitstable	1	1					1
CA0701471	Former Huyck Factory Site Millstrood Road		Whitstable	84	40	44				84
CA0701658	1 Blackburn Road		Herne Bay	1	1					1
CA0801059	51 golden Hill South		Whitstable	10	10					10
CA0801124	25 Broomfield Road Land adjoining		Herne	1	1					1
CA0900265	18 Holmscroft Road		Herne Bay	1	1					1
CA0900444	Whitstable Post Office	Gladstone Road	Whitstable	12		3	3	6		12
CA0900999	Herne Bay Methodist Church	High Street	Herne Bay	9	4	5				9
CA0901439	Land between 9 and 11 The Fairway		Herne Bay	3		3				3
CA0901580	25 Island Road	Upstreet	Chislet	10		5	5			10
CA0901660	82-86 High Street		Herne Bay	10	10					10
ca0901692	The Forge	The Street	Ickham	1	1					1
CA0901713	Barton Yard at junction of Diamond Road and Westmeads Road		Whitstable	14	3	3	8			14
CA0901760	Land rear of 121 - 125 Sturry Road		Canterbury	8	0	8				8
CA0901882	153 Ashford Road		Thanington	4	2	2				4
CA0901917	Land between 112 & 114 Maydowns Road		Chestfield	1	1					1
ca1000225ful	land between	38-39 Pound Lane	Canterbury	1	1					1

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Application No	Address	Address2	Locality	No. of units NET	Year 1 2014-15	Year 2 2015-16	Year 3 2016-17	Year 4 2017-18	Year 5 2018-19	5 year Total
CA1000411	Land rear of 15-31 High Street		Whitstable	5	5					5
CA1000479	Land at 64a	Union Street	Canterbury	1	1					1
CA1000503	Land west of Mill Lane & north of A299 Thanet Way		Herne Bay	8	8					8
CA1000713	53 Joy Lane		Whitstable	0	0					0
CA1000970	21 Roper Road		Canterbury	7	3	4				7
CA1001011	Beech Cottage	Nackington Road	Lower hardres	0	0					0
CA1001228	Land rear of 12 Gorse Lane		Herne	1	1					1
CA1001299FUL	Sweech Farm	Herne Bay Road	Broad Oak	4		2	2			4
CA1001301	66 Eddington Lane		Herne Bay	4	2	2				4
CA1001360	33A Borstal Hill		Whitstable	3		3				3
CA1001629	16 Hodgson Road	Seasalter	Whitstable	1	1					1
CA1001644	Chestfield Farm	The Drove	Chestfield	4	2	2				4
CA1001662FUL	56-58 Central parade		herne bay	10		5	5			10
CA1001828	Bulls Head		Adisham	2		2				2
CA1001840	102 Island Road		Sturry	1	1					1
CA1001965	Land adjoining Mount Charles House Mount Charles Walk	Union Road	Bridge	1		1				1
CA1002032	Land rear of Hoath Village Hall	Church Road	Hoath	3	3					3
CA1002042	Land rear of 58 London Road		Canterbury	2	2					2
CA1100232	Carlton Lodge	Ashford Road	Chartham	-1	-1					-1
CA1100468	11-12 Orchard Street		canterbury	1	1					1

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Application No	Address	Address2	Locality	No. of units NET	Year 1 2014-15	Year 2 2015-16	Year 3 2016-17	Year 4 2017-18	Year 5 2018-19	5 year Total
CA1100519	Cedar House	Broadway	Petham	0		0				0
CA1100534	62 London Road		Canterbury	1	1					1
CA1100582	65-67 High Street		Whitstable	-1		-1				-1
CA1100590FUL	7-16 Stour Street		canterbury	12			6	6		12
CA1100600	Little Eaton Farm Pett Bottom Road		Lower Hardres	1	1					1
CA1100660FUL	Bigbury Gap site	land between Bigbury House, Bigbury Cottage & Bigbury	Chartham hatch	1			1			1
ca1100698	The Manor House Hardres Court Road The Stables		Upper Hardres	1		1				1
CA1100733	Francewood Littlebourne Road		Canterbury	0		0				0
CA1100740	Land rear of 19 Saddleton Road		Whitstable	1	1					1
CA1100747	55 Millstrood Road		whitstable	6	2	4				6
CA1100757	Crow Park Farm	Molehill Road	Chestfield	2		2				2
ca1100793	Land adjacent to 29 Westlands Road		Herne Bay	1	1					1
CA1100945	Cornerstone Maypole Lane	hoath	Hoath	0		0				0
CA1100977	8 Vernon Place		canterbury	4		4				4
CA1100993OUT	Land adjacent to 103 St John's Road	Swalecliffe	Whitstable	2		2				2
CA1101128	Freshfields Westcourt Lane	Woolage Green	Womenswold	1		1				1
CA1101190	156 Tankerton Road	Tankerton	whitstable	6	2	4	0			6
CA1101294	The Former Hog and Donkey Public House North Stream	marshside	Chislet	1	1					1
CA1101335	56A High Street		Whitstable	1		1				1

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Application No	Address	Address2	Locality	No. of units NET	Year 1 2014-15	Year 2 2015-16	Year 3 2016-17	Year 4 2017-18	Year 5 2018-19	5 year Total
CA1101363	Land adjacent to 44 Ridgeway Road	Herne	Herne	1	1					1
CA1101388	45 Joy Lane		Whitstable	1		1				1
CA1101492	Land adjacent to 12 Green Dell	Hales Place	canterbury	1		1				1
CA1101501	49A Castle Street		canterbury	1	1					1
CA1101610FUL	23 Stanley Road		Herne Bay	1			1			1
CA1101627FUL	57 Grand Drive		Herne Bay	2		2				2
CA1101651	Land adjoining	20 Plantation Road	chestfield	1	1					1
CA1101708	Land adjoining	5 Hawthorn Corner Maystreet	herne Bay	1		1				1
CA1101733FUL	Land at Invicta Road		Whitstable	3		3				3
CA1101854	96 Station Road		Herne Bay	4	2	2				4
CA1101879	2 Sturry Hill		Sturry	12		4	4	4		12
CA1101885	The Thatched House	Gravel Castle Road	Barham	0		0				0
CA1101889	11 Burnan Road		whitstable	1	1					1
CA1101902FUL	2-4 St John's Road	Swalecliffe	whitstable	9		3	3	3		9
CA1101952	11 Nightingale Close	Chartham Hatch	Chartham	1		1				1
CA1101967	18 Princess Road		Whitstable	0	0					0
CA1102032FUL	Land adjacent to	40 Park View,	Sturry	1		1				1
CA1102137	St Mildreds Tannery Rheims Way		Canterbury	5	5					5
CA1102145OUT	Land adjacent to 6 The Avenue	Hersden	Sturry	1		1				1
CA1102170FUL	Land adjacent to No 1 Clare Road		Whitstable	1		1				1

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Application No	Address	Address2	Locality	No. of units NET	Year 1 2014-15	Year 2 2015-16	Year 3 2016-17	Year 4 2017-18	Year 5 2018-19	5 year Total
CA1200019FUL	The Old Malt House	Malthouse Road	Canterbury	14			14			14
CA1200022FUL	Downland Cycles Ltd	Malthouse Road	Canterbury	5		5				5
CA1200068FUL	Land at the corner of	Southsea Drive and Cross Street	Herne Bay	2	2					2
CA1200087FUL	62 Sturry Hill		Sturry	2		2				2
CA1200136	15 The Friars		Canterbury	-1		-1				-1
CA1200137FUL	Land rear of	7 Victoria Road	Canterbury	1	1					1
CA1200140FUL	Ridgeway Farm Bungalow	Ridgeway Road	Herne	0		0				0
CA1200161OUT	Tankerton Evangelical Church,	154 Northwood Road	Whitstable	12		6	6			12
CA1200167	Cherrybrook Lodge	Rayham Road	Whitstable	1		1				1
CA1200178FUL	Hickling	Manwood Avenue	Canterbury	1		1				1
CA1200213FUL	66-68 Shalmsford Street		Chartham	1		1				1
CA1200225FUL	Land adjacent to 6 Chestnut Avenue		Blean	1		1				1
CA1200256FUL	Land adjacent to 10 Cogans Terrace		Canterbury	1		1				1
CA1200299OUT	Land rear of 159 Ashford Road		Thanington	2		2				2
CA1200520FUL	Land at	10 Bridgefield Road	Whitstable	1		1				1
CA1200559FUL	The Old Farm House	The Drive	Chestfield	1	1					1
CA1200563FUL	Former Huyck Factory Site plot 237	Millstrood Road	Whitstable	1	1					1
CA1200566FUL	Huyck Plot 238	Millstrood Road	Whitstable	1	1					1
CA1200567FUL	Former Huyck Factory Site plot 239	Millstrood Road	Whitstable	1	1					1
CA1200621FUL	Almonry House	Monastery Street	Canterbury	2		2				2

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Application No	Address	Address2	Locality	No. of units NET	Year 1 2014-15	Year 2 2015-16	Year 3 2016-17	Year 4 2017-18	Year 5 2018-19	5 year Total
CA1200657FUL	The Telephone Exchange	Ashford Road	Chartham	0	0					0
CA1200678FUL	38B St Dunstan's Street		Canterbury	1			1			1
CA1200689FUL	64 High Street		Whitstable	1		1				1
CA1200690FUL	64 Mortimer Street		Herne Bay	2		1				1
CA1200720FUL	65-65A London Road		Canterbury	12		3	5	4		12
CA1200731Ful	LAND AT JUNCTION OF Farleigh Rd Broad Oak Rd		Canterbury	2		2				2
CA1200741FUL	2 Chapel Street		Herne Bay	1		1				1
CA1200810FUL	7 Sea View Road		Herne Bay	0	0					0
CA1200814RES	Land to the rear of Ivydene Montpellier Avenue		Whitstable	1		1				1
CA1200826FUL	1A and 1B Craddock Road		Canterbury	2	2					2
CA1200831FUL	34 St Anne's Road	Tankerton	Whitstable	2		2				2
CA1200848FUL	White House	4 St Martins Avenue	Canterbury	1	1					1
CA1200863FUL	101B Tankerton Road		Whitstable	2		2				2
CA1200915FUL	Land adjacent to	38 Whitstable Road	Canterbury	3		3				3
CA1200932FUL	Coach house	55 London Road	Canterbury	2		2				2
CA1201050FUL	64 Sturry Hill		Sturry	1	1					1
CA1201123FUL	77 New Dover Road		Canterbury	1		1				1
CA1201136FUL	Westwood	Stodmarsh Road	Canterbury		0					0
CA1201137FUL	Bridge Methodist Chapel	Patricbourne Road	Bridge	1	1					1
CA1201138FUL	The Coach House	Denne Hill Farm	Womenswold	1	1					1
CA1201153FUL	land to rear of	137 Canterbury	Herne Bay	1		1				1

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		Road								
CA1201169FUL	Folly Farm	Headcorn Drive	Canterbury	4		2	2			4
CA1201173FUL	The Old Jolly Sailor	142 Joy Lane	Whitstable	1			1			1
CA1201184OUT	Former Telephone Engineering Centre,	Littlebourne Road	Canterbury	93	10	20	30	33		93
CA1201208FUL	53 Dargate Road	Yorkletts	Whitstable	1			1			1
CA1201247FUL	39 Blean Common		Blean	1			1			1
CA1201458VAR	126 and garages to rear of 128 Tankerton Road		Whitstable	13	8	5				13
CA1201532FUL	21-23 Whitstable Road		Canterbury	1	1					1
CA1201561FUL	Kent County Cricket Ground	Old Dover Road	Canterbury	6	6					6
CA1201608FUL	38 Island Road	Sturry Road	Sturry	5		2	3			5
CA1201615FUL	140 Cromwell Road		Whitstable	1			1			1
CA1201693FUL		5 High Street	Whitstable	7		5	2			7
CA1201695FUL	Shrub Hill Cottage	Molehill Road	Chestfield	0	0					0
CA1201698FUL	Land at Sea Farm and Croft Farm	Dargate Road	Yorkletts	6		3	3			6
Ca1201715FUL	land at Farleigh Road		Canterbury	12		3	5	4		12
CA1201722FUL	North Barn	Home Farm House	Marshside	1		1				1
CA1201818FUL	Neville House	90-91 Northgate	Canterbury	7	3	4				7
CA1201825FUL	Land adjacent to	10 The Street	Kingston	1			1			1
CA1201850FUL	52 Honey Hill		Blean	0	0					0
CA1201861FUL	Land adjacent to the Royal Oak	Hatch Lane	Chartham	2		1	1			2



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CA1201865FUL	Beltinge Lodge	Hillborough Road	Herne Bay	1	1					1
CA1201895OUT	Land adjacent to 103 St John's Road		Whitstable	1		1				1
CA1201953FUL	Land between	49 and 51 Fitzroy Road	Whitstable	1	1					1
CA1202029FUL	The Local PH	Cockering Road	Chartham	2			2			2
CA1202037OUT	35 Island Road		Sturry	2			2			2
CA1202061FUL	Denge Wood Farm	Flaxland Lane	Garlinge Green, Petham	0		0				0
CA1202062FUL	Land adjacent to	74 Wincheap	Canterbury	3		3				3
CA1202086FUL	120 Blean Common		Blean	1	1					1
CA1202104FUL	74 The Broadway		Herne Bay	0		0				0
CA1202108FUL	Land rear of	36 St Martin's Road	Canterbury	1			1			1
CA1202135FUL	Woodlands	Fox's Cross Hill	Yorkletts	0			0			0
CA1202145FUL	23 St George's Avenue		Herne Bay	1			1			1
CA1202220FUL	Land adjacent to	133 Reculver Road	Herne Bay	1			1			1
CA1202243FUL	38 Western Esplanade		Herne Bay	0			0			0
CA1300002FUL	Land adjacent to no 11 Lismore Road		Whitstable	1		1				1
CA1300031FUL	Former Wyevale Garden Centre	London Road	Upper Harbledown	19		5	7	7		19
CA1300048FUL	Land adjacent to Elmcourt	Bullockstone Road	Herne Bay	2	2					2
CA1300058FUL	44 Honey Hill		Blean	-1		-1				-1
CA1300098FUL	32 High Street		Herne Bay	8		4	4			8
CA1300107FUL	Plough Inn	London Road	Upper Harbledown	1	1					1

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CA1300153FUL	Jersey Dairy Farm	80 Mill Lane	Herne	5	2	3				5
CA1300163FUL	Tanga	Radfall Road	Chestfield	0		0				0
CA1300165FUL	Anester Cottage	London Road	Harbledown	1		1				1
CA1300228FUL	Plots 1 & 2 The Oast Shalmsford Farm	Shalmsford Street	Chartham	2	2					2
CA1300299FUL	61 Lansdown Road		Canterbury	1		1				1
CA1300301FUL	2 Beer Cart Lane & 70 Stour Street		Canterbury	14	5	9				14
CA1300333FUL	57 Marine Parade	Tankerton	Whitstable	1	1					1
CA1300393FUL	1 Sea View Road (Milford House		Herne Bay	5	5					5
CA1300421FUL	3 Argyle Road		Whitstable	1		1				1
CA1300432FUL	Land adjacent to	64 Warwick Road	Canterbury	8			8			8
CA1300439FUL	55 Millstrood Road		Whitstable	1		1				1
CA1300484FUL	80 Herne Avenue		Herne Bay	1		1				1
CA1300523FUL	Sunnyside	Rayham Road	Whitstable	2		2				2
CA1300532FUL	30 New House Close		Thanington	1	1					1
CA1300558FUL	1A Craddock Road		Canterbury	1	1					1
CA1300576FUL	Horton Chapel	Cockering Road	Chartham	1		1				1
CA1300600FUL	102 New Dover Road		Canterbury	-1		-1				-1
CA1300606FUL	8 High Street		Canterbury	4		4				4
CA1300624FUL	19 Saddleton Road		Whitstable	1	1					1
CA1300638FUL	9A Gorrell Road		Whitstable	2	2					2

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CA1300659FUL	Land adjoining 173 Ashford Road	Thanington	Canterbury	2	2					2
CA1300666FUL	The Old Cottage	Bekesbourne Lane	Canterbury	-1	-1					-1
CA1300694FUL	Barham Methodist Chapel	Derringstone Hill	Barham	1	1					1
CA1300715FUL	Orchard Cottage	Church Lane	Seasalter	0	0					0
CA1300748FUL	Motorists Centre	Island Road	Hersden	10	10					10
CA1300764ful	Folly Farm	Headcorn Drive	Canterbury	1		1				1
CA1300773FUL	Sea Pinks	Sunray Avenue	Whitstable	1		1				1
CA1300787FUL	37 Vauxhall Avenue		Herne Bay	0		0				0
CA1300791FUL	Bees End	Chapel Lane	Broad Oak	1	1					1
CA1300833FUL		226a and 226b Tankerton Road	Whitstable	5			5			5
CA1300850FUL	27 Long Meadow Way		Canterbury	1			1			1
CA1300853FUL	Former Oil Depot	Union Road	Bridge	4		2	2			4
CA1300865FUL	6 Sea View Road		Herne Bay	1		2				2
CA1300868FUL	190 Wincheap		Canterbury	10		2	4	4		10
CA1300885FUL	Queens Acre	Broomfield Gate	Chestfield	0	0					0
CA1300911FUL	Land adjacent to	9 Bowyer Road	Whitstable	1		1				1
CA1300931FUL	Land adjoining	251 Old Dover Road	Canterbury	1	1					1
CA1301015FUL	69-71 High Street		Whitstable	1		1				1
CA1301110OUT	Braymor House,	Queens Avenue	Canterbury	1		1				1
CA1301132FUL	Port & Starboard House	26 & 26A Admiralty Walk	Whitstable	-1		-1				-1

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CA1301164FUL	Land between 16 and 22 The Street		Adisham	2	2					2
CA1301192RES	54 Sea View Road		Herne Bay	2		2				2
CA1301205PAJ	10 Upper Bridge Street		Canterbury	8	8					8
CA1301210FUL	114A High Street		Herne Bay	1	1					1
CA1301220OUT	Broadway Green Farm	Broadway	Petham	1		1				1
CA1301223FUL	Land at Bakers Lane		Chartham	1		1				1
CA1301235FUL	28 Prioress Road		Canterbury	3	3					3
CA1301266FUL	St John Ambulance	St Marys Court, Church Lane	Canterbury	10	2	4	4			10
CA1301269FUL	The Marlowe Centre	St Peter's Lane	Canterbury	11	5	6				11
CA1301271FUL	20 High Street		Whitstable	1		1				1
CA1301272FUL	The Retreat And Beach Cottage	Seasalter Beach	Seasalter	-1			-1			-1
CA1301314FUL	Honey Hill Farm	11 Honey Hill	Blean	2	2					2
CA1301335FUL	Old Oast House	Hollow Lane	Canterbury	2		2				2
CA1301336FUL	Land at Woodside House	London Road	Harbledown	1		1				1
CA1301391FUL	Sparrow Court	Gravel Castle Road	Barham	0		0				0
CA1301421FUL	Land adjacent to 56 Bekesbourne Lane		Littlebourne	1		1				1
CA1301437FUL	62 Borstal Hill		Whitstable	1	1					1
CA1301496FUL	39 Baddlesmere Road		Whitstable	0		0				0
CA1301524FUL	21 Preston Parade		Seasalter	0		0				0
CA1301525FUL	Springfield Nurseries	Bekesbourne Lane	Bekesbourne	0		0				0

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CA1301549FUL	The Bungalow	North Stream	Marshside	0		0				0
CA1301566FUL	11 Admiralty Walk		Seasalter	0		0				0
CA1301612FUL	Land adjacent to 25 Grimthorpe Avenue		Whitstable	1	1					1
CA1301657FUL	St Joseph's Hall	River View	Sturry	3		3				3
CA1301700FUL	Land adjacent to Rosary Farmhouse	Church Road	Hoath	1		1				1
CA1301718FUL	Land and garages at 41 Shalmsford Street		Chartham	1			1			1
CA1301729FUL	Dempseys Removals	Diamond Road	Whitstable	22	22					22
CA1301739	62 burgate		Canterbury	1		1				1
CA1301771FUL	Land at Bakers Lane		Chartham	26	13	13				26
CA1301781FUL	Land adjacent to Ashby Cottage	Westbere Lane	Westbere	1		1				1
CA1301808FUL	Land adjacent St Michaels	Montpelier Avenue	Whitstable	1	1					1
CA1301811FUL	5 Railway Avenue		Whitstable	1	1					1
CA1301875FUL	Oriel Lodge	3 Queens Avenue	Canterbury	1	1					1
CA1301876FUL	19 South Canterbury Road		Canterbury	1		1				1
CA1301886FUL	6 Dargate Road	Yorkletts	Whitstable	0		0				0
CA1301910FUL	Land at Calcott Hall	Calcott Hill	Sturry	1	1					1
CA1301945PAJ	Unit 3 Townergate House	Chaucer Business Park	Wraik Hill	15	5	10				15
CA1301949FUL	Land adjoining 5 and 6 Thornden Wood Road		Herne Bay	4		2	2			4
CA1301992FUL	17 Baddlesmere Road		Whitstable	1			1			1
CA1302001FUL	Land at Windmill Road Grosvenor Road		Whitstable	5		3	2			5

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CA1302014FUL	The Old Oast	35 Oaten Hill	Canterbury	1		1				1
CA1302036FUL	32 Jubilee Road		Littlebourne	2			2			2
CA1302053PAJ	Units 1, 2 3 Hoath Farm	Bekesbourne lane	Canterbury	1	1					1
CA1302094PAJ	St Andrews House	Station Road East	Canterbury	25	10	15				25
CA1302150FUL	The Old Post Office	Valley Road	Barham	0	0					0
CA1302156FUL	7 Morris Avenue		Herne Bay	1	1					1
CA1302201FUL	1-6 Manwood Hospital	St. Stephens Green	Canterbury	4		2	2			4
CA1302245OUT	Land adjacent to Southern Water Pump House	Nethergong Hill	Chislet	1		1				1
CA1302250FUL	32 St Augustine's Crescent		Whitstable	1	1					1
Ca1302298FUL	16 Richmond Street		Herne Bay	0	0					0
CA1302353PAJ	Units 7 Hoath Farm	Bekesbourne Lane	Canterbury	1	1					1
CA1302374PAJ	77-79 Castle Street		Canterbury	1	1					1
CA1302377FUL	The Loft, Little Burstled Farm	Lynsore Bottom	Upper Hardres	0		0				0
CA1302385FUL	Roseacre	Trenley Drive	Canterbury	0		0				0
CA1302396FUL	Beechmount	Conyngnam Lane	Bridge	0		0				0
CA1302403FUL	47 Castle Street		Canterbury	0	0					0
CA1400001FUL	108 High Street		Herne Bay	6		6				6
CA1400091FUL	57 New Dover Road		Canterbury	-1	-1					-1
Ca1400094FUL	114 Blean Common		Blean	1	1					1
CA1400304PAJ	10 Station Road West		Canterbury	1	1					1
Ca1400319PAJ	212 Tankerton Road		Whitstable	1	1					1

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CAE0300009	Blue Anchor caravan park	Faversham Road	Seasalter	10		10				10