

**HEARING STATEMENT
RESPONSE TO
INSPECTOR'S
MATTERS, ISSUES AND
QUESTIONS
MATTER 2 (HOUSING
GROWTH AND
RESIDENTIAL
WINDFALL
DEVELOPMENT)**

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1.0 Introduction

1.1 Background

This Hearing Statement has been prepared by Bidwells on behalf of Emmanuel College, Cambridge in respect of Matter 2 (Housing Growth and Residential Windfall Development) of the Dover Local Plan Examination in Public.

This Statement makes representations to the following issues:

- Issue 1: Local Housing Need and the Housing Requirement (Policy SP3)
- Issue 2: Settlement Hierarchy (Policy SP3)
- Issue 3: Housing Distribution (Policy SP3)
- Issue 4: Site Selection Methodology

Representations were made to the 'Regulation 19' Local Plan under reference SDLP585 (SP3: Housing Growth)

2.0 Responses to Matters, Issues and Questions

2.1 Matter 2, Issue 1: Local Housing Need and the Housing Requirement (Policy SP3)

The supporting text to Policy SP3 states that a non-implementation reduction of 5% has been applied to the total number of commitments identified in Table 3.1.

Question 5: What is the justification for the use of a 5% figure? Does this reflect the circumstances in Dover?

There is no apparent justification for the use of the 5% figure for non-implementation rate and no indication as to whether this is realistic. This should be clarified by the Council during the Examination.

Question 6: Is a similar non-implementation rate applied for the Whitfield Urban Extension and/or other allocated housing sites in the Plan? If not, why not?

It is not clear whether a 5% non-implementation rate has been applied to the Whitfield Urban Expansion (Policy SAP1). This should be clarified by the Council during the Examination.

Policy SP3 (Housing Growth) states that the majority of new housing development will be in Dover and Whitfield with land identified to deliver a minimum of 3,381 dwellings over the Plan period in addition to existing commitments. Allocation SAP1 is the largest single allocation for residential development in the district, in terms of housing numbers.

The delivery rates outlined in Appendix Di (Local Plan Housing Supply Position and Trajectory) of the submission Local Plan assume that delivery of this allocation will commence in Year 4 (2025-2026). The Council is reliant on delivery of allocation SAP1 to deliver and bolster the Council's housing land supply over a five year period and the Local Plan period. However, any fluctuations in delivery across the Plan period would risk a shortfall in housing delivery. Additionally, the track record of delivery at Whitfield suggests that the Council should take a more cautious approach than is currently proposed.

The Council's Annual Monitoring Report for 2021-2022 identifies that Dover has seen fewer housing completions than planned for over the period 2006 - 2022 as the Strategic Allocations at Whitfield and Connaught Barracks are behind in anticipated delivery rates envisaged. The performance summary in the Report identifies delivery as 'orange' which is defined as "*Progress has been made towards meeting the Core Strategy Target however further work is required*". There is considerable uncertainty over delivery of dwellings at allocation SAP1 over the Plan period, particularly with extensive infrastructure required and the apparent lack of progress with securing planning permission at the site.

The Whitfield Urban Extension Masterplan Supplementary Planning Document (adopted April 2011) anticipates the number of completions at allocation SAP1 as 240 dwellings per annum from Year 7 (a specific year is not identified). Appendix Di of the submission Local Plan anticipates the provision of 150 dwellings per annum from Year 7 (2028-2029) of the Plan. This is a moderation over the initial estimate of delivery but is still not considered to be realistic. To sustain this rate for an extended period of time is considered to be optimistic. The uncertainty over delivery of allocation SAP1 means the Council should be cautious about housing delivery rates, particularly in the current housing and economic climate. The Council should justify application of a 5% non-implementation rate and consider whether delivery projections or the non-allocation rate is justified and effective.

The Annual monitoring Report identifies the total number of completions at allocation SAP1 stands as 363 dwellings, as at 31 March 2022. This is a low number of dwellings delivered at the site, especially 11 years after adoption of the Masterplan SPD. The proposed delivery rates for this allocation, as outlined in Appendix Di of the submission Plan do not reflect historic delivery rates and the proposed rates of delivery at the site across the Plan period are not considered to reflect the site precedent or realistic delivery rates across the Plan period.

Given the doubt over delivery rate, the Inspector should consider whether they are realistic and well-evidenced. If they are not, this will have adverse implications for housing delivery numbers over the Local Plan period and over-reliance on allocation SAP for delivering housing in the district. This, in turn, would call into question the development strategy for the submission Plan as outlined at Policy SP3 of the Plan.

2.2 Matter 2, Issue 2: Settlement Hierarchy (Policy SP3)

Question 1: What is the justification for setting out the settlement hierarchy in Appendix E of the Local Plan? To be effective, does the hierarchy need to be set out in policy?

We consider that relegating the settlement hierarchy to an Appendix does not give sufficient weight to the development strategy for the district. We consider that this should be subject to a specific policy in the main body of Local Plan.

2.3 Matter 2, Issue 3: Housing Distribution (Policy SP3)

Question 1: Having established a settlement hierarchy, what process did the Council follow to determine the distribution of new development? Was this process robust and based on reasonable judgements about where to direct new development?

There is no clear evidence to support the rationale behind establishment of the settlement hierarchy. Whilst provision of a significant number of dwellings at Dover may be appropriate, we do not consider that delivery numbers are accurate and therefore the Council should consider allocating a greater proportion of new dwellings and housing growth in district and rural service centres, which are able to deliver small sites but over a condensed timeframe. This would ensure that delivery of housing can be maintained over the Plan period.

We question delivery of approximately 300 dwellings at allocation SAP28 (Land between Elvington and Eythorne). These villages are classified as 'Local Centres' and although the villages contain some services, they are not considered appropriate to support 300 dwellings. The definition of a 'Local Centre' (as outlined in Appendix E of the Plan) is "*Villages that provide services for a local rural area and a secondary focus for development in the rural area at a scale that would reinforce their roles.*" We do not consider that 300 dwellings would meet this definition and that the capacity of the settlements to accommodate growth should be reduced or that the capacity is redistributed to 'Rural Service Centres' and other higher order settlements in the district. Such settlements include Ash which have a good level of facilities and services and which could deliver dwelling on smaller sites, far more quickly than strategic allocations.

The 'Made' Ash Neighbourhood Plan allocates two sites for residential development. The first is nearing completion (Land west of Chequer Lane for approximately 90 dwellings). The second (Allocation ANP7d (Land north of Molland Lane) for approximately 105 dwellings) is subject to pre-application enquiry with a planning application due to be submitted by Emmanuel College in Spring 2024. The settlement has a consistent history of delivering residential development and given the size of small allocations is capable of delivering dwellings more effectively. We advocate a re-appropriation of dwellings across the district in such settlements where they will be

delivered promptly and within five years, thereby bolstering and maintaining the Council's housing land supply.

Given there is little evidence to support definition of settlement hierarchies and the resultant site allocations and distribution of development across the district. This should be confirmed by the Council to ensure that the development strategy for the district is appropriate.

Question 3: Table 12 in the Council's Housing Topic Paper states that, combined, almost 50% of all new housing will occur in Dover and at Whitfield. When considering the acknowledged viability challenges around Dover, and the strategic size and scale of the Whitfield Urban Expansion, is the distribution of development justified?

We do not consider that such a significant proportion of housing growth should be directed towards Dover and Whitfield. If a viability issue exists, this should be appropriately evidenced and justified. There are also other questions over deliverability of these extensions, due to their size and over-reliance on them for housing delivery across the Plan period. As such, we do not consider that the distribution of development is justified and the Inspector should consider small allocations in lower order settlements to ensure that delivery of dwellings can be maintained and bolstered across the Plan period.

Paragraph 69 (Identifying land for homes) of the National Planning Policy Framework acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. It requires that, to promote the development of a good mix of sites local planning authorities should identify, through the development plan land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.

There is a strong emphasis in the submission Plan of to deliver dwellings through strategic sites and those which exceed the threshold outlined at paragraph 69 of the Framework. Redistribution of dwellings throughout the district, at lower order settlements, which meet or reflect this aspiration will ensure that delivery of dwellings is bolstered and maintained and that there is sufficient flexibility to deliver dwellings where they will be built quickly and effectively, with limited lead in times or infrastructure delivery requirements.

The 'Made' Ash Neighbourhood Plan allocates two sites for residential development. The first has been completed (Land west of Chequer Lane for approximately 90 dwellings). The second (Allocation ANP7d (Land north of Molland Lane) for approximately 105 dwellings) is subject to pre-application enquiry with a planning application due to be submitted by Emmanuel College in Spring 2024. The settlement has a consistent history of delivering residential development and given the size of small allocations is capable of delivering dwellings more effectively. We advocate a re-appropriation of dwellings across the district in such settlements where they will be delivered promptly and within five years, thereby bolstering and maintaining the Council's housing land supply.

2.4 Matter 2, Issue 4: Site Selection Methodology

Question 1: How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?

There is no apparent rationale for determining which sites to include as allocations. The principle of allocations at Regional Centres, District Centres and Rural Centres is appropriate. However, it is not clear why a significant allocation at SAP28 (Land between Eythorne and Elvington) is appropriate where other higher order settlements such as Ash have apparently been overlooked. Settlements such as Ash are appropriate for development because they have a range of services

which are commensurate with development in the settlement thereby reducing out commuting and reliance on the private car.

Question 5: Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

There is no evidence of site selection criteria and methodology and the rationale behind allocations at the lower order settlements. For example, we do not consider that a significant allocation at SAP28 is appropriate, given the limited range of facilities and services in Elvington and Eythorne. We consider that more proportionate development is appropriate here and that consideration should be given to other appropriate Local Centres and Larger Villages which could address issues of viability and deliverability in the larger allocations and ensure that development is commensurate with the size and capacity of the 'host' settlement.



BIDWELLS