

Five Year Housing Land Supply Statement

2022-2027

March 2023



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1. Introduction

- 1.1 This five-year housing land supply statement sets out how Gravesham Borough Council calculates its five-year housing land supply. The five-year period covered by this statement is 1 April 2022 to the 31 March 2027.
- 1.2 The National Planning Policy Framework (NPPF) (DLUHC: 2021)¹ requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of deliverable housing land when assessed against their housing requirement as set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.
- 1.3 Policy CS02: Scale and Distribution of Development of the Local Plan Core Strategy sets out the Borough's objectively assessed housing need for the period 2011 - 2028 as being for at least 6,170 new dwellings delivered at a variable rate as follows; at least 325 dwellings per year for 2011/2012 – 2018/2019, at least 363 dwellings per year for 2019/2020 – 2023/2024, and at least 438 dwellings per year 2024/2025 – 2027/2028.
- 1.4 Paragraph 74 of the NPPF states that the Borough's five-year supply should be set against the strategic requirement as set out in adopted strategic policies or against a local planning authority's local housing need figure, as set out in the Government's Standard Method, where relevant policies are more than 5 years old. As the Borough's Local Plan Core Strategy was adopted in September 2014, it is now more than five years old, therefore the Standard Method, as set out in the Government's Planning Practice Guidance² (Housing and Economic Needs Assessments) provides the basis for the figures in this statement.

¹ National Planning Policy Framework (DLUHC: 2021):
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

² Planning Practice Guidance (last updated 16 December 2020)
[Housing and economic needs assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/housing-and-economic-needs-assessment)

Table 1: Gravesham Local Housing Need figure

Local Housing Need	Number of dwellings
Average annual change 2022-2032	505 Households
Affordability ratio 2021	10.90
Adjustment factor	1.43
Annual Local Housing Need Figure before Cap	722 dwellings per annum
Indicative Five-Year Supply Local Housing Need Figure before cap	3,610 dwellings
Cap Example A	707 dwellings per annum
Cap Example B	707 dwellings per annum
Capped Five Year Supply Local Housing Figure	3,535 dwellings

2. Housing Delivery Test Results

- 2.1 To ensure choice and competition in the market for land, the NPPF requires local planning authorities to add an additional 5% buffer to their housing requirements over the next five-year period. For local authorities where there has been under-delivery in the last 3 years, this buffer is to be increased to 20%.
- 2.2 The NPPF states in paragraph 74 (c), footnote 41, that under delivery will be measured against the Housing Delivery Test. The latest published Housing Delivery Test³ for Gravesham show's that over the period 2018 - 2021 661 dwellings were delivered in the Borough against a requirement for 1,154 dwellings. This results in a Housing Delivery Test 2021 measurement of 57%, which engages the presumption in favour of sustainable development and requires a 20% buffer to be applied.

Table 2: Gravesham Local Housing Need figure with buffer

Local Housing Need	Number of dwellings
Average annual change 2022-2032	505 Households
Capped Annual Local Housing Need Figure	707 dwellings per annum
Five Year Supply Local Housing Need Figure	3,535 dwellings

³ <https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement>

Local Housing Need	Number of dwellings
Average annual change 2022-2032	505 Households
Five Year Supply Local Housing Need Figure with 20% buffer applied	4,242 dwellings

3. Deliverable Housing Land Supply

- 3.1 The NPPF at paragraph 68, requires strategic policy making authorities to have a clear understanding of the land available for development in their Borough through the Strategic Housing Land Availability Assessment (SHLAA). From this, planning policies should identify a sufficient supply and mix of sites, including a supply of specific, deliverable sites for the first five years of the Local Plan. The NPPF (Annex 2: Glossary) provides a definition of “deliverable” as follows:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”*

- 3.2 In June 2020 the Secretary of State for Housing, Communities and Local Government conceded that the NPPF's definition of a "deliverable" housing site was not to be taken as a "closed list" therefore leaving room for decision makers to exercise their planning judgement. They stated that:

“The secretary of state has explicitly accepted that the definition (of deliverable in the NPPF) is not to be taken as a 'closed list' and site types not listed within the definition - for example, sites with a resolution to grant planning permission subject to the execution of a section 106 agreement, or draft allocations in an emerging plan - are capable of being deliverable if the evidence shows that they are "available now, offer a suitable location for development now, and are achievable with a realistic prospect that housing will be delivered on the site within five years.”⁴

⁴ (East Northamptonshire Council v Secretary of State for Housing, Communities and Local Government. Case Number: CO/917/2020)

4. Assessment of Deliverable Housing Land Supply

- 4.1 The Appendix to this statement lists the sites that the Council considers form part of the Borough's five-year housing land supply as of 1st April 2022 (the base date). These sites are considered to be deliverable and have been assessed via the annual monitoring undertaken by the Council. The sites include:

- Local Plan Core Strategy Key Sites without Planning Permission
- Sites with Planning Permission
- Specific Unallocated Sites
- Small and Large Site Windfalls

Local Plan Core Strategy Key Sites without Planning Permission

- 4.2 The Gravesham Local Plan Core Strategy allocates a number of key sites for residential development. The allocated key sites which have been granted planning permission are considered alongside all sites with planning permission in the section below entitled 'Sites with Planning Permission.'
- 4.3 There are four allocated key sites which do not currently benefit from planning permission. These are:
- Canal Basin Area (also known as Albion Waterside), Gravesend;
 - Land at Grove Road, Northfleet;
 - Heritage Quarter West, St George's Phase 2, Gravesend; and
 - Land at Coldharbour Road (KCC owned site only), Northfleet.

- 4.4 None of these key sites form part of the five-year housing land supply.

Sites with Planning Permission

- 4.5 As of 31 March 2022, there were 113 sites with planning permission for residential development in the Borough. Table 3 shows a summary of the 113 sites by development type (major/non-major) and planning permission (outline/full).

Table 3: Number of Sites with Planning Permission

Type of Development	Outline Planning Permission No. of Sites	Full Planning Permission No. of Sites	Total
Major Development	0	19	19
Non-Major Development	7	87	94
Total	7	106	113

- 4.6 In total, there are 2,307 homes (net) with planning permission considered to be deliverable within the next five years and which therefore contribute to Gravesham

Borough's five-year housing land supply. Table 4 below provides a summary of the homes with planning permission over the next 5 years (2022 – 2027) by the type of development and planning permission.

Table 4: Number of Deliverable Homes with Planning Permission

Type of Development	Outline Planning Permission No. of Deliverable Homes (net)	Full Planning Permission No. of Deliverable Homes (net)	Total
Major Development	0	2,091	2,091
Non-Major Development	11	205	216
Total	11	2,296	2,307

Specific unallocated sites

- 4.7 Initial work undertaken on the Borough's draft 2020 Strategic Housing Land Availability Assessments has not identified any unallocated sites or sites that do not benefit from planning permission for inclusion in the Borough's five-year housing land supply.

Windfall Allowance

- 4.8 Windfall sites are sites that are not formally included in the Local Plan Core Strategy as allocated key sites, but which subsequently come forward for residential development. The NPPF defines them as "*sites not specifically identified in the development plan*". Paragraph 71 of the NPPF allows local planning authorities to make an allowance for windfall sites as part of the anticipated housing land supply where there is "*compelling evidence that this will provide a reliable source of supply*". It goes on to state that "*any allowance should be realistic, having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends*".
- 4.9 Windfall sites have historically provided a strong source of housing supply in Gravesham, coming forward on both small sites (defined as sites of 4 units or less) and large sites (defined as 5 units or more).
- 4.10 At the Local Plan Core Strategy Examination (2014), the Examination Inspector considered there was clear evidence to justify including a small and large site windfall allowance in the Borough's housing land supply. All parties, at the examination, agreed that given the evidence in terms of historic and future trends it was appropriate to include a small site windfall allowance of 33 dwellings per year, from

⁵ <https://localplan.gravesham.gov.uk/consult.ti/REG18S2/consultationHome>

year 6 onwards (not from years 1 to 5), and a large site windfall allowance of 30 dwellings per year. As such, no allowance is included for small site windfalls in the five-year housing land supply.

Table 5: Windfall Allowance

Windfall	Number of Dwellings
Small Site Windfall Allowance	0
Large Site Windfall Allowance	150

Summary of Deliverable Housing Land Supply

- 4.11 The total contribution from the sources that make up Gravesham Borough's five-year housing land supply is set out in Table 6 below. Table 6 indicates that a total of 2,397 (net) homes are considered deliverable over the next five years (- 2022 – 2027).

Table 6: Total Five-Year Supply of Deliverable Homes

Component	No. of Deliverable Homes in Next Five Years (net)
Local Plan Core Strategy Key Sites without Planning Permission	0
Sites with Planning Permission	2,307
Specific Unallocated Sites	0
Small and Large Site Windfalls	150
Total	2,457

5. Housing Land Supply Calculation

- 5.1 The previous sections of this statement set out the different considerations that need to be factored into calculating the Borough's five-year housing land supply. This section summarises these factors and sets out the Borough's land supply for housing compared with the Borough's local housing need figure, with a 20% buffer applied, for the period 2022-2027.
- 5.2 Table 7 indicates there is a supply shortfall of 1,785 homes against Gravesham Borough's local housing need figure with a 20% buffer applied over the next five years. Table 7 also indicates that Gravesham Borough has the equivalent of a 2.90 years' supply of housing over the next five years. This calculation is determined by dividing the amount of housing land available (the deliverable housing supply) by the local annual housing need figure (annual requirement with 20% buffer applied).

Table 7: Calculation of the Borough's housing land supply 2022-2027

Component	No. of Deliverable Homes (net)	No. of Years Deliverable Housing Supply
(a) Deliverable Housing Supply	2,457	
(b) Local Housing Need Figure (plus 20% buffer)	4,242	
Housing Supply Surplus/Shortfall (a) - (b)	-1,785	
(c) Annual housing requirement (b ÷ 5)	848	
Years Supply Equivalent Over Five Years (a ÷ c)		2.90

- 5.3 Consequently, Table 7 indicates that Gravesham Borough is unable to demonstrate a supply of deliverable sites for housing against its housing requirement over the next five years from 2022 to 2027. Under the NPPF, councils are required to demonstrate a five-year supply of deliverable housing sites. In decision making, if an authority cannot demonstrate a five-year housing land supply, including any appropriate buffer, the presumption in favour of sustainable development will apply when considering planning applications, as set out in paragraph 11(d) of the NPPF. As Gravesham is unable to demonstrate a five-year housing land supply, the council will be required to undertake a balancing exercise when considering planning applications, to ensure that the correct weight is attached to the shortfall in meeting the five-year housing land supply requirement and the provisions within the NPPF.

Appendix A - Sources of Deliverable Housing Land Supply (1 April 2022 - 31 March 2027 only)

Site Reference	Status (Implemented or expiry date)	Site Name	Total no. of dwellings 2022-2027
EDC/16/0004	Implemented	Northfleet Embankment West	450
19960035	Implemented	Springhead (Ebbsfleet)	142
20200343	Implemented	The Charter - Land At Market Square And Horn Yard Car Parks New Swan Yard Gravesend DA12 2EN	242
20220432	Implemented	Former Gravesend Police Station Windmill Street 133	75
20150028	Implemented	128 London Road Northfleet Gravesend Kent DA11 9LE	14
20130957	Implemented	3 & 4 London Road Land to Rear Of	9
20160539	Implemented	Man Of Kent 53 - 57 Wrotham Road Gravesend Kent DA11 0QB	6
20160791	Implemented	Cheema Fabrics 29 - 30 High Street Gravesend Kent DA11 0AZ	6
20160807	Implemented	Costa Coffee 1 New Road Gravesend Kent DA11 0AA	2
20160890	Implemented	Land Adjacent To 214 Springhead Road Northfleet Gravesend Kent DA11 8HS	1
20160980	Implemented	Salem Yard Salem Place Northfleet Gravesend Kent DA11 9QA	1

Site Reference	Status (Implemented or expiry date)	Site Name	Total no. of dwellings 2022-2027
20191187	11/06/2024	Land At The Rear Of Bridge Bar And Club 24 Stone Street Gravesend Kent DA11 ONP	14
20190504	17/02/2025	M Block Former Gravesend & North Kent Hospital Bath Street Gravesend Kent DA11 ODG	115
20141214	Implemented	Land At Coldharbour Road Northfleet Gravesend Kent	292
20170748	Implemented	South Street Farm Wrotham Road Meopham Gravesend Kent	2
20180893 / 20150395	Implemented	Corner Site Junction Of High Street Lawn Road Northfleet Kent	1
20180074	Implemented	1 Johns Road Meopham Gravesend Kent DA13 OLP	1
20180381	Implemented	Gore Green Farm (East Of Gore Green Road), Gore Green Road Higham Rochester Kent ME3 7LT	2
20180459	12/07/2023	Amrit Jewellers 59 Wrotham Road Gravesend Kent DA11 OQB	1
20170999	22/02/2022	Lomer Farm Estate Wrotham Road Meopham Gravesend Kent	4
20190150	09/04/2022	377 Singlewell Road Gravesend Kent DA11 7RL	1
20190097	Implemented	10 Fleet Road Northfleet Gravesend Kent DA11 8EE	1
20180641	Implemented	33 Ivy Close Gravesend Kent DA12 5NP	1
20190096	26/07/2022	2 Cobham Street, Gravesend	3
20170892	10/07/2022	Costa Coffee 1 New Road Gravesend Kent DA11 0AA	1
20190870	16/10/2022	28 Coutts Avenue, Shorne, DA12 3HU	2

Site Reference	Status (Implemented or expiry date)	Site Name	Total no. of dwellings 2022-2027
20190724	03/10/2022	Land West Of 16 - 18 Wilberforce Way Gravesend Kent DA12 5DQ	1
20190725	03/10/2022	Land To The Rear Of 125 Barr Road Gravesend Kent DA12 4DX	1
20190497	02/10/2022	Former Builders Yard Rear Of 3 Cobham Street Gravesend Kent	4
20170688	10/10/2022	Site Known As Shawline House Burch Road Northfleet Gravesend Kent	7
20190936	31/01/2023	16 Havengore Avenue Gravesend Kent DA12 2QP	1
20190727	29/10/2022	Top Yard Hardys Corner 2 Vale Road Northfleet Gravesend Kent	10
20190155	Implemented	Land At 270-340 Valley Drive Gravesend Kent	12
20190914	15/11/2022	72 Sun Lane Gravesend Kent DA12 5HN	1
20180722	25/11/2022	9 Essex Road Gravesend Kent DA11 0SL	1
20191255	26/02/2023	Flats Above 12 - 16 Queen Street Gravesend Kent DA12 2EE	(4)
20190520	18/02/2023	The Builders Yard Lower Range Road Gravesend Kent DA12 2QL	14
20190405	Implemented	Mid Higham Post Office 2 Hermitage Road Higham Rochester Kent ME3 7DA	2
20200078	23/03/2023	The Muslim Cultural Centre 11 Albion Terrace Gravesend Kent DA12 2SX	1
EDC/17/0038	Implemented	Northfleet Embankment East - Cable Wharf	399
20030315	Implemented	Former Lord Street Car Park	106

Site Reference	Status (Implemented or expiry date)	Site Name	Total no. of dwellings 2022-2027
20191122	04/12/2023	Clifton Slipways West Street Gravesend Kent	106
20200651	25/08/2023	20 Tradescant Drive Meopham Gravesend Kent DA13 0EE	1
20200635	30/09/2025	Unit A Buckland Farm Chalk Road Higham Rochester Kent ME3 7JY	2
20200636	30/09/2025	Equipets Cleaning Services Ltd Unit D Buckland Farm Chalk Road Higham Rochester Kent ME3 7JY	3
20200637	30/09/2025	Unit F Buckland Farm Chalk Road Higham Rochester Gravesend Kent ME3 7JY	1
20200583	04/09/2023	61 Lennox Road Gravesend Kent DA11 0EL	1
20200546	05/08/2023	Land East Of 18 Copperfield Close Gravesend Kent	1
20200525	19/08/2023	COSTA 1 New Road Gravesend Kent DA11 0AA	2
20200528	04/08/2023	19 Beaumont Drive Northfleet Gravesend Kent DA11 9NN	1
20200412	Implemented	27 - 28 High Street Gravesend Kent DA11 0AZ	5
20200327	Implemented	Land To Side Of 4 Beresford Road Northfleet Gravesend Kent DA11 9JU	1
20200312	18/05/2023	Land At Brook Road Northfleet Gravesend Kent	1
20200314	Implemented	9 Spring Grove Gravesend Kent DA12 1LL	2
20200302	Implemented	31 - 33 High Street Gravesend Kent	6
20200234	02/06/2023	Land Adjacent To 55 Forge Lane Higham Rochester Kent ME3 7AH	1

Site Reference	Status (Implemented or expiry date)	Site Name	Total no. of dwellings 2022-2027
20200206	05/06/2023	Land Adjacent To And At The Rear Of Norwood Farm House Norwood Lane Meopham Gravesend Kent DA13 0YF	1
20200182	21/04/2023	Ebbsfleet Grill 1 - 2 Stonebridge Road Northfleet Gravesend Kent DA11 9DR	1
20200141	12/06/2023	Mountfield House Wrotham Road Culverstone Gravesend Kent DA13 0RQ	1
20200094	08/06/2023	Campbell Arms 1 Campbell Road Gravesend Kent DA11 0JZ	3
20200059	04/05/2023	195 Parrock Street Gravesend Kent DA12 1EW	4
20191080	24/07/2023	165 Parrock Street Gravesend Kent DA12 1ER	2
20190823	08/06/2023	O'Dell Farm Lower Higham Road Gravesend Kent DA12 2NY	3
20181222	01/07/2023	168 Parrock Street Gravesend Kent DA12 1ER	9
20201104	23/12/2023	16 Wellington Street Gravesend Kent DA12 1JG	1
20201020	01/12/2023	J And P Arnott 82 Havelock Road Gravesend Kent DA11 0JL	1
20200839	Implemented	7 Zion Place Gravesend Kent DA12 1BH	1
20200815	14/10/2023	Tufail 139 Parrock Street Gravesend Kent DA12 1EZ	4
20200800	08/10/2023	Rear Of 68-74 Brook Road Brook Road Northfleet Gravesend Kent	2
20200702	08/01/2024	F S Steakhouse Ltd 25 - 26 Milton Road Gravesend Kent DA12 2RF	2
20200604	07/10/2023	Garage Blocks Arnold Avenue Meopham Gravesend Kent DA13 0NU	1

Site Reference	Status (Implemented or expiry date)	Site Name	Total no. of dwellings 2022-2027
20200561	Implemented	Former St Johns Ambulance Brigade H Q Armoury Drive Gravesend Kent DA12 1NB	6
20191261	13/01/2024	Get Bar 68 - 69 High Street Gravesend Kent DA11 0BB	4
20171245	09/12/2023	Site Of Battle Of Britain Coldharbour Road Northfleet Gravesend Kent	20
2019/00019/REF (20180163)	Implemented	Land At Heron Hill Lane Meopham Gravesend Kent	5
20211472	02/02/2025	Invicta Bar 31 Windmill Street Gravesend Kent DA12 1AS	1
20211185	25/11/2024	Flat Above The Peacock Public House 78 Peacock Street Gravesend Kent DA12 1EG	1
20210874	Implemented	80A And 82A Parrock Road Gravesend Kent DA12 1QF	3
20210564	Implemented	197A Parrock Street Gravesend Kent	1
20210471	29/09/2024	Spices 2 Peacock Street Gravesend Kent DA12 1EE	4
20210045	Implemented	163 Parrock Street Gravesend Kent DA12 1ER (ECHO SQ)	1
20210291	29/04/2024	44 - 46 The Grove Gravesend Kent DA12 1DF (Job Centre)	12
20211448	25/01/2025	1 Foxbury Manor Old Watling Street Higham Rochester Kent ME2 3UG	1
20211415	17/02/2025	Garages Rear Of Osney Way Car Park Lower Higham Road Gravesend Kent	4
2020/00044/REF	18/05/2024	Land Adjacent To Home Farm Cottage School Lane Higham Rochester Kent	3
20201100	25/08/2024	Graveney Lodge Wrotham Road Meopham Gravesend Kent DA13 0AQ	1

Site Reference	Status (Implemented or expiry date)	Site Name	Total no. of dwellings 2022-2027
20211564	Implemented	4 -5 The Parade Wrotham Road Meopham Gravesend Kent	4
20210390	25/08/2024	94 Gordon Road Northfleet Gravesend Kent DA11 9JW	1
20211196/20191187	14/02/2025	Land To The Rear Of Bridge Bar And Club 24 Stone Street Gravesend Kent DA11 ONP	14
20211057	Implemented	Flat 3 107 Windmill Street Gravesend Kent DA12 1BW (opp. Clarence Pl)	1
20201336	17/05/2024	48 Pelham Road Gravesend Kent DA11 OHZ	4
20201225/ 20160539	10/09/2024	Man Of Kent 53 - 57 Wrotham Road Gravesend Kent DA11 0QB	9
20211179	Implemented	36 Albion Road Gravesend Kent	1
20210478	Implemented	13 - 14 Milton Road Gravesend Kent DA12 2RE	1
20210215	19/05/2024	24 And 24C Queen Street Gravesend Kent DA12 2EE	7
20210334	17/03/2025	6 Berkley Crescent And 48 Harmer Street Gravesend Kent (east side corner)	2
20210935	16/02/2025	Harrison Bernstein Ltd 10 Harmer Street Gravesend Kent DA12 2AX	2
20191051	Implemented	Poundworld Plus 1 - 2 King Street & 34 & 35 High Street Gravesend Kent DA12 2EB	35
20210861	08/09/2024	Side Garden Of 24 Ivy Close Gravesend Kent DA12 5NP	1
20210672/20130801	Implemented	Elizabeth Huggins Cottages Cross Lane West Gravesend Kent	4
20201134	Implemented	Sparks And Co Church Road North Gravesend Kent DA12 5UR	1

Site Reference	Status (Implemented or expiry date)	Site Name	Total no. of dwellings 2022-2027
20211253	30/01/2024	The Mission House 19 Royal Pier Road Gravesend Kent DA12 2BD	(1)
2021/00021	25/01/2025	6 Lacknut Cottages, Wrotham Road, Culverstone Green, DA13	1
20200569	25/03/2024	Garages And Land Rear Of Devonshire Road Gravesend Kent	2
20210985	22/09/2024	51 Milroy Avenue Northfleet Gravesend Kent DA11 7AZ	1
20200947	25/02/2024	Meopham Court Farm Wrotham Road Meopham Gravesend Kent DA13 0QJ	1
20201344	Implemented	Public Conveniences Perry Street Northfleet Gravesend Kent DA11 8RA	2
20200704	24/03/2024	19 Milton Road, DA12 2RF	2
20200726	17/02/2024	29-30 High Street (Cheema Fabrics)	6
20200672	23/03/2024	Newsbox Express 186 Rochester Road	3
20210263	04/11/2024	9 Vauxhall Close Northfleet Gravesend Kent DA11 9NP	1
20211196	11/06/2024	24 Stone Street Gravesend Kent DA11 ONP	19
20210407	16/06/2024	25 Coutts Avenue Shorne Gravesend Kent DA12 3HJ	1
Windfalls	Not applicable	Not applicable	150
Total			2,457