



Housing and Economic Land Availability Assessment (HELAA) - Main Report October 2022



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1. Introduction

1.1 The Housing and Economic Land Availability Assessment (HELAA) aims to identify a future supply of land in the District which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. The purpose of the Housing and Economic Land Availability Assessment is to:

- identify sites and broad locations with potential for development;
- assess their development potential;
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

1.2 The Housing and Economic Land Availability Assessment is a technical piece of evidence to support the Local Plan making process and is a requirement of the National Planning Policy Framework (2021). It should however be noted that the HELAA does not in itself determine whether a site should be allocated for development. The allocation of land for development will depend upon the extent of policy and practical constraints identified in the assessment and the choices ultimately made by the Council taking account of the outcomes of the Sustainability Appraisal, further evidence gathering and following public consultation on the strategy. Ultimately, it is the role of the Local Plan itself to determine which of those sites identified in the HELAA are the most suitable to be taken forward and allocated for housing and employment uses.

Structure of document

1.3 Work on the HELAA has been on-going as part of the Local plan making process and the structure of the HELAA report reflects this. Section 1 explains the general methodology for the HELAA.

1.4 Section 2 is a summary of the conclusions of the HELAA, and provides the latest summary site assessments and conclusions for all sites that have been considered in the HELAA through the site preparation process.

1.5 Section 3 sets out the findings of the targeted call for sites that was undertaken as part of the consultation on the Regulation 18 draft Local Plan between January and March 2021.

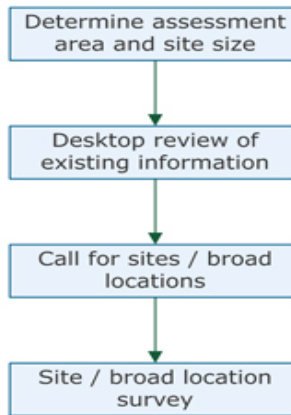
1.6 Section 4 explains the changes that have been made the HELAA published alongside the Regulation 18 draft Local Plan taking into account updates in policy position, further technical work and the comments made as part of the Local Plan consultation.

1.7 Site specific information is set out in the appendices which are published as separate documents/spreadsheets, which is explained in Section 5 of this report.

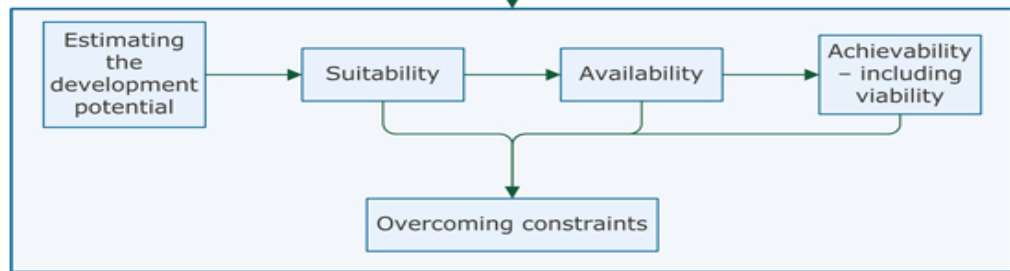
Methodology

1.8 The Government’s Planning Practice Guidance sets out the process for undertaking a Housing and Economic Land Availability Assessment <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>. This process is set out in the Flow Chart below. The HELAA has been undertaken in accordance with this guidance.

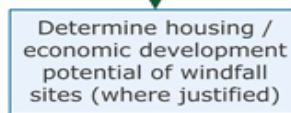
Stage 1- Site / broad location identification



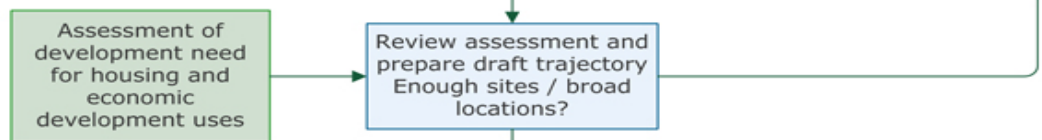
Stage 2 - Site / broad location assessment



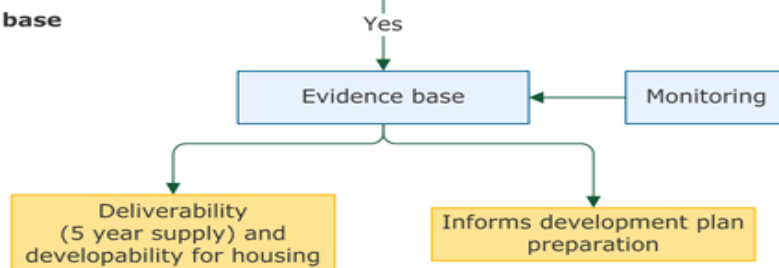
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



Stage 1 – Site Location Identification

- 1.9 As part of Stage 1 of the HELAA process sites have been identified from two call for sites exercises (2017 and 2021) and a desk-based review of existing information which looked at:
- existing allocated sites in the Core Strategy and Land Allocations Local Plan;
 - unimplemented planning permissions, refused planning applications and withdrawn planning applications;
 - sites previously considered as part of the Strategic Land Availability Assessment (2009) and Urban Capacity Study;
 - sites on the brownfield register and those submitted as part of the call for sites carried out for the brownfield register in 2016;
 - land in the Council's ownership;
 - public sector land; and
 - vacant and derelict buildings.

1.10 In addition to this, officers also identified some sites for assessment following site visits to areas in the District.

Stage 2 - Initial Desktop Assessment

- 1.11 An initial sift of sites was undertaken and sites were eliminated if they were:
- too small to be allocated – those under 5 dwellings, or under 0.25ha.
 - entirely covered by specific national designations e.g Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest, Ramsar sites, Heritage Coast, ancient woodland and notified safety zones (sites which are partly covered by specific designations have been taken forward for further assessment);
 - Subject to planning permission (to avoid double counting housing supply);
 - under construction or since built;
 - contrary to the policies in the NPPF; and
 - considered to be isolated development in the open countryside and had no relationship to any settlement i.e not sustainable in terms of the NPPF.
- 1.12 These sites are set out in Appendices 4, 16 and 17.

Stage 2 - Suitability Assessment

- 1.13 The first stage of this process involved a desktop review using GIS mapping layers to identify any relevant on-site constraints. Following this, sites were then physically surveyed and assessed to determine their suitability and development potential (i.e number of houses that could be delivered on the site) using the following criteria:
- site size, physical characteristics of the site and location;
 - land uses and character of surrounding area;
 - landscape impact, impacts on landscape views and screening of site;
 - potential impact on heritage assets relevant to the site;
 - access and highways; and
 - environmental constraints.

1.14 In addition to this, on some sites, where further clarification was required concerning on or off-site constraints and a more detailed assessment was needed, officers sought advice concerning site suitability from:

- KCC Highways;
- KCC Heritage and Archaeology;
- KCC Drainage;
- Environment Agency;
- Natural England;
- Historic England;
- The Kent AONB Unit;
- External Landscape Consultant; and
- The Councils Principal Heritage Officer

1.15 Councillors were consulted on the draft findings of the suitability assessment in 2019, following which a series of meetings were held with Town and Parish Councils in February/March 2020. The draft HELAA (suitability assessment and availability assessment) was then published on the Council’s website at the start of April 2020.

1.16 Where highways concerns were identified by KCC Highways, site promoters were then contacted in the summer of 2020 to ask for further information to demonstrate that the constraints identified could be addressed. This information was then re-assessed by KCC Highways and their comments were updated accordingly.

1.17 Suitability assessments have subsequently been updated following the Reg 18 consultation as set out in section 5 of this report.

1.18 The findings of the suitability assessment of the HELAA housing sites in relation to landscape, highways and access, heritage and environmental constraints then informed the overall suitability assessment and suitability rating for each site, with sites classified as being either suitable (green), potentially suitable (amber) or unsuitable (red) in accordance with criteria below.

Suitable	The site offers a suitable location for development for the use proposed and is compatible with neighbouring uses. There are no known constraints that will significantly limit the development of the site.
Potentially Suitable	The site offers a potentially suitable location for development for the use proposed, but is subject to a policy designation which inhibits development for the defined use and/or constraints that require mitigation. The development plan process will determine the future suitability for the defined use and whether the constraints can be overcome.
Unsuitable	The site does not offer a suitable location for development for the proposed use and/or there are known constraints which cannot be mitigated. The site is unlikely to be found suitable for the defined use within the next 15-20 years.

Stage 2 - Availability Assessment

- 1.19 To confirm the availability of sites identified as Green and Amber within the HELAA, an engagement exercise was undertaken with site promoters between November 2019 and January 2020. The exercise consisted of a two-stage process where site promoters were asked to complete a questionnaire on their sites availability including detailing any progress towards applying for planning permission and any known constraints which may affect the timing of the sites delivery. The first stage involved sending out an availability enquiry email or letter dependant on known contact details for each site. Respondents were given two weeks in which to reply, after the two week period those who had not responded were sent a reminder email or letter and given a further week in which to respond. The second stage of the engagement exercise involved attempts to telephone site promoters of the green and amber sites whom had not responded to the email or letter enquiries. The telephone exercise involved a minimum of three attempts to contact the site promoter.
- 1.20 A further availability survey was subsequently carried out in October and November of 2021.
- 1.21 Sites have then been classified as being either available (green), potentially available (amber) or unavailable (red) in accordance with criteria below.

Available	The landowner/ site promoter has confirmed availability within the next 15-20 years and there are no known legal issues or ownership problems.
Potentially Available	Confirmation has not yet been received from the landowner/ site promoter that the land will be available within the next 15-20 years. Further information is required to provide the Council with certainty that the site is available.
Unavailable/No Contact	The landowner/ site promoter has confirmed that the land is not available for development in the next 15-20 years. The land is subject to known legal issues which are unlikely to be overcome within the next 15-20 years. It has not been possible to make contact with the landowner/ site promoter.

Stage 2 - Achievability Assessment

- 1.22 As part of the overall assessment of sites within the HELAA, sites must be assessed for their achievability, in the sense that the development being considered on the site could actually be built out. In determining the achievability of the sites, the Planning Practice Guidance states that this is essentially a judgement about the economic viability of the site and the capacity of the developer to complete and let or sell the development over a certain period. In effect, this means a sites achievability is determined by: the likely costs of development by site size; existing land use and location; comparing it against local market factors including the

likelihood the development could be successfully leased or sold at a rate that would return a profit to the developer; and, offer a price incentive for release of the land.

- 1.23 As part of the preparation of the Local Plan a Whole Plan viability study (the Study) was undertaken. The main purpose of this study was to identify the achievability of development across the District so that it can be determined whether, on financial grounds, the sites selected within the Local Plan can be delivered. It is important to note, that once the Local Plan for the District is adopted, the Study will become the reference point for any future viability assessments submitted through the Development Management process due its being the most up to date viability evidence that has been subject to independent examination.
- 1.24 The Study primarily focused upon: the current selling price of land throughout the district; the price of dwellings being sold; estimated build costs, by type of dwelling; and, the costs from policy requirements set out within the Regulation 18 consultation document of the Local Plan. The work has subsequently been reviewed to ensure it is still up to date. The study having set out these factors, then prescribed a set of typical development typologies by number dwellings being developed and whether the development is on greenfield or brownfield. To determine the achievability of these typologies, the study then tested them against the determined costs of development, selling price of dwellings and the level of land release incentive required across the district.
- 1.25 Based on these considerations the Study identified that the District broadly fell into four value areas. The value areas were determined by: the areas with the higher financial return, medium return, lower return and areas of negative return from development. The Study specifically prescribes the four areas as:
- Higher: Being the north of the District.
 - Medium: Being the Coastal Towns to the east of the District and the Rural areas and settlements to the south of the District.
 - Lower: Being the sites within and adjacent to Aylesham, and the sites adjacent to wider Dover, principally to the north and west of the built-up area, and Whitfield.
 - Dover Town: Being the relatively tightly defined built-up area of Dover.
- 1.26 The evidence in the Whole Plan Viability Study has determined four value areas that set out the likely levels of financial return from development. It is appropriate then to use these value areas when determining the achievability of sites assessed through the HELAA process, due to the value areas being determined by the latest available viability evidence.
- 1.27 At each of the steps of HELAA assessment (suitability/availability/achievability) a red/amber/green (RAG) colour rating has been used to classify sites. The table below demonstrates how the four values areas used in the viability Study have been interpreted into the Achievability RAG summary.

Value Area	Achievability RAG	Process summary
Higher	Achievable	Good or better financial return from land development
Medium		
Lower	Marginally	Marginal to moderate financial return from land develop
Dover Town	Unachievable	No or negative return from land development

2. Overarching Conclusions

2.1 This part of the report sets out the overarching and latest conclusions of the HELAA 2022, following the targeted call for sites that was undertaken in 2021 and a review of the HELAA 2020 sites that has been undertaken.

2.2 In summary the overarching findings of the HELAA are:

Housing

- 83 suitable sites with the potential for approx. 9,805 homes;
 - 14 potentially suitable sites with the potential for approx. 900 homes;
 - 9 mixed suitability sites (where part of the site is either suitable or potentially suitable and the remainder of the site is unsuitable) with the potential for approx. 175 homes; and,
 - 241 unsuitable sites.
- 2.3 From the 106 suitable, potentially suitable and mixed suitability sites, 95 were available and 11 unavailable. Of the 95 available sites, 66 were achievable, 11 marginal and 18 unachievable.
- 2.4 The 18 unachievable sites are all within the Dover urban area. Review of these sites has determined that development would facilitate needed regeneration and that removing the policy requirement for 30% of dwellings to be affordable, would allow the sites to become achievable.
- 2.5 See Appendix 1a for the housing summary site assessments.

Employment

- 22 suitable sites; with around 190,000 sqm of potential developable floorspace;
 - 6 potentially suitable sites; and,
 - 2 unsuitable sites.
- 2.6 See Appendix 1b for the employment summary site assessments.

Gypsy and Traveller Sites

2.7 There were no Gypsy and Traveller site submitted in the Call for sites exercise in 2017. To address the need for pitches identified in the Gypsy and Traveller Accommodation Assessment (GTAA) 2018, a GTAA site options review and potential sites assessment was carried out in 2020. The findings of the site option and assessment can be found at:

<https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/gypsy-traveller-site-options-review.pdf>

<https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/gypsy-and-traveller-potential-sites-assessment.pdf>

2.8 The site options and assessment didn't identify enough suitable sites to meet the need for pitches in the GTAA and a further targeted call for sites exercise was carried out in 2021. It should be noted that the HELAA does not include existing G&T sites identified for potential

intensification. These have been identified as assessed in the Gypsy and Traveller Site Options review: <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/gypsy-traveller-site-options-review.pdf>

2.9 Taking the findings of the GTAA 2020 site work and the targeted call for sites, the conclusions of the HELAA is:

- 1 suitable site with the potential for 2 pitches;
- 1 potentially suitable site with the potential for 10 pitches; and,
- 5 unsuitable sites.

2.10 From the 2 suitable/ potentially suitable sites, 1 was available and 1 unavailable. The available site is considered to be achievable.

2.11 See Appendix 1c for the Gypsy and Traveller Site Summary Assessments

3. Targeted Call for Sites (TC4S)

3.1 This section sets out the process and detailed findings of the targeted call for sites that was undertaken alongside the consultation on the Regulation 18 draft Local Plan in early 2021.

Approach to the Targeted Call for Sites

3.2 A targeted call for sites was undertaken between January and March 2021 to seek additional site options that would inform later versions of the Local Plan and forms part of Stage 1 of the HELAA process. As part of this exercise landowners, developers, consultants and estate agents that were registered on the Local Plans contacts database were contacted and the following types of sites were requested:

- Gypsy and Travellers and Travelling Show-people
- Self-build and Customhouse Building (0.25ha size or 5 units or more)
- Employment Use (500sqm floor space or more)
- Housing sites between 0.25 and 1 hectare in size
- Local Green Space

3.3 The targeted call for sites was also advertised alongside the Local Plan on the Council's website and through Teams Live events, with additional engagement carried out with the Gypsy and Traveller community, to encourage site submissions for Gypsy and Traveller pitches. An online portal was also created for submissions and guidance was provided on the targeted types of site required.

3.4 In total 120 sites were submitted for consideration.

TC4S Initial Desktop Assessment of Sites

3.5 All 120 sites submitted through the targeted call for sites were then subject to a stage 1 desk-based assessment to establish:

- Whether sites met the targeted call for sites criteria;
- Whether it was a new site submission or resubmission of existing HELAA site;
- The location of the site - was it isolated in the countryside, 100% in the AONB or covered by an environmental constraint; and
- Whether the level of development proposed was in accordance with Local Plan Strategic Policies 3 and 4 and was proportionate in scale to the settlement area.

3.6 The initial assessment resulted in 68 sites not meeting these criteria. The 3 Local Green Spaces submitted as part of the targeted call for sites were also sifted out at this stage and considered separately. The results are set out in Appendix 2a.

TC4S Stage 2 Assessment of Sites

3.7 49 sites were subsequently taken forward to the stage 2 assessment. Of these 49 sites:

- 36 sites were either housing or self-build sites;
- 5 sites were Gypsy and Traveller sites;
- 6 sites were employment sites; and

- 2 sites (TC4S083 and TC4S100) were submitted for mixed use and have therefore been considered as part of the assessment of housing sites and part of the assessment of employment sites.

Housing Sites

- 3.8 Council officers undertook a suitability assessment of the 36 housing/ self-build sites and 2 mixed use sites (TC4S083 and TC4S100) taken forward to stage 2 based on the Housing Economic Land Availability Assessment methodology. As part of the assessment detailed GIS surveys were undertaken to identify environmental constraints and site surveys were conducted to assess impacts on landscape, highways and heritage. Further engagement was also undertaken with The Kent Downs AONB Unit, KCC Highways, Historic England, the Council's Heritage Officer, The Environment Agency and Natural England, where additional clarification was required concerning on or off-site constraints.
- 3.9 The suitability assessment of the sites identified:
- 12 housing sites as suitable;
 - 4 housing sites and 1 mixed use site (TC4S083) as potentially suitable for housing; and
 - 20 housing sites and 1 mixed use site (TC4S100) as unsuitable for housing.
- 3.10 Sites assessed as being suitable or potentially suitable were then subject to an availability and achievability assessment in accordance with the HELAA methodology. This concluded that the 16 housing sites and 1 mixed use site (TC4S083) were available, 9 housing sites were achievable, 3 housing sites and 1 mixed use site (TC4S083) were marginally achievable and the 4 Dover housing sites were unachievable.
- 3.11 The detailed findings of the stage 2 assessment of the housing and self-build sites can be found in Appendices 2b, 2c, 2d and 2e, with the summary assessment in Appendix 1a.

Gypsy and Traveller Sites

- 3.12 Five Gypsy and Traveller sites were submitted in response to the targeted call for sites and these were all taken forward to stage 2 of the assessment process. Following the same approach as set out above, 2 sites were assessed as being suitable for Gypsy and Traveller accommodation and 3 sites were assessed as unsuitable.
- 3.13 The 2 sites assessed as suitable were then subject to an availability and achievability assessment which concluded that one site was available and the other was unavailable.
- 3.14 The detailed findings of the stage 2 assessment of the Gypsy and Traveller sites can be found in Appendix 2f

Employment Sites

- 3.15 The 6 employment sites and 2 mixed use sites (TC4S083 and TC4S100) taken through to stage 2 were subject to a suitability assessment. The assessment used the same approach as the housing sites (as outlined above) but also focused on the potential employment capacity and future employment uses for the sites.
- 3.16 The suitability assessment of the sites identified:

- 3 employment sites as suitable;
- 2 employment sites and 1 mixed use site (TC4S083) as potentially suitable; and
- 1 employment site and 1 mixed use site (TC4S100) as unsuitable.

3.17 The detailed findings of the Stage 2 assessment of the employment sites can be found in Appendix 2g.

4. Summary of changes to Dec 2020 HELAA

Introduction

- 4.1 The Housing and Economic Land Availability Assessment (HELAA) (Dec 2020) was published for consultation alongside the Regulation 18 draft Local Plan in January 2021.
- 4.2 A number of representations were received as part of that consultation, both on the proposed site allocations identified in the Plan, and on sites in the HELAA that were not proposed as allocations in the draft Local Plan.
- 4.3 The Council's response to the comments made of the draft Local Plan is reported in the Regulation 22 Local Plan Consultation Statement. A summary of the comments made by site promoters on the site allocations proposed in the draft Local Plan and a summary of the 39 comments made by site promoters on HELAA sites not included within the Plan – Known as Omission Sites can be found in the Regulation 22 Statement.
- 4.4 The HELAA has been updated to take account of:
- Representations made through the Regulation 18 consultation on the draft Local Plan;
 - The targeted call for sites;
 - Sites which now have planning permission or resolution to grant subject to S106;
 - Changes to the capacity of sites;
 - Changes in policy;
 - Further technical work;
 - Further engagement with key stakeholders (Appendix 3g); and
 - Further site assessment work.
- 4.5 This section of the report summarises the changes have been made to the HELAA following the 2021 consultation. The final HELAA site assessments, following this re-appraisal can be found in Appendices 1a, 1b and 1c.

Housing Sites

Sites with Planning Permission

- 4.6 The following sites are now subject to planning permission or resolution to grant subject to completions of a S106 legal agreement. Please note this is the position as at 1 April 2022, some additional sites may have subsequently been granted permission and this will be recorded in the next update to the HELAA.

- ASH010
- AYL002
- DEA018
- DEA020
- DEA021
- DOV009
- EAS011
- GUS002
- NOR005
- SAN010
- SAN015
- SHO002 (part of)
- SHO004
- STA009
- WOO002

Changes to site capacities

4.7 The following housing sites have had their development capacities amended through the update to the HELAA:

Table 1 – Changes to site capacities

Site Reference	Address	HELAA Dec 20	HELAA Oct 22	Reason for Change
AYL005	Former Snowdown Colliery, Aylesham	10	40	To reflect the landowners aspirations for the site
CAP006	Land to the east of Great Cauldham Farm, Capel-le-Ferne	50	70	Access and capacity concerns reviewed.
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne	18	10	To mitigate the impact upon the AONB
CAP013	Land at Cauldham Lane, Capel-le-Ferne	15	5	To mitigate the impact upon the AONB
DEA012	Land to the north of Deal	2500	975	To reflect the landowners aspirations for the site
WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	100	75	To enable a scheme to come forward which reflects the character of the surrounding area, and enable sufficient landscaping to be provided
DOV017	Dover Waterfront and Bench Street	200	263 DW 100 BS	The site promoter for Dover Waterfront has informed the council that the current masterplan for the site

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				shows it can deliver 263 units. The site promoter for the Bench Street site has informed the council it can deliver 100 units.
DOV022B	Land including gas holder, Coombe Valley, Dover	40	80	To reflect the landowners aspirations for the site
DOV022E	Land in Coombe Valley, Dover	220	150	To mitigate visual and landscape impact on the AONB.
DOV023	Buckland Mill, Dover	124	135	To reflect current planning application for the site
DOV026	Westmount College, Folkestone Road, Dover	100	60	To reflect the landowners aspirations for the site
EYT003/009/012	Land between Eythorne and Elvington	350	300	To mitigate highways impact
KIN002	Land at Woodhill Farm, Ringwoud Road, Kingsdown	90	50	To mitigate visual and landscape impact on the AONB.
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	65	30	To take into account the area of the site at risk from surface water flooding
PRE003	Apple Tree Farm, Stourmouth Road	12	5	To reflect the landowners aspirations for the site
PRE016	Site north of Discovery Drive, Preston	35	20	
PRE017	Site north-west of Appletree Farm, Stourmouth Road, Preston	75	40	
SAN004	Land south of Stonar Lake and to the north and east of Stonar Gardens, Stonar Rd, Sandwich	50	40	To reflect the landowners

				aspirations for the site and take into account the significant environmental and heritage constraints
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	80	35	To reflect the landowners aspirations for the site
SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	60	40	To take into account the area of site at risk from surface water flooding
SAN023	Land at Archers Low Farm, St George's Rd	40	35	To mitigate the impact on adjacent trees and wider landscape
SHE006	Land west of Coxhill Road, Shepherdswell	20	10	To take into account the area of site at risk from surface water flooding
SHO002	Land to the South West of Sandwich Rd, Sholden	110	250	To reflect the landowners aspirations for the site
WIN014	Footpath Field, Staple Rd, Wingham	50	75	To reflect the landowners aspirations for the site
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	20	15	To reflect the landowners aspirations for the site

Review of site suitability

4.8 Table 2 sets out the sites that have been subject to a review of site suitability as a result of updated information and responses to Reg 18, and explains the reason why sites suitability has changed.

Table 2 – Review of Site suitability

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Site Reference	Site Address	Previous Suitability Assessment	Updated Suitability Assessment	Reason for Change
ASH003	Land south of Mill Field, CT3 2BD			Now allocated in the Ash Neighbourhood Plan
ASH004	Land to the north of Molland Lane, Ash, CT3 2JF			Now allocated in the Ash Neighbourhood Plan
ASH005	Land west of Molland Lane, Ash, CT3 2HL			The Ash Neighbourhood Plan was made by DDC in September 2021. This sets out the housing allocations for Ash. No further housing allocations in Ash are proposed as part of the Local Plan.
ASH008	Land to the east of Queens Road, Ash, CT3 2BA			The Ash Neighbourhood Plan was made by DDC in September 2021. This sets out the housing allocations for Ash. No further housing allocations in Ash are proposed as part of the Local Plan.
ASH011	Guilton, Ash, CT3 2HS			Now allocated in the Ash Neighbourhood Plan
ASH014	Land to the south of Sandwich Road, Ash, CT3 2AH			Now allocated in the Ash Neighbourhood Plan
ASH015	Former Council Yard, Molland Lea, Ash, CT3 2JQ			Now allocated in the Ash Neighbourhood Plan
AYL003	Land to the south of Spinney Lane, Aylesham, CT3 & CT4			Considered the constraints identified on the site can be mitigated through the Local Plan.
AYL004	Farmland lying to the north Aylesham and to the east of the B2046 (Adisham Road), CT3 3JA			Unsuitable on transport grounds. Concerns in relation to the cumulative impact upon the highways network.
AYL005	Land off Holt Street, Snowdown, Aylesham			Site has been re-assessed based on the new information provided at Reg 18. Site is still

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Site Reference	Site Address	Previous Suitability Assessment	Updated Suitability Assessment	Reason for Change
				considered to be potentially suitable.
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne, CT18 7JD			Considered the constraints identified on the site can be mitigated through the Local Plan
DEA012	Land to the North of Deal			Site re-assessed based upon revised submission. Site remains unsuitable
DOV012	Farthingloe, Dover			Objections from AONB unit and Natural England at Reg. 18. No evidence provided that major development in the AONB can be mitigated or justified.
DOV025	Land off Wycherley Crescent, Dover, CT16 2BH			Previous Local Plan allocation. Site is a designated Local Wildlife Site and is considered to be unsuitable as impact cannot be mitigated.
EAS002	Land at Buttsole Pond, Lower Street, Eastry, CT13 0JF			Considered the constraints identified on the site can be mitigated through the Local Plan
EYT001	Land at Monkton Court Lane, CT15 4BH			Site covered by a surface water flow path which constrains development
EYT002	Farm land behind and accessed from Adelaide Road, CT15 4DR			Impact of development on highways grounds/ cumulative impact on highways network. Level of development would not be commensurate with the size of existing settlement. Not in accordance with growth strategy.
EYT004	Land adjoining Adelaide Road, Elvington, CT15 4DP			Impact of development on Highways grounds/ cumulative impact on

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Site Reference	Site Address	Previous Suitability Assessment	Updated Suitability Assessment	Reason for Change
				highways network. Level of development would not be commensurate with the size of existing settlement. Not in accordance with growth strategy
EYT015	Play area to the west of Adelaide Road, Elvington, CT15 4DS			Impact of development on Highways grounds/ cumulative impact on highways network. Level of development would not be commensurate with the size of existing settlement. Not in accordance with growth strategy
HOU004	Land to the north east of Broadsole Lane and to the rear of Jubilee Cottage, West Hougham, CT15 7BB			Not in accordance with growth strategy.
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown			Considered the constraints identified on the site can be mitigated through the Local Plan
NON004	Land to the north of Church Street, Nonington, CT15 4LE			Not in accordance with growth strategy.
NON009	Land North of Cornerways, Church Street, Nonington, Dover, CT15 4LB			Not in accordance with growth strategy.
NOR001	Mercers Farm, Finglesham, CT14 0NG			Not in accordance with growth strategy.
NOR002	The Former Packhouse, The Drove, Northbourne, CT14 0LW			No change in assessment based on comments at Reg.18. Remains potentially suitable.
NOR003	White Horse Public House, Broad Lane, Finglesham, CT14 0LY			Not in accordance with growth strategy.
PRE001	Land to the north of Court Lane, CT3 1DJ			Impact on transport grounds. Concerns in relation to the cumulative

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Site Reference	Site Address	Previous Suitability Assessment	Updated Suitability Assessment	Reason for Change
				impact upon the highways network.
PRE007	Land lying at the west side of Preston Lane, Preston, CT3 1DP			Impact on transport grounds. Concerns in relation to the cumulative impact upon the highways network.
RIN003	Land at Ringwoud Nursery, Hangmans Lane, Ringwoud, CT14 8HJ			Not in accordance with growth strategy
SAN004	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich			Site has been re-assessed based on the new information provided at Reg 18. Considered the constraints identified on the site can be mitigated through the Local Plan
SAN006	Sandwich Highway Depot/ Chippies Way, Ash Road, Sandwich, CT13 9HZ			Considered the constraints identified on the site can be mitigated through the Local Plan
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich, CT13 0BN			Considered the constraints identified on the site can be mitigated through the Local Plan
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich, CT13 0AA			Considered the constraints identified on the site can be mitigated through the Local Plan
SAN016	Poulders Gardens, Sandwich, CT13 0AJ			No change remains potentially suitable.
SAN023	Land at Archers Low Farm, St George's Road, Sandwich, CT13 9LD			Considered the constraints identified on the site can be mitigated through the Local Plan
SHE001	Land off Mill Lane, CT15 7LR			Due to concerns in relation to the cumulative impact upon the highways network. Not in accordance with growth strategy

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Site Reference	Site Address	Previous Suitability Assessment	Updated Suitability Assessment	Reason for Change
SHE003	Land to the north of Westcourt Lane, Shepherdswell, CT15 7PU	Yellow	Red	Due to highway safety concerns raised by KCC highways.
SHE004	Land to the north and east of St Andrew's Gardens, Shepherdswell, CT15 7LP	Yellow	Light Green	Considered the constraints identified on the site can be mitigated through the Local Plan. Portion of site still remains unsuitable.
SHE013	Land around Coldred, CT15 5AP	Black	Light Green	Site has been re-assessed based on the new information provided at Reg 18.
SHO002	Land to the South West of Sandwich Road, Sholden Deal	Red and Light Green	Red and Blue	Site has been re-assessed based on the new information provided at Reg 18.
STA003	The Barn, Chapel Lane, Barnsole, CT3 1NX	Yellow	Red	Not in accordance with growth strategy
STA008	Mill Road, Staple - smaller site, CT3 1JZ	Yellow	Red	Not in accordance with growth strategy
STA010	Land between Fairview and Chapel Lane, Lower Road/ Fleming Road, Barnsole, CT3 1LH	Light Green	Red	Not in accordance with growth strategy
STM007	Land to the west of Townsend Farm Road, St Margarets (Site B), CT15 6JE	Yellow	Light Green	Considered the constraints identified on the site can be mitigated through the Local Plan.
STM008	Land to the west of Townsend Farm Road, St Margarets at Cliffe (site A), CT15 6EP	Yellow	Light Green	Considered the constraints identified on the site can be mitigated through the Local Plan.
STM010	Land located between Salisbury Road and The Droveaway, St Margarets-at-Cliffe, CT15 6DL	Yellow	Light Green	Considered the constraints identified on the site can be mitigated through the Local Plan.
STM011	Land to the north of Salisbury Road, St Margarets-at-Cliffe, CT15 6DP	Yellow	Yellow	Remains as potentially suitable
SUT002	Land adjacent to The Follies, Downs Road, East Studdal	Light Green	Red	Not in accordance with growth strategy

Site Reference	Site Address	Previous Suitability Assessment	Updated Suitability Assessment	Reason for Change
SUT005	The Homestead, Homestead Lane, East Studdal			Site erroneously assessed as having planning permission. Re-assessed based on Reg.18 comments as being potentially suitable.
SUT009	Downs Road, East Studdal (SUT01), CT15 5DA			Not in accordance with growth strategy
TIL001	Land on the west side of Dover Road			Not in accordance with growth strategy
WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown, CT14 7PS			Considered the constraints identified on the site can be mitigated through the Local Plan.
WIN006	Land at Broomhill, Gobery Hill, Wingham, CT13 1JJ			To remain potentially suitable, subject to overcoming KCC highways comments
WOR007	Land to the rear of Jubilee Road, Worth, CT14 0DN			Designated Local Green Space in Worth Neighbourhood Plan

Review of Site Availability

4.9 Table 3 sets out the changes in site availability:

Site Reference	Site Address	Previous Availability Assessment	Updated Availability Assessment
EAS012	Lower Gore Field, Lower Gore Lane, Eastry, CT13 0ED	Available	Unavailable
EYT019	DDC owned site - land to east of Adelaide Road, Eythorne, CT15 4AL	Available	Unavailable
HOU004	Land to the north east of Broadsole Lane and to the rear of Jubilee Cottage, West Hougham	Available	Unavailable
STM010	Land located between Salisbury Road and The Droveaway, St Margarets-at-Cliffe, CT15 6DL	Available	Unavailable
WHI006	Guide Hut, Sandwich Road, Whitfield, CT16 3NG	Available	Unavailable

Summary of HELAA (excluding additional sites submitted through the TC4S)

4.10 Since the HELAA was published in January 2021, 1 site SHE013 has changed from being deleted to being included and this results in 365 sites. Of the 365 sites, 46 have gained planning permission or are subject to permission and are awaiting completions of a S106 legal agreement and 5 are allocated in the Ash Neighbourhood Plan made by the Council in September 2021.

Employment Sites

Site with planning permission

4.11 ELR Site 6 – Betteshanger Colliery Site has been granted planning permission

Changes to development potential

4.12 The following employment sites have had their development potential amended to take into account comments made at Regulation 18 stage and updated site assessments and evidence:

- ELR Site 2 – Discovery Park, Sandwich
- ELR Site 4 – Aylesham Development Area, Aylesham
- ELR Site 7 – White Cliffs Business Park, Whitfield
- ELR Site 9 – Dover Western Docks, Dover
- ELR Site 16 - Ringwould Alpines, Ringwould
- ELR Site 18 – Dover Waterfront, Dover

4.13 The following sites have been identified as regeneration sites and therefore no floorspace allowance has been made for these sites in the HELAA. Instead, the development capacity of the site should be determined through the planning application process in accordance with the policies in the Local Plan:

- Site 14 – The Former Snowdown Colliery, Aylesham
- Site 21- Dover Mid Town, Dover
- Site 22 – Former Co-op site, Dover
- Site 23 – The Citadel, Dover

Review of Site suitability

4.14 Table 4 sets out the sites that have been subject to a review of site suitability as a result of updated information and responses to Reg 18, and explains the reason why sites suitability has changed.

Table 4 – Updates to Site Suitability

Site Reference	Site Address	Previous Suitability Assessment	Updated Suitability Assessment	Reason for Change
Site 4	Aylesham Development Area, Aylesham			Existing employment allocation. Considered the constraints identified on

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Site Reference	Site Address	Previous Suitability Assessment	Updated Suitability Assessment	Reason for Change
				the site can be mitigated through the Local Plan.
Site 12	Whitfield Urban Extension, Whitfield			Existing allocation. Considered the constraints identified on the site can be mitigated through the Local Plan.
Site 21	Dover Mid Town, Dover			Existing allocation. Considered the constraints identified on the site can be mitigated through the Local Plan.
Site 22	Former Co-op, Dover			Considered the constraints identified on the site can be mitigated through the Local Plan.

5. Windfall Assessment

5.1 The NPPF defines windfalls as sites not specifically identified in the development plan.

Paragraph 70 of the NPPF states that local planning authorities can make an allowance for windfall development in their five year supply if there is compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends.

5.2 A continuing review is taken of the average number of windfall dwellings completed per annum since the adoption of the Core Strategy in 2010. Windfall sites have been identified using the revised NPPF definition that includes all sites not identified through a development plan. This approach identifies an overall historic average windfall delivery rate of **171 dwellings per annum**. A summary of windfall completions is set out below:

Year	Windfalls on sites of more than 5 units	Windfalls on sites of less than 5 units	Total Windfalls
Average	119	73	192
2021/2022	311	77	388
2020/2021	113	92	205
2019/2020	133	84	217
2018/2019	50	62	112
2017/2018	58	99	157
2016/2017	89	60	149
2015/2016	116	87	203
2014/2015	94	83	177
2013/2014	112	27	139
2012/2013	99	66	165
2011/2012	179	61	240
2010/2011	74	74	148

Historic Windfall Completions

5.3 As required by paragraph 70 of the NPPF, in applying a windfall allowance to housing supply, there needs to be consideration of both future trends as well as historic windfall delivery rates. The most significant impact is likely to be the adoption of the new Local Plan, however the likely implications arising from this on the windfall allowance cannot be known until a draft of the Plan is published.

5.4 In view of this, and in taking an extremely cautious approach, the Council will only be applying a windfall allowance from sites of less than five dwellings. This takes into account the HELAA methodology of site selection for the new local plan in that only sites above this size are to be considered as potential new allocations. Historically sites of less than five dwellings have contributed significantly to new housing in the District and we anticipate that they will continue to do so.

5.5 It is recognised that windfall sites of five dwellings or more will continue to make a significant contribution to the Council's Housing Supply up to the adoption of a new Local Plan. Not taking

this source of supply into account may be viewed as overly pessimistic. However, it is considered that by taking such an approach, a significant buffer is built into the supply calculation.

5.6 The windfall contribution from small sites of less than five new dwellings to the overall supply of housing is 70 dwellings per annum - based on the annual average of past trends from this source since adoption of the Core Strategy in 2010. The contribution from small windfall sites is considered appropriate from year 4 of the Plan to avoid any double counting from windfall sites that have already received planning permission, and are counted within the extant permissions.

6. Site Assessments

6.1 Site assessments are set out in the appendices as explained below.

6.2 Appendices 1a (housing) 1b (employment) and 1c (Gypsy and Traveller) includes a summary of the latest site assessments for all sites that have been considered at Stage 2 following the initial desktop sift assessment. This includes both sites that were considered during the Stage 2 assessment published in the 2020 HELAA, which has been reviewed and updated, as well as those submitted in the Targeted Call for Sites.

6.3 Appendices 2a-g are the detailed assessments of sites that were submitted to the Targeted Call for Sites. This includes Appendix 2a which lists the sites eliminated after the initial desktop assessment. Appendices 2b to 2e includes detailed issues specific assessments for the housing sites. Appendix 2f is the Gypsy and Traveller sites and Appendix 2g is the employment sites

6.4 Appendices 3a to f relate to the HELAA 2020. Except for Appendix 3g these assessments are published in the HELAA 2020. Appendices 3a to 3d being the detailed issue specific assessments carried out to inform the 2020 HELAA. Appendix 3e and 3f are the sites that were eliminated following the initial desk-based assessment in the HELAA 2020. Appendix 3g sets out the responses to stakeholder engagement that has taken place following the Reg 18 consultation and has informed the re-assessment of sites.

6.5 There are a number of duplicate sites which were submitted through the TC4S that were also original HELAA sites. The sites are listed in Appendix 4.

6.6 The following diagram is a guide to viewing the appendices.

