



Dover Local Plan Examination

Matter 2 Hearing Statements

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01260 288888

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MATTER 2: HOUSING GROWTH AND RESIDENTIAL WINDFALL DEVELOPMENT

Issue 1: Local Housing Need and the Housing Requirement

Q1: What is the minimum number of new homes needed over the plan period as calculated using the standard method? Are the calculations accurate and do they reflect the methodology and advice in the PPG?

1.1.1 Gladman consider that this is for the Council to address but reserve the right to comment on the calculations and methodology presented by the Council at Examination if necessary.

Q7: Is the housing requirement of 10,998 (net) new homes over the plan period justified? If not, what should the housing requirement be?

1.1.2 Gladman have previously submitted that we do not consider it justified that the housing requirement fell from 11,920 homes based on the standard method, to 10,998 as per the 2022 Housing Needs Assessment.

1.1.3 The standard method is the starting point for calculating the housing requirement, and Gladman advocate for a sufficient buffer to be included in the supply. Whilst there is no rule for what this should be, the Home Builder's Federation recommend a 20% buffer. A greater level of flexibility should be incorporated into the housing requirement to allow the Plan to respond to unexpected changes in circumstance to national policy or housing land supply and remain in alignment with the economic growth envisaged by the plan.

Issue 2: Settlement Hierarchy- Policy SP3

Q1: 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?

1.1.4 The settlement hierarchy should support and inform the spatial strategy and provide guidance for the suitability of windfall development in different locations. In this regard, it is more robust as a policy with supporting text to determine its use.

1.1.5 However, Gladman consider that the settlement hierarchy being an appendix rather than policy provides a degree of flexibility in simply stating the suitability for development, both within and adjacent to, each settlement whilst not being overly prescriptive in the quantum of development.

Q2: What methodology has the Council used to determine which settlements fall within each category for the purposes of Appendix E? Is that methodology appropriate and sufficiently robust?

1.1.6 The methodology underpinning the settlement hierarchy is detailed in HEB03 Settlement Hierarchy and Confines Topic Paper (2022).

1.1.7 Gladman consider that the methodology is appropriate and suitably robust. The document identifies sustainable settlements suitable for growth on the basis of their services and facilities present, including bus services, railway stations, education provision, local shops, public houses, or health care provision.

Q3: 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?

1.1.8 Gladman consider that development in these locations is suitable and sustainable. Gladman support the current identification of smaller site allocations across the settlement hierarchy which mitigate the risks regarding delivery and viability that typically impact urban extensions and large scale growth.