



Topic Paper: **Housing**

Regulation 18 Consultation on the Draft Local Plan
December **2020**



Dover District **Local Plan**
Supporting document



1. Introduction

- 1.1 In 2018 Dover District Council started work on a Local Plan Review. The new Local Plan 2040 will be aspirational and deliverable, with clear, unambiguous policies. It will provide a positive vision for the future and will address the housing needs and economic, social and environmental priorities of the district covering the period to 2040.
- 1.2 Preparation work has been undertaken in accordance with the requirements of the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment Directive (European Directive 2001/42/EC as transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive), the National Planning Policy Framework (NPPF) 2019, National Planning Practice Guidance and the local context and evidence base. The Planning Advisory Service (PAS) Local Plan Route Mapper Toolkit 2019 has provided useful guidance throughout.
- 1.3 In order to inform the Local Plan Review process, which includes a review of existing local plan policies, an extensive programme of stakeholder engagement has been undertaken. At the start of the review process a series of workshops was organised in 2018 to gather initial thoughts on a vision, objectives and policies for the District and to re-examine the Council's land allocation process. The focus of these workshops was on a fully participative process with a wide-ranging group of invited stakeholders. One of the key overarching aspirations that came out of such early consultation exercises was a desire for a more streamlined Local Plan, with, for example, supporting text in the document kept to a minimum. As a result it was decided that the majority of background evidence and other contextual information which support the policies within the Plan will be set out in a series of Topic Papers. This evidence will then be summarised succinctly in the text of the Plan itself. With the objective of ensuring that the Local Plan 2040 will be easy to use and accessible to all users of the planning system in the district.
- 1.4 This Topic Paper is one in a series that sets out the policy context and evidence base that has informed the preparation of each of the chapters of the Dover District Local Plan 2040, Regulation 18 Draft. Each Topic Paper presents the relevant national and local planning legislation, policy and guidance as well as other background information, including stakeholder engagement outcomes, monitoring of usage of existing policies, that will form the evidence base for each section of the new Plan. For further information on individual pieces of evidence, links are provided to the full documents as appropriate.
- 1.5 The information in the Topic Papers will form a key part of the Dover Local Plan 2040 evidence base that will be relied on at the Local Plan Examination. Such evidence and information will be updated as and when necessary.
- 1.6 The issues covered by this Housing Topic Paper are as follows:
 - Background
 - Policy Context and Evidence Base

- National
- Regional
- Local
- Usage of existing Policies
- Community Engagement
- Sustainability Issues
- Issues effecting housing delivery in Dover District
- Historical housing delivery
- Housing land supply issues and options
- Local Plan housing need target
- Local Plan Housing land supply

2. Background

- 2.1 Dover District contains two urban areas (Dover and Deal), a market town (Sandwich) and a large number of villages. In general, Sandwich and the north of the District, are the most expensive parts of Dover District, while Dover Town and the south of the District are the cheapest. Current average values in Deal at £323,852 are slightly cheaper than Sandwich at £342,837, but more expensive than Dover Town at £242,693 (Zoopla August 2020). In March 2020, the mean price of dwellings in Dover District was £243,833, approximately the same as in England and Wales, but considerably lower than the regional level at £323,353 (Land Registry July 2020).
- 2.2 The 2011 Census showed that the number of households in Dover District increased by 9% since 2001, reaching 48,310 households in total. This compares to the regional average of 8.2% and the national figure of 7.9%. In the District, the number of households rose at a faster rate than the population in households between 2001 and 2011. This implies that the average size of households is falling across the District. The same trend is recorded regionally and nationally.
- 2.3 The 2011 Census also showed that there were more single person households and few couple households with dependent children in the District than recorded regionally and nationally. Furthermore, over the period 2001 to 2011 the main change in household types was a growth in 'other' households, followed by lone parent households with no dependent children. However, the households with only non-dependent children increased while the number of households with dependent children decreased. This suggested that household formation rates amongst young adults may have reduced.
- 2.4 The 2011 Census indicated that 24.8% of households in Dover District were older person only households (households where all members are 65 or over), compared to 21.9% regionally and 20.5% nationally. Of these, older person only households in Dover District in 2011, 59.1% contained only one person, a higher proportion than that recorded in the South East region (57.7%) but lower than the figure for England (60%).

- 2.7 As the PAS Toolkit acknowledges, a good local plan is more than just about planning for the delivery of an area's housing numbers; it is about strategy, vision, focus and creativity. However, it is important to acknowledge upfront that much of the debate at most independent examinations centre on housing and the policy context for securing its delivery. Failure to deliver new homes is also the single matter most likely to trigger the need for a review of policies and update of a local plan, while failure to keep the housing need requirement under regular review, or to achieve delivery of the housing need requirement in an existing local plan can significantly hamper efforts to maintain a plan-led system.
- 2.8 The new Local Plan will need to set out the Council's strategy for delivering new homes in the District over the plan period to 2040. As part of this, the Plan will need to identify:
- Housing need over the plan period i.e. how many homes need to be delivered in the District over the next 20 years;
 - A revised settlement hierarchy to reflect the Council's growth strategy;
 - Site allocations for delivering new housing development within the District;
 - Detailed development management policies covering issues such as affordable housing, approach to windfall development, accommodation for gypsies and travellers and the preferred housing type and mix.
- 2.9 In addition to establishing the strategic approach to housing need and distribution, the Local Plan is also required to set out more detailed development management policies for housing to guide the determination of planning applications (NPPF para 28) and to ensure the delivery of a variety of housing to address the needs of the community as a whole over the plan period.
- 2.10 A whole Plan Viability Assessment was undertaken in the summer of 2020. 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. And, the second reviews the level of section 106 costs and the level of affordable housing that would allow the funding of infrastructure and meet needs, without putting at risk the economic viability of development in the District.
- 2.11 It is important to note, that once the Local Plan for the District is adopted, the whole Plan Viability Assessment will become the reference point for any future viability assessments submitted through the Development Management process due to, its being the most up to date viability evidence, that has been subject to independent examination. 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 18 consultation document of the 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.
- 2.12 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. The Assessment 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.

2.13 The housing sites assessed within the Council's Housing Economic Land Availability Assessment, where tested against the whole Plan Viability Assessments', value areas, to inform the expected achievability of the sites. This consideration, then formed part of the housing allocation site selection process for the Local Plan.

3. Policy Context and Evidence Base

National

EVIDENCE BASE

NPPF paragraphs 59 – 79, 118
Specifically:

- 62 affordable housing
- 63 affordable housing in rural areas allows for threshold of 5 or fewer
- 64 10% affordable housing
- Para 68 10% of housing requirement to be allocated on sites up to 1 ha
- 71 entry-level homes exception sites
- 72 new settlement larger scale developments
- 77 local needs rural
- 78 policies should identify opportunities for villages to grow and thrive
- 118 making effective use of land

3.1 **Planning Policy for Traveller Sites**¹: Sets out the Government's planning policy for traveller sites, replacing the older version published in March 2012. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community

¹ <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

3.2 **Housing White Paper 2016 (Fixing our broken housing market)**²: Sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

- Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.
- Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.
- Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.
- Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

3.3 **Housing White Paper 2020 (Planning for the future)**³ proposes a series of reforms to streamline and modernise the planning process whilst bringing a new focus on design and sustainability. The white paper focuses on:

- Streamlining the planning process with more democracy at the plan making stage;
- Digital first approach to modernising the planning process, moving from a process based on documents to driven by data;
- Bring a new focus on design and sustainability;
- Improvements to infrastructure delivery in all parts of the country, ensuring that developers will play their part through reform to developer contributions; and,
- Ensure that more land is available for homes and development people and communities need, and to support renewal of town and city centres.

3.4 **Changes to the current planning system consultation (2020)**⁴ sets out proposals for measures to improve the effectiveness of the current planning system. The documents four main proposals are:

- Changes to the standard method for assessing local housing need to include either a housing stock or household projection approach, and a second additional adjustment based on affordability of dwellings in a local authority area over a 10 year period⁵;

² <https://www.gov.uk/government/publications/fixing-our-broken-housing-market>

³ <https://www.gov.uk/government/consultations/planning-for-the-future>

⁴ <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

⁵ Proposed changes to the standard method were not implement, in a written ministerial response to the consultation "...we plan to leave the standard method as it was created in 2017 for the majority of the country. We have seen that these levels are beginning to create ambitious plans in many parts of the country, which we expect to drive housing delivery beyond its current near record levels...We recognise that we need to go further than the previous standard method to achieve the ambition to build more in urban areas. So we will be increasing Local Housing Need above current levels by 35 per cent for authorities which contain the largest proportion of the 20 most populated cities and urban centres in England."

<https://questions-statements.parliament.uk/written-statements/detail/2020-12-16/hcws660>

- Securing of First Homes through developer contributions in the short term until transition to a new system;
- Supporting small and medium-sized builders by temporarily lifting the small sites threshold below which developers do not need to contribute to affordable housing; and,
- Extending the current Permission in Principle to major development.

3.5 **Laying the foundations: a housing strategy for England⁶:** Sets out a package of reforms to:

- Get the housing market moving again;
- Lay the foundations for a more responsive, effective and stable housing market in the future;
- Support choice and quality for tenants; and,
- Improve environmental standards and design quality.

Local

EVIDENCE BASE

SHMA
 HELAA
 Settlement hierarchy (2008 – update 2020)
 GTAA (2018) review and site selection (2020)
 Affordable Housing Economic Viability?
 Self-Build and custom house building register
 Brownfield land register

Strategic Housing Market Assessment (SHMA)

3.6 To inform the development of the housing strategy for the Local Plan and to take account of the revised NPPF's requirements and definitions in relation to housing, the Council commissioned a review of the Strategic Housing Market Assessment (SHMA) that was carried out by Peter Brett Associates in 2017. The SHMA update December 2019, which underpins this Local Plan recommends an objectively assessed need (OAN) of 630 dpa (12,600 dwellings) over the period 2020-2040. More specifically, the OAN projections indicate that the population aged 65 or over is going to increase drastically over this period. The SHMA concludes recommending the type and mix of dwellings to be provided with an overall tenure split of 73.1% market housing, 5.1% Starter homes, 5.8% shared ownership and 16.0% affordable rent.

⁶ <https://www.gov.uk/government/publications/laying-the-foundations-a-housing-strategy-for-england--2>

- 3.7 The Local Plan should, as a minimum, provide for the objectively assessed need for housing within the District (NPPF para 11). To determine the minimum number of homes needed Local Planning Authorities are now expected to follow the standard method set out in the Planning Practice Guidance for assessing local housing need. This standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.
- 3.8 Applying the Government's standard method, the minimum annual objectively assessed housing need figure for the Dover District currently stands at **596 dwellings per annum (dpa)**, which equates to providing a minimum of **11,920 dwellings** over the 20 year Plan period to 2040. However, this figure will be subject to change up to submission of the Plan for examination as new data is released by the government. The standard method approach for identifying OAN housing need will be taken forward in the new Local Plan with the specific types and mix of dwellings required being informed by the latest SHMA.
- 3.9 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. The figure below taken from the SHMA update December 2019 sets out the size and tenure required over the plan period (between 2020 and 2040). The figure illustrates that of the new homes built: 73.1% should be market housing, 16% affordable rent, 5.8% shared ownership and 5.1% Starter homes.

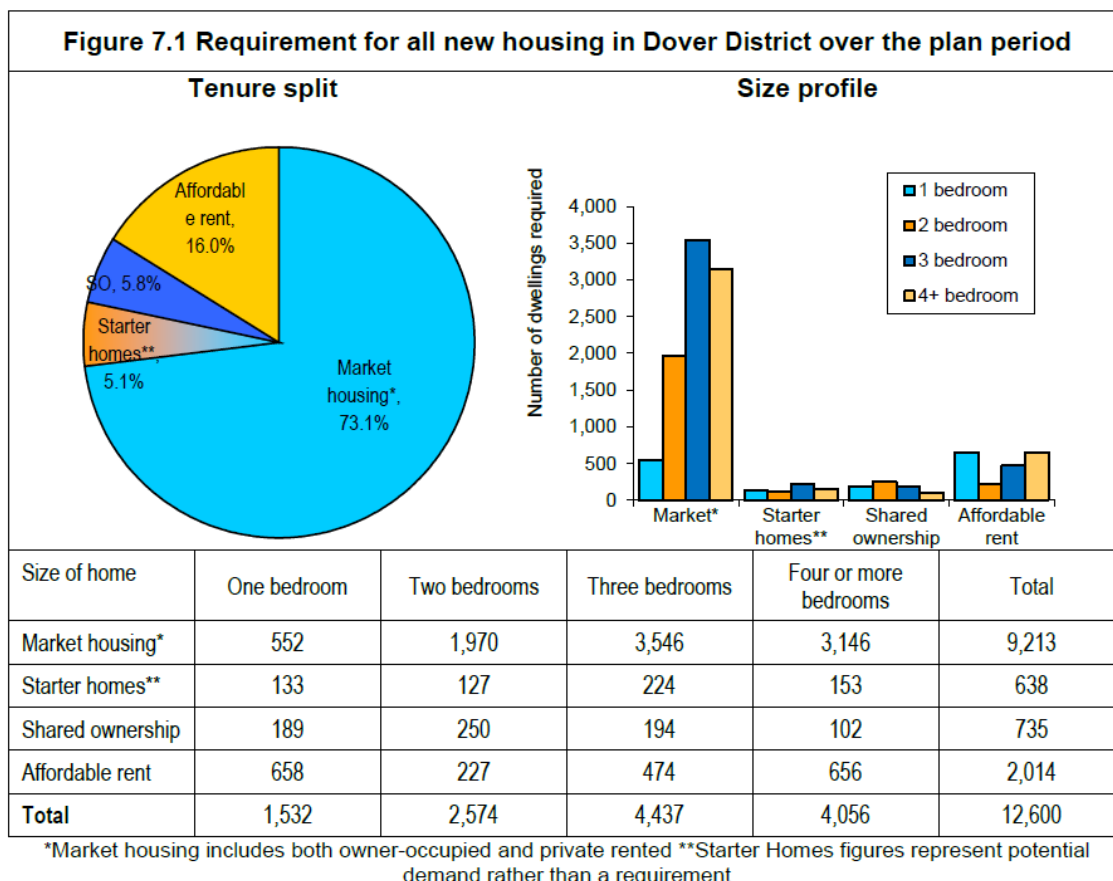


Figure 1. Required tenure split in Dover District (SHMA partial update 2019)

- 3.10 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)

- 3.11 In addition to establishing the District's housing need, the Local Plan is also required to identify a sufficient amount and variety of land for housing to meet both the District's overall housing need, and to deliver a range of housing to address the needs of different groups within the community. This is with the aim of supporting the Government's objective to significantly boost the supply of homes (NPPF para 59).
- 3.12 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 2019⁷.
- 3.13 The HELAA is an important step in the Plan making process and comprises a number of stages:
- Stage 1: Identification of sites through a 'call for sites', review of existing land allocations in the Core Strategy and Land Allocations Local Plan, review of planning permissions (including those which are unimplemented, withdrawn and refused), review of previous sites identified in the Strategic Housing and Land Availability Assessment and desk top review of other data sources;
 - Stage 2: Site assessment to determine whether a site is (a) suitable, (b) available, and (c) deliverable;
 - Stage 3: Windfall assessment; and,
 - Stage 4: Assessment review
- 3.14 The interim version of the HELAA was published on the Councils website in April 2020⁸ following a series of engagement meetings with ward councilors and town and parish councils in February and March 2020.
- 3.15 The draft HELAA has subsequently been updated to take account of:
- Further evidence requested by officers in relation to highways constraints identified on certain sites;
 - New availability evidence;
 - Viability evidence in respect of achievability;
 - Comments made as part of the wider engagement on the HELAA sites; and,

⁷ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

⁸ <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/New-District-Local-Plan/HELAA.aspx>

- Sites which now have planning permission.

3.16 The updated HELAA has been published as part of the Regulation 18 consultation on the draft Local Plan and further representations are invited. Alongside this, a further call for sites is also being undertaken which will inform future updates to the HELAA.

Settlement hierarchy

3.17 The Dover District Settlement Review and Hierarchy (2008)⁹ 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.

3.18 The review used the South East Plans 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.

3.19 In June and July 2020 the Districts settlement hierarchy was reviewed. The study 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.

3.20 The study drew on the inventory of village facilities produced annually for the Dover District Annual Monitoring Report¹⁰, together with surveys of all rural settlements in the district, 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.

3.21 The outcomes of the settlement hierarchy study can be found within table 3 of the document. The study acknowledges that the settlement of Aylesham has successfully developed as a rural service centre; that the settlements of Ash, Eastry, Wingham, Shepherdswell and St Margarets at Cliffe enjoy 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, a food shop or general store able to meet a range of daily needs, and

⁹ <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Settlement-Review-Hierarchy-Review.pdf>

¹⁰ This survey work is undertaken by Council officers and then forwarded to parish councils for verification.

a commuter-friendly bus or train service that act as a local centre role; 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 within the hierarchy and six settlements having none of the key indicators of sustainable services.

Gypsies and Travellers Accommodation

- 3.22 To inform both the need for allocation of land for Gypsy and Traveller sites and the Council's policy approach for the determination of applications for Gypsy and Traveller pitches, a Gypsy and Travelling Showperson Accommodation Assessment (GTAA) was undertaken in 2018¹¹.
- 3.23 The GTAA identified a cultural need for 30 pitches, and 18 pitches under the Planning Policy for Traveller Sites (PPTS) 2015 definition of Gypsy or Traveller, over the period 2014 – 2037. Over the immediate five year period 2017/18 to 2021/22 this equated to 18.5 pitches under the cultural definition, and 12 pitches under the Planning Policy for Traveller Sites (PPTS) 2015 definition. However, taking into account the potential turnover on local authority sites in the District and opportunities for additional capacity, the GTAA 2018 concludes that there is residual cultural need for 12 pitches and PPTS need would be addressed.
- 3.24 In January to March 2020, an update was carried out to the GTAA to assess the sites that were contributing to potential turnover and additional capacity that formed the conclusions in the GTAA 2018, and to identify additional sites suitable to meet the residual need. The update also revised the pitch need to the new Local Plan period 2020 to 2040¹²¹³. The update states that the 2018 GTAA established a cultural need for 30 pitches and a PPTS need for 18 pitches equating to, an annualised cultural need of 1.3 pitches and PPTS need of 0.8 pitches. By applying the annual needs figures to the revised plan period, this resulted in a cultural need for 26 pitches and a PPTS need for 16 pitches, a reduction in the need was factored in, to address new pitch supply at Hay Lane since 2018. The GTAA update provided site details for helping determine the Councils approach to demonstrating a 5 and 20 year supply of pitches for the Local Plan. A further call for sites alongside the regulation 18 version of the Local Plan, will additionally inform the availability of sites as yet unidentified for intensification and allocation, in later drafts of the Plan.

Affordable housing

- 3.25 The Local Plan's approach to the provision of affordable housing has been informed by the SHMA. 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

¹¹ <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Final-GTAA-Report-2018-Dec-21-Version.pdf>.

¹² <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Gypsy-Traveller-Site-Options-review-March-2020.pdf>.

¹³ <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Gypsy-Traveller-Potential-Sites-assessment-March-2020.pdf>

ownership products (including Starter Homes) fall within the definition of Affordable Homes set out in the Glossary of the 2019 NPPF.

- 3.26 The SHMA update December 2019 identifies that 26.9% of all the proposed dwellings for the Plan should be for affordable housing, with a tenure split of 5.1% Starter homes, 5.8% shared ownership and 16.0% affordable rent. This requirement has been tested as part of the whole Plan Viability Assessment, with the assessment suggesting that the following affordable housing approach is adopted: 30% (split Intermediate Housing 35%, Affordable Rent 65%) and a Nil rate in the built-up area of Dover.

Self Build and Custom Housebuilding Register

- 3.27 In line with the Self Build and Custom Housebuilding Act 2015 local authorities are required to keep a register of those seeking serviced plots for self build and custom house building. In early 2020, the Council relaunched the register to try and gain a more accurate identification of those with: a local need for Self build and Custom house building within the District and who were also financially capable of carrying out a build.
- 3.28 It was identified, that a more accurate understanding of this need and the ability to build had become apparent, due to the discrepancy between those registering an interest, and the number of planning applications submitted identifying themselves as a Self build and Custom house building project. Between the commencement of the legislation and the relaunch of the Councils register, there had been one planning application for 1 dwelling that had identified itself for Self build and Custom house building, and this identification only occurred during an appeal process for refusal of planning permission.
- 3.29 In accordance with legislation, the current version of the Councils register requires applicants and associations wishing to register an interest in Self build and Custom house building in the district, to provide evidence of local connectivity and of being financially solvent to carryout a build. All existing individuals and associations were contacted (with follow on reminders) that the register was being relaunched, and those who met the tests and were on the previous version of the register would have their interest back dated to their previous register entry.
- 3.30 On 1 September 2020, the Self build and Custom house building need for the District as reported by the register was 4 plots. In addition, there was a registered interest for 3 plots from persons and organisations entering onto part 2 of the Register. At present, the Districts' need is small compared to other identified housing needs within the SHMA. However, the Council acknowledge that this type of development can offer diversity to the housing market and provide individuals and associations the opportunity to build their own homes, to meet their own specific requirements.

Brownfield Land Register

- 3.31 There is a duty placed on Local Authorities to produce and update annually a brownfield land register. The aim of brownfield land registers is to provide up-to-date and consistent information on sites that local authorities consider to be appropriate for residential development on previously developed land. Registers can be in two parts: Part 1 comprises all brownfield sites the local authority considers appropriate for residential development; and, Part 2 those sites brownfield sites granted permission in principle.

- 3.32 Greenfield land is considered not appropriate for inclusion on a brownfield land register. For a plot of land to be placed onto a brownfield land register, the local authority must decide: if the plot of land falls within the definition of previously developed land; it must have an area of at least 0.25 hectares or is capable of supporting at least 5 dwellings; the land is suitable for residential development; the land is available for residential development; and, residential development of the land is achievable within 15 years of entry onto the register.
- 3.33 The Council last updated its brownfield land register in 2019. Sites were identified from planning consents and un-implemented development plan allocations. Part 1 of the Council's register has 51 sites on it, totalling a developable area of 138.2 hectares, with the potential to deliver a net gain of 2,674 dwellings. At present, there are no sites on Part 2 of the Council's register.

Usage of Existing Policies

- 3.34 The following are the current saved Local Plan and Core Strategy Housing policies. These are designed to be used when housing issues are a relevant factor in the determination of planning applications:
- CP1 Settlement Hierarchy
 - CP3 distribution of housing allocations
 - CP4 housing quality, mix, density and design
 - DM1 settlement boundaries
 - DM4 re-use or conversion of redundant rural buildings
 - DM5 provision of affordable housing
 - DM6 rural exception affordable housing
 - DM7 provision for gypsies, travellers and travelling showpeople
 - DM8 replacement dwellings in the countryside
 - DM9 accommodation for dependent relatives
 - DM10 self contained temporary accommodation for dependent relatives
 - LA1 provision for gypsies, travellers and travelling showpeople
- 3.35 The Council's Annual Monitoring Report (AMR) includes the monitoring of the effectiveness of Development Management Policies, through an examination of how often each policy is used by the Council as a 'reason for refusal'. If a policy can confidently be used to refuse a proposal, knowing that it may be challenged at appeal, it indicates that it remains useful.
- 3.36 Of the saved Local Plan policies used most frequently in planning refusals, those that relate to housing feature strongly (table 1).

Policy	Topic	Percentage of refusals where Policy is used
DM1	Settlement boundaries	38%
CP1	Settlement Hierarchy	12%
DM4	Re-use or conversion of redundant rural buildings	6%
DM5	Provision of Affordable Housing	1%
DM9	Accommodation for dependent relatives	1%

Table 1: Use of Local Plan Housing Policies in refusal decisions by DDC 2018/19

- 3.37 In addition to Local Plan Policies, the Council's AMR monitors the use of the NPPF in planning refusals (table 2).

NPPF Paragraph	Topic	Percentage of refusals
8	Achieving sustainable development	12%

Table 2: Use of NPPF Housing paragraphs in refusal decisions by DDC 2018/19

- 3.38 Finally, planning appeal decisions are monitored to see which Local Plan Policies and NPPF paragraphs have been cited most frequently in the decisions of cases in Dover District by Planning Inspectors (table 3).

Policy	Topic	Percentage of appeal decisions
DM1	Settlement Boundaries	45%
CP1	Settlement Hierarchy	14%

Table 3: Use of NPPF paragraphs and Local Plan policies in appeal decisions in Dover District 2018/19

4 Community Engagement

- 4.1 In order to inform the Local Plan Review process, a series of workshops were set up in 2018 to obtain initial thoughts on a new vision and objectives for the District, and to reconsider how we make allocations for new housing. The focus of the events was on a fully participative process with small group discussions and plenary clustering of outcomes.
- 4.2 The first workshop held at The Ark, Dover on 11th July 2018 and involved members of the District Council Leadership Team. The event was facilitated by Peter Woodward, an experienced independent facilitator. The second workshop held at The Ark, Dover on 17th July 2018 involved a wide-ranging group of invited stakeholders. The event was facilitated by Peter Woodward and Liz Gray, experienced independent facilitators. All outcomes from the group discussions have been accurately transcribed. Inevitably they have required further reflection and refinement during the Local Plan preparation process.
- 4.3 The third workshop held at The Ark, Dover on 12th October 2018 and involved stakeholders with a special interest in policies related to Development Management. The aim of the workshop was to give representatives an opportunity to review and discuss the existing

local plan policies (Dover District Local Plan, Core Strategy, Land Allocations Local Plan) and suggest additional policies. Participants attended 3 rounds of small group discussions.

- 4.4 There were contrasting views at the Local Plan workshop, as to whether the Local Plan should continue to focus on Dover where there is the most need for change, but where the housing market is not as strong as for example, in Deal and the rural area. Summary details of the workshop are provided below with the full outcomes included in Appendix 1.

- Promote a settlement hierarchy with the focus on Dover;
- Need to deliver a sufficient amount of housing whilst also broadening the range and offer
- Emphasis should be on the provision of affordable and rural housing;
- Need to identify proactive ways of delivering new homes e.g. the Council's role and partnership working;
- Change policies to enable housing growth;
- Consider proportional development to existing communities (including Hamlets);
- Protect and retain the rural character of remaining villages through proportional and organic growth e.g. 10 - 20% increase proportional to the size of the settlement which is unlikely to change the character of the settlement;
- Consider a new settlement if there was a suitable opportunity in the District;
- Promote residential building in town centres;
- Allocate medium and smaller sites instead of larger sites (including self-build sites);
- Allocate a range of different sized developments; and
- Plan and embrace our ageing population and coastal location.

5 Sustainability Appraisal

- 5.1 In 2017, Dover District Council commissioned LUC to carry out the Sustainability Appraisal (incorporating Strategic Environmental Assessment (SEA)) of the new Local Plan for Dover District. This process is designed to consider and communicate the significant sustainability issues and effects of emerging Plans and Policies, including their alternatives. It informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid or at least minimise the potential for adverse effects.
- 5.2 The 2018 Scoping Report¹⁴ provides the context for, and determines the scope of, the Sustainability Appraisal review of the Local Plan and sets out the framework for undertaking

¹⁴ <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-New-Local-Plan-Scoping-Report-SA-SEA.pdf>

the later stages of the SA. The Scoping Report starts by setting out the policy context of the Local Plan, before describing the current and likely future environmental, social and economic conditions in the District. This contextual information is used to identify the key sustainability issues and opportunities that the new Local Plan can address. The key sustainability issues and opportunities are then used to develop a framework of SA Objectives used to appraise the likely significant effects of the constituent parts of the Local Plan, including strategic policies, site allocations and development management policies.

5.3 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.

5.4 The likely significant effects of the constituent parts of the Local Plan will therefore be 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.

Appraisal of the Local Plan Housing Growth Strategy

5.5 As part of the preparation of the Local Plan the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) process:

- Growth options - range of potential scales of housing and economic growth that could be planned for; and,
- Spatial options - range of potential locational distributions for the growth options.

5.6 By appraising the reasonable alternative options the SA provides an assessment of how different options perform in environmental, social and economic terms, which helps inform which option should be taken forward. It should be noted, however, that the SA does not decide which spatial strategy should be adopted. Other factors, such as the views of stakeholders and the public, and other evidence base studies, also help to inform the decision.

5.7 The SA identified and appraised five reasonable spatial options for growth (i.e. the pattern and extent of growth in different locations):

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (informed by the HELAA and Economic Land Review);
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population;
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy (informed by the Settlement Hierarchy Topic Paper);
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover; and,
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

5.8 The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Plan, Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario.

5.9 However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the Council's preferred option for the distribution of housing and economic growth will comprise a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing and economic growth in the District will therefore primarily be based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

5.10 Sites have therefore been selected in accordance with the preferred option for the distribution of housing and economic growth, based on their suitability, availability, and achievability.

Appraisal of Housing Sites

5.11 As part of the Sustainability Appraisal of the draft Local Plan, site specific Sustainability Appraisal assessments were carried out on the 126 HELAA sites that were assessed as being suitable or potentially suitable and available or potentially available. In addition to this, a further 8 sites were also subjected to SA alongside the other 126 sites on a precautionary basis. These were sites where the Council had been unable to contact the landowners to confirm their availability before the SA work was carried out.

5.12 Each residential site option was appraised using the detailed assessment criteria and associated assumptions set out in the Sustainability Appraisal. To ensure that all site options were appraised to the same level of detail in the SA, all options have been appraised at a high level based on the potential capacity of each site using each sites redline boundary and the Council's most up-to-date evidence base.

5.13 The Sustainability Appraisal then organised the sites by settlement, with the strongest site options at the top and the weaker performing site options at the bottom. The stronger performing sites have the fewest adverse effects recorded, in particular potential significant adverse effects, and the potential to generate the most positive effects. Conversely, the

weakest performing site options have the greatest potential to generate adverse effects, particularly significant adverse effects, and the least potential for positive effects.

- 5.14 The Sustainability Appraisal identified no fundamental constraints at individual site level that would prevent sites from coming forward. On all sites there is considered to be scope to avoid or significantly mitigate the potential significant adverse effects identified through the SA against SA objectives 5 (Air Pollution), 7 and (Flood Risk) and 9 (Biodiversity) through the policies in the draft Plan.

6 Issues effecting Dover District's housing market

- 6.1 In 2019, the median cost of a home in Dover District was 8.22 times the median workplace earnings, an increase of nearly three fold since 2009. In the 10-year period the median house price increased sharply by 66% with the highest rate of growth occurring between 2015 and 2018. This was compared to stagnant median work based earnings that only saw a substantial increase in 2019 (figure 2). Whilst house prices within the District have increased substantially earnings have not. Chapter 7 below, goes on to demonstrate that even though housing completions doubled in the District since 2015, the same period also saw the steepest rises in median house prices.
- 6.2 The number of jobs within the District substantially declined between 2008 and 2012. Recent years has seen an increase in jobs; however, the level of employment is still substantially below that seen in 2008. Consequently, with the decrease of jobs within the District the percentage of unemployed increased, however since 2015 the rate of unemployment has been lower than in 2008 (figure 3). The trend of jobs within the District still being lower than levels in 2008, whilst experiencing lower unemployment for the same period could lead to a trend of, a reduction in persons who both live and work within the District with the potential outcomes: of out commuting, or relocating for work.
- 6.3 The Districts economy is primarily focused around its traditional port activities as the gateway between England and Europe. However, the industry has been in a period of transition over the last 20 years with the introduction of the Euro tunnel moving focus from passenger ferries to one of freight. In terms of the dominance of London on the South East of England, this impact is somewhat limited within the District, with the economic powerhouse being 1 hour 59 minutes by car (ukdistance.com), and 1 hour 13 minutes by train (trainline.com). This results in many of the economic benefits and housing demand generated by London only having limited impact in the Dover area and is negligible within the Districts rural hinterland.
- 6.4 When considering the cost of land for development, the MHCLG produces a list of value estimates for 1 hectare of land for residential development, by local authority area. The valuations apply several caveats that include the value of the proposed development and the costs of development¹⁵. From the 4 years of data available, the land for residential development value estimates within the District has increased by 214% from £1,097,000 in 2014 to £2,350,000 in 2019. This substantial increase in land values will have inevitably put pressure on the viability of residential schemes and the supply of affordable housing, the types of homes being built and the market prices being asked.

¹⁵ <https://www.gov.uk/government/publications/land-value-estimates-for-policy-appraisal-2019/land-value-estimates-for-policy-appraisal-2019-guidelines-for-use>

- 6.5 Chapter 7 will now go on to analyse the historical delivery of homes within the District as measured against the aspirations and targets set out within the Districts Core Strategy. Chapter 7 will demonstrate that even with the increase in land values and house prices in a stagnant local economy, the Councils housing delivery strategy realised through its Core Strategy, land allocations DPD and approach to sustainable windfall development has resulted in a doubling of completions in recent years.

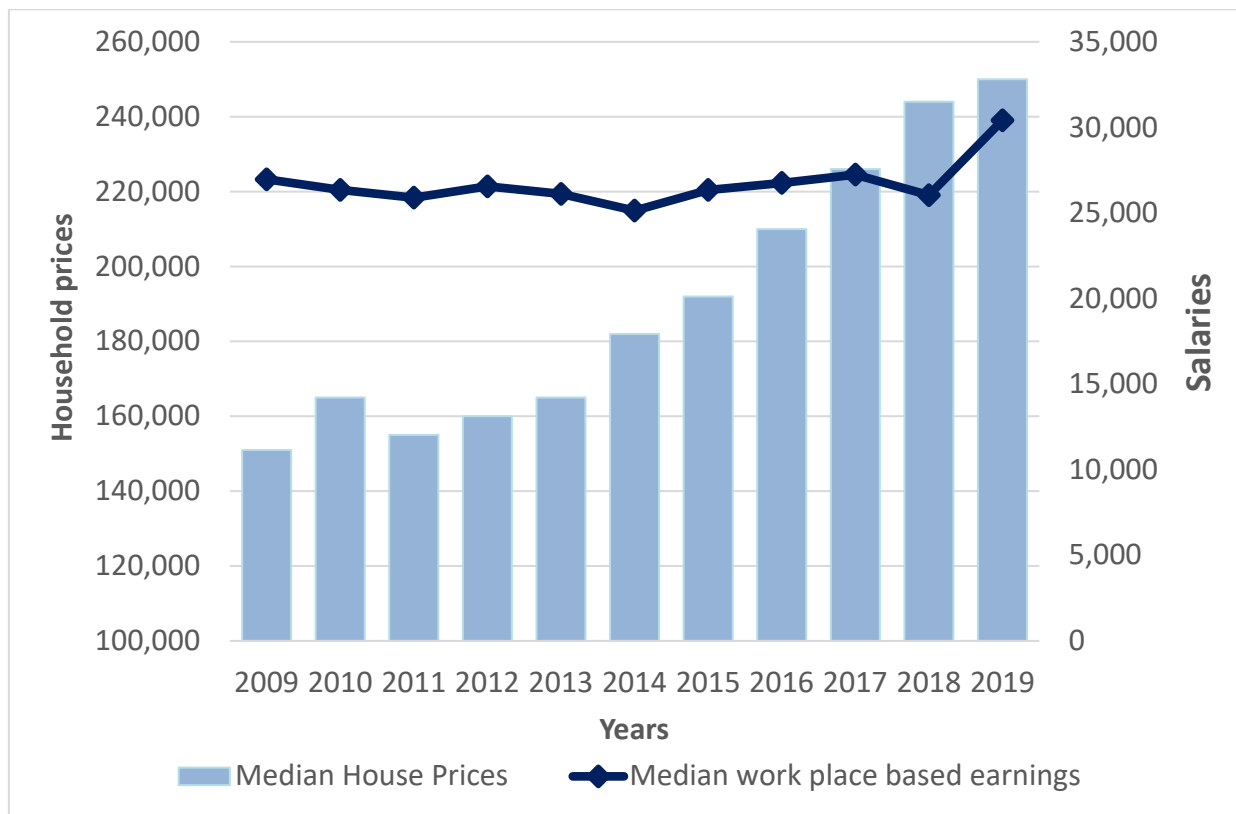


Figure 2. Comparison of median household prices and work based earning (ONS 2020)

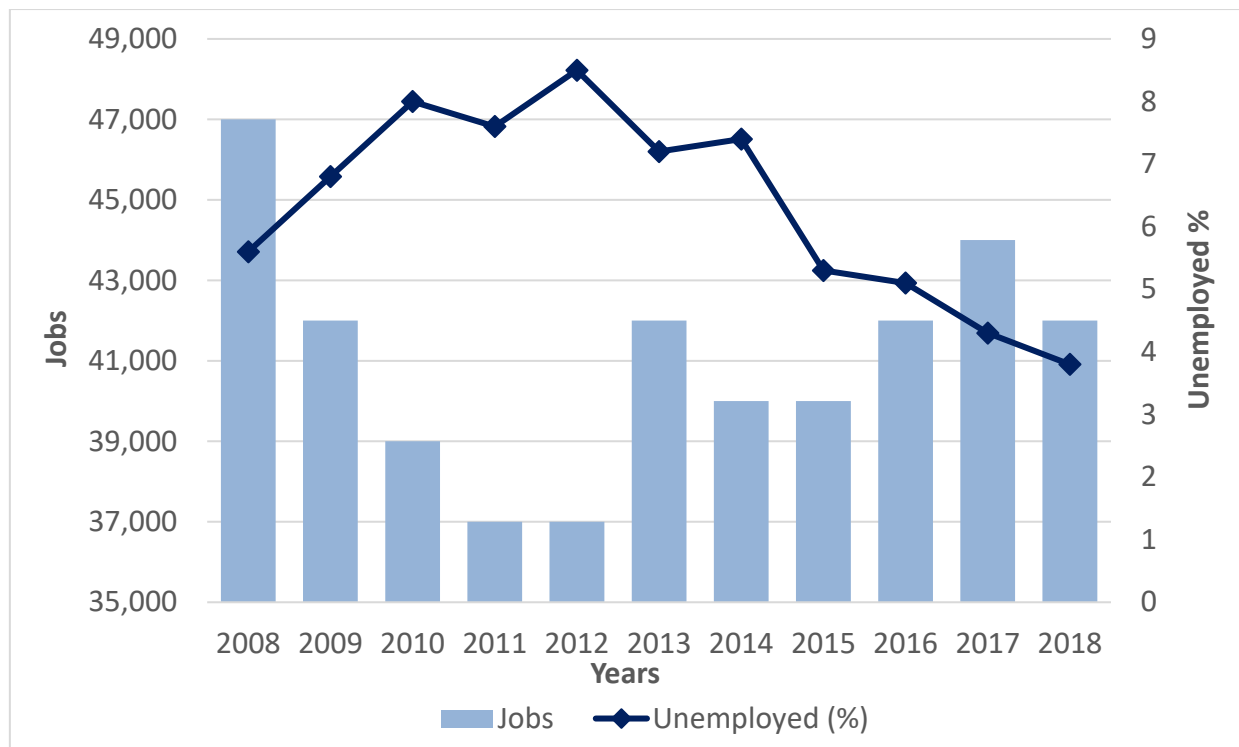


Figure 3. Comparison of number of jobs and unemployment (NOMIS 2020)

7 Historical housing delivery

- 7.1 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 only a limited provision for dwellings within the other settlement areas and rural hinterland of the District. However, through the monitoring of completions a very different picture of actual delivery has occurred over the 10 year period since adoption of the Core Strategy. During the timeframe 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 (figure 4).
- 7.2 It appears through analysis of completions, that the considerable deviation away from the planned distribution as set out within the Core Strategy has largely been a result of windfall development. Over the 10 year period, windfall development at 45% has accounted for nearly half of all completed dwellings within the district (figure 5). Analysis of windfall development has found that 69% of all homes provided were new builds and that the remaining 30% came from building conversions, with residential to residential intensification and office the most common forms (figure 6).
- 7.3 At the beginning of the 10 year period, the majority of new dwellings were being built on brownfield land. However, from the monitoring year 2013-14 onward development on greenfield land began to play a much greater part in the location for new development (figure 7). This trend of increased housing development on greenfield land is a result of the allocations within the Core Strategy and Land Allocation DPD being built out.
- 7.4 Subsequently, as development on greenfield land has contributed a greater proportion of housing development, the resultant number of completions within the District has doubled during the time period. From 2013-14 onwards the average number of completed dwelling per annum has doubled to that of the early years of the Core Strategy. The increased completion rate from 2013-14 has overall been consistent with the delivery quantum's set

out within the Core Strategy. However, 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 methods transitional arrangements, housing targets from 2018-19 onwards have been much higher than those set in the Core Strategy. The result of this change in targets has seen that completion rates for the District have fallen short of the new local housing need requirements (figure 8).

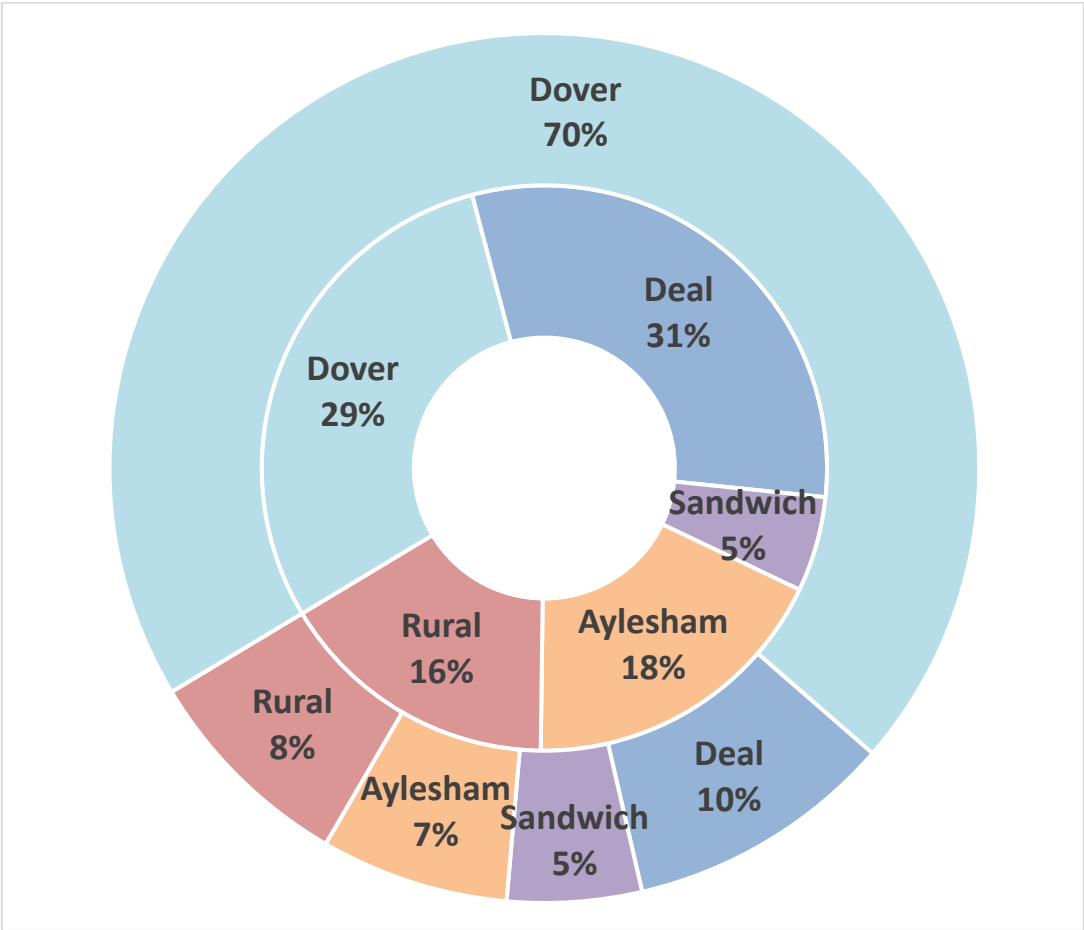


Figure 4. Comparison of planned housing distribution (outer ring) to actual delivery (inner ring)

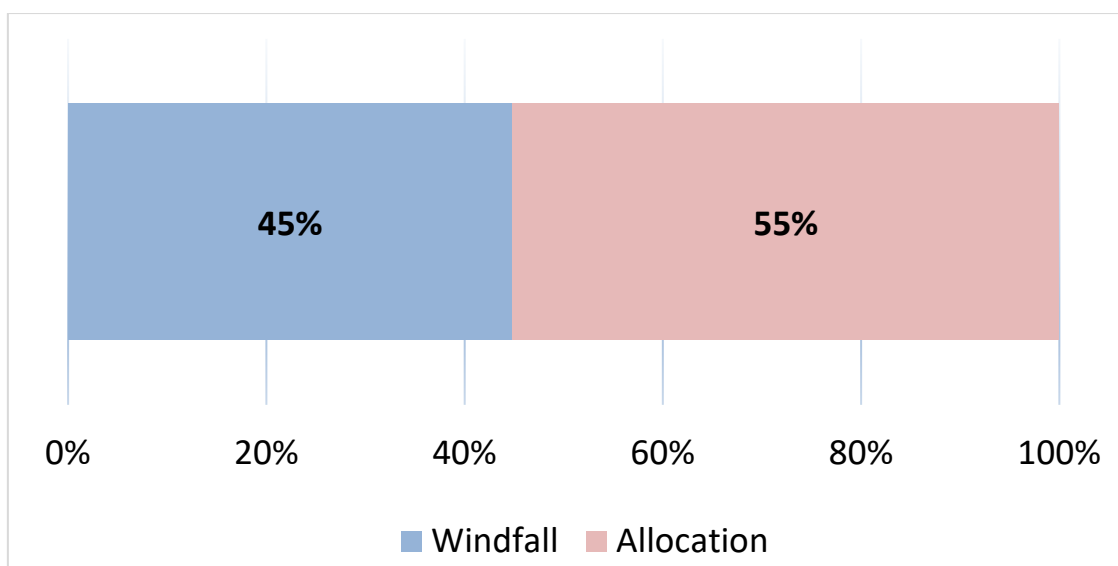


Figure 5. Windfall/allocated percentage of completions 2010/11 to 2019/20

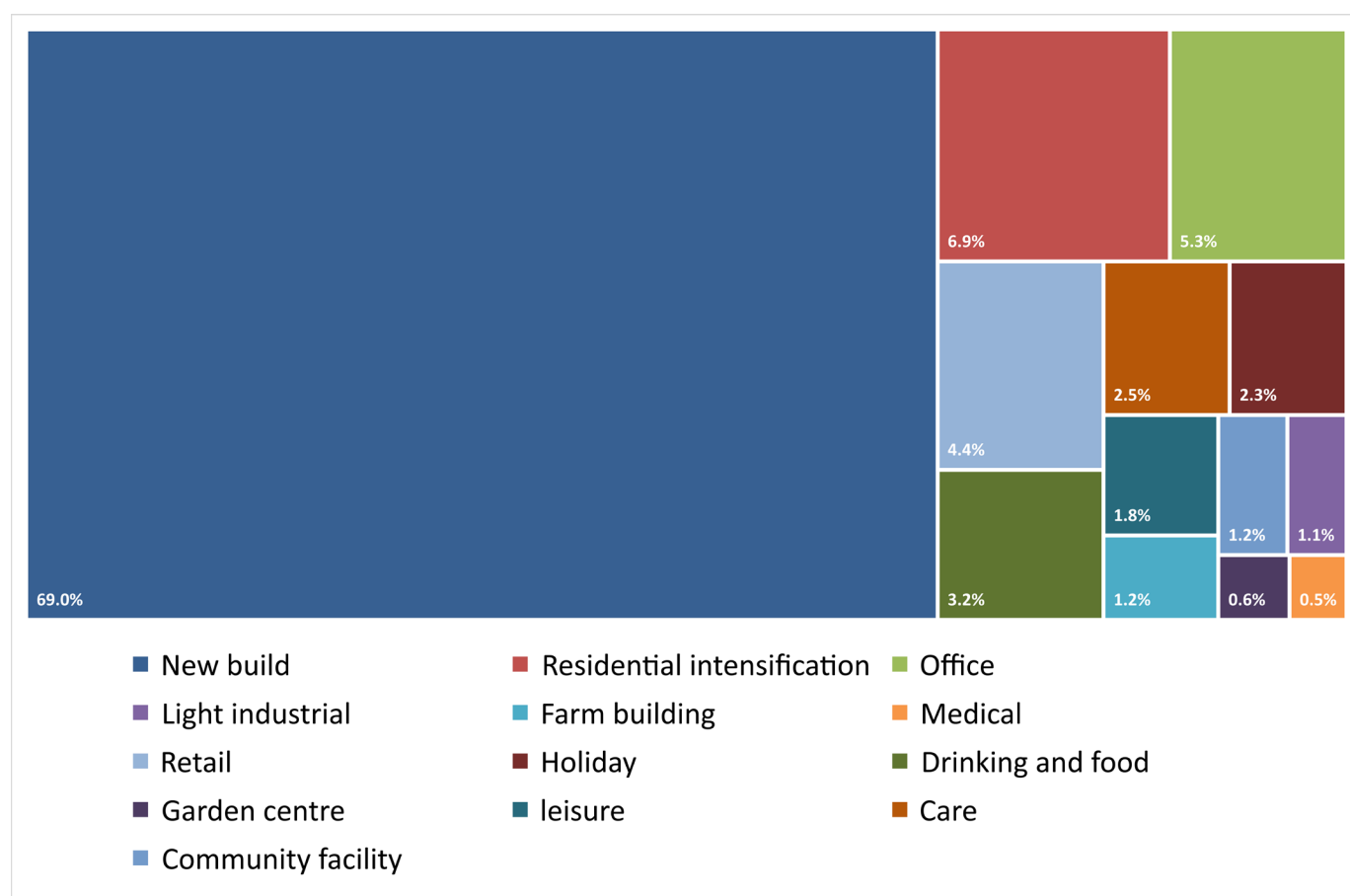


Figure 6. Sources of windfall dwellings

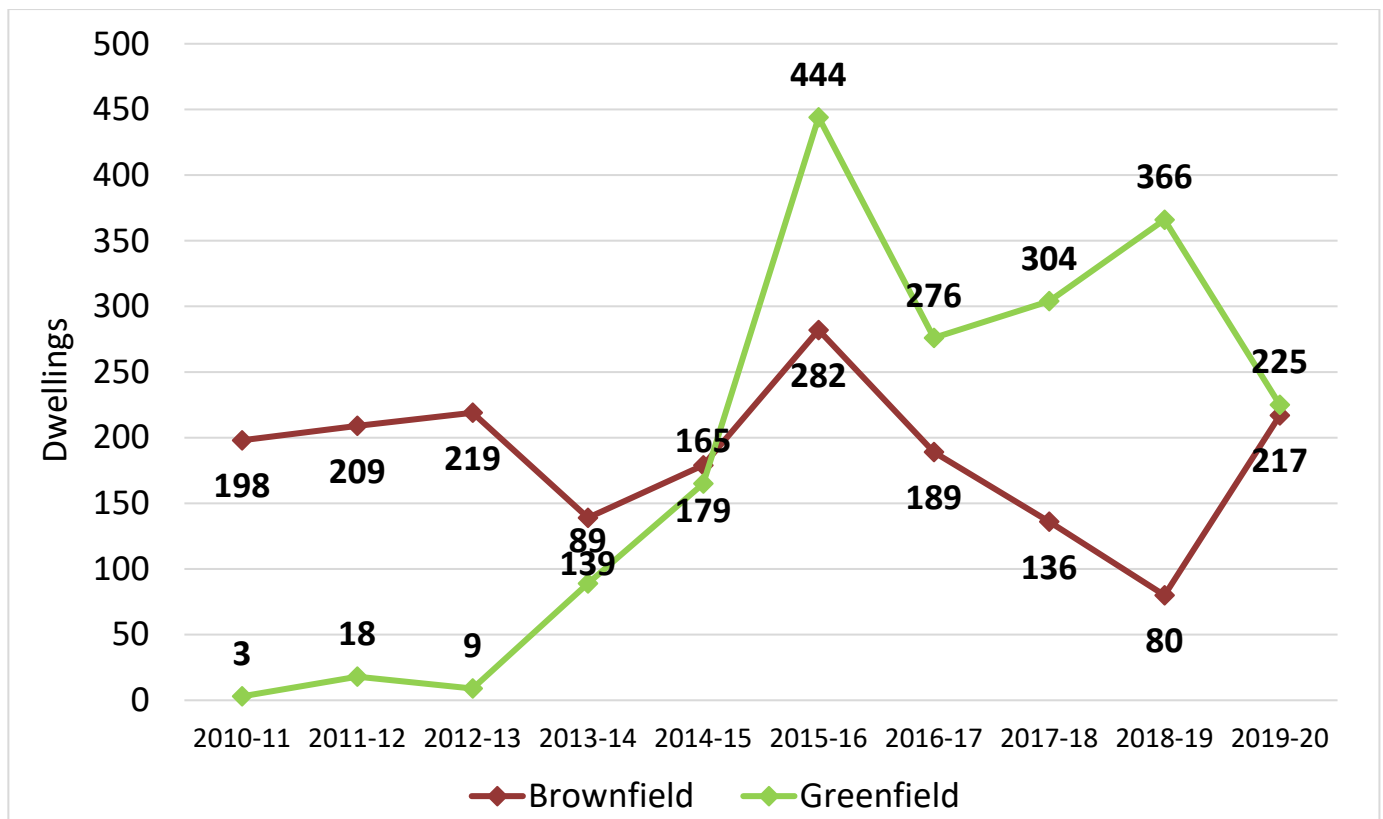


Figure 7. Brownfield / Greenfield completions 2010/11 to 2019/20

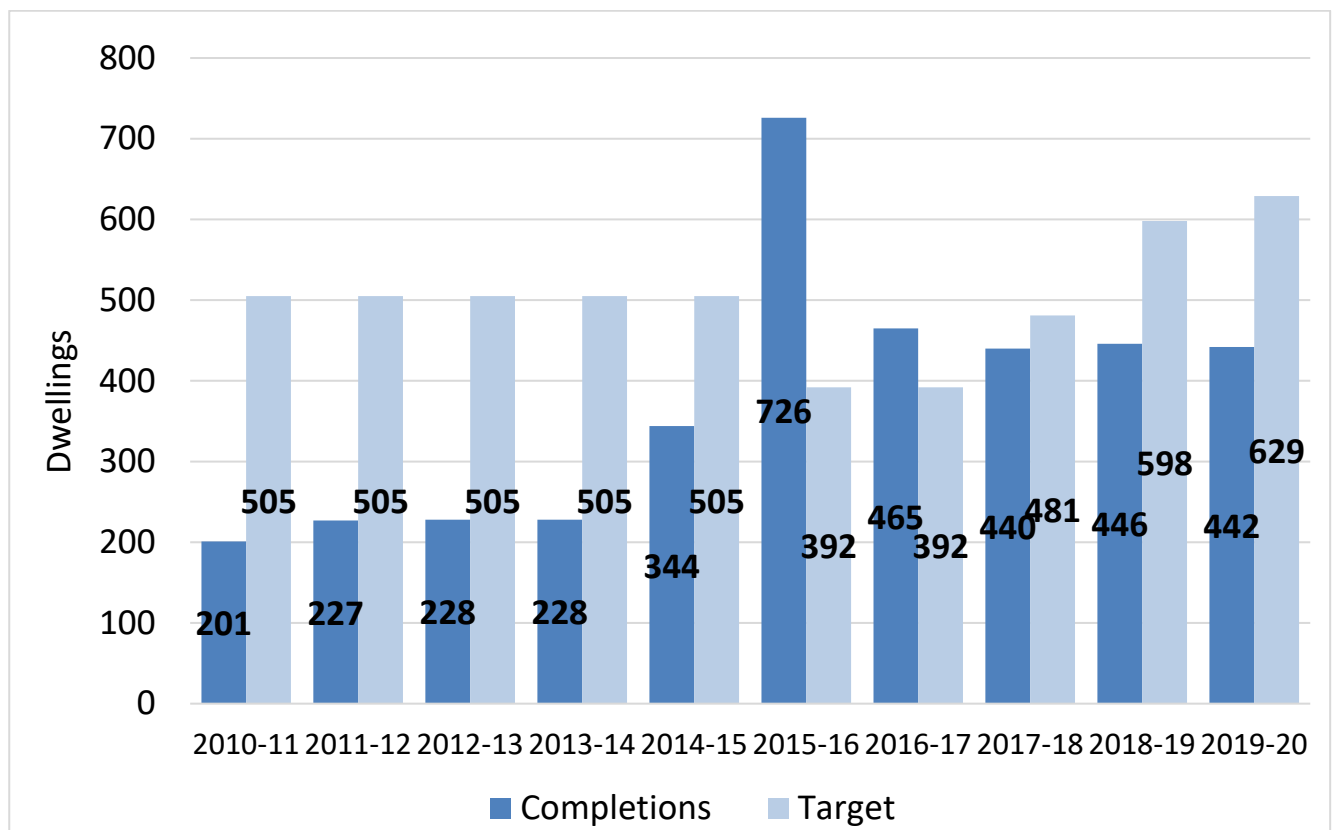


Figure 8. Completed dwellings measured against housing targets

8 Housing land supply issues and options

Residential Windfall development

- 8.1 Residential windfall development can make a significant contribution to the supply of homes coming forward during the Plan period. Such development tends to be small scale and to come forward on previously developed land or vacant areas within or adjoining existing settlement boundaries. For such proposals, policies are needed to clarify which locations and circumstances would be considered acceptable and the criteria against which such applications will be assessed.
- 8.2 Windfall sites are sites that have not been identified for residential development through the land allocation process but that may be otherwise suitable for development. They tend to be small in scale and can offer a significant contribution to the supply of homes using previously developed land and vacant areas within settlement boundaries. Over the last 10 years windfall development has made an important and sustained contribution to the provision of additional homes in the District, accounting for 45% of all completed dwellings within the District over this period. Over two thirds of these windfall developments have been new-build dwellings with 85% of these coming forward on previously developed land. Over this period, the spatial distribution of windfall development has largely followed the settlement hierarchy, with 39% at Dover, 31% at Deal and 12% within the defined confines of rural villages.
- 8.3 In accordance with the NPPF and associated guidance it is important that policies allow for suitable development opportunities for windfall housing to come forward during the Plan period in sustainable locations, within or immediately adjoining the built confines of settlements which have a reasonable range of facilities. In doing so it is important that the scale and quantity of such windfall developments should always be in proportion to the size of the settlement and the range of services and community facilities it offers at the time. Such an approach acknowledges that new housing can help rural communities retain existing services, such as public transport routes, retail and educational facilities. In Districts such as Dover where the countryside is characterised by groups of smaller settlements, development in one village may also support the viability of services in another village close by.
- 8.4 As part of the evidence base for the Regulation 18 Draft Dover Local Plan 2040 the Rural Settlement Hierarchy Study has been updated. This demonstrates that the settlement pattern of the District continues to be dominated by a large number of small villages and hamlets. Such small settlements have a wide range of educational, public transport, retail and community facilities provision. The NPPF advises that windfall development is directed to those villages which are the most sustainable. It also requires that policies reflect the reality that where there are groups of smaller settlements, such as is the case with the settlement pattern in this District, development in one village can support services in, and therefore the vitality of, nearby villages. The Settlement Hierarchy makes clear that Dover District has a number of larger villages with a good range of key sustainability indicators and a larger number of smaller villages and hamlets which have less facilities but which can be reasonably considered to be located near to, and supportive of, the sustainability and vitality of larger ones.
- 8.5 The current adopted policy in relation to windfall proposals restricts such development to locations within designated settlement areas (those with defined settlement boundaries as shown on the Local Plan Proposals Map), and the principle of development in settlements without defined boundaries is generally not supported. This policy approach was developed under previous national policy and is now considered overly restrictive having regard to the

guidance set down in the NPPF and NPPG. The option of continuing with the current policy approach is therefore not considered appropriate.

- 8.6 The Councils preferred option therefore when considering suitable locations for residential windfall development is to support in principle windfall development at existing settlements on sites which can support existing services and facilities, and where the scale of the development proposed is appropriate to the capacity of such services and facilities to accommodate the additional development. It is important such a policy includes clear criteria to ensure there are no unacceptable impacts and that the design of such windfall developments is of a particularly high standard reflective of the character and setting of the settlement.

Type and Mix of Housing

- 8.7 The housing needs of the various community groups and the emerging population trends and demographics have been assessed through the latest Strategic Housing Market Assessment (SHMA) for the District. To meet the projected local housing needs for the District, the assessment goes on to set out the dwelling size, household type and tenures that are required to be built over the plan period.
- 8.8 The SHMA partial update December 2019 projects that by 2040 the population of the District will have grown by nearly 19,000 persons. Chart 6.2 below illustrates that the age groups 60-75 and over 75s are projected to be the major contributors to the Districts population growth and will account for nearly 16,000 persons. The SHMA update also projects the growth of nearly 12,000 households by 2040 and that approximately half of the new households will come from one person formations.
- 8.9 Using the latest local housing need for the District and being considerate of projected demographic and household changes, the SHMA update states that 73.1% of the dwellings built should be market housing, 5.1% Starter homes, 5.8% shared ownership and 16.0% affordable rent. The SHMA also prescribes that 576 units of housing for older people and 66 units of housing with care should be provided within the identified need. Detail is also given within the SHMA on the dwelling sizes by tenure, with an overall mix sought of: 12.2% from one bedroom; 20.4% from two bedrooms; 35.2% from three bedrooms; and, 32.2% four or more bedroom dwellings. The SHMA 2019 also identifies a need for 990 additional spaces of Registered Care for housing those aged 65 and over between 2020 and 2040. This forms part of the institutional population and is in addition to the housing supplied within the local housing need identified above.
- 8.10 The following options have been considered in relation to providing for a type and mix of housing:
- policy requiring the type and mix of housing delivered meets the local need identified through the latest evidence;
 - use nationally produced age and type of household projections from the Office for National Statistics to determine the appropriate type and mix of homes to be built with the District; or,
 - allow the type and mix of homes to be determined by the housing market and have no specific policy requirement.
- 8.11 Providing the right type and mix of housing will ensure that the local needs of the Districts demographics will be provided for over the plan period. Specifically, the National Planning Policy Framework requires that the needs of the differing community groups in the community should be assessed and reflected in planning policy. Given this and having considered the evidence, the opportunities and policy context within Dover, the preferred

approach is to include a policy on the type and mix of housing that should be built based on the latest evidence of demographic need within the District. This is considered the most appropriate approach to ensuring the housing needs of the various demographics of the District are met. The preferred approach aligns most appropriately with national legislation and most effectively addresses the issues outlined above.

Self Build and Custom House Building

- 8.12 As part of preparing the draft Local Plan, an informal review was undertaken comparing the need as identified on the Self Build Register against planning applications received for Self build and customhouse building. The review undertaken in Autumn 2019, identified that since the 1 April 2016, only one planning application had been submitted for Self build and was only identified by the applicant during an appeal against refusal for planning permission. Due to the large discrepancy between the need on the register and the materialized demand through planning applications, it was deemed appropriate to identify those with and actual intent and financial capacity to secure a plot of land and undertake a Self build customhouse building. The Councils concern was that the Self Build need on the register may not materialize in future planning applications. And that there could be a danger of housing land supply targets not being met, due to allocated land and planning policies being set for Self build in the new Local Plan, which would then not be built out or developed.
- 8.13 Self build and custom housebuilding contributes toward the Councils overall housing need requirement for completed dwellings. To ensure that Self build and customhouse building contributes toward the local need for the District, it was essential that those on the register are local or have a local connection to the District. The local connection test for the Council serves two purposes: to ensure that the identified local need as determined by the governments standard method of calculation is being met, and thus homes are not being built by persons without a local need, resulting in a shortfall of homes for local persons; and, secondly to prevent potential double counting from persons entering onto multiple local authority Self Build registers, in turn generating duplicate needs. This duplication has the potential to create artificially high need requirements for Self build at the expense of other types of home required within a Local Authority area.
- 8.14 In early 2020, the Council relaunched the register to try and gain a more accurate identification of those with: a local need for self build and custom house building and who were also financially capable of carrying out a build. In accordance with legislation, the current version of the Councils register requires applicants and associations wishing to register an interest in Self and Custom Build in the district to provide evidence of local connectivity and of being financially solvent to carryout a build. Those who met the evidenced tests and were on the previous version of the register had their interest dated to the previous register.

How many self build and custom house building plots should be planned for?

- 8.15 At present, the Council has an identified need for 4 plots on part 1 of it register and 3 plots on part 2. Legislation only requires the Council to consider the need as identified on part 1 of the register. Plan policy options include:
- allocating specific sites to meet the established need as reported on part 1 of the register;

- go beyond meeting the statutory need and allocate specific sites to meet the identified need for part 1 and 2 of the register;
- rely on windfall planning consents to address the plot need as established by part 1 and/or part 2 of the register

8.16 Due to the number of plots required on the register the Council's preferred option is include a specific windfall policy for self build and custom house building to assist in the delivery of self and custom build housing. The Council's register is a process formulated through legislation and provides an accurate indication of local need and capability to carryout development. By not placing an undue requirement on site allocations to provide for a level of self build and custom house building need that is not established, those sites will be less constrained in delivering other types of identified housing need. This is considered to represent the most appropriate method for setting out a set of clear principles that each development will need to consider, and will assist in the effective management of development in the District. The preferred approach aligns most appropriately with national legislation and most effectively addresses the issues outlined above.

Where should the new plots be located?

8.17 The Self Build and Custom House building register poses a series of questions to applicants to help identify their preferred location for development and size of dwelling to be built. The information obtained from the register can help identify the locations and size of plots required when planning for this need. The options for considering where plots can be located include:

- Allow the housing market to determine plot provision through windfall consented planning applications; or
- Plan for plots as prescribed by the Self Build and Custom House building register; or,
- Allocate site(s) where land has been made available to meet the plot need.

8.18 The Councils preferred approach is to allow the location and size of plots to be determined through the housing market and windfall planning applications. This approach is appropriate is considered the most appropriate due to the low level of need currently identified on the register, the limited amount of land required and that no sites for this need have been identified through the Councils Housing and Economic Land Availability Assessment and deemed suitable allocation in the Plan.

Gypsy and Traveller Accommodation

8.19 Further detail on this how this need identified and the strategy for meeting it, is contained within the Gypsy and Traveller Accommodation Topic Paper.

How many Gypsy and Traveller pitches should be planned for?

8.20 The level of need for the District is set out within the latest Gypsy and Traveller Accommodation Assessment (GTAA) and includes both need as defined within PPTS and need based on a broader 'cultural' definition of Gypsies and Travellers and Travelling Showpeople which identifies households as a Gypsy and Traveller /Travelling Showperson but do not meet the travelling clarification questions of the PPTS. The GTAA includes this second cultural need as it accords with the Housing and Planning Act 2016 section 124 which considers the needs of households living in caravans.

8.21 The latest update to the GTAA states that for the plan period 2020 to 2040 there is a cultural need for 26 pitches and a PPTS need for 16 pitches. Policy options for addressing these needs include:

- The Council could plan to meet both Cultural and PPTS pitch needs as established in the GTAA; or,
- Plan for a higher Cultural and PPTS pitch growth than the established in the GTAA; or,
- Plan to deliver less Cultural and PPTS pitch growth than established in the GTAA; or,
- Plan to meet only the PPTS need as established in the GTAA; or,
- Rely on windfall planning consents to address the pitch needs as established in the GTAA.

8.22 The preferred option is to meet the cultural and pitch need as established in the GTAA. This option is considered the most appropriate when considering national planning policy and legislative requirement. Failure to identify and plan for a policy and legislative compliant Gypsy and Traveller Accommodation need, may increase the risk of unauthorized encampments and appeal challenges to planning applications for pitches in non-policy compliant locations within the District.

Where should the new pitches be located?

8.23 The Gypsy and Traveller site options investigation study (2020) identified that there were opportunities and locations for addressing the cultural and PPTS accommodation need for the district. The study stated that at January 2020 there were 10 vacant pitches on existing authorised sites; 22 potential pitches could be delivered through the intensification/expansion of existing sites (15 on authorised sites, 5 on tolerated sites, 2 on sites that are unauthorised); and, 28 pitches which could be delivered on new sites. Plan policy options include:

- In planning for pitches in the district count and monitor vacant pitches, identify permitted and tolerated sites for prescribed levels of intensification, and to allocate sites to a level to meet any residual need after other sources of supply have been counted; or,
- Require strategic and large allocations in areas where there are concentrations of Gypsy and Traveller sites, to take a proportion of the pitches need for the district; or,
- Rely on windfall planning consents to address the need.

8.24 The Council's preferred option is to allocate sufficient sites to meet the need over the plan period, and not to rely on any windfall provision. In order to do this, it is proposed to identify pitches on existing sites which are considered appropriate for expansion/intensification, and identify additional specific sites for allocation to meet the remainder of the identified need.

Residential Extensions and Annexes

8.25 The provision of residential extensions and annexes can allow for homes to be adaptive to changing lifestyle and societal needs. These types of residential development can also reduce the need to move home and lower the demand for larger homes. The need for annexes and extensions can include: increases in family size; changes in personal mobility and access requirements; changing working patterns towards an increase in home working; and, the pursuit of home based leisure and fitness activities.

8.26 Extensions and annexes also offer the opportunity to support the living needs of mobile older persons whilst reducing the premature need to enter into care facilities. The latest SHMA acknowledges that the population is ageing and states that those aged 60 and over will account for 38.7% of the population by 2040 an increase of 7.1% from 2020. The level of housing support and care can change over time for an elderly person and annexes can offer a solution to the those seeking a level of independence whilst also being part of a wider family and extensions can go further providing the opportunity for more close support.

- With regards to residential extensions and annexes in the District, the council can either adopt a local approach to managing this issue and include a policy in the Plan to facilitate the delivery of residential extensions and annexes; or
- Instead rely on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for development in the District.

8.27 The preferred approach is to include a policy to assist in the delivery of residential extensions and annexes. This is considered to represent the most appropriate method for setting out a set of clear principles that each development will need to consider, and will assist in the effective management of development in the District. The preferred approach aligns most appropriately with national legislation and most effectively addresses the issues outlined above.

Houses in Multiple Occupation

8.28 Houses in multiple occupation (HMOs) are properties which are occupied by unrelated households that share one or more facilities such as a bathroom or kitchen. HMOs can provide useful accommodation, but in many cases the property was not originally designed for such intensive residential use.

8.29 In 2010 the government introduced a new use class (C4), which covers small shared houses or flats occupied by between 3 and 6 unrelated individuals who share basic amenities. Planning permission is generally not required for a change of use from a dwelling house (C3) to C4, as it is permitted under the General Permitted Development Order (GPDO). Large houses in multiple occupation (those with more than 6 people sharing) are unclassified by the Use Classes Order, and planning permission is required for a change use of from a C3 or C4 to a large house in multiple occupation. The Council will consider whether there is justification in certain locations to serve Article 4 directions so that changes of use from C3 to C4 would require planning permission and therefore be subject to this policy.

8.30 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.

Houses in Multiple Occupation research

8.31 Research was undertaken in October 2020 to try and identify any clusters of HMOs within the District. Properties were attempted to be identified through: the records of licenced HMOs'; approved planning and building control records for conversion to HMO over the 20 year period 2000 to 2020; and, enquires of the Councils Housing and Council Tax teams on whether they monitor HMOs. Both the Councils Housing and Council tax teams stated that they did not monitor HMO properties. This resulted in properties only being identified through licensed HMO's and the planning and building control process. In terms of planning applications, the number of properties able to be identified was considerably constrained due to only large HMO's of 5 persons or more households being required to apply for planning permission, with small HMO's of 1-4 person households falling within permitted development.

8.32 The research identified 53 HMO properties registered as licenced, 14 HMOs had approved planning applications and 10 HMOs identified through building control records. From the three sources 67 individual properties were identified with 12 properties being

identified from multiple sources. The postcodes for each of the 67 properties were then mapped to identify if they created any clusters within the District.

- 8.33 The spread of the 67 properties was relatively even spread through-out the Dover and Deal urban areas, with some located in rural areas, resulting in no clusters identified. A constraint to the research undertaken is the inability of the planning process to identify small HMOs. And inevitably there are likely to be single occupancy properties illegally operating as HMOs. A potential future route for investigation could be for the Council to consider streetscape surveys of suspected HMO clusters. However, this approach may be constrained in that the high levels of street clutter like car parking and bins could be resultant from the poor provision of parking spaces and amenity space when the planning of town centre houses occurred, some of which date back to the late Victorian times.
- 8.34 However, at this stage of drafting the Local Plan, it is acknowledged that street clutter can be a problem which can be detrimental to the vitality and vibrancy of the Districts urban areas, and that HMOs can further exasperate the problem. As a result, it is appropriate for planning to consider measures to help mitigate the impact of this type of development. With regards to houses in multiple occupation, the council can:
- Include a specific criteria based policy in the Plan to manage HMOs and their impacts on communities;
 - Instead rely on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for development in the District.
- 8.35 At present, having considered the evidence, opportunities and policy context within Dover, the preferred approach is to include a criteria based policy to manage HMOs and their impacts. This is considered to represent the most appropriate method for setting out a set of clear principles that each application will need to consider, and will assist in the effective management of development in the District.

9 Local Plan Housing Need target

- 9.1 Paragraph 60 of the NPPF states that in order to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.
- 9.2 At the time of drafting the Local Plan, the Ministry of Housing, Communities and Local Government (MHCLG) made it clear that the baseline of 2014-based Household Projections should be used for calculating local housing need. A worked example of how this calculation currently applies to the District is provided below and shows the use of household growth projections 2014 and the most recent affordability ratio of 8.22 released 19th March 2020.
- 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 2030 is 56,988 households, which when taken against the projection for 2020 of 52,275 households, equates to 4,713 households over the 10 year period, creating the average need of **471.3 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 (2020) is **8.22**
- 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 the calculation is:

1. $8.22 - 4 = 4.22$
2. $4.22 / 4 = 1.055$
3. $1.055 \times 0.25 = \mathbf{0.26375}$

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

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

4. $1.26375 \times 471.3 = \mathbf{596 \text{ dwellings}}$

- 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.

Current 5 year housing land supply

9.3 The NPPF 2019 requires local planning authorities to demonstrate a 5 year supply of

deliverable housing sites, which must be updated annually. The Councils Housing Technical Paper 2020¹⁶ sets out that at 1st April 2020, the Council has 6.16 years of housing supply, with a 5% buffer. Accordingly, it is considered that the Council can demonstrate a 5 year housing supply for the purpose of paragraph 11 of the NPPF. At present this supply does not contain any of the proposed site allocations set out in the draft Plan. Whilst the Council can demonstrate a five year housing land supply without the need for additional housing sites, the provision of additional sites will ensure resilience and promote flexibility and choice, and assist in ensuring the Council can demonstrate a five year housing land supply in future years.

10% buffer for supply resilience

- 9.4 In order to meet the level of identified housing need, it is important to maintain a healthy supply of housing sites, to provide flexibility and choice, and to account for changing circumstances and under-delivery on sites where final mitigation measures determined at the planning application stage may slightly amend downwards the number of dwellings on a site. Therefore, a buffer of 10% is provided within the identified supply and added to the Local Housing Need figure.
- 9.5 The approach of applying a 10% buffer will also provide resilience to the supply during the drafting and examination of the Local Plan. The approach enables the supply to meet any potential increase in the Local Housing Need requirement before the Local Plan is submitted for examination. The approach also allows for the potential removal of sites by the Planning Inspector during examination of the Local Plan. Local Authorities are required to update annually their Local Housing Need requirement using the most current published data sets, until they submit their Local Plan. Once submitted, the Local Housing Need requirement is then fixed for two years, to allow time for examination and adoption of the Local Plan. If the Local Authority fails to adopt their Plan within the two years period, the Local Housing Need requirement must then be recalculated at that time using the latest methodology and data and applied to the Plan making.
- 9.6 Furthermore, even though the Council has robustly assessed all the housing sites proposed within the Local Plan, the examination of the Plan is the primary forum where the latest evidence and submissions from representors to the Plan are considered. A Government Planning Inspector will then reach a formal conclusion on the suitability of the supply strategy and sites within the Plan, and where appropriate the inspector may recommend a site or sites be removed due to issues as yet unresolved at this stage of drafting the Plan.

Local Plan Housing Need Target

- 9.7 The current Local Housing Need figure for Dover District is 596 dwellings per annum, which equates to 11,920 dwellings over the 20 year period (2020-2040) for the Local Plan. The application of a 10% buffer to the current Local Housing Need figure for supply resilience, produces at present, a Local Plan Housing Need Target of 13,112 (11,920+1,192).

10 Local Plan Housing Land Supply

- 10.1 To ensure successful delivery of the housing objectives of the Local Plan, it is appropriate to determine whether enough housing land supply has been identified to meet the Local Plan Housing Needs Target. Further, it is also essential to demonstrate that the identified

¹⁶ <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Complete-Housing-Technical-Paper-2020.pdf>

supply of sites can be delivered within the Plan period. The assessment can be carried out by reviewing the elements of the Local Plans' proposed housing land supply, measured against the Local Plan Housing Need Target, and to then, provide a trajectory of those sources of supply that demonstrate when the sites in the Local Plan will deliver completed dwellings.

- 10.2 The types of housing supply being considered deliverable within the Local Plan time period includes: extant planning consents; sites for allocation within the Local Plan; and, windfall from sites not identified in the plan making process. The final supply position is then measured against the Councils current Local Housing Need as set out above.

Summary of Local Plan Housing Land Supply

- 10.3 Taking into account all three elements of housing supply: extant sites, draft site allocations, and, a windfall allowance as set out within this paper below, and measured against the Local Plan Housing Need Target, the Council can at this stage in drafting the Local Plan illustrate that there is sufficient supply proposed to meet the housing objectives of the Local Plan. Table 4 below sets out the indicative housing land supply position for the Local Plan. Further details on the anticipated annual rates of housing delivery can be found within the housing land supply trajectory contained in Appendix 2.
- 10.4 It is acknowledged, that the overall balance of housing land supply measured against the Local Plan housing needs targets at this time is only very marginal. In turn, to address this, there will be a further call for sites exercise alongside the regulation 18 consultation of the Local Plan. The exercise will seek to further increase the housing land supply options that are available to address potential changes of housing need that may occur in later drafts of the Local Plan.

	Dwellings (net)	Dwellings (net)
Local Plan housing need figure (20xLHN 2020 596dpa)		11,920
Supply Resilience buffer (10% Local Housing need target)		13,112
Extant supply at 31 March 2020 (excluding Whitfield and with 10% non-implementation discount applied)	3,151 (3,501 – 10%)	
Whitfield (extant and allocation)	3,483	
Draft allocations (regulation 18)	5,315	
Windfall allowance (small sites)	1,190	
Total housing land supply	13,139	
Balance of supply		27

Table 4. Local Plan housing land supply

Extant Supply

10.5 The extant permissions that make up the housing land supply have been identified through the Council's annual housing information audit 2020. How the permissions are identified and assessed in terms of their deliverability are detailed within the Housing Technical Paper 2020. 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 Council's 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 Council's 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.

Expired Planning consents

10.6 Historically, the District has experienced a very low rate of expired planning consents for dwellings (table 5), however much of the housing land supply at that time was on small windfall sites. Due to the nature of the proposed site allocations in terms of their size, complexity of planning issues and their medium to long term delivery expectations during the Local Plan lifetime, it is appropriate to take a more cautious approach when considering non-implementation of proposed dwellings. As a result, 10% non-implementation discount has been deemed appropriate to be applied and considered when reviewing the extant supply (excluding Whitfield urban expansion) for the Local Plan.

	Expired permissions	Extant stock	Percentage
Average	80	3,976	2%
19-20	84	4,785	2%
18-19	14	4,497	0%
17-18	238	4,238	6%
16-17	44	4,589	1%
15-16	22	4,369	1%
14-15	*		
13-14	75	1,377	5%
* no data			

Table 5. Expired Planning permissions

Whitfield Urban Expansion

- 10.7 The Whitfield Urban Expansion 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, April 2011.
- 10.8 To date planning permission has been granted for 1,483 dwellings, a health centre, primary school and new pumping station. As at April 2020 200 homes have been completed on the site and the construction of the primary school is nearing completion. A planning application has also been submitted for Dover Fastrack, which will provide a rapid bus transit system connecting Whitfield with Dover town centre and Dover Priory railway station.
- 10.9 Whilst the development has not come forward as quickly as was originally envisaged, there is now significant interest from a number of 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 current delivery rates.
- 10.10 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 permission for Phase 1 must provide interim upgrades to the Whitfield roundabout before the completion of the 800th dwelling. Further mitigation will be required to accommodate the remainder of the development. The Council is working with KCC Highways and Transportation, and Highways England to develop an appropriate mitigation strategy for the road network.
- 10.11 The delivery assumptions for the Whitfield Urban Expansion are set out in Table 6 below, total 3,483 additional dwellings between 2020 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. It is expected that representations will be made by the landowners and developer interests regarding their proposed build out and phasing, and these assumptions will be updated and refined in order to inform the Regulation 19 draft of the Plan, also taking into account any other relevant evidence, such as the phasing of the required infrastructure. The following assumptions and consideration have been made in determining the likely delivery rates within the plan period:
- The identification of additional land for development for a further 600 homes to the west of the existing allocation (as justified in the Site Allocations Topic Paper).
 - A revised phasing and delivery programme will need to be agreed through an update to the SPD, with flexibility to be provided in relation to the current requirement for east to west delivery of the site.
 - Interest from a further three housebuilders at the site, allowing separate parcels to be brought forward concurrently.
 - Reserved matters applications are currently under consideration for further sub phases of Phase 1 of the development (OL/01010), with other parcels currently under construction. 16/00136 (133 dwellings) is also currently under construction. All the 1,283 dwellings currently extant are therefore assumed to be delivered within the plan period.
 - Taking account of the separate landownership parcels (figure 9) and known interest from housebuilders, the following delivery is assumed outside of those areas which already have planning permission.

Areas	2020-2025	2025-2030	2030-2035	2035-2040	Total 2020-2040
B	200				200
C, F & I		250	250	250	750
D, E & G		250	500	500	1250
Total	200	500	750	750	2200

Table 6. Whitfield Urban Expansion delivery assumptions

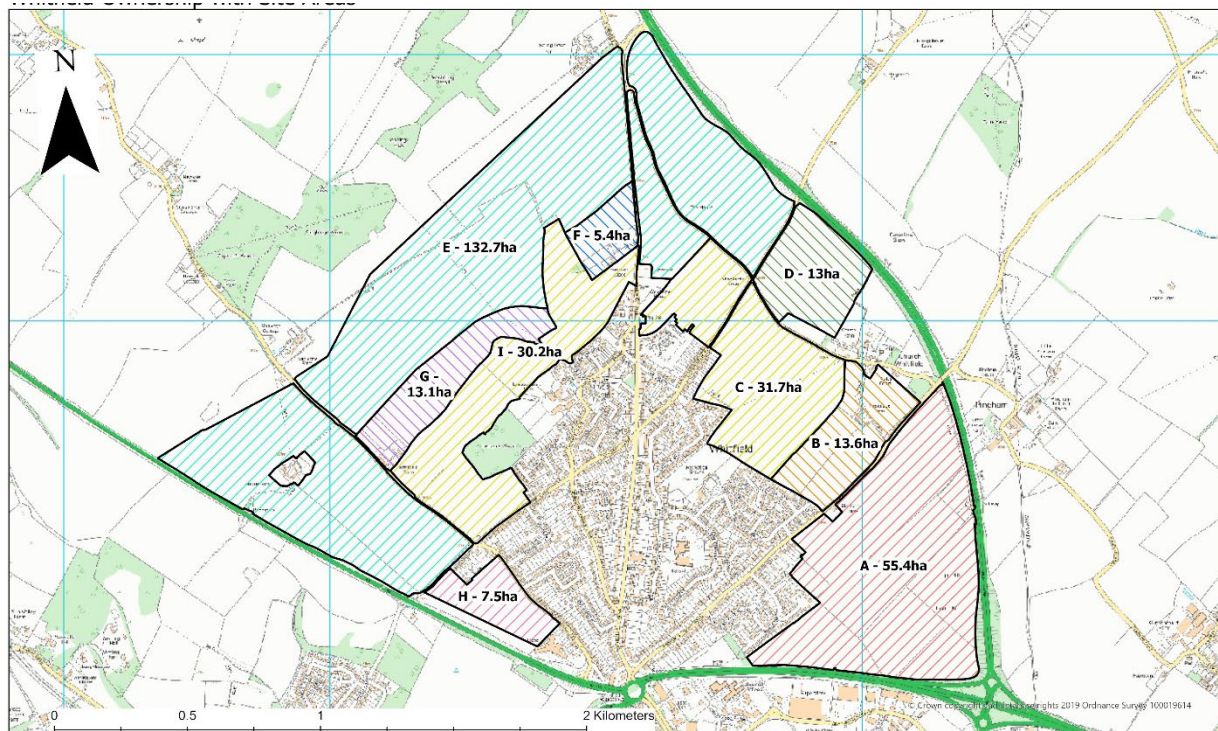


Figure 9. Whitfield Urban Expansion land ownership parcels

Site selection

10.12 The Interim HELAA (April 2020) identified 126 green and amber sites, that would deliver in the region of 12,111 new homes. This is clearly in excess of the amount of land that is needed to meet the residual housing requirement of 5,288 homes over the Plan period (figure doesn't include the Whitfield Urban expansion).

10.13 The HELAA is a technical piece of evidence to support the Local Plan making process and is a requirement of the NPPF (2019). It should however be noted that the HELAA does not in itself determine whether a site should be allocated for development, that is the role of the Local Plan.

10.14 In determining the sites to be taken forward as housing allocations in the draft Local Plan the Council has also therefore had regard to:

- The overarching growth strategy set out in the draft Local Plan;
- Site specific Sustainability Appraisal assessments carried out as part of the Sustainability Appraisal of the Local Plan;
- Updates to the HELAA post April 2020;
- The revised settlement hierarchy;

- The Whole Plan Viability Study;
- The Air Quality Study; and,
- The Local Plan Transport Modelling Work.

- 10.15 The Local Plan allocates sites to deliver 7,511 new homes over the Plan period, of which 3,690 homes are proposed on strategic sites and 3,821 are proposed on non-strategic housing sites.
- 10.16 The reasoning behind the selection of the proposed housing site allocations for the draft Local Plan is set out in the Site Allocations Topic Paper.

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

- 10.17 The NPPF 2019 acknowledges the value that small and medium sized housing sites can make towards the supply of housing, through their often relatively quick build out timeframes. Further, these types of site can offer opportunities for more sustainable forms of construction. Typically, small and medium sized sites are built out by local developers sourcing materials and labour locally, they also tend to have more localised knowledge on the context of a site, and they can also retain much of the developments financial gain within the local economy. In comparison, larger sites tend to be developed by volume housebuilders, whom source materials and labour from their regional and national networks, with much of the developments finance gain going to national and multinational companies.
- 10.18 To this effect, the NPPF 2019 requires local authorities to identify through their development plans and brownfield land registers (BLR), land to accommodate at least 10% of their housing requirements on sites no larger than 1 hectare (ha). For the Councils Local Plan period 2020 to 2040, and based on the local housing need calculation at 1 April 2020 of 596 dwellings per annum, this would equate to a requirement of 1,190 dwellings (596 x 20 (years) x 0.1 (10%)) on sites of 1ha or less. Table 7 demonstrates that there are 1,273 dwellings on sites of 1ha or less from proposed allocations in the Local Plan and identified through the Councils BLR 2019, and this equates to 10.7% of the Councils housing requirement for the Plan period.

	Dwellings (Sites 1ha or less)	% housing requirement (11,920 dwellings)
BLR (2019)	665	5.6%
Preferred allocations	608	5.1%
Total	1,273	10.7%

Table 7. 10% housing requirement on land of 1ha or less, dwelling supply

- 10.19 It is acknowledged that at present, the supply of dwellings is only marginally more than the 10% requirement. As a result, to ensure enough sites are provisioned, the Council will carry out a targeted call for sites exercise alongside the regulation 18 consultation of the Local Plan. This exercise, amongst other things will seek further sites of 1ha or less that could be suitable for consideration in future drafts of the Local Plan. Furthermore, it should be noted, that existing windfall housing planning consents, that don't qualify for a BLR, are not required by policy to be counted towards the sites available. If those types of site

where considered, then at 1 April 2020, there were a further 322 dwellings available on sites of 1ha or less.

Phasing and delivery rates of site allocations

- 10.20 To determine whether there are enough sites that can deliver completions within the 20 years to meet the Local Plan Housing Need Target, it has been appropriate to assess the likely phasing of site commencements and annual delivery rates of completed dwellings within the Local Plans proposed housing land supply. The delivery of new dwellings using this approach can then be illustrated through the use of a trajectory for the 20 year period. In terms of the extant supply element of the Local Plan, these sites' phasing and their delivery rates of completions have been based on the approach taken for them in the Housing Technical Paper 2020, and as a result a level of certainty can be applied to these sites.
- 10.21 Due to the draft nature of the housing sites for allocation in the Local Plan, the approach to phasing of those sites has been indicative in nature and has been based on the progress of the site toward gaining planning consent, as stated by the site promoters in December 2019 and January 2020. The phasing of housing supply at this stage in preparing the Local Plan is purely indicative and in no means provides a definitive 5 year housing land supply position for the Council. In terms of the Councils latest 5 year housing land supply for the purpose of Paragraph 73 of the NPPF 2019, please refer to the Housing Technical Paper 2020. However, by assessing the phasing and delivery of sites at this stage of drafting the Plan, a strong indication will be provided that the housing land supply strategy as presented in the Plan, will meet the requirement of the Local Plan Housing Need Target.
- 10.22 As the Local Plan progresses towards its regulation 19 consultation, the sites proposed for allocation will have their phasing and delivery assessed at the higher requirements as set out within the NPPF 2019. By assessing the major sites without detailed planning consent at the higher levels of delivery evidence required by the NPPF 2019, at the regulation 19 stage of consultation, it will then be possible to demonstrate that on adoption of the Local Plan, and in subsequent years the Council will be able to demonstrate a 5 year supply of housing.
- 10.23 Figure 10 below illustrates how indicatively, the draft site allocations have been applied to inform the draft Local Plan housing land supply trajectory. The phasing approach includes:
- site with a submitted planning application with a decision pending, will commence delivery of completions from year 3;
 - site with a pre-planning application enquiry, or site masterplan will commence delivery of completions from year 4;
 - site with a developer interested in building out the site, will commence delivery of completions from year 5;
 - site that has been made available, will commence delivery of completions from year 6; and,
 - an additional year added to phasing assumptions of commencement for every identified constraint to delivery.

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Planning consent pending										
Pre application enquiry/site masterplan										
Developer interested in the site										
Site is available										
1 additional year to phasing assumption per type of constraint identified (i.e PDL, mix GF/PDL, Highways, Flooding, Access...)										

Figure 10. Phasing assumptions for draft Local Plan site allocations

10.24 For the purpose of indicating the number of dwellings that can be delivered for each year of the Local Plan, the draft site allocations have been assessed using the average delivery rates by site size over the 10 year period 2010 to 2020. The average historic delivery rates by site size has been set out in table 8 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 10 dwellings per annum;
- 25 to 49 dwelling capacity site, will average 19 dwellings per annum;
- 50 to 99 dwelling capacity site, will average 26 dwellings per annum;
- 100 to 199 dwelling capacity site will average 60 dwellings per annum; and,
- 200 or more dwelling capacity site will average 71 dwellings per annum.

Site size	1 to 4	5 to 9	10 to 24	25 to 49	50 to 99	100 to 199	200+
Overall Average	1	5	10	19	26	60	71
2018-19	1	6	8	7	33	96	104
2017-18	1	7	8	7	31	*	72
2016-17	1	6	10	*	25	*	51
2015-16	2	5	11	13	42	91	77
2014-15	1	6	5	25	17	15	57
2013-14	1	5	10	24	16	*	63
2012-13	1	4	13	40	6	56	*
2011-12	1	5	12	*	38	*	*
2010-11	1	6	10	*	*	44	*
* no data							

Table 8. Historical delivery rates by site size

Windfall allowance

10.25 With regards to the final element to the draft Local Plans housing land supply, a windfall allowance has been determined by an approach based on the average monitored windfall completions over the years 2010 to 2020. By taking the average completions rate over a 10 year period covering a complete economic cycle from the last recession in 2009, the approach to the allowance is considered robust. Due to the wide variety of large sites that have been identified through the Local Plan making process, it is felt appropriate to only apply a small sites (1-4 dwellings) approach to the Plans windfall allowance. Sites of this

size will have fallen below the site size assessment threshold as set out within the Councils Housing and Economic Land Availability Assessment¹⁷.

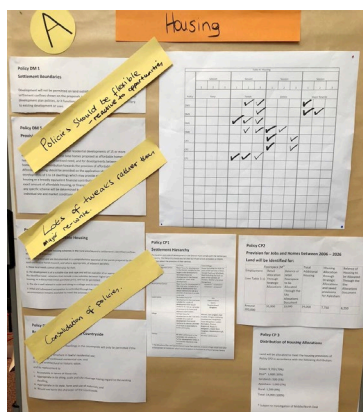
- 10.26 The approach to determining the windfall allowance has also been used in the Councils 5 year housing land supply positions and is set out within the Councils Housing Technical Paper 2020. The 10 year average completions on small windfall sites is 70 dwellings per annum. Taking the small sites windfall allowance approach as set out in the Housing Technical Paper 2020 to the Local Plan time period of 2020 to 2040, will mean that small site windfall completions will be expected to deliver from 2023 to 2040, after the extant permissions for small sites has been considered to be built out. This approach has determined that 1,190 dwellings (70 dwellings x 17 years) will be expected from small sites windfall during the Local Plan time period. Further details on the monitored yearly delivery of windfall dwellings between 2010 and 2020 can be found in table 9 below.

Year	Windfalls on sites of more than 5 units	Windfalls on sites of less than 5 units	Total Windfalls
Average	70	101	171
2019/2020	135	82	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

Table 9. Historic Windfall Completions

Appendix 1 : October 2018 workshop results

Group A – Housing



Policy DM1: Settlement Boundaries	
Suggested change:	Rationale:
Need policy as you need some idea of where development is acceptable.	<ul style="list-style-type: none"> - Too prescriptive. - Good opportunity on the edge of settlements

¹⁷ <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/New-District-Local-Plan/HELAA.aspx>

<p>General support, but needs tweaking</p> <p>Tweaking policy or could you combine with Policy CP1?</p> <p>Need to reflect exception to the rules</p>	<ul style="list-style-type: none"> - Cannot pigeonhole sites as come out of the wood work Should be more flexible - Need windfall sites - Do not want sporadic development - Should be some form of exception rule - Helpful to start somewhere! - Creates too much uncertainty - Define what is acceptable – development found on settlement confine – rare occasion could be acceptable if no harm to the countryside. - Carefully drawn with landscape protection and to allow for the expansion. - Confines must be logical (needs an additional policy in the plan to justify development beyond confines). - Pre-NPPF. Not positively worded as it could be missing some flexibility - Do you still need confines? Some LPAs refer to the built environment. Other Councils (e.g. Wealdon) identify broad areas for growth. - Positively plan for growth if it addresses local housing need. - Start the text in the policy more positively as it is currently worded negatively. - Should the policy be linked to the settlement hierarchy? - Combine policy DM1 and CP1. - Expand CP1.
Policy DM5: Provision of Affordable Housing	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Needs to set out a starting position - Major re-write required to make it consistent with NPPF - Elements – larger sites or smaller site financial contribution 	<ul style="list-style-type: none"> - Needs flexibility - Logistics of delivering affordable housing on small sites is sometimes very difficult - Criteria of 10 dwellings is no longer compliant with NPPF - Policy currently does not mention infrastructure - Do not want to make the policy town-specific? - Brought in line with the NPPF. - At the moment it is 30% or nothing - At the moment do not negotiate - Should the policy offer the possibility for a financial payment or should you set out what you want to achieve - Needs to be above '10' units to be in line with NPPF - Threshold out of date - Very long policy could be shortened - Simplify into categories - Is 30% across the District or should it be different? Up to date summary of need - Could define the viability more - Need to caveat the viability to be in line with NPPF. This could be in a SPD?
Policy DM6: Rural Exception Affordable Housing	
Suggested change:	Rationale:
<p>Tweaking the policy in terms of looking at Entry Level exception sites (para. 71 of the NPPF)</p>	<ul style="list-style-type: none"> - Updated to reflect para. 71 of the NPPF - Does this cover starter homes? - Is it covered by other policies? - Need more justification than the needs of the PC - Relook at the policy in light of the NPPF - Should start by tightly defining the confines and then this

	<p>policy should look at those exceptions</p> <ul style="list-style-type: none"> - Could make the policy very permissible - Principle something to retain
Policy DM8: Replacement Dwellings in the Countryside	
Suggested change:	Rationale:
<p>Tweak or delete!</p> <p>Do you need this policy?</p> <p>Out of date?</p>	<ul style="list-style-type: none"> - Picking out the criteria that are still appropriate - At the moment there are two different objectives: permanent structure/lawful use in criterion (i) - Must be in a generic design policy - Criteria (ii) – very restrictive (existing dwelling and context) - Criteria (iii) – of no architectural or historic value – what is this? - Unsure what it's aiming to achieve? - Flood-risk dealt with already – no need for this in the policy (lose last part of the policy) - First three criteria guide me to what I should be looking for
Policy CP1: Settlement Hierarchy	
Suggested change:	Rationale:
<p>Local Centre:</p> <p>GP Surgery:</p>	<ul style="list-style-type: none"> - Principles helpful but needs to be reviewed. - Possible refinement of the “hamlet” - Good starting point to look at the services and facilities - Trying to identify most sustainable settlement - Sustainability hierarchy. - Not the settlement itself. - Justification sound but whether it has the flexibility? - Need to consider how you treat hamlets. - Do not need to stick with the status quo – just because it is a hamlet, should it always be a hamlet? - Should be open-minded. - Expect some form of shop, some form of accessibility/connection to a larger settlement. - Possibly “function” in the text rather than the policy.
Policy CP2: Identified Need	
Suggested change:	Rationale:
Do not need policy CP2	<ul style="list-style-type: none"> - Informative rather than a policy - Do you need this in a policy?
Policy CP3: Settlement Distribution	
Suggested change:	Rationale:
Do not need policy CP3	<ul style="list-style-type: none"> - This information can be in a table in the LP rather than a policy - Do you need this as a policy?
SUGGESTED NEW POLICIES:	
<p>Agricultural Dwellings</p> <ul style="list-style-type: none"> - Circumstances for an agricultural dwelling (financial and function test). - Recognise vacant building credit - Circumstances that the conversion of a rural building would be acceptable <p>BRT – there is currently no specific policy on BRT so there is no mechanism for smaller sites to pay for this as it falls on the larger sites</p> <p>Do you need a policy in order to allow you to switch your strategy if you are not delivering housing in a certain area?</p>	

Table A: Housing												
Policy	Session			Session			Session			Session		
	1	2	3	1	2	3	1	2	3	1	2	3
	Keep			Delete			Tweak			Major Rewrite		
DM1								✓	✓	✓		
DM5									✓	✓	✓	
DM6							✓	✓	✓			
DM8				✓	✓			✓	✓			
CP3				✓		✓						
CP2				✓		✓						
CP1							✓	✓	✓			

Group A: Overall Observations:

- Policies should be flexible – reactive to opportunities
- Lots of tweaks rather than major re-write
- Consolidation of policies

Appendix 2. Housing land supply trajectory

	Y1 - 2020/21	Y2 - 2021/22	Y3 - 2022/23	Y4 - 2023/24	Y5 - 2024/25	Y6 - 2025/26	Y7 - 2026/27	Y8 - 2027/28	Y9 - 2028/29	Y10 - 2029/30	Y11 - 2030/31	Y12 - 2031/32	Y13 - 2032/33	Y14 - 2033/34	Y15 - 2034/35	Y16 - 2035/36	Y17 - 2036/37	Y18 - 2037/38	Y19 - 2038/39	Y20 - 2039/40	Total
Extant supply (10% non- implementation discount)	374	775	800	404	104	260	203	101	64	64	3	0	0	0	0	0	0	0	0	0	3,151
Whitfield (extant and allocation)	52	134	111	120	120	140	200	200	200	200	200	200	200	200	200	200	200	200	200	206	3,483
Draft allocations Reg 18	0	0	266	279	678	1129	1092	595	247	149	357	251	129	71	71	1	0	0	0	0	5,315
Windfall (small sites)	0	0	0	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	1,190
Total Supply	426	909	1177	873	972	1599	1565	966	581	483	630	521	399	341	341	271	270	270	270	276	13,139
Local Plan housing need figure (inc 10% buffer)	656	656	656	656	656	656	656	656	656	656	656	656	655	655	655	655	655	655	655	655	13,112
Balance	-231	253	521	217	316	943	909	310	-75	-173	-26	-135	-256	-314	-314	-384	-385	-385	-385	-379	27
Cumulative supply balance	-231	22	544	761	1,077	2,020	2,929	3,238	3,163	2,990	2,964	2,829	2,573	2,259	1,945	1,561	1,176	791	406	27	