
Examination Statement

Land off Sandwich Road, Ash

Dover District Council Local plan
Examination in Public

Matter 5: Type and Mix of Housing

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1. Introduction

- 1.1. This Examination Statement has been prepared on behalf of Barratt David Wilson Homes (BDW). BDW is the sole promoter of the Land at Sandwich Road, Ash (identified in the 2020 HELAA as Site reference ASH006). The site has not been allocated within the emerging Local Plan.
- 1.2. Prior to the submission of the Dover District Local Plan to the Planning Inspectorate for examination, BDW have participated in the formal consultation of the Local Plan at Regulation 18 (R18) (January 2021) and Regulation 19 (R19) stages (October-December 2022).
- 1.3. The location of ASH006, its surroundings and the vision have been set out in detail at the R18 stages and the R19 Stage and have therefore not been reproduced in detail in this statement.
- 1.4. For the avoidance of doubt, any policies referred to within this Statement relate to the emerging Local Plan unless otherwise stated.

2. Response to the Inspectors Questions

Issue 1 – Affordable Housing and Viability

Q4 Based on the requirements for qualifying developments, how many affordable homes is the Local Plan expected to deliver? How does this compare to the identified need? If needs will not be met, what alternative options has the Council considered?

- 2.1. The SHMA¹ explains that DDC need to deliver 167 affordable households a year (equivalent of 3,006 dwellings across the plan period). To accommodate this affordable growth, the SHMA sets out that an uplift to the identified housing need may be required. The Viability Assessment² provides evidence to suggest that the delivery of affordable housing in the Dover Urban Area would result in undeliverable site. Thus, draft Policy SP5 does not require any affordable housing in Dover. Within the Dover Urban Area 1,030 dwellings are proposed via new allocation. If they were subject to the affordable housing policy 306 dwellings would be available as affordable homes.

Table 2.1: Affordable Housing Shortfall

Ref	Required housing details	Number of dwellings
a.	Housing Growth (Draft policy SP3)	10,998
b.	Housing allocation in Dover Urban Area	1,030
c.	Residual housing growth (a.-b.)	9,968
d.	30% of c.	2,990.4
e.	Affordable housing requirement	3,006
f.	Shortfall in affordable housing (e.-d.)	15.6

- 2.2. Table 2.1 details the potential shortfall in delivery of affordable homes. Table 2.1 does not consider housing development brought forward as a minor development which would result the provision of no affordable homes. It also does not consider site specific viability issues that could result in a reduction of affordable

¹ HEB01c, Strategic Housing Market Assessment Partial Update December 2019

² GEB08a Whole Plan Viability Study Main Report and Appendices, GEB08b Viability Study Update Note August 2022

housing. This is particularly relevant as the Viability Assessment³ states that the delivery of housing in lower value areas will and remains to be challenging. On this basis, it can be assumed that the shortfall in affordable housing will be less than displayed in table 2.1. This, coupled with the Council's historic under delivery of affordable homes, suggests that DDC's approach to affordable housing will result in a shortfall of affordable housing being delivered.

- 2.3. The Council has explained that draft Policy SP5 sets out a minimum required of 30% and effectively sites could deliver more than 30%. It is also explained that the affordable housing delivered directly by the Council or external capital funding such as Homes England grants. These developments, however, have not been assessed and are not guaranteed. As such, they cannot be included within the planned affordable housing. Thus, there will remain a shortfall.
- 2.4. Appendix C of the Local Plan sets out that the affordable housing provision will be monitored via Annual Housing Information Audit, S106 Agreements and Infrastructure funding statement and information from the DDC Housing and Registered Providers. There are no details as to how affordable housing will be delivered if these fall short.
- 2.5. Given that the Local Plan does not plan for a sufficient amount of affordable housing, the most effective way to ensure the delivery of affordable housing would be to allocate further housing sites in the higher value areas of the district where the delivery of affordable housing is viable. Moreover, it is these areas (as identified in the paragraph) that are most in need of affordable housing. Site such as ASH006 are capable of delivering at least 30% affordable homes on site and would support the delivery of affordable housing in the district.

³ GEB08a Whole Plan Viability Study and GEB08b Viability Study Update

3. Conclusion

- 3.1. This Examination Statement is written on behalf of Barratt David Wilson Homes with regards to the Land at Sandwich Road, Ash. It has answered questions raised by the Planning Inspectors under Matter 5 (Type and Mix of Housing), Issues 1 (Affordable Housing and Viability).
- 3.2. The emerging Local Plan does not adequately plan for the identified affordable housing need. Consideration should have been given to the allocation of additional housing sites in higher value areas to ensure the delivery of affordable housing. The current spatial strategy cannot be considered positively prepared and thus is not sound.

