



# Housing Topic Paper

March 2023

Dover District Council

Evidence Base



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## 1. Introduction

- 1.1 This Housing Topic Paper is an update to the Housing Topic Paper produced at Regulation 19 stage and has been prepared to support and draw together housing related evidence, data, and information. The paper has been updated and streamlined from previous versions and focuses on the following:
- 1.2
- Section 2 - Dover District population, household data and housing market
  - Section 3 - Housing evidence base
  - Section 4 - Past housing delivery
  - Section 5 - Local Plan housing land need and supply

## 2. Dover District Population and Household Data

- 2.1 Dover District has a total population of 116,600 (2021 Census), increasing by 4.2% from 111,674 since 2011 (2011 Census). Elsewhere in East Kent, Ashford has seen faster population growth, Thanet and Canterbury saw similar growth to Dover and Folkestone and Hythe saw a lower level of growth (2021 Census), while the Southeast region on average saw population growth of 7.5%. Dover has also seen an increase of 23.9% in people aged 65 years and over, a decrease of 1.2% in people aged 15 to 64 and an increase on 1.1% in children aged under 15 years. The number of households has increased from 48,310 (2011) to 50,548 (2021), a 4.6% increase since 2011. The average household size based upon latest census data is 2.3 and has increased from 2.2 in 2011.
- 2.2 In 2022, the median cost of a home in Dover District was 9.57 times the median workplace earnings, an increase of more than three times average earning since 2010. In the 12-year period the median house price increased sharply by £135,000 to £300,000 with the highest rate of growth occurring between 2015 and 2018. This was compared to stagnant median work-based earnings that only saw substantial increases in 2019 and 2020 before returning to 2019 levels in the subsequent years. Whilst house prices within the District have increased substantially earnings have not.

## 3. Housing Evidence Base

- 3.1 This section sets out a summary of the housing evidence base that has been used to inform the Local Plan and policies proposed within it.

### Strategic Housing Market Assessment (SHMA)(HEB01) and Housing Standard Method Calculation

- 3.2 To inform the development of the housing strategy for the Local Plan, the Council commissioned a Strategic Housing Market Assessment (SHMA) that was carried out by Peter Brett Associates in 2017. At that time the SHMA was the vehicle for evidencing a District's objectively assessed housing need which is now superseded by the standard methodology. The SHMA was subsequently updated in 2019 and focused on disaggregating the standard method by size and tenure and providing the affordable housing mix and composition. A further partial update to consider how First Homes could meet the housing needs of the

District was carried out in 2022. This provides the latest evidence on housing mix and composition, in terms of tenure types and sizes.

- 3.3 The Local Plan should, as a minimum, provide for the objectively assessed need for housing within the District (NPPF para 11). The standard method approach for identifying OAN housing need is taken forward in the Plan. Applying the Government's standard method, the objectively assessed housing need figure for the Dover District on which the Plan has been based is **611 dwellings per annum (dpa)** (See Appendix 1 for the full calculation), which equates to providing a minimum of **10,998 dwellings** over the 18 years of the Plan period to 2040. This uses the 2021 affordability ratio released in March 2022 and the household projections with the 10-year average calculated between 2022 and 2032. An update to the affordability ratio was released on 22<sup>nd</sup> March 2023, shortly before the submission of the Plan. The updated data results in a standard methodology calculation of 609 dwellings dpa.
- 3.4 The specific types and mix of dwellings required for the Plan is informed by the latest SHMA. The housing needs of the various community groups and the emerging population trends and demographics have been assessed through the latest SHMA for the District. To meet the local housing needs identified, the SHMA sets out the dwelling size, household type and tenures that are required to be built over the plan period. In terms of tenure mix the latest evidence recommends the following mix: 70.1% private market; 16% Affordable Rented/Social Rented and 13.9% Affordable Home Ownership (5.8% Shared Ownership and 8.1% First Homes). The SHMA evidences that for specialist dwellings for older persons (class C3b) and 576 units of housing for older people and 66 units of housing with care should be provided over the plan period within the identified local housing need. The SHMA further concludes that 990 additional spaces of Registered Care will be required for housing those aged 65 and over, for the Plan period and as part of the institutional population is in addition to the housing supplied within the local housing need.

### **Housing and Economic Land Availability Assessment (HELAA) (GEB09)**

- 3.5 The HELAA identifies 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 HELAA has been prepared in accordance with the guidance set out in the Government's Planning Practice Guidance 2019<sup>1</sup>.
- 3.6 The interim version of the HELAA was published on the Council's website in April 2020 following a series of engagement meetings with ward councilors and town and parish councils during February and March 2020.
- 3.7 The draft HELAA was subsequently updated and published alongside the Regulation 18 consultation on the draft Local Plan. A Targeted Call for sites exercise was carried out in 2021 alongside the formal Regulation 18 consultation on the draft Local Plan. The exercise sought to increase options on specific types of sites that would then inform further drafting of the Local Plan. The specific types of sites were for: housing on sites of 1 ha or under, Self Build and Custom Housing, Employment and Local Green Spaces.

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<sup>1</sup> <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

3.8 A further update to the HELAA was published as evidence to the Regulation 19 submission version of the Local Plan during the consultation period. Further information on the HELAA and site selection process can be found in the HELAA summary report and Site Selection Topic Paper Update 2023 (to follow in April).

### Settlement hierarchy (HEB03)

3.9 The Dover District Settlement Review and Hierarchy (2008)<sup>2</sup> informed the Core Strategy 2010 on the spatial objectives for the District's settlements. The key aim of the study was to identify those settlements that were in the most sustainable locations, based on the range of facilities and services present, and which would benefit socially or economically from further development. In broad terms the review:

- defined a sustainable settlement hierarchy;
- identified the current role of the settlements; and,
- identified settlements within the hierarchy that would be suitable for future development.

3.10 The review used the South East Plan's network classification for settlements, and Dover Town was classified as a Secondary Regional Centre, due to the level of high order facilities provided within the town. The hierarchy used and how the settlements were classified are summarised in the table in policy CP1 of the Councils Core Strategy 2010.

3.11 In 2020 and again in 2022 the District's settlement hierarchy was reviewed as part of the emerging Local Plan evidence. The review identified those settlements in the District that are the most sustainable, based on the range of facilities and services present. It focused particularly on the rural settlements of the District, given that the sustainability credentials of the three main centres of Dover, Deal and Sandwich were well-established.

3.12 The study drew on the inventory of village facilities produced annually for the Dover District Annual Monitoring Report<sup>3</sup>, together with data from the Local Land Property Gazetteer, which is collected annually, and which was examined and cross-checked against historic survey data. Finally, consultation was held with Parish Councils to establish the accuracy of this information. Specifically, tables setting out the facilities that data was indicating was present at each settlement were forwarded to Parish Councils for their input and fact checking during November - December 2021, with the resultant output presented as a hierarchy of settlements. The hierarchy was based on an analysis of the presence in each village of a range of services deemed to act as indicators of the sustainability of a settlement. The services reviewed included shops, primary schools, health services and access to public transport.

3.13 The study acknowledges that the settlement of Aylesham has successfully developed as a rural service centre; that the settlements of Ash, Wingham, Eastry, St Margarets at Cliffe, Shepherdswell, Elvington and Eythorne have a wide range of the services regularly identified as key indicators of sustainability and appear to serve as local centres; that a group of villages emerge as containing a high number of key services such as a primary school, a GP service,

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<sup>2</sup> <https://www.doverdistrictlocalplan.co.uk/about/evidence-base>

<sup>3</sup> This survey work is undertaken by Council officers and then forwarded to parish councils for verification.

a food shop or general store able to meet a range of daily needs, and a commuter-friendly bus or train service; and, a small number of villages have a reasonable level of local services. However, the study also acknowledges that the majority of settlements in the District emerge as having a low level of facilities or sustainable services.

### Self-Build and Custom Housebuilding Register

- 3.14 The Self-Build Register (kept in accordance with the Self Build and Custom Housebuilding Act 2015, as amended by the Housing and Planning Act 2016) is used to inform the Council of the needs within the district.
- 3.15 It is split into two parts; Part One and Part Two. Those with a local connection to the Dover District, and with the ability to evidence their financial capacity to carry out a Self-Build project are eligible to join Part One of the Register. Those without a local connection to the Dover District, or who cannot provide evidence of their financial ability to carry out a self-build project can be placed on Part Two of the register. The following sets out the current and past registrations on the self-build register.

**Table 1 - Self Build and Custom Housebuilding Register 2019-2022**

	Registrations	Part 1	Part 2	Total
Total Registrations as of 30 October 2019 <sup>4</sup> (On previous register without tests)	167	N/A	N/A	167
Total Registrations as at 30 <sup>th</sup> October 2020 (register with tests)	N/A	4	2	6
Total Registrations as at 30 <sup>th</sup> October 2021 (register with tests)	N/A	4	7	11
Total Registrations as at 30 <sup>th</sup> October 2022 (register with tests)	N/A	9	9	18

- 3.16 Since monitoring year 19/20 there have been 23 plots granted planning permission, 13 of those within the 21/22 year. Further detail can be accessed from the relevant annual [Authority Monitoring Reports](#).

### Brownfield Land Register

- 3.17 The Council's Brownfield Land Register 2023 identifies land from planning consents and unimplemented development plan allocations. Part 1 of the Council's register has 81 sites on it, totalling a developable area of 176 hectares, with the potential to deliver a net gain of 3,827 dwellings. At present, there are no sites on Part 2 of the Council's register.

### Whole Plan Viability Assessment (GEB08)

- 3.18 A whole Plan Viability Assessment was undertaken in the summer of 2020 followed by update in 2022 to identify any impacts as result of the COVID pandemic and Britain's exit from Europe. The assessment covers 2 substantial matters. The first, tests the deliverability of the Local Plan to ensure that the sites identified in the Plan are not subject to a scale of planning obligations and policy requirements that render them undeliverable. The second reviews the level of section 106 (developer obligation) costs and the level of affordable housing that would allow the funding of infrastructure and meet needs, without putting at risk

<sup>4</sup> See Authority Monitoring Report 20/21 (page 23)

the economic viability of development in the District. The update identified that in the two years since the 2020 assessment, house prices had increased at a higher rate than costs of construction and as a result there were no changes to the assessment conclusions.

- 3.19 The viability considerations in the assessment 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 19 Submission Local Plan. The assessment having set out these factors, then prescribed a set of typical development typologies by number of dwellings being developed and whether the development is on greenfield or brownfield.
- 3.20 To determine the achievability of these typologies, the whole Plan Viability Assessment then tested them against the determined costs of development, selling price of dwellings and the level of land release incentive required across the district. Based on these considerations the Assessment 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.
- 3.21 The assessments identifies these area geographically for the District 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.
- 3.22 The evidence has been used to inform the affordable housing policy, in particular the nil requirement for affordable housing on sites in the Dover urban area<sup>5</sup>, and the level of other policy requirements (such as carbon emission standards).
- 3.23 The work concludes that the plan as a whole is deliverable, and not subject to a scale of planning obligations and policy requirements that would make it undeliverable. Further work has been carried out by the site promoters/landowners of the strategic sites and the Council intends to enter into Statements of Common Ground with these parties on this matter.

### Five Year Housing Land Supply 2022-2027 (GBD02)

- 3.24 The Council's most recent published position on five-year housing land supply relates to the period 2022-2027 and demonstrates that a **6.03 year supply** of housing can be demonstrated.

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<sup>5</sup> As shown on the Local Plan Policies Map



## Authority Monitoring Report (AMR), including Housing Information Audit (HIA) and Commercial Information Audit (CIA)

- 3.25 The latest AMR covers the monitoring year 1<sup>st</sup> April 2021 to 31<sup>st</sup> March 2022. The AMR provides the update to date position regarding extant planning consents for housing and commercial development. The HIA and CIA will be updated following the annual completion survey that will commence during April 2023. The updated position will be provided during the examination.
- 3.26 Previous AMR's have also assessed the use and effectiveness of existing development plan policies. The latest assessment can be viewed in the AMR 2019/20.

## Sustainability Appraisal (SA)

- 3.27 With regard to Housing, the key sustainability issues facing Dover District are identified in the SA Scoping Report as follows.
- Population growth, household growth and demographic change will place additional demand on key services and facilities such as housing, health, education and social care. The Local Plan offers a new opportunity to manage these pressures, encouraging mixed communities;
  - There is a need for affordable housing across the District. At present, the mean price of dwellings is higher than the national average. The Local Plan will help to expedite its delivery; and,
  - There is the need for a mix of housing types that cater for the needs of a range of people, including the growing number of single person and elderly households. Without an up-to date Local Plan, the required housing is less likely to be delivered.
- 3.28 The likely significant effects of the constituent parts of the Local Plan have therefore been assessed against the following SA Objective: **SA 1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.**
- 3.29 The SA has been used to assess options for the housing growth strategy and individual site allocations. More detail on this process is set out in the Site Selection Topic Paper Update 2023 (to be published April 2023).

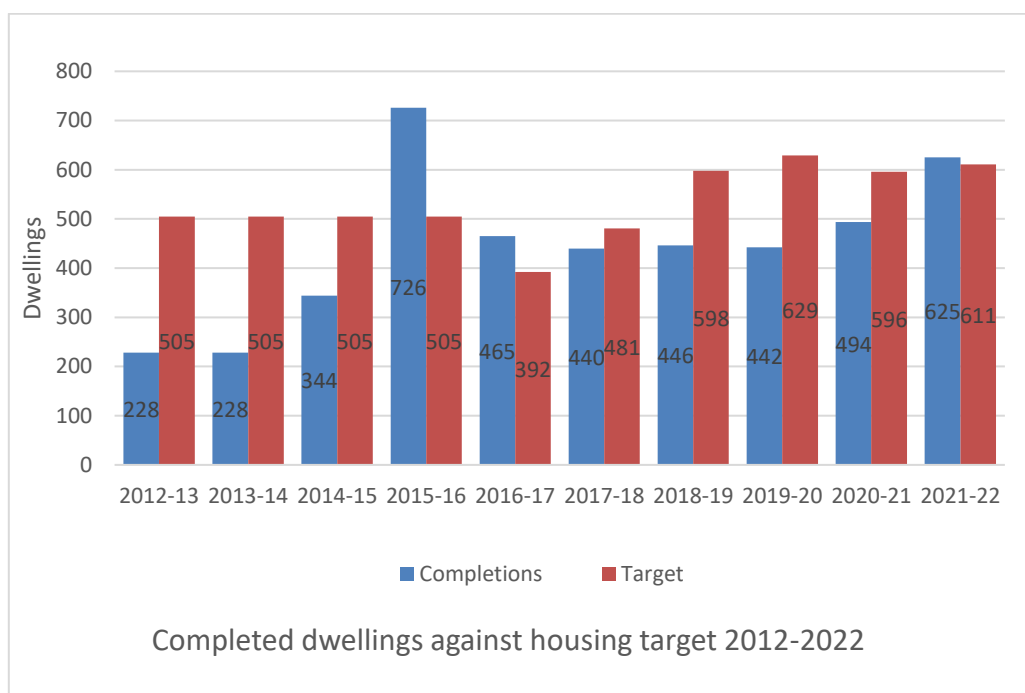
## Community Engagement

- 3.30 Full details of engagement that has taken place on the Local Plan and supporting documents in relation to housing policies and proposals can be viewed in the Council's Regulation 22 Consultation Statement (SD05). In summary this has included:
- Workshops with Members and stakeholders
  - Meetings with Town and Parish Councils on the draft HELAA
  - Formal consultation on options and the draft Plan (Regulation 18)
  - Direct consultation with Town and Parish Councils on specific matters such as the settlement facilities surveys and settlement boundaries
  - Formal consultation on Regulation 19 Submission Local Plan

## 4. Past housing delivery

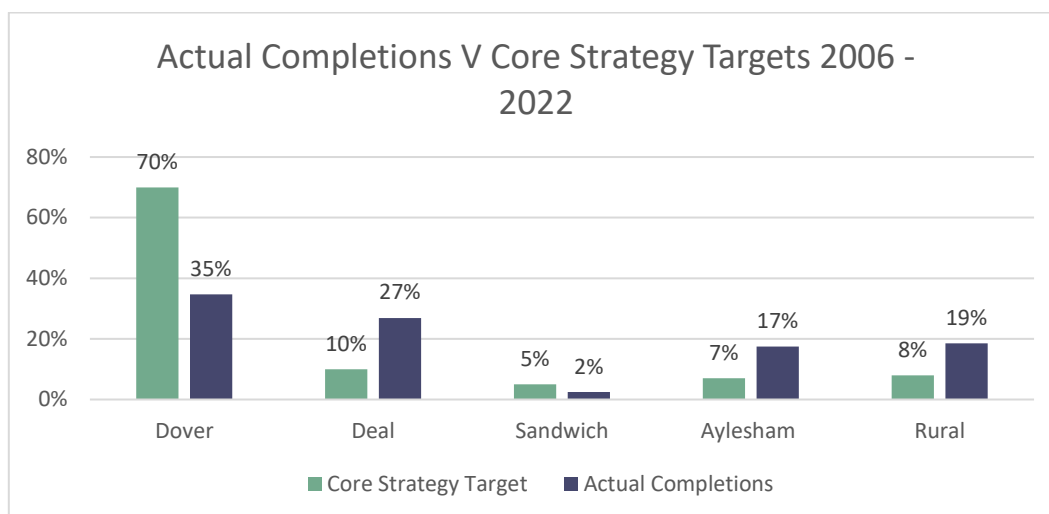
- 4.1 Figure 1 shows the District's past housing completions annually since 2012/13. From 2013-14 onwards the average number of completed dwellings per annum has doubled to that of the early years of the Core Strategy (2010). The increased completion rate from 2013-14 has overall been consistent with the delivery quantum's set out within the Core Strategy. Since 2016-17 the level of completions within the District have been measured against the transitional requirements of the government standard method for assessing Local Housing Need. As a result of the standard method transitional arrangements, housing targets from 2018-19 onwards have been higher than those set by the Core Strategy.

**Figure 1. Completed dwellings measured against housing targets**



- 4.2 The Core Strategy (2010) placed an emphasis on housing delivery within the Dover Town area, with the strategic urban extension at Whitfield being the primary focus. There was limited provision for dwellings within other settlement areas and the rural hinterland of the District. However, since the Core Strategy was adopted, the delivery of dwellings has been primarily split between the Dover and Deal areas, with both the rural and Aylesham areas having taken nearly twice the intended levels of development (see Figure 2). Dover urban area (including Whitfield) remains the most sustainable location for growth and with most opportunity to maximise development on brownfield site. However, a key issue that has been considered in determining the scale of growth that can be accommodated here is the likely delivery of sites in the town centre and the rate of delivery of Whitfield Urban Expansion.
- 4.3 The deviation away from the planned distribution as set out within the Core Strategy has largely been a result of windfall development. Over an 11 year period to 2021/22 windfall development has accounted for 44% of delivery in the district.

**Figure 2 - Distribution of Completions against Core Strategy Targets 2006-2022**



## 5. Local Plan Housing Need and Supply

- 5.1 The following section sets out supporting information and evidence in relation to housing need and supply for the Local Plan as set out in Tables 3.1 and 3.2 of the Dover District Local Plan Regulation 19 Submission (SD01). Table 3.1 of the Local Plan sets out the Plan housing need and supply and is replicated below in Table 2.

**Table 2 – Summary of Local Plan Housing Need and Supply (extract from Plan)**

Table 3.1 Local Plan Housing Need

<b>LOCAL PLAN HOUSING NEED (18 X LHN 2022 - 611)</b>	<b>10,998</b>
Extant supply (Permitted development not yet built) (Excluding Whitfield and with 5% non-implementation discount applied, as at March 2022)	3,829
Whitfield Urban Expansion Extant Supply as at March 2022	1,120
Subject to S106 <sup>1</sup> since April 2022	137
Ash Neighbourhood Plan Sites <sup>2</sup>	196
<b>COMMITTED SUPPLY TOTAL</b>	<b>5,282</b>
Whitfield Urban Expansion Allocation SAP1	2,200
Local Plan Allocations (Excluding SAP1)	3,392
Windfall allowance (70 a year from year 4)	1,050
<b>LOCAL PLAN SUPPLY TOTAL</b>	<b>6,642</b>
<b>TOTAL HOUSING SUPPLY</b>	<b>11,924</b>
Contingency Buffer	926

1 ASH010 (76 units), DOV009 (32 units), 20/00510 (29 units)

2 ASH003 (8 units), ASH004 (110 units), ASH011 (10 units), ASH014 (63 units), ASH015 (5 units)

Note – As set out in Additional Modifications schedule some minor changes are proposed to add clarity to rows 2 and 4.

## Local Plan Housing Need

5.2 As set out at paragraph 3.3 of this Topic Paper, the standard method calculation of March 2022 has provided the basis for the housing requirement set out in the Plan.

## Total Committed Supply

5.3 The total committed supply is the total of the extant consents (with non-implementation discount, extant supply from Whitfield Urban Expansion, Major sites with a resolution to grant planning permission subject to S106 negotiations and the Sites allocated in the Ash Neighbourhood Plan. **This totals 5,282** as set out below in more detail.

## Extant Supply

5.4 As at March 2022 there is an extant supply of 5,150 dwellings which have planning permission (including full, outline and prior approval permissions). 1,120 of these are at Whitfield Urban Expansion<sup>6</sup>, the remaining 4,030 are across the district. The full list of extant consents is provided in [Appendix B of the AMR 2021/22](#).

5.5 The extant permissions that contribute to the housing land supply have been identified through the Council's annual Housing Information Audit (HIA) 2021/2022. How the permissions are identified and assessed in terms of their deliverability are detailed within the Housing Land Supply Paper 2022<sup>7</sup>. The paper principally sets out how the Council's annual 5 year housing land supply position is determined, through engagement with promoters of sites and how the sites are phased and delivery rates set. The approach includes:

- All extant sites with detailed planning consent having been subjected to a site visit to determine status of housing units as completed, under construction and not started;
- Review of Building Control commencement and completion records and Council Tax records to determine the status of units on sites;
- Survey questionnaires sent to all major sites for updates on phasing and delivery rates;
- Requests for evidence of deliverability from major sites without detailed planning consent;
- A forum with local planning consultants and developers to outline the evidence behind the Councils phasing and deliverability methodology and to set out the types of evidence of deliverability being sought from sites without detailed consent;
- Review and engagement with the Councils Development Management team on sites progressions towards gaining detailed planning consent: and,
- Consideration of all available evidence on the sites progress, with review against the historically evidence phasing and deliverability methodology.

## Non-implementation Discount

5.6 Historically, the district has experienced a very low rate of expired planning consents for new dwellings at 2% of the extant stock (see Table 3). However, it is considered appropriate to take a cautious approach towards non-implementation of extant dwellings to ensure sufficient supply of housing land. As a result, a 5% non-implementation discount (which is more than double the average of past expired consents) has been applied and considered when reviewing the extant supply (excluding Whitfield Urban Expansion) for the Local Plan, which is considered to be a justified approach.

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<sup>6</sup> Includes Full application 16/00136 Singledge Lane not covered by the two outline consents,

<sup>7</sup> <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Authority-Monitoring-Report/Plan-Monitoring.aspx>

Table 3. Expired Planning permissions

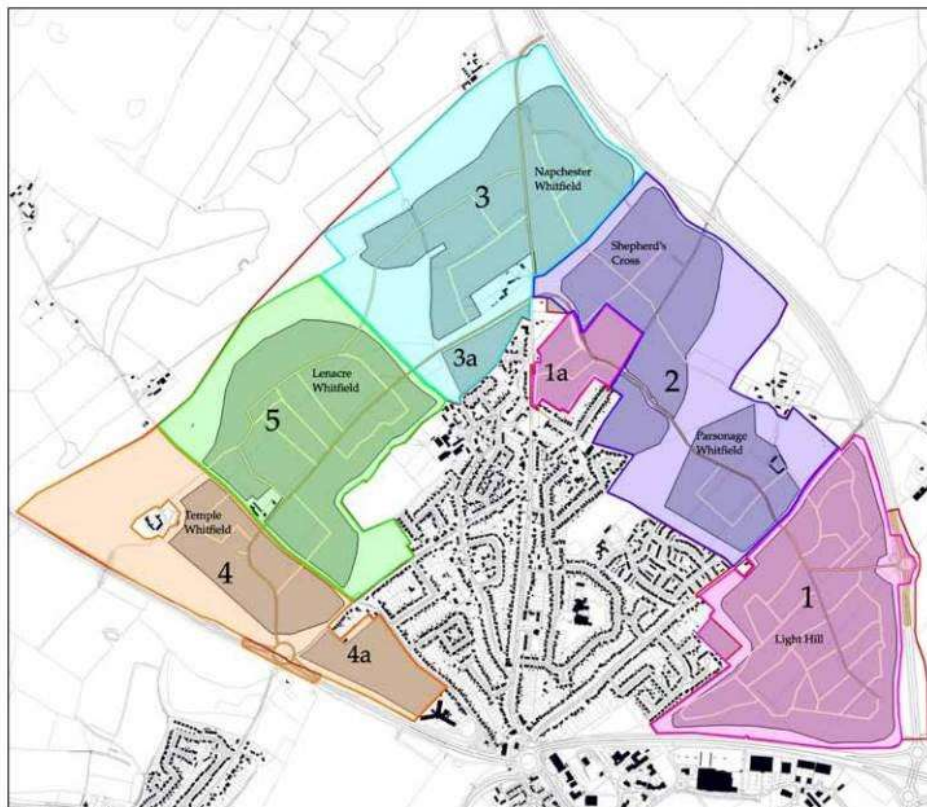
	Expired permissions	Extant stock	Percentage
<b>Average</b>	<b>88</b>	<b>4823</b>	<b>1.93%</b>
21-22	16	5,186	0.31%
20-21	*0	4,979	0.00%
19-20	14	4,784	0.29%
18-19	234	4,498	5.20%
* no expired permissions			

### Whitfield Urban Expansion Background and expected supply

#### Summary of planning permissions

5.7 The Whitfield Urban Expansion (WUE) was allocated for development in the Dover District Core Strategy 2010, with a Masterplan for the development being adopted within the Whitfield Urban Expansion Supplementary Planning Document (Whitfield SPD), April 2011. Below is an extract from the Whitfield SPD showing the phasing based upon the current allocation:

Figure 3 – Whitfield Urban Expansion Phasing Plan



WUE Phasing Plan

5.8 To date planning permission has been granted for 1,483 dwellings, a health centre, primary school and new pumping station. As of April 2022, 363 homes have been completed on the site and a primary school has been constructed and opened. Completions are summarised in Table 4 below:

**Table 4 – Whitfield Urban Expansion Extent Planning Permissions**

Application number	Total dwellings approved Outline and Full permissions	Total dwellings with reserved matters approved at March 2022	Total dwellings complete as at March 2022
10/01010 (OL) / Phase 1	1250	595	170
10/01011 (OL) / Phase 1a	100	100	74
16/00136 (Full) / Phase 4a	133	n/a	119

5.9 Whilst the development has not come forward as quickly as was originally envisaged, there is now significant interest from local and national housebuilders, and it is expected that this will enable a significant increase in the delivery of housing on the site, compared to the previous delivery rates. The original developer, Halsbury Homes, has built out one sub-phase of the Phase 1 development, and is selling parcels to other housebuilders. At the current time Barratt Homes are building out further sub-phases of Phase 1. The completed element of Phase 1a has been built out by Abbey Homes, along with the Phase 4a development. The remaining 26 dwellings of Phase 1a are currently being constructed by Dover District Council.

5.10 Planning applications for the start of Phase 2, including the whole of Parsonage Whitfield (to be submitted by Pentland Homes) and part of Shepherd’s cross (to be submitted by Danescroft) are expected to be submitted in Summer 2023. The submission of these applications has been delayed due to capacity constraints at Whitfield roundabout, a matter which has now been resolved as set out below.

#### Infrastructure delivery

5.11 The main constraint to delivery is the provision of necessary upgrades to the A2, including upgrades to the Whitfield and Duke of York roundabouts, as well as the proposed new access from the A2 on the south-western boundary of the site. The outline planning permissions for Phase 1 and 1a must provide interim upgrades to the Whitfield roundabout prior to the occupation of the 801<sup>st</sup> dwelling. Further mitigation would be required to accommodate the remainder of the allocation.

5.12 Given the amount of time that has passed since the mitigation was agreed as part of the outline consent, NH has subsequently modelled the proposed mitigation scheme and the conclusion of that work is that it does not create any meaningful capacity at the junction to mitigate the impacts generated by the consented schemes as required by the reason for the condition. As such they have advised that they could not support entering into a s278 to allow

it to be executed. It has therefore been necessary through the Local Plan work to identify an alternative scheme that could mitigate this development and Local Plan growth

- 5.13 The Council, working with KCC Highways and Transportation and National Highways has developed an alternative mitigation scheme for Whitfield roundabout that can mitigate Phase 1 and the growth in the Local Plan, including the full build out of the Whitfield Urban Expansion. This would replace the requirement for the developer of Phase 1 to have to implement a scheme however a financial contribution is expected towards its delivery instead, as set out in the IDP 2022.
- 5.14 National Highways has also programmed the delivery of a 'signing and lining' scheme to improve the current operation and safety at the junction. Whilst this would not create any additional capacity, it will enable a further development in addition to the 801 homes to come forward prior to the Local Plan mitigation scheme being completed, as set out in the Statement of Common Ground with National Highways and Kent County Council Highways and Transportation.
- 5.15 In terms of the Duke of York roundabout, a mitigation solution has also been agreed for this junction. Proportionate financial contributions will be collected from development to fund the schemes. Forward funding for the Whitfield Roundabout Mitigation may be required to enable its delivery in time.
- 5.16 Dover Fastrack, which is a new bus rapid transit system connecting the development to Dover Town Centre and Dover Priory Railway Station is currently under construction and is expected to open at the end of 2023. Fastrack will provide a reliable, high-quality bus service.
- 5.17 Fastrack buses will have priority on the proposed express route which will include a new bus, cycle and pedestrian-only bridge across the A2 at Whitfield, and a new link road from the B&Q roundabout in Whitfield to Dover Road at Guston. The junction with Dover Road will be for buses, bicycles and pedestrians only. A fleet of new electric buses will operate on Dover Fastrack as part of the Department for Transport's Zero Emission Bus Regional Areas (ZEBRA) scheme.
- 5.18 The scheme has been funded by Homes England (£22.9m Housing Infrastructure Fund), Department for Transport (£9.5m Zero Emission Bus Regional Areas (ZEBRA) scheme), Dover District Council (£1.42m).
- 5.19 The provision of wastewater infrastructure has also been a constraint to earlier delivery of the development. A solution to accommodate the first 1800 units of development is currently in place. A comprehensive upgrade to accommodate the remainder of the development is being developed by Southern Water as part of the Business Plan for the period 2025-2030.

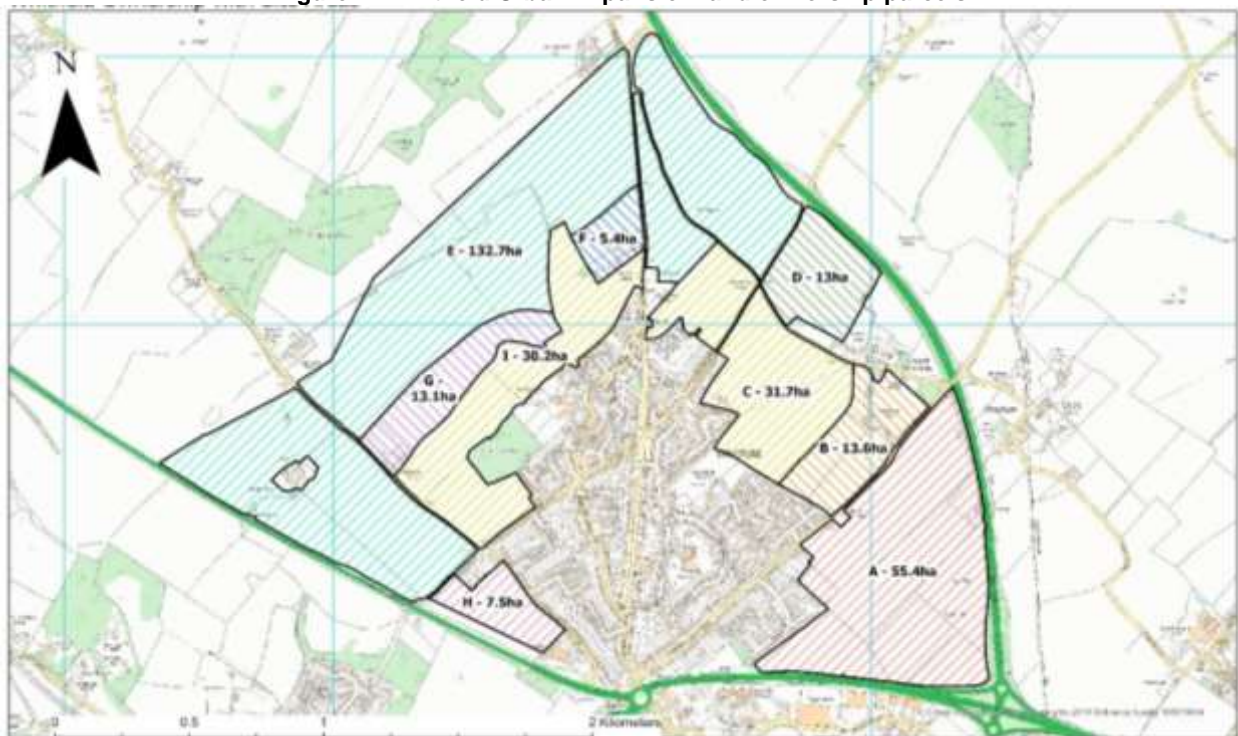
#### Expected future housing delivery

- 5.20 The delivery assumptions for the Whitfield Urban Expansion set out in Table 5 below, total 3,483 additional dwellings between 2022 and 2040. This is not meant as a ceiling to delivery within the Plan period but has been provided as an estimate in order to ensure that sufficient provision is provided through other sites in the Plan to meet the District's housing need. It is

considered to be a relatively conservative estimate of the potential delivery rates at the site. The following assumptions and consideration have been made in determining the likely delivery rates within the plan period.

- The identification of additional land to the west of the existing allocation which will provide primarily open space and mitigation land and allows for increased housing provision on the remainder of the site for a further 600 homes.
- A revised phasing and delivery programme will need to be agreed through an update to the masterplan, with flexibility to be provided in relation to the current requirement for east to west delivery of the site.
- Interest from a further housebuilders/land promoters at the site, allowing separate parcels to be brought forward concurrently.
- Of the 1,006 homes extant on the Phase 1 outline permission, 595 units<sup>8</sup> have reserved matters consent (365 of these were under construction as of 31<sup>st</sup> March 2022) and further RM applications are under consideration. All the dwellings currently extant are therefore assumed to be delivered within the plan period. This is therefore included in the committed supply in Table 3.1 of the Plan.
- Taking account of the separate landownership parcels (Figure 4) and known interest from housebuilders, the following delivery is assumed outside of those areas which already have planning permission, totalling a further 2,200 in the plan period. This is included in the Local Plan supply in Table 3.1 of the Plan.

**Figure 4. Whitfield Urban Expansion land ownership parcels**



<sup>8</sup> It is important to note that the first reserved matters on Phase 1c for 248 dwellings (18/01238/A) is in part superseded by subsequent applications and this is taken into account in these calculations, only assuming 41 extant and 26 completions on that application and not double counting those units.



**Table 5. Whitfield Urban Expansion delivery assumptions**

<b>Areas</b>	<b>2022-2025</b>	<b>2025-2030</b>	<b>2030-2035</b>	<b>2035-2040</b>	<b>Total 2020-2040</b>
B		200			200
C, F & I		250	250	250	750
D, E & G		250	500	500	1250
<b>Total</b>		<b>700</b>	<b>750</b>	<b>750</b>	<b>2200</b>

### Major sites Subject to S106

5.21 The committed supply also includes major sites that were subject to a resolution to grant planning permission, subject to the completion of a S106 agreement, as at the end of March 2022. The planning permissions on these sites have subsequently been granted and this will be reflected in the updated HIA 22/23. This totals 137 dwellings across 3 planning applications.

### Ash Neighbourhood Plan Sites

5.22 The Ash Neighbourhood Plan was made in September 2021 and includes the allocation of 5 sites, for an estimated capacity of 196 dwellings. These allocations are therefore included in the extant supply for delivery within the plan period.

### Local Plan Allocations (Excluding SAP1)

5.23 Site allocations are made for 3,392 dwellings across the plan period, not including the delivery of the Whitfield Urban Expansion. The site selection process and justifications for site allocations is set out in the Site Selection Topic Paper Update (April 2023).

### Phasing and delivery rates methodology

5.24 The following sets out the Council's evidence and methodology for the supply of sites across the Plan period, as set out in the Housing Trajectory at Appendix D of the Local Plan Regulation 19 Submission. The Council can demonstrate a continuous supply of housing across the plan period, including a five-year housing land supply.

5.25 In terms of the extant supply element of the housing supply, these sites' phasing and their delivery rates have been set out in the Five-Year Housing Land Supply Paper 2022 – 2027(GBD02).

5.26 The Local Plan site allocations have had their phasing and delivery assessed in line with requirements as set out within the NPPF 2021, in that sites have only been considered deliverable within the first 5 years of the Plan where evidence has been made available. To inform the phasing and delivery of the allocated sites, a direct survey was carried out in October 2021 with site promoters/landowners. The survey asked for the phasing and delivery expectation for sites and supporting evidence. Responses were then reviewed and checked against local historical data on lead-in times to development commencement and average delivery rates of completions.

5.27 Further updated information has been submitted by site promoters in response to the Regulation 19 Submission consultation. The housing trajectory has not been updated to take account of this, however, information submitted supports the trajectory and, in some cases,

suggests that sites could come forward earlier than proposed. An update to the housing trajectory can be provided to take account of any changes in evidence to follow the annual housing information audit that will commence in April 2023, if requested as part of the Examination

5.28 Figure 5 below illustrates the methodology applied to phasing site allocations within the Local Plan. Phasing is based on progress towards a site gaining planning consent, feedback from site promoter availability surveys and DDC knowledge on historic lead in times and site specific issues. The phasing approach includes:

- site with a detailed planning application with decision in principle awaiting S106, will commence delivery of completions from year 3;
- Site with a outline planning application consent and deliverability evidenced, will commence delivery of completions from year 3;
- Site with a outline planning application consent and deliverability evidenced awaiting S106, will commence delivery of completions from year 4;
- Allocated site with deliverability evidence, will commence delivery of completions from year 5;
- Site with a outline planning application consent and no deliverability evidenced; will commence delivery of completions from year 6;
- site where promoter has stated a planning application is pending submission; will commence delivery of completions from year 7;
- site with a pre application enquiry or master plan provided by promoter, will commence delivery of completions from year 8;
- site that has been made available and is likely to gain a developer agreement; will commence delivery of completions from year 9;
- Site that has been made available and has a developer interested; will commence delivery of completions from year 10;
- Site that has been made available and promoter has stated medium term intent to develop; will commence delivery of completions from year 11;
- Site that has been made available and promoter has stated medium term intent to develop; will commence delivery of completions from year 15; and,
- Additional years have been added to phasing assumptions for identified constraints to delivery.

5.29 For the purpose of indicating the number of dwellings that can be delivered for each year of the Local Plan, the proposed site allocations have been assessed using the average delivery rates by site size over the 12 year period 2010 to 2022. The average historic delivery rates by site size has been set out in Table 6 below and the rates are as follows:

- 1 to 4 dwelling capacity site. will average 1 dwelling per annum;
- 5 to 9 dwelling capacity site, will average 5 dwellings per annum;
- 10 to 24 dwelling capacity site, will average 9 dwellings per annum;
- 25 to 49 dwelling capacity site, will average 18 dwellings per annum;
- 50 to 99 dwelling capacity site, will average 28 dwellings per annum;
- 100 to 199 dwelling capacity site will average 52 dwellings per annum; and,
- 200 or more dwelling capacity site will average 53 dwellings per annum.

**Figure 5 Local Plan allocation phasing assumptions**

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15
Full plans awaiting S106															
Outline permissions - Deliverability Evidenced															
Outline permissions - awaiting S106 - Deliverability Evidenced															
Allocation - Deliverability Evidenced															
Planning application submitted (outline) no evidence															
Planning application pending															
Pre application enquiry/site masterplan															
Developer agreement likely															
Developer interested in the site															
Site is available (medium term intent to develop)															
Site is available (long term intent to develop)															
First year of phased delivery															

**Table 6. Past delivery rates by site size**

Site size (dwellings)	1 to 4	5 to 9	10 to 24	25 to 49	50 to 99	100 to 199	200+
<b>Overall Average</b>	<b>1</b>	<b>5</b>	<b>9</b>	<b>18</b>	<b>28</b>	<b>52</b>	<b>53</b>
<b>2021-22</b>	1	6	8	17	39	26	18
<b>2020-21</b>	1	5	10	13	51	40	8
<b>2019-20</b>	1	6	7	17	10	49	24
<b>2018-19</b>	1	6	8	7	33	96	104
<b>2017-18</b>	1	7	8	7	31	*	72
<b>2016-17</b>	1	6	10	*	25	*	51
<b>2015-16</b>	2	5	11	13	42	91	77
<b>2014-15</b>	1	6	5	25	17	15	57
<b>2013-14</b>	1	5	10	24	16	*	63
<b>2012-13</b>	1	4	13	40	6	56	*
<b>2011-12</b>	1	5	12	*	38	*	*
<b>2010-11</b>	1	6	10	*	*	44	*
<b>* no data</b>							

## Windfall allowance

- 5.30 With regards to the final element of supply identified in Table 3.1 of the Plan, a windfall allowance has been included from year 4 onwards, in accordance with paragraph 71 of the NPPF, using an approach based on the average historic windfall completions over the years 2010 to 2022 on small sites of 1-4 dwellings
- 5.31 Table 7 below sets out the evidence of historic windfall completions over the past 12 years. Whilst there has been significant delivery of large windfall sites over the past 10 years, the delivery of large sites has not been used to calculate the likely windfall allowance, as it is considered that most suitable sites are likely to have been allocated through this Plan, and therefore this rate is likely to decrease once the Plan is adopted. Sites of 1-4 dwellings will have fallen below the site size assessment threshold as set out within the Councils Housing and Economic Land Availability Assessment<sup>9</sup>. It is therefore considered appropriate to only take account of the previous delivery of small sites) when determining the windfall allowance for the Plan.

**Table 7. Historic Windfall Completions**

Dwellings	Windfall on sites of 5 or more dwellings	Windfall on sites of 1 to 4 dwellings	Total windfall
<b>Overall Average</b>	<b>119</b>	<b>73</b>	<b>192</b>
<b>2021-22</b>	311	77	388
<b>2020-21</b>	113	92	205
<b>2019-20</b>	133	84	217
<b>2018-19</b>	50	62	112
<b>2017-18</b>	58	99	157
<b>2016-17</b>	89	60	149
<b>2015-16</b>	116	87	203
<b>2014-15</b>	94	83	177
<b>2013-14</b>	112	27	139
<b>2012-13</b>	99	66	165
<b>2011-12</b>	179	61	240
<b>2010-11</b>	74	74	148

- 5.32 The 12 year average completions on these small windfall sites is 73 dwellings per annum. To allow for a minor fluctuation in the average windfall over time an annual allowance of 70 dwellings per annum has been applied to the Local Plan supply. Taking the small sites windfall allowance to the remaining 18 years of the Local Plan will mean result in windfall delivery from 2025 to 2040, a period of 15 years. The first 3 years of the remaining 18, doesn't have an allowance as extant permissions for small sites will be built out during this time. This approach has determined that 1,050 dwellings (70 dwellings x 15 years) will be

<sup>9</sup> <https://www.doverdistrictlocalplan.co.uk/about/evidence-base>

expected from small sites windfall during the Local Plan time period. This approach is considered to be realistic and based on compelling evidence.

### Contingency buffer

- 5.33 Taking account of the committed and local plan supply, a contingency buffer of 926 units or 9.4% of the local housing need for the plan period is provided. This is considered sufficient to provide flexibility and choice, and to account of changing circumstances and under-delivery on site allocations.

### Five Year Housing Land Supply

- 5.34 Table 3.2 of the Regulation 19 Submission Local Plan sets out a summary of the five-year housing land supply. Paragraph 3.4 of the Plan suggests that the Council is intending to confirm the 5 year housing land supply confirmed through the Local Plan examination. However, it is no longer proposed to do so. An Additional Modification is therefore proposed to change the buffer required on the supply to 5% (See SD05 Schedule of Additional Modifications). An update to Table 3.1 is also proposed in the Additional Modifications schedule and the proposed revised version is provided below in Table 8 below:

**Table 8 Five Year Housing Land Supply (updated with Additional Modification)**

<b>HOUSING REQUIREMENT</b>	<b>3,055</b>
<b>LHN 2021 611 x 5 years</b>	
5% buffer	153
<b>TOTAL REQUIREMENT</b>	<b>3,208</b>
<b>HOUSING LAND SUPPLY</b>	
Extant sites (excluding Whitfield UE)	3,003
Sites with resolution to grant subject to S106	61
Whitfield UE extant	571
Whitfield UE remaining allocation	100
Local Plan allocations	263
Windfall allowance	140
Ash NDP 2021 allocated sites	5
<b>TOTAL SUPPLY</b>	<b>4,143</b>
Housing supply surplus	782
<b>TOTAL FIVE YEAR HOUSING SUPPLY</b>	<b>6.46 years</b>
<b>Total Housing Supply (4,134) / Total Requirement (3,208) x 5</b>	

### Extant sites and sites with resolution to grant subject to S106

- 5.35 Evidence is provided in relation to the delivery of the extant planning consents and sites with resolutions to grant subject to S106, in the Council's Five Year Housing Land Supply Paper 2022-2027 (GBD02), appendices 2, 3 and 6.

## Whitfield Urban Expansion

- 5.36 Of the 1005 units remaining extant on outline consent 10/01010, 595<sup>10</sup> of these had reserved matters permission as of 31<sup>st</sup> March 2022. During the latest monitoring year (2022/23) further reserved matters application have been granted permission. At present there are 4 developers building out at Whitfield Urban Expansion (Dover District Council, Abbey Homes, Barratt Homes and Halsbury Homes). Delivery rates have increased in recent years, with multiple developers bringing forward parcels of the development.
- 5.37 Further planning permissions are expected to be submitted for the start of Phase 2 in Summer 2023. It is therefore considered reasonable to assume that a minimum of 100 units from the next phase of the development deliverable within the five year period.

## Local Plan Allocations

- 5.38 Table 9 below sets out the justification and evidence for sites which are proposed to be allocated in this Plan to be delivered in five year period. Phasing has been based upon the methodology explained above and supported by responses to the Phasing survey which was carried out in November 2021. This is considered to be a conservative estimate of the likely delivery from site allocations in the first five years of the Plan. Since the Regulation 19 trajectory was progress has been made towards delivery on a number of other sites and responses received to the Regulation 19 Publication supports this. An update to the trajectory and five year housing land supply can be provided during the examination to take account of the latest information and following the annual housing information audit which will commence in April 2023.

**Table 9. Evidence of Site allocation delivery in Five Year Supply**

Site name/allocation ref	Indicative site capacity	Delivery in First five years	Justification/evidence
SAP43 Land at Short Lane, Alkham	10	9	Small site where site owner is the developer intending to bring site forward. Response received to phasing survey indicated delivery 1-2 years after plan adoption.
SAP44 Land to the east of Great Cauldham Farm	70	28	Developer controlled site. Technical Reports completed. Response to phasing survey evidenced delivery in first five year.
SAP45 Longships, Cauldham Lane	10	9	Full planning application for 15 dwellings (20/01569), has resolution to grant subject to S106.
SAP45 Land at Cauldham Lane	5	5	Developer controlled site. Response to phasing survey evidenced delivery in first five year.

<sup>10</sup> It is important to note that the first reserved matters on Phase 1c for 248 dwellings (18/01238/A) is in part superseded by subsequent applications and this is taken into account in these calculations, only assuming 41 extant and 26 completions on that application and not double counting those units.

<b>Site name/allocation ref</b>	<b>Indicative site capacity</b>	<b>Delivery in First five years</b>	<b>Justification/evidence</b>
			Outline application submitted (23/00401) for 16 dwellings in March 2023.
SAP10 Buckland Mill Dover	135	40	Homes England controlled site. Outline application under consideration (20/1068), with resolution to grant subject to S106.
SAP13 Land at Roosevelt Road, Dover	10	9	Developer controlled site, small site. Response to phasing survey evidenced delivery in first five year.
SAP30 Land at Chapel Hill, Eythorne	5	5	Developer controlled site, small site. Response to phasing survey evidenced delivery in first five year.
SAP50 Land adjacent to Short Street, Chillenden	5	5	Single ownership with stated interest from developers. Site assessments and viability carried out. Confirmation of financial support for development. Response to phasing survey evidenced delivery in first five year.
SAP34 Land at Woodhill Farm, Kingsdown	50	20	Developer controlled site in single ownership. Site assessment work completed, no known constraints to development. Pre-application taken place. Response to phasing survey evidenced delivery in first five year.
SAP52 Prima Windows, Easole Street, Nonington	35	35	Developer controlled. Planning application submitted for 28 units awaiting determination.
SAP22 Land at Archers Low Farm, Sandwich	35	35	Developer controlled. Planning application submitted for 42 units (refused and dismissed at appeal). Revised application to be brought forward to overcome reasons for refusal
SAP51 Land Opposite the Conifers	5	5	Outline planning application with resolution to grant (21/00882)
SAP54 Land at Durlock Road, Staple	3	3	Small site, site assessments carried out.
SAP39 Land to the west of Townsend Farm, St Margarets	36	18	Response to phasing survey indicated application being prepared for submission. Surveys being carried out. Response to phasing survey evidenced delivery in first five year.

Site name/allocation ref	Indicative site capacity	Delivery in First five years	Justification/evidence
SAP41 Footpath Field, Staple Road, Wingham	75	28	Developer controlled site. Planning application in preparation, sites assessments and technical reports underway, including pre-application. Response to phasing survey evidenced delivery in first five year.
SAP49 Land East of former Bisley Nursery, Worth	15	9	Developer controlled site. Site assessments underway. Response to phasing survey evidenced delivery in first five year.
Ash Neighbourhood Plan site (Land South of Mill Field – ASH003)	8	4	Small site, phased in accordance with methodology

#### Windfall allowance

5.39 The justification for the use of a windfall allowance in the five year supply position is provided in Five Year Housing Land Supply Position 2022-2027 (GBD02) at pages 13 and 14.

#### Local Plan Five Year Housing Land Supply Summary

5.40 Taking the above into account the Local Plan can demonstrate a five year housing land supply of 6.46 years with a 5% buffer. This is considered to be a conservative position based upon the assumptions that have been applied to the elements of the supply, as explained above.

#### Rolling Five Year Housing Land Supply

5.41 Table 10 also shows that based upon the Local Plan Housing Trajectory (Appendix D1 of the Local Plan), a rolling five year supply can be demonstrated.

**Table 10. Local Plan Rolling 5 year Housing Land Supply**

	Year 1 2022/23	Year 2 2023/24	Year 3 2024/25	Year 4 2025/26	Year 5 2026/27
<b>Housing land Supply</b>	<b>4,143</b>	<b>4,558</b>	<b>4,666</b>	<b>4,422</b>	<b>4,306</b>
LHN 611*5	3,055	3,055	3,055	3,055	3,055
LHN 5% buffer	153	153	153	153	153
<b>Total 5 year Housing need</b>	<b>3,208</b>	<b>3,208</b>	<b>3,208</b>	<b>3,208</b>	<b>3,208</b>
<b>5 year supply (supply/requirement) *5</b>	<b>6.46</b>	<b>7.10</b>	<b>7.27</b>	<b>6.89</b>	<b>6.71</b>



## Distribution of housing

### Brownfield/Greenfield Split

5.42 From the allocations, 23.3% them are on brownfield sites with over three quarters on greenfield and a 1 site being a mix of both. The list of the sites by Greenfield/Brownfield classification is set out within Appendix 2.

### 10% of housing requirement on sites of 1 hectare or less

5.43 The NPPF (paragraph 68) makes clear that small and medium sized sites, defined as those sites no larger than one hectare in size, make an important contribution to delivering an authority's required housing targets. Moreover, it is required that the Council provide 10% of the total housing supply required over the Plan period on these small and medium sized sites. Table 11 below sets out how the Council meets this requirement through its proposed allocation, extant planning permissions as well as small sites windfall allowance. The Local Plan and Ash Neighbourhood Plan site allocations that contribute to the requirement are presented in Appendix 3.

**Table 11. 10% housing requirement on land of 1ha or less**

	Number of units	% share towards housing target
Overall housing target	10,998	
10% minimum requirement	1099	
<b>Source of small sites</b>		
Extant planning consent on small sites at 31 <sup>st</sup> March 2022	851	7.7%
Local Plan Allocations (34 sites in total)	516	4.7%
Ash Neighbourhood Plan Allocations	23	0.2%
<b>Total</b>	<b>1390</b>	<b>12.6%</b>
Small sites windfall allowance	1050	9.5%
<b>Total with small sites windfall allowance</b>	<b>2,440</b>	<b>22.1%</b>

5.44 Table 11 shows that through extant planning permissions, Local Plan Allocations and Ash Neighbourhood Plan Allocations the Council meets the requirement to provide at least 10% of its total housing supply on sites of under 1 hectare, totalling 1,390 units or 12.6% of supply. The Plan also accounts for an evidence-based windfall allowance which it is expected would be delivered through small sites, so once this is factored in it further boosts the portion of supply which can reasonably be expected to be met through small sites to 2,440 dwellings or 22.1% of total supply.

### Distribution of housing across the District

5.45 The following Table 12 shows the distribution of housing proposed across the District, this includes the Local Plan Allocations, the Ash Neighbourhood Plan and the extant supply. The full list of sites included within the extant supply figures is included at Appendix 2 of the Council's Authority Monitoring Report (2021-22).

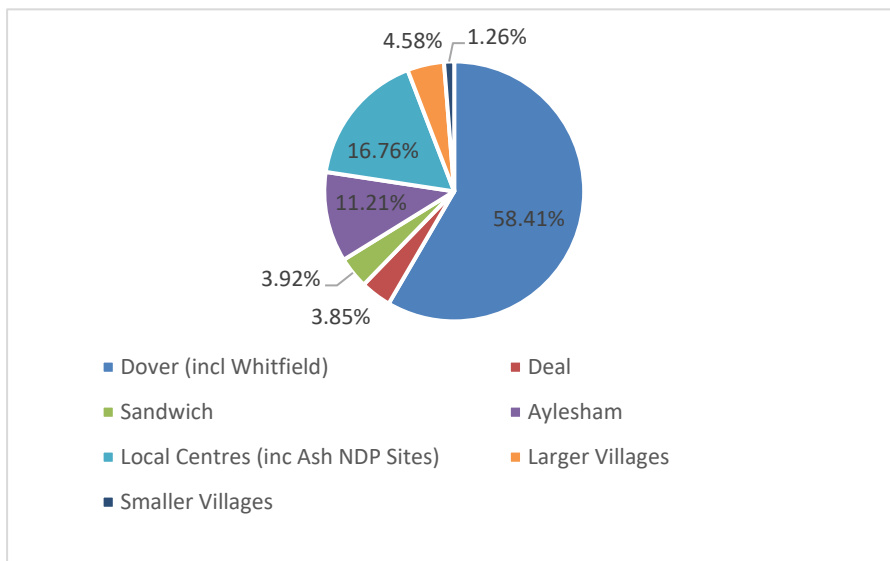
**Table 12. Housing Distribution by settlement**

By Settlement	Local Plan site allocations		Extant Supply		Combined allocations and extant %
	Total	% of total	Total	% of total	
<b>Secondary Regional Centre</b>					
Dover (incl Guston, Temple Ewell)	1181	20.40%	891	17.30%	<b>18.94%</b>
Whitfield	2200	38.01%	1159	22.50%	<b>30.71%</b>
<b>District Centre</b>					
Deal (incl Walmer, Sholden, Gt Mongeham)	223	3.85%	954	18.52%	<b>10.76%</b>
<b>Rural Service Centre</b>					
Sandwich	227	3.92%	862	16.74%	<b>9.96%</b>
Aylesham	649	11.21%	384	7.46%	<b>9.44%</b>
<b>Local Centres</b>					
Ash (NDP)	196	3.39%	111	2.15%	<b>2.81%</b>
Eastry	95	1.64%	181	3.51%	<b>2.52%</b>
Wingham	103	1.78%	9	0.17%	<b>1.02%</b>
Shepherdswell	70	1.21%	23	0.45%	<b>0.85%</b>
Eythorne and Elvington	355	6.13%	18	0.35%	<b>3.41%</b>
St Margarets	96	1.66%	17	0.33%	<b>1.03%</b>
Kingsdown	55	0.95%	8	0.16%	<b>0.58%</b>
<b>Larger Villages</b>					
Capel le Ferne	95	1.64%	38	0.74%	<b>1.22%</b>
Lydden	30	0.52%	29	0.56%	<b>0.54%</b>
Preston	65	1.12%	11	0.21%	<b>0.69%</b>
Worth	25	0.43%	2	0.04%	<b>0.25%</b>
Alkham	10	0.17%	32	0.62%	<b>0.38%</b>
East Langdon	40	0.69%	7	0.13%	<b>0.43%</b>
Goodnestone	0	0%	4	0.08%	<b>0.04%</b>
Northbourne	0	0%	214	4.15%	<b>1.96%</b>
Ripple	0	0%	2	0.04%	<b>0.02%</b>
<b>Smaller Villages</b>					
Ringwould	10	0.17%	87	1.69%	<b>0.89%</b>
Chillenden	5	0.09%	0	0%	<b>0.05%</b>
Nonington	35	0.60%	5	0.1%	<b>0.37%</b>
Woodnesborough	15	0.26%	19	0.37%	<b>0.31%</b>
Staple	3	0.05%	36	0.70%	<b>0.36%</b>
Coldred	5	0.09%	0	0%	<b>0.05%</b>
Denton with Wootton	0	0%	9	0.17%	<b>0.08%</b>
East Studdal	0	0%	14	0.27%	<b>0.13%</b>
West Hougham	0	0%	4	0.08%	<b>0.04%</b>
Martin	0	0%	1	0.02%	<b>0.01%</b>
Stourmouth	0	0%	6	0.12%	<b>0.05%</b>

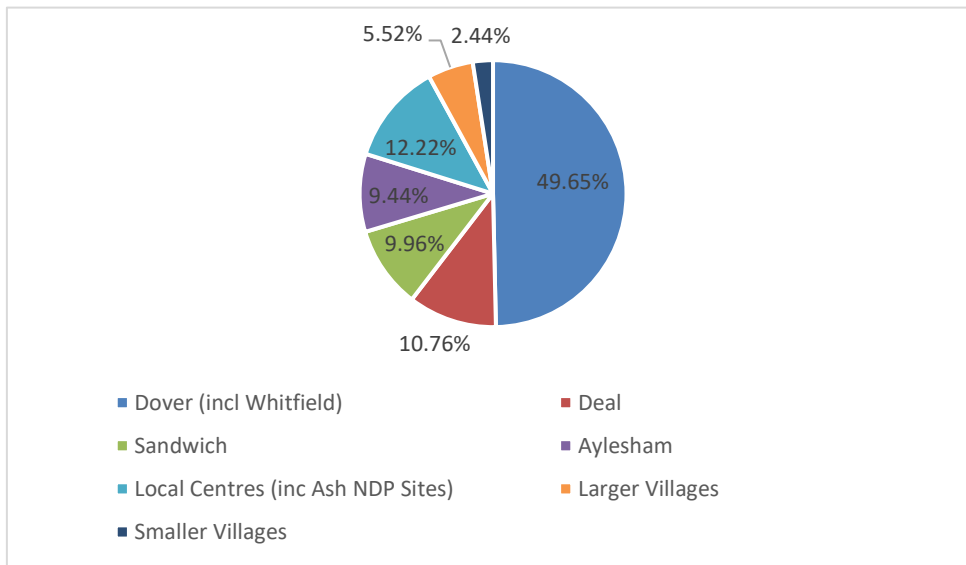
By Settlement	Local Plan site allocations		Extant Supply		Combined allocations and extant %
	Total	% of total	Total	% of total	
Sutton	0	0%	12	0.23%	<b>0.11%</b>
Tilmanstone	0	0%	1	0.02%	<b>0.01%</b>
	5788	100.00%	5150	100.00%	100.00%

5.46 The below pie charts (Figures 6 and 7) show the distribution of housing by the settlement hierarchy for Local Plan allocations, and the combination of Local Plan allocations and extant planning permissions.

**Figure 6 – Distribution of Housing by Settlement Hierarchy (Local Plan Allocations)**



**Figure 7 - Distribution of Housing by Settlement Hierarchy (Local Plan Allocations and Extant planning permissions)**



## The Supply of Housing for Particular Groups

### Affordable housing

- 5.47 The Local Plan's approach to the provision of affordable housing has been informed by the SHMA – in the latest assessment set out in the HEB01d Modelling the Demand for First Homes and tested through the Whole Plan Viability Assessment (GEB08). The SHMA identifies an overall requirement for 31% of housing delivered through the plan period to be affordable housing. A 30% site target was therefore used as the starting point for viability testing.
- 5.48 With the exception of Dover Urban Area, the viability evidence demonstrates that the delivery of 30% affordable housing is viable on most sites. In the lower value areas of the District, the delivery of 30% is more marginal and would depend upon the level of developer contributions being sought for other infrastructure. However, this area of the District does not contain a significant number of proposed site allocations (outside of the strategic sites – which have been tested individually). This requirement would therefore not put the delivery of the Plan at risk due to the scale of policy requirement and is considered an appropriate level for the policy.
- 5.49 The nil requirement in Dover Urban Area (as shown on the Policies Map), is evidenced by the Whole Plan Viability Study (GEB08) which shows that development in this area cannot viably deliver any affordable housing. Sites remain marginal even without the affordable housing requirement.

### Policy Thresholds

- 5.50 The threshold of the policy requirement has been set at the minimum allowed by national policy, in order to maximize the delivery of affordable housing across the plan period. This is 10 dwellings or more, or on sites over 0.5ha in all areas outside of Dover Urban Area, or those in Designated Rural Areas and/or the AONB, set at 6 dwellings or more.

### Tenure Mix

- 5.51 The NPPF has introduced an expectation that housing sites deliver a minimum of 10% affordable home ownership units, but this can include Shared Ownership homes and discounted market sales products as well as Starter Homes. In this context affordable home ownership products (including Starter Homes) fall within the definition of Affordable Homes set out in Annex 2 the Glossary of the NPPF 2021. The First Homes PPG states that First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.
- 5.52 HEB01d highlights that it is clear from the cost profile of First Homes that their likely price-level will mean that they could be suitable for a notable number of households that would otherwise reside in the private rented sector and this has altered the assumptions on tenure mix set out in the 2019 SHMA and Regulation 18 draft policy and provides the following

recommendation on the future needs. The overall requirement for 16.4% of housing to be Affordable Rented/ Social Rented and 14.7% affordable home ownership (of which 5.9% could be Shared Ownership and 8.8% First Homes) which reflects the mix of housing that would best address the needs of the local population. Within the affordable sector it is proposed that 52.9% of homes are Affordable Rented/ Social Rented, 18.9% shared ownership and 28.2% First Homes. Policy SP5 rounds these figures to 25% First Homes; 20% Shared Ownership / other intermediate products; 55% Social / Affordable Rent.

- 5.53 The policy satisfies the NPPF requirement for 10% affordable home ownership to be delivered on sites, as well as being able to deliver 25% of the affordable proportion as First Homes as required by the First Homes PPG.

### Housing for Older People and People with disabilities

- 5.54 The SHMA indicates that the population aged 65 or over is going to increase dramatically in Dover District over the plan period. The 2019 update (HEB01c) concludes that it will increase from 28,409 in 2020 to 43,616 in 2040, a rise of 53.5%.
- 5.55 The 2021 census results show that the 23.6% of the population of Dover District are aged 65 or over, this is 27,517. The projections also suggest that there will be an increase in the number of households headed by someone over 65 from 18,567 in 2020 to 29,179 in 2040, an increase of 57.1%.
- 5.56 The SHMA also considered the need for specialist accommodation and identified a need for 576 units of housing for older people and 66 units of housing with care, which falls within the overall need for housing. However recognises that the actual numbers and types of specialist accommodation needed may depend on changes in patterns of demand and expectations, and it is therefore considered appropriate to acknowledge this need, but not be too prescriptive of the requirement. A need for 990 additional spaces of Registered Care was also identified. This is in addition to the housing supplied through the local housing need.
- 5.57 As a result of these emerging trends, the SHMA (HEB01c), estimates that by 2040 there will need to be between 9,813 and 10,878 dwellings built to the lifetime homes standard in the District within the general housing stock. It also identifies a likely significant increase in the number of people with a health condition or requiring assistance with activities. This means all new dwellings built during the plan period will need to be to the lifetime homes standard, and provision should be made for wheelchair accessible housing.
- 5.58 To meet the needs of Housing for Older Persons and People with Disabilities the Plan includes the following policy requirements:
- Policy H1 requires all schemes to take account of the latest evidence of need, including for older persons housing when determining the type and mix of homes. This policy also provide specific support for standalone proposals for older persons housing and other specialist housing.

- As set out in the relevant policies (SAP1, SAP24 and SAP28), the strategic sites in the Plan will be expected to provide housing to meet the needs of older persons housing (with and without care provision).
- All new dwellings to be built to Building Regulation Part M4 (2) – Accessible and Adaptable dwellings (Policy PM2 – Quality of Residential Accommodation)
- On schemes of 20 dwellings or more, 5% should be provided as Building Regulations M4(3) (wheelchair accessible homes). This will be provided in the affordable element of the scheme to accord with national guidance.
- The buffer provided on the housing supply provides the flexibility for some sites to come forward as Registered Care, without impacting upon the Council's ability to meet the overall housing requirement.

### Self-Build and Custom Housebuilding

5.59 As set out at paragraph 3.15 and 3.16, monitoring of the self-build register indicates that without any current local policy support for Self-Build and Custom Housebuilding, these types of homes are being brought forward sufficient to meet the need of the register.

5.60 The Local Plan Regulation 19 Submission document contains Policy H5-Self-Build and Custom Housebuilding. This policy is to support Self build and Custom housebuilding schemes on housing sites allocated in the Local Plan and on non-allocated windfall developments. This is to meet the needs of the self-build register as well as to provide a sustainable and diverse mix of dwellings within the district. The policy does not specify a minimum number that should be provided on all new developments as there is not the evidence to demonstrate that this is needed, and it may result in difficulty in delivering sites if a particular percentage of development was required. In addition to the general policy support provided by Policy H5, the strategic sites (Policy SAP1, SAP24 and SAP28) specifically require an element of self-build, the amount of which should be evidenced by the need on the register at that time.

### Space Standards and quality of New Dwellings

5.61 Paragraph 62 of the National Planning Policy Framework (NPPF 2021) states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. To help ensure the size of dwellings to meet identified need, NPPF 2021 footnote 49 states *“Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.”*

5.62 The [National Planning Practice Guidance](#) goes further and advises that planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations including the use of the Nationally Described Space Standards (NDSS), by gathering evidence to justify why such an approach is required and then by setting policies in their Local Plans which refer to the NDSS.

5.63 The NDSS for housing was published in March 2015 and deals with internal space within new dwellings regardless of tenure. The standard measures internal space using Gross Internal Area (GIA) which is defined as the total floor space measured between the internal

faces of perimeter walls that enclose the dwelling. The standard provides that GIA should be measured and denoted in square metres (m<sup>2</sup>) and built-in storage areas are included within the overall GIAs.

- 5.64 The Council's existing Development Plan never set policy on space standards. However, the Core Strategy (2010) identified that much of Dover's housing stock offered insufficient choice in larger dwelling sizes and tenure and therefore identified a need for three bedroom and larger houses. At that time, the Lifetime Homes Standard was a series of sixteen criteria which intended to make new homes more easily adaptable for lifetime use at minimal cost. However, following a review of housing standards (2015) the Government replaced Lifetime Homes standards with the optional Building Regulations requirement M4(2) 'accessible and adaptable dwellings'.
- 5.65 Building Regulations M4(2) aim to make reasonable provision for people to gain access to, and make use of the dwelling and its facilities, including those with differing needs such as age or disability, and enabling adaptation of the building to meet the changing needs of occupants over time. Requirements are provided for door and hall widths and the dimensions of habitable rooms, from the perspective of enabling appropriate access to the dwelling and its facilities.
- 5.66 Historically in Dover, space standards for new permitted dwellings have in the main, been greater than the requirements of the NDSS (see Table 13). This can largely be attributed to negotiations between the Councils Development Management team and planning applicants and the objectives of the Core Strategy to provide larger dwelling sizes.

**Table 13: NDSS comparison with permitted dwellings 2017/18 to 2021/22**

No. of bedrooms (b)	No. of bed spaces (persons)	1 storey dwellings		2 storey dwellings		3 storey dwellings	
		NSS	DDC average 5> dwellings	NSS	DDC average 5> dwellings	NSS	DDC average 5> dwellings
1b	1p	39/37	44.0		49.0		
1b	2p	50	53.3	58	59.0		
2b	3p	61	66.5	70	91.4		
2b	4p	70	69.6	79	83.8		
3b	4p	74	102.7	84	130.8	90	
3b	5p	86	98.0	93	95.8	99	
3b	6p	95	114.7	102	123.6	108	
4b	5p	90		97	167.5	103	181.1
4b	6p	99	121.0	106	120.3	112	
4b	7p	108		115	112.6	121	
4b	8p	117		124	157.1	130	
5b	6p	103		110	207.8	116	
5b	7p	112		119	171.3	125	
5b	8p	121		128	208.3	134	
6b	7p	116	46.3	123		129	
6b	8p	125		132		138	

- 5.67 However, it is important to recognise that this trend may change in the future, particularly as the Local Plan supports a more varied housing mix on sites, in addition to higher densities and due to the rise in conversions to residential from other uses. Given this, it is considered justified and to require developments to meet the National Described Space Standard over the Plan period.
- 5.68 In addition, the Local Plan policy position adds to this requirement with requirements for building regulation compliance in relation to M2 (2) and M4 (3), as well as requiring consideration of layouts and light and ventilation and appropriate external amenity space. The evidence above, and the viability report supports the policy position in the Local Plan policy PM2.

### Houses in Multiple Occupation

- 5.69 Houses in multiple occupation (HMOs) are properties occupied by unrelated households that share one or more facilities such as a bathroom or kitchen. They can provide useful accommodation to persons whom may not be able to, or afford, to rent or own a single occupancy dwelling. They can offer opportunities for mobile persons to live close to places of employment, public transport and leisure use. However, in many cases the property and the area they are situated in was not originally designed for such intensive residential use.
- 5.70 HMOs are classified into two types, small dwellings (4 or less tenants forming more than 1 household) and large dwellings (5 tenants or more, forming more than 1 household). The change from single residential to small HMOs is allowed under permitted development unless the property is within a conservation area subject to an Article 4 direction thereby removing permitted development rights. Large HMOs and those with permitted development rights removed required planning consent.
- 5.71 An increase in concentrations of HMOs in an area alters the population mix, impacting on the facilities and services that can be supported, as well as affecting residential amenity and social cohesion. It can give rise to noise, nuisance, more callers, a higher parking requirement and visual deterioration of buildings and gardens.
- 5.72 Research has been undertaken to identify the quantity and location of HMOs within the District and the density of any clusters. HMOs were identified through three sources: Planning applications for large HMOs and those with permitted development rights having been removed; building control records; and, licensed HMOs reported by the Councils Housing Team. Table 14 lists the number of HMOs identified from the three sources, double counting from sites identified from more than one source have had the second source of identification removed. Map 1 and 2 shows the location of HMOs in Dover and Deal urban areas and illustrate that in Dover there are two light groupings of HMOs to the west and north of the Town, whilst in Deal they are spread out.
- 5.73 The research into HMOs has identified that the majority of those are located within the Dover urban area, with a few in Deal. There are two groupings of HMOs in Dover Town and at present they are of a low density. However, the research won't have been able to identify the majority of small HMOs and their location due to their being allowed under permitted

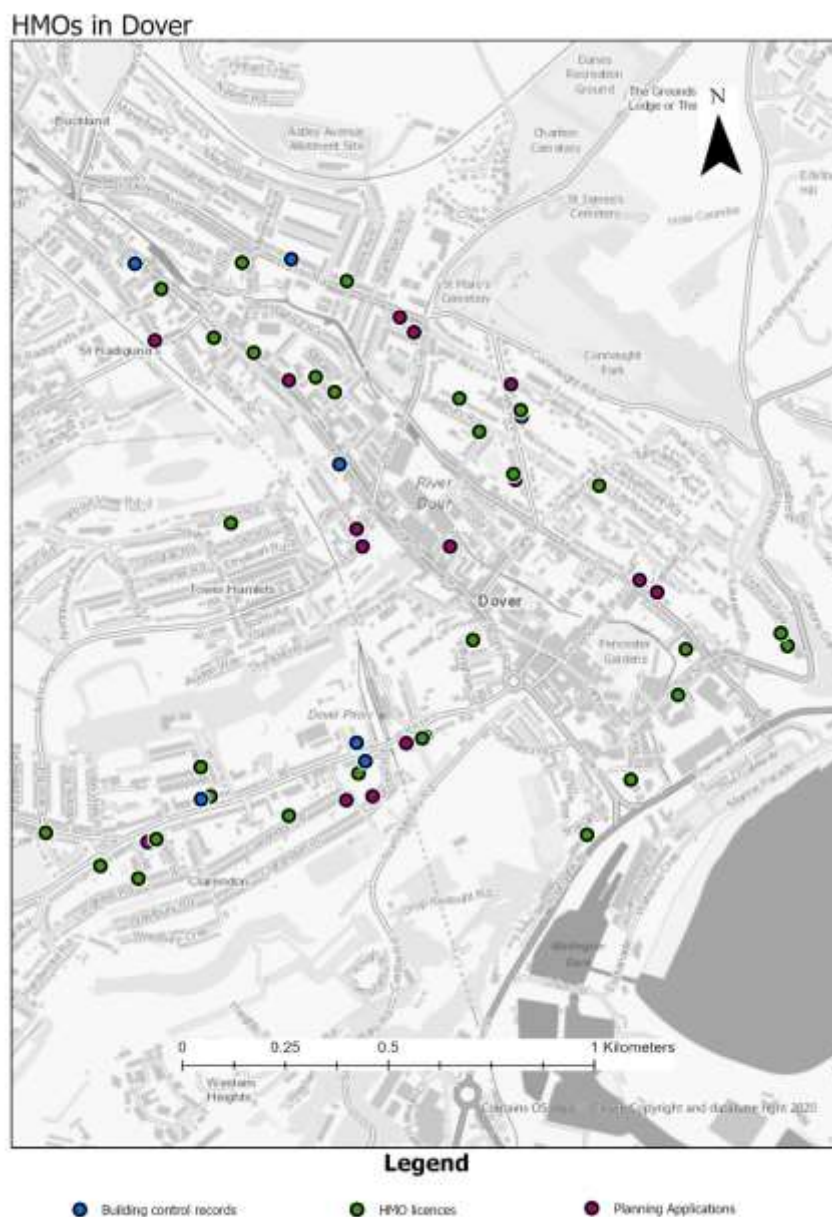


development rights. To ensure that the impact of both large and small HMOs are considered in planning terms, Local Plan Policy H7 – Houses in Multiple Occupancy sets out to ensure that any planning application addresses the location of existing HMOs and their cumulative impact on local area.

**Table 14: Identified HMOs (August 2022)**

	Dover	Deal	Total
Planning applications	21	0	21
Building Control applications	11	2	13
HMO licences	40	5	45
<b>Total</b>	<b>72</b>	<b>7</b>	<b>79</b>

**Map 1: Location of HMOs in Dover urban area (May 2022)**



Map 2: Location of HMOs in Deal urban area (May 2022)

HMOs in Deal



Legend

- Building control records
- HMO licences
- Planning Applications

## Appendix 1: Standard Methodology Calculation

The standard methodology calculation for the District is provided below, using the household growth projections 2014 and the most recent affordability ratio of 9.25 released 23rd March 2022.

Step 1 - Set the baseline using national household growth projections, the area of the local authority. Taking the most recent projections, calculate the projected average annual household growth over a 10 year period (this should be 10 consecutive years, with the current year being the first year). For Dover the relevant data is on the tab labelled 406 at row 327. This shows that the projection for 2032 is 57,838 households, which when taken against the projection for 2022 of 53,238 households, equates to 4,600 households over the 10 year period, creating the average need of **460 per annum**.

Step 2 – Use ONS Local Affordability Ratios data (Dover's median affordability ratio) Then adjust the average annual projected household growth figure (as calculated in step 1) based on the affordability of the area. The most recent median workplace based affordability ratios published by the Office for National Statistics at a local authority level, should be used. For Dover the relevant data is on Table 5c row 263 which shows the latest published figure (2022) is **9.25**

Step 3 – Apply the adjustment formula to get the adjustment factor

$$\text{Adjustment factor} = \left( \frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25$$

For Dover District the calculation is:

1.  $9.25 - 4 = 5.25$
2.  $5.25 / 4 = 1.3125$
3.  $1.3125 \times 0.25 = \mathbf{0.328125}$

Step 4 – Use the above to calculate the Local Housing Need

$$\text{Local housing need} = (1 + \text{adjustment factor}) \times \text{projected household growth}$$

4.  $1.328125 \times 460 = \mathbf{611 \text{ dwellings}}$

Step 5 – Capping the level? A cap may then be applied which limits the increase in the minimum annual housing need figure an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing. Where these policies were adopted within the last 5 years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies.

Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:

- a. the projected household growth for the area over the 10 year period identified in step 1; or
- b. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).

For Dover, our 2010 adopted Core Strategy figure of 505 would be the appropriate figure to use. As 40% equates to 707 dwellings per annum and thus no capping of the figure is required.

## Appendix 2 Allocated sites existing land use

Site Reference	Address	GF or PDL	Dwellings
ALK003	Land at Short Lane, Alkham	GF	10
AYL001	Land at Dorman Avenue	GF	9
AYL003	Land to the south of Spinney Lane, Aylesham	GF	640
CAP006	Land to the east of Great Cauldham Farm, Capel-le-Ferne	GF	70
CAP013	Land at Cauldham Lane, Capel-le-Ferne	GF	5
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne	GF	10
DEA008	Land off Cross Road, Deal	GF	100
WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	GF	75
GTM003	Land to the east of Northbourne Road, Great Mongeham	GF	10
DOV008	Land adjoining 455 Folkestone Road, Dover	GF	5
DOV030	Land at Durham Hill, Dover	GF	10
EAS002	Land at Buttsole Pond, Lower Street, Eastry	GF	80
EAS009	Eastry Court Farm, Eastry	GF	5
TC4S023	Land adjacent to Cross Farm, Eastry, Near Sandwich	GF	10
EYT008	Land on the south eastern side of Roman Way, Elvington	GF	50
Eythorne & Elvington Local Centr	Land east of Adelaide Road, Elvington	GF	300
GOO006	Land adjacent to Short Street, Chillenden	GF	5
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown	GF	50
TC4S074	Land adjacent Courtlands, Kingsdown	GF	5
LAN003	Land adjacent Langdon Court Bungalow, The Street, East Langdon	GF	40
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	GF	30
SHE013	Land around Coldred	GF	5

PRE003/ PRE016/ PRE017	Apple Tree Farm, Stourmouth Road	GF	65
DOV026	Westmount College, Folkestone Road, Dover	GF	60
RIN002/ RIN004	Land at Ringwould Alpines, Dover Road, Ringwould	GF	10
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	GF	35
SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	GF	40
SAN019	Sydney Nursery, Dover Road, Sandwich	GF	10
SAN023	Land at Archers Low Farm, St George's Road, Sandwich	GF	35
SHE004/ TC4S082	Land to the north and east of St Andrew's Gardens, Shepherdswell	GF	50
SHE006	Land at Botolph Street Farm	GF	10
SHE008	Land off Mill Lane, Shepherdswell	GF	10
STM003	Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way	GF	40
STM006	Land at New Townsend Farm, Station Road, St Margarets	GF	10
STM007/ STM008	Land to the west of Townsend Farm Road, St Margarets (Site B)	GF	36
STM010	Land located between Salisbury Road and The Droveaway, St Margarets-at-Cliffe	GF	10
STA004	Land at Durlock Road, Staple	GF	3
WHI001	Managed Expansion of Whitfield	GF	2200
WIN003	Land adjacent to Staple Road	GF	20
WIN004	Land adjacent to White Lodge, Preston Hill	GF	8
WIN014	Footpath Field, Staple Road, Wingham,	GF	75
WOO005	Beacon Lane Nursery, Beacon Lane, Woodnesborough	GF	5
WOO006	Land south of Sandwich Road, Woodnesborough	GF	10
WOR006	Land to the east of Jubilee Road	GF	10
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	GF	15

CAP009	Longships, Cauldham Lane, Capel-le-Ferne	PDL	10
TC4S008	Bridleway Riding School, Station Road Deal	PDL	25
TC4S047	104 Northwall Road, Deal	PDL	8
TC4S032	Ethelbert Road garages, Deal	PDL	5
DOV006	Land at Dundedin Drive (south), Dover	PDL	8
DOV012	Western Heights	PDL	100
DOV017a	Bench Street	PDL	100
DOV017	Dover Waterfront	PDL	263
DOV018	Mid Town	PDL	100
DOV019	Albany Place Car Park, Dover	PDL	15
DOV022B	Land in Coombe Valley, Dover	PDL	80
DOV022C	Land in Coombe Valley, Dover	PDL	20
DOV022E	Land in Coombe Valley, Dover	PDL	150
DOV023	Buckland Mill, Dover	PDL	135
DOV028	Charlton Shopping Centre, High Street, Dover	PDL	100
TC4S026	Military Road, Dover	PDL	9
TC4S027	Roosevelt Road, Dover	PDL	10
TC4S028	Peverell Road, Dover	PDL	6
TC4S030	Colton Crescent, Dover	PDL	10
TC4S039	Chapel Hill, Eythorne	PDL	5
NON006	Prima Windows, Easole Street/Sandwich Road, Nonington	PDL	35
SAN004	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	PDL	40
SAN006	Sandwich Highway Depot/Chippies Way, Ash Road, Sandwich	PDL	32
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	PDL	35

## Appendix 3 1ha or under 10% site requirement – Local Plan and Ash NDP Allocations

Site Reference	Address	Site Size (ha)	Capacity
ALK003	Land at Short Lane, Alkham	0.32	10
ASH003	Land south of Mill Field	0.40	8
ASH011	Guilton, Ash	0.35	10
ASH015	Former Council Yard, Molland Lea, Ash	0.16	5
AYL001	Land at Dorman Avenue North	0.31	9
CAP009	Longships, Cauldham Lane, Capel-le-Ferne	0.49	10
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne	0.66	10
CAP013	Land at Cauldham Lane, Capel-le-Ferne	0.76	5
GTM003	Land to the east of Northbourne Road, Great Mongeham	0.77	10
TC4S032	Ethelbert Road garages, Deal	0.09	5
TC4S047	104 Northwall Road, Deal	0.28	8
DOV006	Land at Dundedin Drive (south), Dover	0.37	8
DOV008	Land adjoining 455 Folkestone Road, Dover	0.34	5
DOV017	Dover Waterfront - Bench Street	0.99	100
DOV019	Albany Place Car Park, Dover	0.28	15
DOV022C	Land in Coombe Valley, Dover	0.37	20
DOV028	Charlton Shopping Centre, High Street, Dover	0.63	100
DOV030	Land at Durham Hill, Dover	0.34	10
TC4S026	Military Road, Dover	0.11	9
TC4S027	Roosevelt Road, Dover	0.22	10
TC4S028	Peverell Road, Dover	0.19	6
TC4S030	Colton Crescent, Dover	0.20	10
EAS009	Eastry Court Farm, Eastry	0.84	5
TC4S023	Land adjacent to Cross Farm, Eastry, Near Sandwich	0.44	10
TC4S039b	Chapel Hill, Eythorne	0.21	5
TC4S074	Land adjacent Courtlands, Kingsdown	0.71	5
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	0.70	35
SAN019	Sydney Nursery, Dover Road, Sandwich	0.38	10
SHE006	Land at Botolph Street Farm	0.82	10
SHE008	Land off Mill Lane, Shepherdswell	0.38	10
SHE013	Land around Coldred	0.83	5
STA004	Land at Durlock Road, Staple	0.24	3
WIN003	Land adjacent to Staple Road	0.83	20
WIN004	Land adjacent to White Lodge, Preston Hill	0.31	8
WOO005	Beacon Lane Nursery, Beacon Lane, Woodnesborough	0.73	5
WOR006	Land to the east of Jubilee Road	0.56	10
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	0.83	15