



Dover Local Plan Examination

Matter 4 Hearing Statements

October 2023



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MATTER 4: MEETING HOUSING NEEDS

Issue 1: Total Supply

Q1: What is the most up-to-date position regarding the projected supply of housing over the plan period?

- 1.1.1 Gladman consider that this a question for the Council to answer but reserve the right to comment at Examination if necessary.

Q2: What is the windfall allowance based on and is it justified?

- 1.1.2 Gladman consider that this a question for the Council to answer but reserve the right to comment at Examination if necessary.

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?

- 1.1.3 Gladman consider that to support the safeguard the delivery of housing, a sufficient buffer must be included in the supply. Gladman support the Home Builders Federation's recommendation that a local plan should seek a 20% buffer.

Issue 2: Five Year Housing Land Supply

Q1: What is the five-year housing land requirement?

- 1.1.4 Gladman consider this is a question for the Council to address but reserve the right to comment at Examination.

Q2: Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption?

- 1.1.5 Gladman consider that this is for the Council to provide up to date evidence on and reserve the right to comment at Examination.

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

1.1.6 Gladman consider this is a question for the Council to address but reserve the right to comment at Examination.

Q4: Where sites have been identified in the Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years as required by the Framework?

1.1.7 Gladman consider that there is sufficient evidence of deliverability on the proposed site allocations included in Table 9 and have provided commentary in relation to our site interests within our Matter 3 Hearing Statement.

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?

1.1.8 Gladman consider that the historic delivery of small windfall sites is suitable evidence that these sites will come forward over the plan period.

1.1.9 The Housing Topic Paper (March 2023) (HEB02) states that '*Over an 11 year period to 2021/22 windfall development has accounted for 44% of delivery in the district.*'. The Council recognise that this level of delivery has resulted from large sites and have therefore adjusted the windfall allowance accordingly to reflect the delivery of the small windfall sites and to align with HELAA site selection methodology.

Q6: Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?

1.1.10 Gladman consider that there will be a five-year supply on deliverable housing sites on adoption of the Plan. We reserve the right to comment on this matter at Examination.

Q7: What flexibility does the Plan provide if some of the larger sites, such as the Whitfield Urban Extension, do not come forward in the timescales envisaged?

1.1.11 Gladman support the proposed policy wording at Policy SP4 which permits development immediately adjacent to settlement boundaries where nine other criteria are met. This represents positive plan making and is a flexible and constructive approach to windfall development. In the event of large scale allocations not delivering as expected, this policy can be utilised to ensure that sustainable development in suitable locations can be realised.