

EXAMINATION INTO THE DOVER NEW LOCAL PLAN TO 2040

Response to the Inspectors Matters, Issue and Questions (MIQs)

Matter 4 – Meeting Housing Needs

Land on the South West side of Hillside Road, Dover

On behalf of Glen Virtue Properties

Original Representation: 479

Original Site Reference: DOV011/TC4S100

Prepared by:

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Matter 4 – Meeting Housing Needs

Issue 1: Total Supply:

Q3 Is the projected supply of housing justified and has sufficient land been identified to ensure that housing needs will be met, including an appropriate buffer to allow for changing circumstances on development sites?

1. It is submitted that additional sites should be allocated within the plan to ensure that there is an appropriate buffer to meet the housing requirement of Dover. The Local Plan is currently not providing enough housing to meet the defined housing requirement, but choosing instead to rely on committed supply. This position creates a risk, where not enough housing will come forward and on this basis, additional sites should be found for allocation.
2. Paragraph 69 of the NPPF advocates that small sites play an important role in land supply as they can be delivered quickly. The provision of the additional small site at Hillside Road, as part of the proposed Dover Small sites policy SAP13 would make a positive contribution to the Local Plan as a whole in this regard.

Issue 2: Five Year Housing Land Supply

Q3 What evidence has the Council used to determine which sites will come forward for development and when? Is it robust?

3. The Council has not considered the deliverability of the omission sites as part of the initial sift of sites in the HELAA (**GEB09**) and the following Sustainability Appraisal (**SD03**).
4. It has been identified from the outset, through each of the site submissions, that the site at Hillside Road site is deliverable and development proposals could be brought forward in the first 5 years after plan adoption. This hasn't been taken into account where there are larger sites that are likely to have much larger strategic issues to address which could delay delivery.

Q5 What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by paragraph 70 of the Framework?

5. In accordance with the Housing Topic Paper 2023 (**HEB02**) it is submitted that windfalls will come forward at 70 units per year post year four. It is not understood why there is a delay to the delivery of windfalls and it is proposed that this time scale should be brought forward to the start of the plan period, as small sites have the ability to deliver much needed housing with often fewer issues and constraints to address.
6. Q6 Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?
7. We wish to raise a concern that there are not enough allocated sites being proposed in the plan to cover the objectively assessed housing need. There is a risk that some sites, especially large sites, will fail to come forward in a timely fashion as there is the potential for more delays in development delivery.
8. This risk could be negated by delivering further small sites in the plan as advocated by paragraph 69 of the NPPF.