



# Housing Topic Paper Update

## September 2022



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) 2021, 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 an update and supersedes the Housing Topic Paper that informed the Regulation 18 Draft of the Dover District Local Plan 2040. 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 affecting housing delivery in Dover District
- Historical housing delivery
- Housing land supply issues and options
- Local Plan housing need target
- Local Plan Housing land supply
- Gypsy and Traveller provision

## 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 urban area 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 followed by update 2022 to identify any impacts as result of the COVID pandemic and Britain's exit from Europe. The assessment covers 2 substantial matters. The first, tests the deliverability of the Local Plan to ensure that the sites identified in the Plan are not subject to a scale of planning obligations and policy requirements that render them undeliverable. 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. The update identified that in the two years since the 2020 assessment, house prices had increased at a higher rate than costs of construction and as a result there were no changes to the assessments conclusions.
- 2.11 It is important to note, that once the Local Plan for the District is adopted , the whole Plan Viability Assessment and update 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 evidence, having 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 19 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 update 2022, were 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 60 – 79, 119  
Specifically:

- 63 affordable housing
- 64 affordable housing in rural areas allows for threshold of 5 or fewer
- 65 10% affordable housing
- Para 69a 10% of housing requirement to be allocated on sites up to 1 ha
- 72a entry-level homes exception sites
- 73 new settlement larger scale developments
- 78 local needs rural
- 79 policies should identify opportunities for villages to grow and thrive
- 119 making effective use of land

- 3.1 **Planning Policy for Traveller Sites 2015**<sup>1</sup>: 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.
- 3.2 **Housing White Paper 2016 (Fixing our broken housing market)**<sup>2</sup>: 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)**<sup>3</sup> 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)**<sup>4</sup> 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 period<sup>5</sup>;

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

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

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

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

- 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.

#### **Response to the local housing need proposals**

- On the 1 April 2021 the government responded to the local housing need proposals within the changes to the current planning system consultation. Responses to other Policies proposed are at time of writing still being considered.
- That the most appropriate approach was to retain the standard method in its current form. The government concluded this approach will provide stability and certainty for plan-making and decision-making, so that local areas can get on and plan based on a method and level of ambition that they are familiar with.
- The 20 local authorities with largest proportion of the city or urban centre's population will have a further 35 per cent uplift applied to their local housing need. The objective to increase home-building in existing urban areas and to make the most of previously developed brownfield land.

### **3.5 Levelling Up the United Kingdom White Paper<sup>6</sup>: Sets out the next stages to level up the UK by:**

- Boosting productivity, pay, jobs and living standards by growing the private sector, especially in those places where they are lagging;
- Spread opportunities and improve public services, especially in those places where they are weakest;
- Restore a sense of community, local pride and belonging, especially in those places where they have been lost;
- Empower local leaders and communities, especially in those places lacking local agency; and,
- By 2030, renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

### **3.6 Laying the foundations: a housing strategy for England<sup>7</sup>: Sets out a package of reforms to:**

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<sup>5</sup> 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>

<sup>6</sup> <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>

<sup>7</sup> <https://www.gov.uk/government/publications/laying-the-foundations-a-housing-strategy-for-england--2>

- 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 (2017 and partial update 2019)  
 HELAA (2022)  
 Settlement hierarchy (2008 – update 2022)  
 Settlement confines update (2022)  
 GTAA (2018) review and site selection (2020)  
 Housing Supply Technical Paper (2022)  
 Housing Delivery Action Plan (2022)  
 Self-Build and custom house building register  
 Brownfield land register

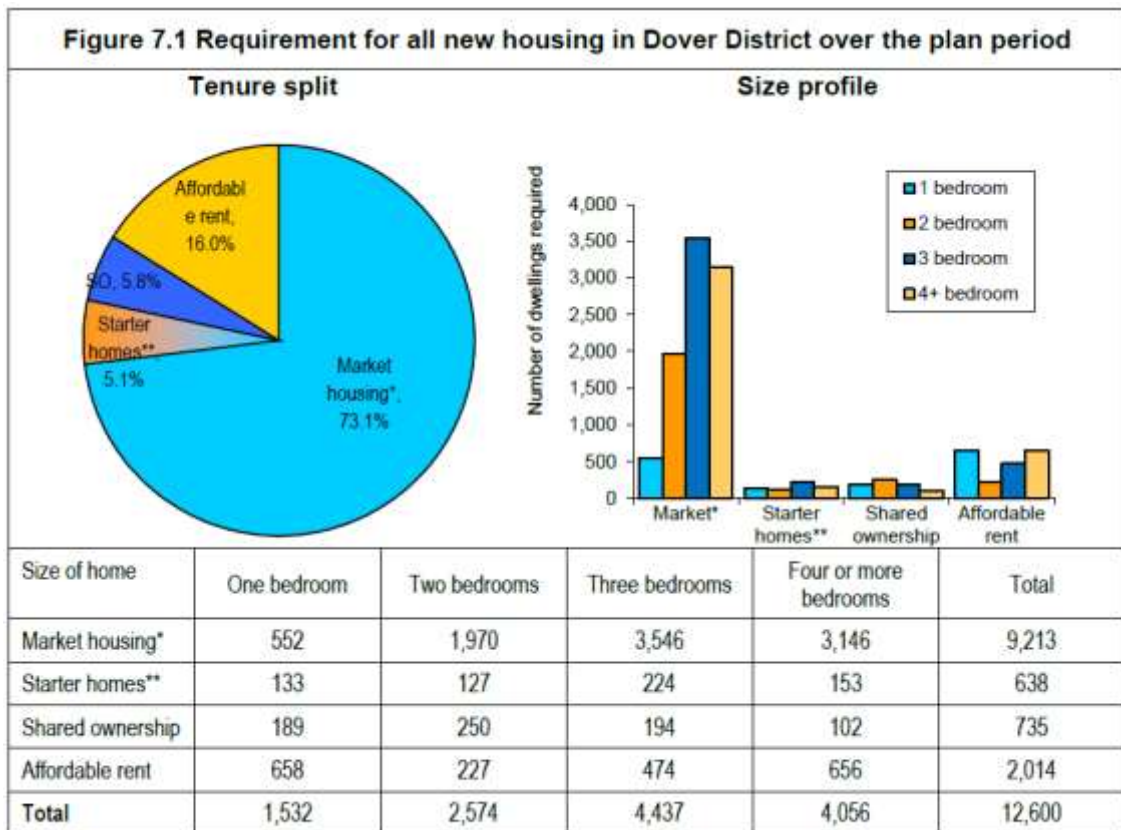
### Strategic Housing Market Assessment (SHMA)

- 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.
- 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 **611 dwellings per annum (dpa)**, which equates to providing a minimum of **10,998 dwellings** over the remaining 18 years of the Plan period to 2040. 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<sup>8</sup>. 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.

<sup>8</sup> <https://www.doverdistrictlocalplan.co.uk/about/evidence-base>

## **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 60).
- 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 2019<sup>9</sup>.
- 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 2020<sup>10</sup> following a series of engagement meetings with ward councilors and town and parish councils in February and March 2020.
- 3.15 The draft HELAA was subsequently updated and published alongside the Regulation 18 consultation on the draft Local Plan. The update took 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,
  - Sites which now have planning permission.

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<sup>9</sup> <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

<sup>10</sup> <https://www.doverdistrictlocalplan.co.uk/about/evidence-base>

- 3.16 A Targeted Call for sites exercise was carried out in 2021 alongside the Regulation 18 consultation on the draft Local Plan. The exercise sought to increase options on specific types of site that would then inform further drafting of the Local Plan. The specific types of sites were for: housing on sites of 1 ha or under, Self Build and Custom Housing, Employment and Local Green Spaces.
- 3.17 A further update to the HELAA was published as part of the Regulation 19 consultation on the submission version of the Local Plan. This update took account of:
- Sites submitted through the Targeted Call for sites exercise 2021;
  - New site submissions through the Regulation 18 consultation;
  - Evidence requested by officers and submitted through the Regulation 18 consultation;
  - Updates to availability and viability evidence; and,
  - Sites which now have planning permission.

### **Settlement hierarchy**

- 3.18 The Dover District Settlement Review and Hierarchy (2008)<sup>11</sup> informed the Core Strategy 2010 on the spatial objectives for the District's settlements. The key aim of the study was to identify those settlements that were in the most sustainable locations, based on the range of facilities and services present, and which would benefit socially or economically from further development. In broad terms the review:
- defined a sustainable settlement hierarchy;
  - identified the current role of the settlements; and,
  - identified settlements within the hierarchy that would be suitable for future development.
- 3.19 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.
- 3.20 In July 2020 and again in 2022 the Districts settlement hierarchy was reviewed<sup>12</sup>. 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.
- 3.21 The study drew on the inventory of village facilities produced annually for the Dover District Annual Monitoring Report<sup>13</sup>, 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

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<sup>11</sup> <https://www.doverdistrictlocalplan.co.uk/about/evidence-base>

<sup>12</sup> <https://www.doverdistrictlocalplan.co.uk/about/evidence-base>

<sup>13</sup> This survey work is undertaken by Council officers and then forwarded to parish councils for verification.

the sustainability of a settlement. The services reviewed included shops, primary schools, health services and access to public transport.

- 3.22 The study acknowledges that the settlement of Aylesham has successfully developed as a rural service centre; that the settlements of Ash, Eastry, Wingham, Shepherdsweil 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 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**

- 3.23 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 2018<sup>14</sup>.
- 3.24 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.
- 3.25 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 2040<sup>1516</sup>. 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.

### **Affordable housing**

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<sup>14</sup> <https://www.doverdistrictlocalplan.co.uk/about/evidence-base>

<sup>15</sup> <https://www.doverdistrictlocalplan.co.uk/about/evidence-base>

<sup>16</sup> <https://www.doverdistrictlocalplan.co.uk/about/evidence-base>

- 3.26 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 ownership products (including Starter Homes) fall within the definition of Affordable Homes set out in Annex 2 the Glossary of the NPPF 2021.
- 3.27 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**

- 3.28 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 updated the register to gain a more accurate identification of those with: a current local need for Self build and Custom house building within the District and who were also financially capable of carrying out a build.
- 3.29 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.
- 3.30 In accordance with legislation, the update to 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 carry out a build. All existing individuals and associations were contacted (with follow on reminders) that the register was being updated, and those who met the tests would have their interest continued. Those whom did not pass the tests or did not respond to the engagement attempts had their interest on the register removed.
- 3.31 On 1 October 2022, the Self build and Custom house building need for the District was 5 plots on part 1 and 2 plots on part 2 of the Register. To note 4 plots were also considered for part 1 of the Register, however no fee was paid by the applicants and this resulted in those plots being removed from the Register. At present, the Districts' Self build and Custom house building 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

- 3.32 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 brownfield sites granted permission in principle.
- 3.33 Greenfield land is considered not appropriate for inclusion on a brownfield land register. For a plot of land to be placed onto a 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.
- 3.34 At the time of writing the Council last updated its brownfield land register<sup>17</sup> in 2021. Sites were identified from planning consents and un-implemented development plan allocations. Part 1 of the Councils register has 75 sites on it, totalling a developable area of 174.4 hectares, with the potential to deliver a net gain of 3,765 dwellings. At present, there are no sites on Part 2 of the Councils register.

## Usage of Existing Policies

- 3.35 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
- 3.36 The Council's Authority Monitoring Report (AMR)<sup>18</sup> 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

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<sup>17</sup> <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Regeneration-and-Development-Opportunities/Brownfield-Register.aspx>

<sup>18</sup> <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Authority-Monitoring-Report/Plan-Monitoring.aspx>

used to refuse a proposal, knowing that it may be challenged at appeal, it indicates that it remains useful.

- 3.37 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
<b>DM1</b>	Settlement boundaries	23.4%
<b>CP1</b>	Settlement Hierarchy	9.1%
<b>DM9</b>	Accommodation for dependent relatives	2.6%
<b>DM4</b>	Re-use or conversion of redundant rural buildings	1.3%
<b>DM5</b>	Provision of Affordable Housing	1.3%

**Table 1: Use of Local Plan Housing Policies in refusal decisions by DDC 2019/20**

- 3.38 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
<b>8</b>	Achieving sustainable development	6.6%
<b>11</b>	Achieving sustainable development	5.7%
<b>78</b>	Delivering a sufficient supply of homes	4.1%

**Table 2: Use of NPPF Housing paragraphs in refusal decisions by DDC 2019/20**

- 3.39 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
<b>DM15</b>	Protection of the Countryside	15.5%
<b>DM1</b>	Settlement Boundaries	14.8%
<b>CP1</b>	Settlement Hierarchy	7.4%
<b>NPPF 78</b>	Delivering a sufficient supply of homes	3.7%

**Table 3: Use of NPPF paragraphs and Local Plan policies in appeal decisions in Dover District 2019/20**

## 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 12<sup>th</sup> 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 Report<sup>19</sup> provides the context for, and determines the scope of, the Sustainability Appraisal review of the Local Plan and sets out the framework for undertaking 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

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<sup>19</sup> <https://www.doverdistrictlocalplan.co.uk/about/evidence-base>

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.

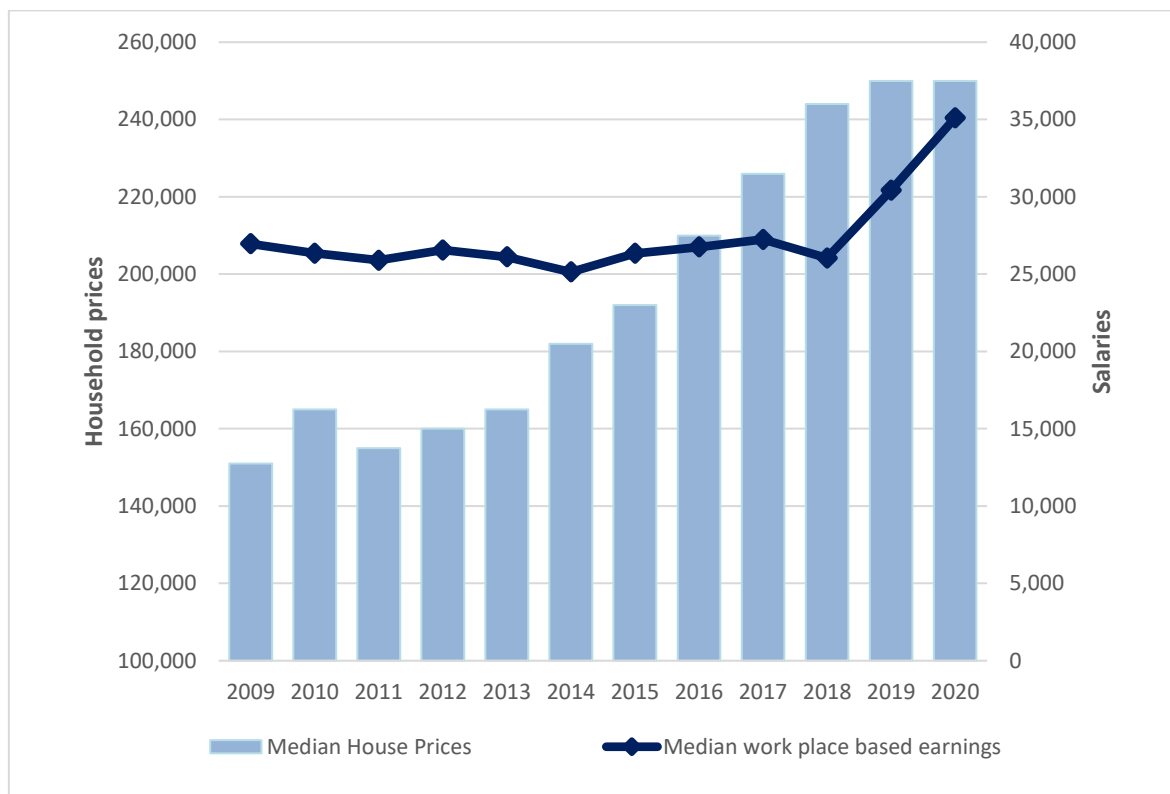
## **Appraisal of Housing Sites**

- 5.11 As part of the Sustainability Appraisal (SA) of the draft Local Plan, site specific SA 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 SA. 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 SA 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 SA 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 Local Plan.

## 6. Issues effecting Dover District's housing market

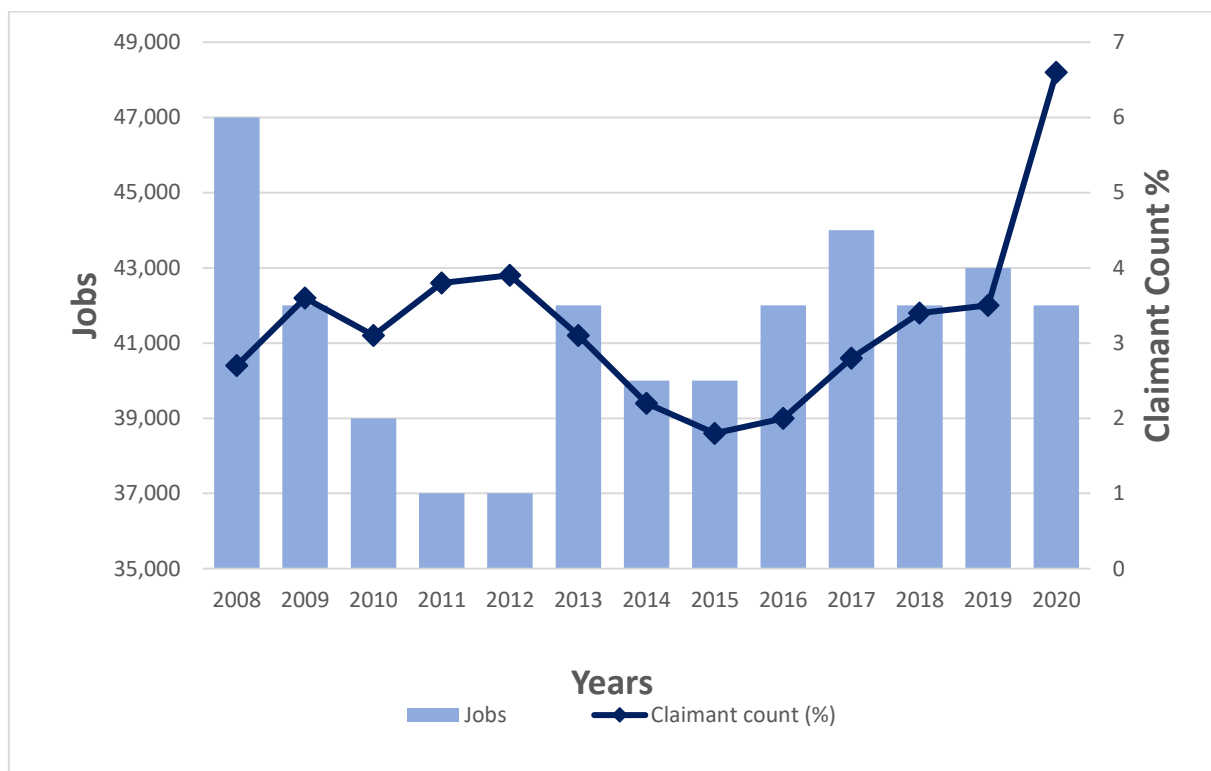
- 6.1.1 In 2022, the median cost of a home in Dover District was 9.22 times the median workplace earnings, an increase of three times average earning since 2010. In the 12-year period the median house price increased sharply by £105,000 to £280,000 with the highest rate of growth occurring between 2015 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 benefits claimants decreased, however in 2020 the number of claimants rose steeply to a 12 year high, a likely result of the COVID19 pandemic (figure 3). The trend of jobs within the District still being lower than levels in 2008, whilst experiencing lower benefits claimants 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 DLUHC 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 development<sup>20</sup>. 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.
- 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.



<sup>20</sup> <https://www.gov.uk/government/publications/land-value-estimates-for-policy-appraisal-2019/land-value-estimates-for-policy-appraisal-2019-guidelines-for-use>

**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

- 6.6 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 other settlement areas and the rural hinterland of the District. However, through the monitoring of completions a very different picture of actual delivery has occurred over the 11 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).
- 6.7 Through analysis of completions, 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 44% has accounted for nearly half of all completed dwellings within the district (figure 5). Analysis of windfall development has found that 71% of all homes provided were new builds and that the remaining 29% came from building conversions, with residential-to-residential intensification and office and retail conversion the most common forms (figure 6).
- 6.8 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 dwellings 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)

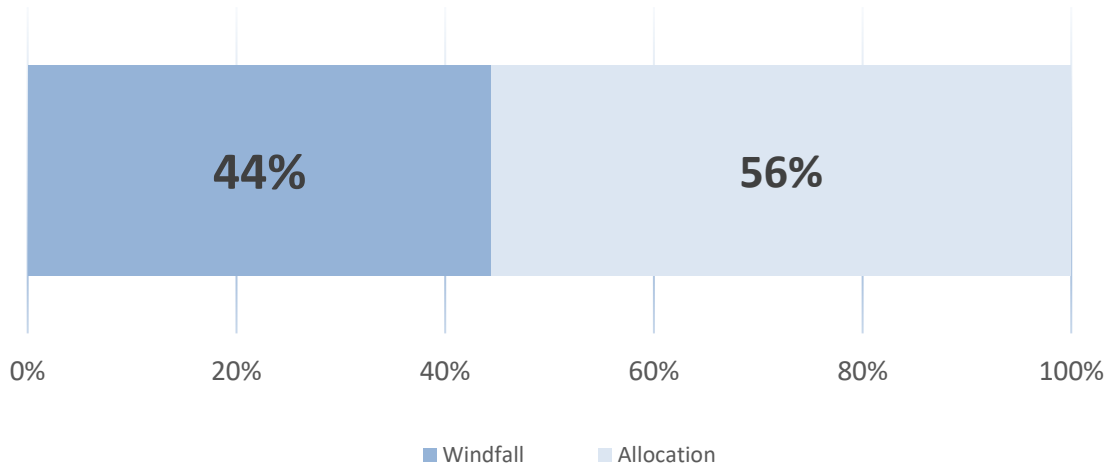


Figure 5. Windfall/allocated percentage of completions 2010/11 to 2019/20

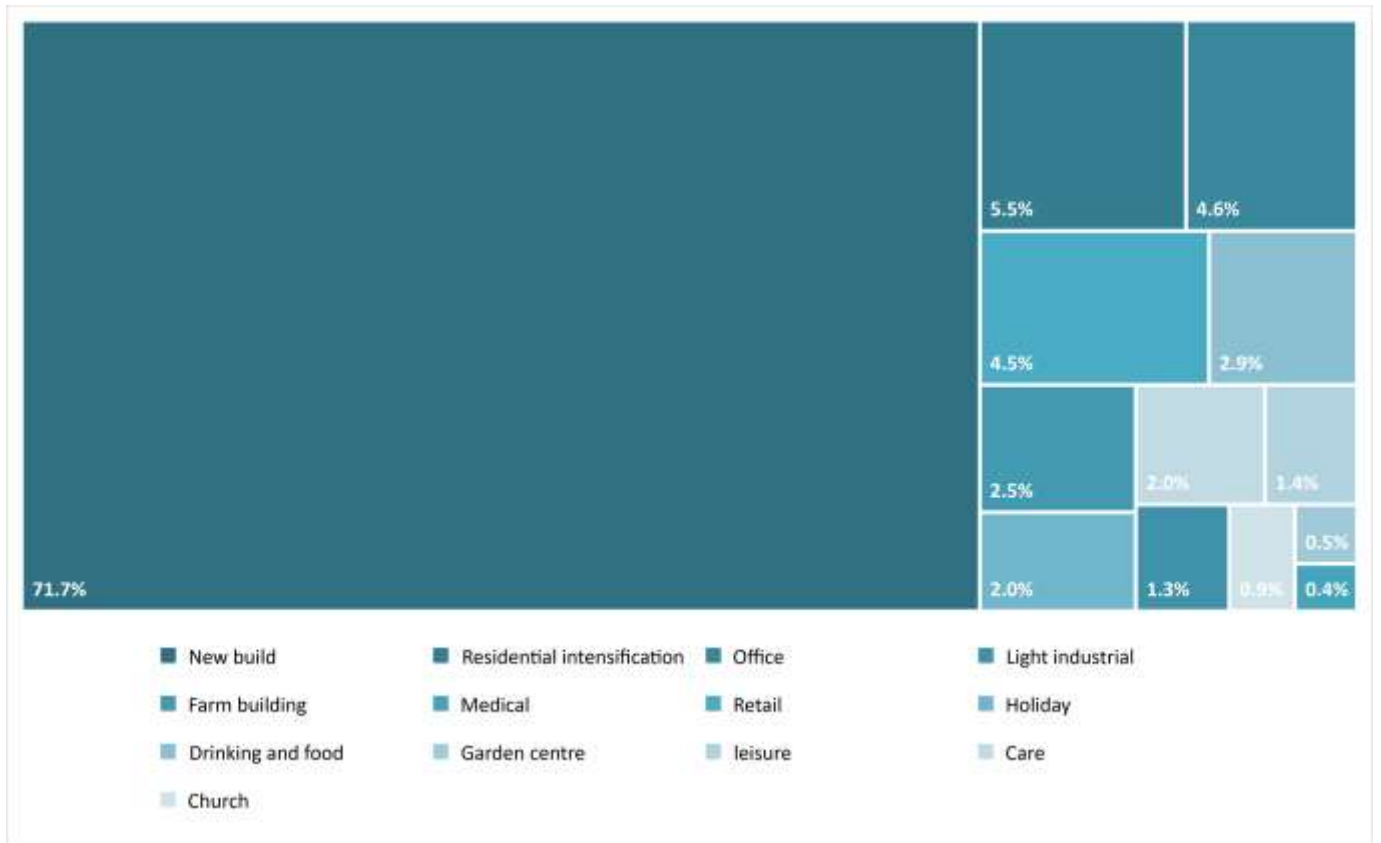
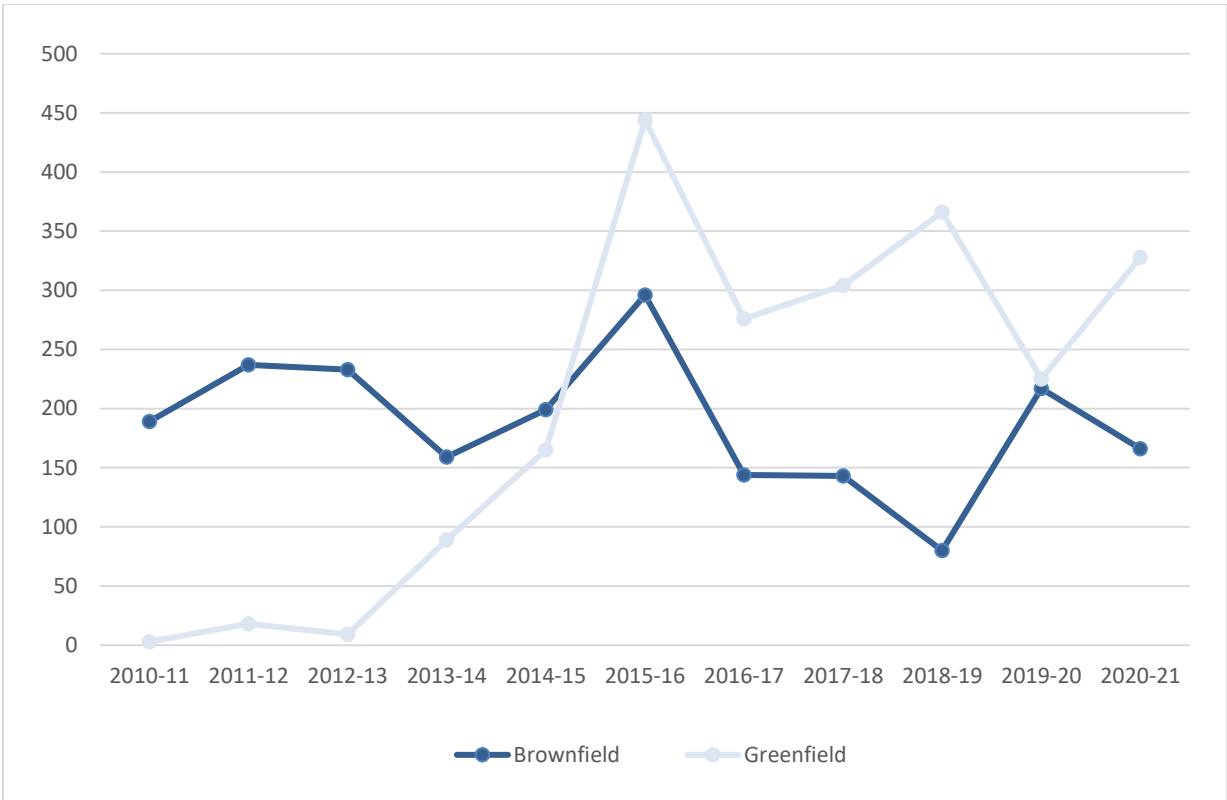
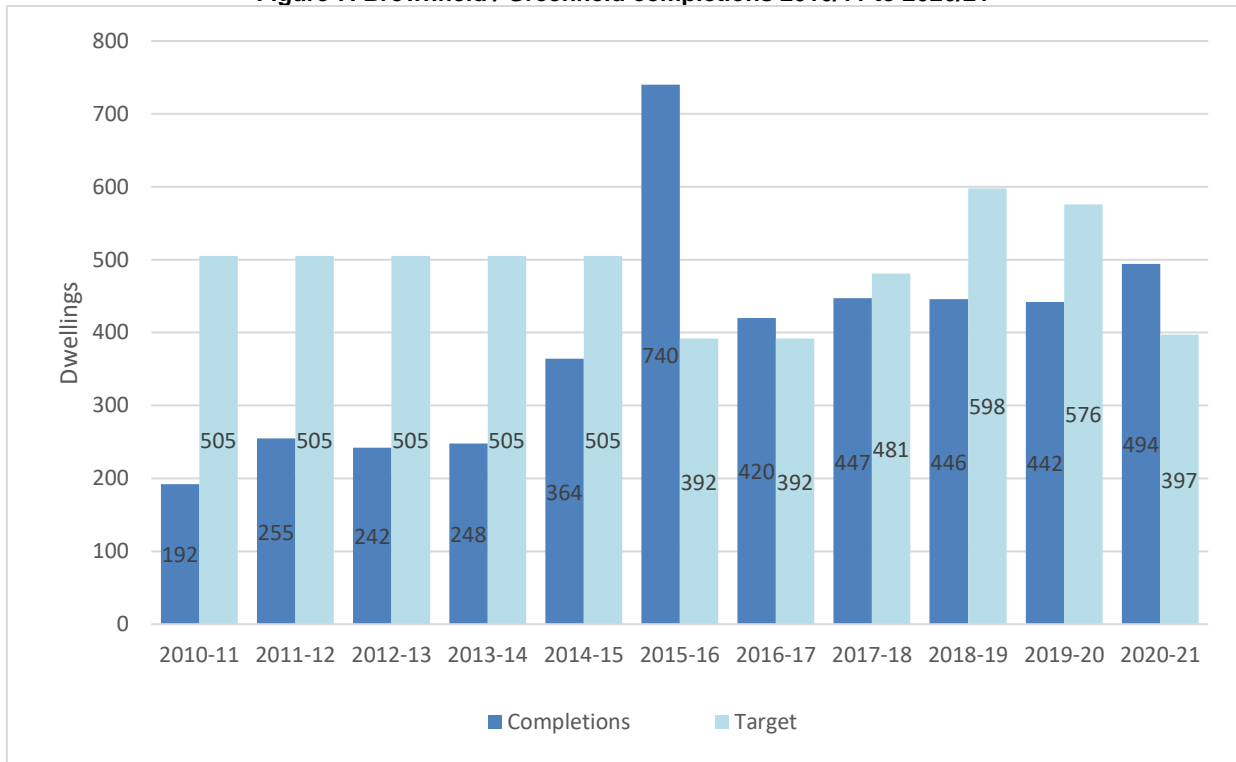


Figure 6. Sources of windfall dwellings



**Figure 7. Brownfield / Greenfield completions 2010/11 to 2020/21**



**Figure 8. Completed dwellings measured against housing targets**



## Space Standards of New Dwellings

- 7.5 Paragraph 62 of the National Planning Policy Framework (NPPF 2021) states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. To help ensure the size of dwellings to meet identified need, NPPF 2021 footnote 49 states *“Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.”*
- 7.6 The National Planning Practice Guidance goes further and advises that planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations including the use of the National Space Standards (NSS), by gathering evidence to justify why such an approach is required and then by setting policies in their Local Plans which refer to the NSS.
- 7.7 The NSS for housing was published by the Department for Communities and Local Government (DCLG) in March 2015 and deals with internal space within new dwellings regardless of tenure. The standard measures internal space using Gross Internal Area (GIA) which is defined as the total floor space measured between the internal faces of perimeter walls that enclose the dwelling. The standard provides that GIA should be measured and denoted in square metres (m<sup>2</sup>) and built-in storage areas are included within the overall GIAs.
- 7.8 The Councils existing Development Plan has never set policy on space standards. However, the Core Strategy (2010) diagnosed that much of Dover’s housing stock offered insufficient choice in larger dwelling sizes and tenure and therefore identified a need for three bedroom and larger houses. At that time, the Lifetime Homes Standard was a series of sixteen criteria which intended to make new homes more easily adaptable for lifetime use at minimal cost. However, following a review of housing standards (2015) the Government replaced Lifetime Homes standards with the optional Building Regulations requirement M4(2) ‘accessible and adaptable dwellings’.
- 7.9 Building Regulations M4(2) aims to make reasonable provision for people to gain access to, and make use of the dwelling and its facilities, including those with differing needs such as age or disability, and enabling adaptation of the building to meet the changing needs of occupants over time. Requirements are provided for door and hall widths and the dimensions of habitable rooms, from the perspective of enabling appropriate access to the dwelling and its facilities.
- 7.10 Historically in Dover District permitted dwellings space standards have in the main, been greater than the requirements of the NDSS (table 4). This can largely be attributed to discussions between the Councils Development Management team and planning applicants and the objectives of the Core Strategy to provide larger dwelling sizes.

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

Table 4: NSS comparison with permitted dwellings 2017/18 to 2021/22

- 7.11 The Strategic Housing Market Assessment (SHMA) 2017 indicates that the population aged 65 or over is going to increase dramatically in Dover District over the plan period; from 28,409 in 2020 to 43,616 in 2040, a rise of 53.5%. The projections also suggest that there will be an increase in the number of households headed by someone over 65 from 18,567 in 2020 to 29,179 in 2040, an increase of 57.1%. As a result of these emerging trends, the SHMA partial update December 2019, estimates that by 2040 there will need to be between 9,813 and 10,878 dwellings built to the lifetime homes standard in the District within the general housing stock. This means all new dwellings built during the Local Plan time period will need to be to the lifetime homes standard.
- 7.12 To help ensure this lifetime homes need is met and to replace and provide more certainty on the existing Core Strategy objective to provide larger dwellings, the Council has included two Policy requirements within the Local Plan. The first, Policy PM2c requires all new dwellings to meet the latest NDSS, and the second, PM2d requires new dwelling schemes to be compliant with Building Regulation M4(2).

### Houses in Multiple Occupation

- 7.13 Houses in multiple occupation (HMOs) are properties occupied by unrelated households that share one or more facilities such as a bathroom or kitchen. They can provide useful accommodation to persons whom may not be able to, or afford, to rent or own a single occupancy dwelling. They can offer opportunities for mobile persons to live close to places of employment, public transport and leisure use. However, in many cases the property and the area they are situated in was not originally designed for such intensive residential use.
- 7.14 HMOs are classified into two types, small dwellings (4 or less tenants forming more than 1 household) and large dwellings (5 tenants or more, forming more than 1 household). The change from single residential to small HMOs is allowed under permitted development unless the property is within a conservation area subject to an Article 4 direction thereby

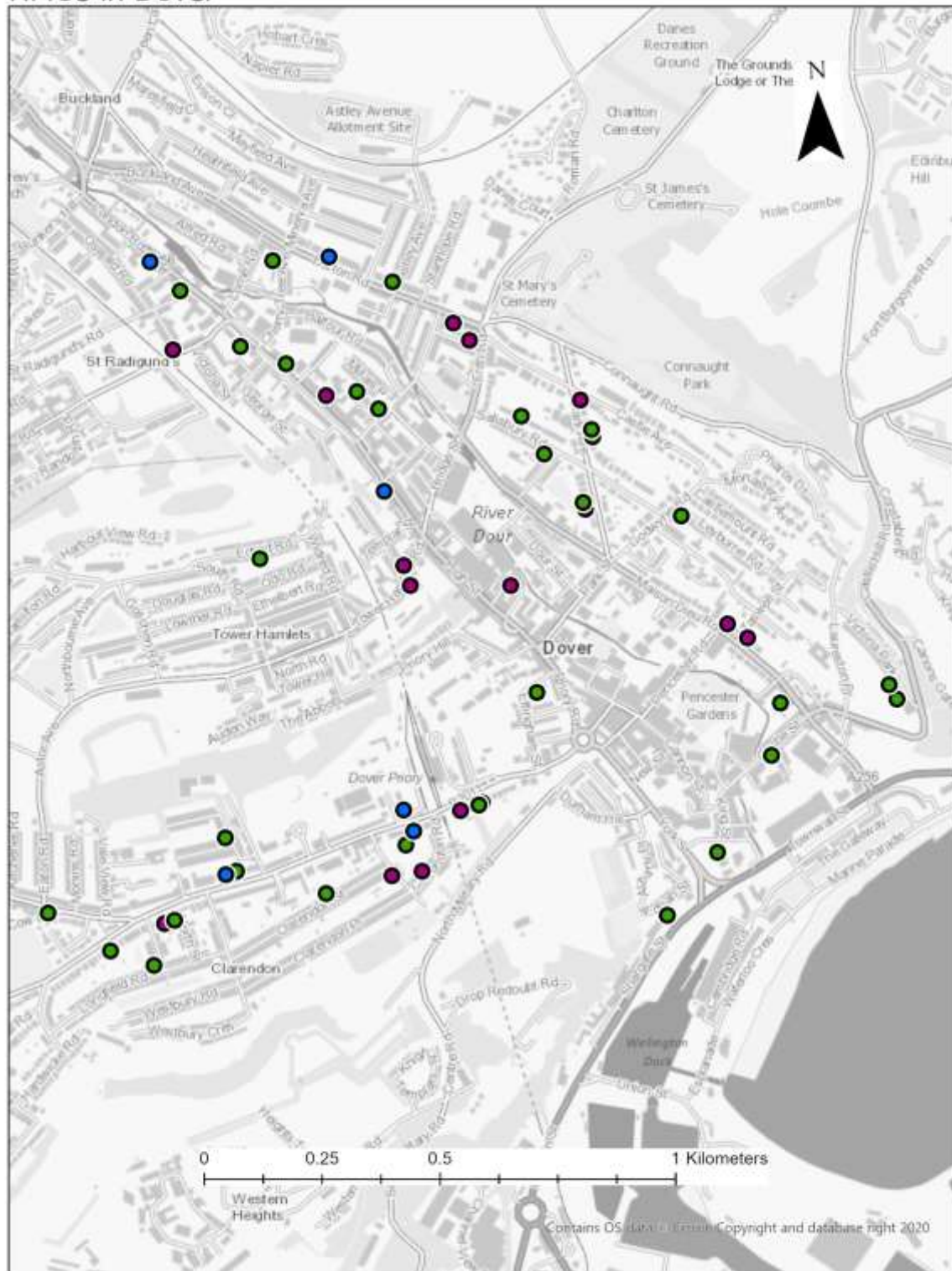
removing permitted development rights. Large HMOs and those with permitted development rights removed required planning consent.

- 7.15 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.
- 7.16 Research has been undertaken to identify the quantity and location of HMOs within the District and the density of any clusters. HMOs were identified through three sources: Planning applications for large HMOs and those with permitted development rights having been removed; building control records; and, licensed HMOs reported by the Councils Housing Team. Table 5 lists the number of HMOs identified from the three sources, double counting from sites identified from more than one source have had the second source of identification removed. Map 1 and 2 shows the location of HMOs in Dover and Deal urban areas and illustrate that in Dover there are two light groupings of HMOs to the west and north of the Town, whilst in Deal they are spread out.
- 7.18 The research into HMOs has identified that the majority of those are located within the Dover urban area, with a few in Deal. There are two groupings of HMOs in Dover Town and at present they are of a low density. However, the research won't have been able to identify the majority of small HMOs and their location due to their being allowed under permitted development rights. To ensure that the impact of both large and small HMOs are considered in planning terms, Local Plan Policy H7 – Houses in Multiple Occupancy sets out to ensure that any planning application addresses the location of existing HMOs and their cumulative impact on local area.

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

**Table 5: Identified HMOs**

# HMOs in Dover



## Legend

- Building control records
- HMO licences
- Planning Applications

Map 1: Location of HMOs in Dover urban area

# HMOs in Deal



## Legend

- Building control records
- HMO licences
- Planning Applications

Map 2: Location of HMOs in Deal urban area

## 8. Local Plan Housing Need target

8.1 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.

8.2 At the time of drafting the Local Plan, The Department for Levelling Up, Housing and Communities (DLUHC) has 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 9.25 released 23rd 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 2032 is 57,838 households, which when taken against the projection for 2022 of 53,238 households, equates to 4,600 households over the 10 year period, creating the average need of **460 per annum**.
- Step 2 – Use ONS Local Affordability Ratios data (Dover's median affordability ratio) Then adjust the average annual projected household growth figure (as calculated in step 1) based on the affordability of the area. The most recent median workplace based affordability ratios published by the Office for National Statistics at a local authority level, should be used. For Dover the relevant data is on Table 5c row 263 which shows the latest published figure (2022) is **9.25**
- Step 3 – Apply the adjustment formula to get the adjustment factor

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

For Dover the calculation is:

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

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

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

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

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

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

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

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

### **Current 5 year housing land supply**

- 8.3 The NPPF 2021 requires local planning authorities to demonstrate a 5 year supply of deliverable housing sites, which must be updated annually. The Councils Housing Technical Paper 2022<sup>21</sup> sets out that at 1st April 2022, the Council has 6.03 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 Regulation 19 Local Plan. Whilst the Council can demonstrate a 5 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.

### **Buffer for supply resilience**

- 8.4 In order to meet the level of identified housing need, it is important to maintain a healthy supply of housing sites, firstly to provide resilience to the housing supply during the examination of the Local Plan where there may be potential removal of sites or adjustment of their capacities by the Planning Inspector. And, secondly, after adoption of the Local Plan to provide flexibility and choice, and to account for changing circumstances and under-delivery on sites where final mitigation measures are determined at the planning application stage. Therefore, through the current housing supply proposed in the Local Plan there is a buffer of 9.4% against the Councils Local Housing Need.
- 8.5 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.

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<sup>21</sup> <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Authority-Monitoring-Report/Plan-Monitoring.aspx>

- 8.6 The Council has robustly assessed all the housing sites proposed within the Local Plan. However, 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 and supply**

- 8.7 The Local Housing Need figure for Dover District in 2022 is 611 dwellings per annum, which equates to 10,998 dwellings over the remaining 18 years of the Local Plan period (2022-2040). The buffer of 8.4% to allow for supply resilience, produces a Local Plan Housing supply of 11,924.

## **9. Local Plan Housing Land Supply**

- 9.1 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 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.
- 9.2 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**

- 9.3 Taking into account all three elements of housing supply: extant sites, Local Plan 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 the Local Plan process demonstrate that there is sufficient supply proposed to meet the housing objectives of the Local Plan. Table 6 below sets out the housing land supply position for the Regulation 19 Local Plan.



	<b>Reg 19 September 22</b>
<b>Local Plan housing need (18 X LHN 2022 – 611)</b>	<b>10,998</b>
Extant supply (Exc Whitfield with 5% non- implementation discount)	3,829 (4031 – 5%) (As at 31 <sup>st</sup> March 2022)
Whitfield (extant)	1,120
Resolution to grant subject to S106	137
Ash NP allocated sites	196
<b>Committed Supply Total</b>	<b>5,282</b>
Whitfield UE	2,200
Local Plan Allocations (Excluding SAP1)	3,392
Windfall (70 a year from year 4)	1,050
<b>Local Plan Supply Total</b>	<b>6,642</b>
<b>Total Housing Supply</b>	<b>11,924</b>
Contingency buffer	926

**Table 6. Local Plan housing land supply**

## Extant Supply

9.5 The extant permissions that contribute to the housing land supply have been identified through the Council's annual housing information audit 2022. How the permissions are identified and assessed in terms of their deliverability are detailed within the Housing Land Supply Paper 2022<sup>22</sup>. The paper principally sets out how the Council's annual 5 year housing land supply position is determined, through engagement with promoters of sites and how the sites are phased and delivery rates set. The approach includes:

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

<sup>22</sup> <https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/Authority-Monitoring-Report/Plan-Monitoring.aspx>

## Non-implementation Discount

9.6 Historically, the District has experienced a very low rate of expired planning consents for new dwellings at 2% of the extant stock (table 7). It is considered appropriate to take a cautious approach towards non-implementation of proposed dwellings to ensure sufficient supply of housing land. As a result, a 5% non-implementation discount which is more than double the historical average 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
<b>Average</b>	<b>88</b>	<b>4823</b>	<b>1.93%</b>
21-22	16	5,186	0.31%
20-21	*0	4,979	0.00%
19-20	14	4,784	0.29%
18-19	234	4,498	5.20%
* no expired permissions			

Table 7. Expired Planning permissions

## Whitfield Urban Expansion

9.7 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.

9.8 To date planning permission has been granted for 1,483 dwellings, a health centre, primary school and new pumping station. As at April 2021 363 homes have been completed on the site and a primary school has been constructed and opened.

9.9 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.

9.10 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 800<sup>th</sup> dwelling. Further mitigation is required to accommodate the remainder of the development. The Council, working with KCC Highways and Transportation, and Highways England has developed an alternative mitigation scheme for Whitfield roundabout that can mitigate the growth in the Local Plan, not just that at Whitfield. It is assumed this can be delivered within the first 5 years of the plan period.

9.11 The delivery assumptions for the Whitfield Urban Expansion are set out in Table 8 below, total 3,483 additional dwellings between 2022 and 2040. This is not meant as a ceiling to delivery within the Plan period but has been provided as an estimate in order to ensure that sufficient provision is provided through other sites in the Plan to meet the District's housing need. It is considered to be a relatively conservative estimate of the potential delivery rates at the site. 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 to the west of the existing allocation which will provide primarily open space and mitigation land and allows for increased housing provision on the remainder of the site for a further 600 homes
- A revised phasing and delivery programme will need to be agreed through an update to the 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.
- Of the 1,120 homes extant on the Phase 1 outline permission, 465 units have reserved matters consent and further RM applications are under consideration. All the 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	2022-2025	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		700	750	750	<b>2200</b>

Table 8. Whitfield Urban Expansion delivery assumptions



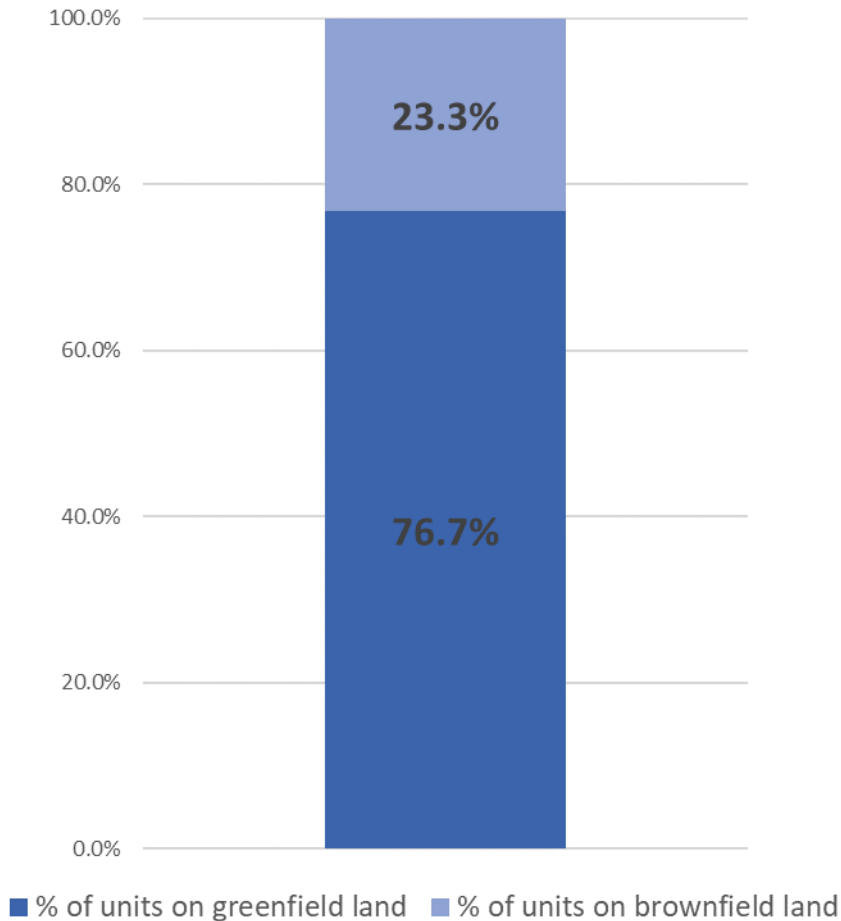
**Map 2. Whitfield Urban Expansion land ownership parcels**

### **Site selection**

- 9.12 The HELAA 2022 draws together the findings of the targeted call for sites that was undertaken in 2021 and the review of the December 2020 HELAA sites that was undertaken post Regulation 18.
- 9.13 The HELAA is a technical piece of evidence to support the Local Plan making process and is a requirement of the NPPF (2021). 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.
- 9.14 In determining the sites to be taken forward as housing allocations in the 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 and Flood Risk assessments;
  - The revised settlement hierarchy;
  - The revised settlement confines;
  - The Whole Plan Viability Study;
  - The Air Quality Study; and,
  - The Local Plan Transport Modelling Work.
- 9.15 The Local Plan allocates sites to deliver 5,592 new homes over the Plan period, of which 3,140 homes are proposed on strategic sites and 2,452 are proposed on non-strategic housing sites.

## Distribution of housing proposed in Plan

9.16 From the allocations, 23.3% them are on brownfield sites with over three quarters on greenfield and a 1 site being a mix of both (figure 10). The itemisation of the sites by Greenfield/Brownfield is set out within Appendix 2.



**Figure 9. Allocated sites brownfield/greenfield mix**

9.17 The reasoning behind the selection of the proposed housing site allocations for the Local Plan is set out in the Site Allocations Topic Paper.

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

9.18 The NPPF 2021 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.

9.19 To this effect, the NPPF 2021 paragraph 69a 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 2022 of 611 dwellings per annum over the remaining 18 years of the Plan would equate to a requirement of 1,100 dwellings (611 x 18 (years) x 0.1 (10%)) on sites of 1ha or less. Table 9 demonstrates that there is 11.4% of dwellings on sites of 1ha or less measured against the Local Plan housing need. The sites contributing to the requirement are presented within Appendix 3.

	<b>Dwellings (Sites 1ha or less)</b>	<b>Percentage split</b>
3 (2021)	733	58.7%
Local Plan Allocations	516	41.3%
<b>Total</b>	<b>1,249</b>	

Table 9. 10% housing requirement on land of 1ha or less, April 2022

### Distribution of housing across the District

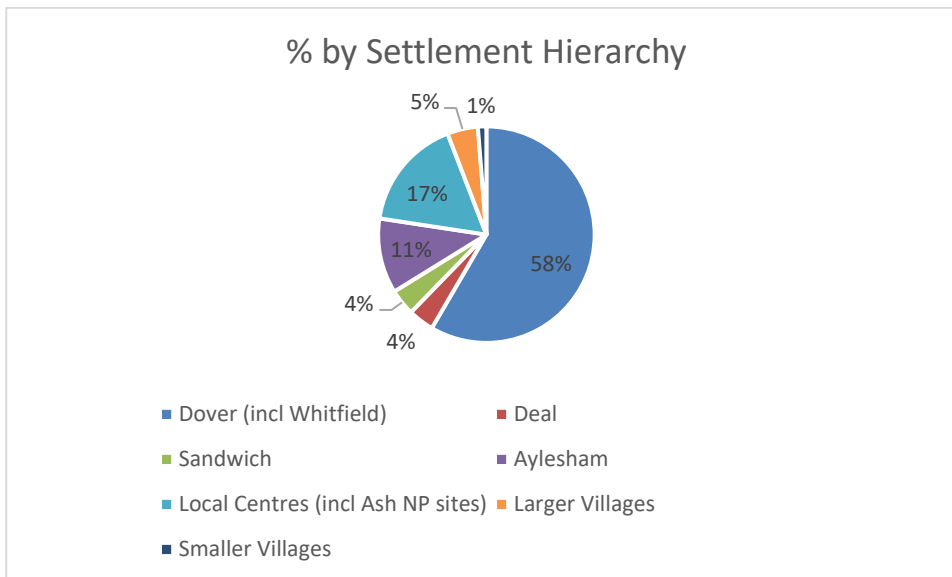
9.19 The following Table 10 shows the distribution of housing proposed across the District, this includes the Local Plan Allocations and the Ash Neighbourhood Plan

<b>By Settlement</b>	<b>No of dwellings</b>	<b>% of total</b>
<b>Secondary Regional Centre</b>		
Dover (incl Guston, Temple Ewell)	1181	20.40%
Whitfield	2200	38.01%
<b>District Centre</b>		
Deal (incl Walmer, Sholden, Gt Mongeham)	223	3.85%
<b>Rural Service Centre</b>		
Sandwich	227	3.92%
Aylesham	649	11.21%
<b>Local Centres</b>		
Ash (NDP)	196	3.39%
Eastry	95	1.64%
Wingham	103	1.78%
Shepherdswell	70	1.21%
Eythorne and Elvington	355	6.13%
St Margarets	96	1.66%
Kingsdown	55	0.95%
<b>Larger Villages</b>		
Capel le Ferne	95	1.64%
Lydden	30	0.52%
Preston	65	1.12%

Worth	25	0.43%
Alkham	10	0.17%
East Langdon	40	0.69%
<b>Smaller Villages</b>		
Ringwould	10	0.17%
Chillenden	5	0.09%
Nonington	35	0.60%
Woodnesborough	15	0.26%
Staple	3	0.05%
Coldred	5	0.09%
	5788	100.00%

**Table 10. Housing Distribution by settlement**

9.20 The pie chart shows the distribution of housing by the settlement hierarchy.



### Phasing and delivery rates methodology

9.21 To determine whether there are enough sites that can deliver completions within the 18 years remaining of the Plan period to meet the Plans Housing Need Target, it is necessary to assess the phasing and delivery rates of sites within the Plans housing land supply. The delivery of the sites can then be illustrated through the use of a trajectory for the Local Plan. In terms of the extant supply element of the housing supply, these sites' phasing and their delivery rates have been set out in the Housing Technical Paper 2022 as part of the Councils annual 5 year supply position.

9.22 The Local Plan allocated sites have had their phasing and delivery assessed inline with requirements as set out within the NPPF 2021 in that sites have only been considered deliverable within the first 5 years of the Plan where evidence has been made available.

9.23 To inform the phasing and delivery of the allocated sites, a survey of the sites promoters was carried out in October 2021. The survey asked for the phasing and delivery expectation for sites and supporting evidence, responses were then reviewed and

checked against local historical data on lead-in times to development commencement and average delivery rates of completions.

9.24 By assessing allocated major sites without detailed planning consent at the higher levels of delivery evidence as required by the NPPF 2021, it has then be possible to demonstrate a housing delivery trajectory. The trajectory shows on adoption of the Local Plan, and in subsequent years the Plan has a 5 year supply of housing and that there are enough sites over the remaining 18 years of the Plan period to meet the housing need.

9.23 Figure 10 below illustrates the methodology applied to phasing site allocations for the Local Plan. Phasing is based on: progress towards a site gaining planning consent, feedback from site promoter availability surveys and planning officer knowledge on lead in times and site specific issues. The phasing approach includes:

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



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

Figure 10. Regulation 19 allocation phasing assumptions

9.24 For the purpose of indicating the number of dwellings that can be delivered for each year of the Local Plan, the proposed site allocations have been assessed using the average delivery rates by site size over the 12 year period 2010 to 2022. The average historic delivery rates by site size has been set out in table 11 below and the rates are as follows:

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

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

Table 11. Historical delivery rates by site size

## Windfall allowance

- 9.25 With regards to the final element of the Local Plans housing land supply, a windfall allowance has been determined using an approach based on the average monitored windfall completions over the years 2010 to 2022. By taking the average completions rate over 12 years, a period that covers a number of economic issues including the last recession in 2009, the impacts from Brexit and COVID19, the approach is considered to be robust. Due to the wide variety of large sites identified through the Local Plan process, it is considered appropriate to only apply a small sites (1-4 dwellings) 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 Assessment<sup>23</sup>.
- 9.26 The windfall allowance for the Local Plan has been determined by using the approach set out in the Councils 5 year housing land supply position, as set out within the Councils Housing Technical Paper 2022. The 12 year average completions on small windfall sites is 73 dwellings per annum. To allow for a minor fluctuation in the average windfall over time an annual allowance of 70 dwellings per annum has been applied to the Local Plan supply. Taking the small sites windfall allowance to the remaining 18 years of the Local Plan will mean result in windfall delivery from 2025 to 2040, a period of 15 years. The first 3 years of the remaining 18, doesn't have an allowance as extant permissions for small sites will be built out during this time. This approach has determined that 1,050 dwellings (70 dwellings x 15 years) will be expected from small sites windfall during the Local Plan time period. Further details on the windfall dwellings between 2010 and 2022 can be found in table 12 below.

<sup>23</sup> <https://www.doverdistrictlocalplan.co.uk/about/evidence-base>

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

Table 12. Historic Windfall Completions

### Local Plan Five Year Housing Land Supply

9.27 For the purposes of confirming a 5 year housing land supply position through the Local Plan a 10% buffer to the five year housing requirement has been applied in accordance with paragraph 74b of the NPPF 2021. Table 13 sets out the Council's 5 year housing land supply based upon the strategy and sites proposed in the Plan and the application of the phasing and delivery approach. At 1<sup>st</sup> April 2022 the Council can demonstrate through the Local Plan 6.16 years supply with the required 10% buffer.

<b>Housing Requirement LHN 2021 611 X 5 years</b>	<b>3,055</b>
10% buffer	306
<b>Total Requirement</b>	<b>3,361</b>
Housing Land Supply	
Extant sites (excluding Whitfield extant)	3,003
Sites that are subject to S106	61
Whitfield UE extant	571
Whitfield UE remaining allocation	100
Local Plan allocations	263
Windfall Allowance	140

Ash NDP 2021 allocated sites	5
<b>Total Supply</b>	<b>4,143</b>
Housing supply surplus	782
<b>Five Year Housing Supply Total Housing Supply (4,143) / Requirement (3,064) X 5</b>	<b>6.16 years</b>

Table 13. Local Plan 5 year Housing Land Supply

9.28 Further, through the use of the Local Plan housing supply trajectory and taking the approach to the 5 year supply calculation, it's possible to demonstrate that the Local Plan has a 5 year supply in subsequent years and that the position improves significantly (table 14).

	<b>Year 1 2022/23</b>	<b>Year 2 2023/24</b>	<b>Year 3 2024/25</b>	<b>Year 4 2025/26</b>	<b>Year 5 2026/27</b>
Housing land Supply	4,143	4,558	4,666	4,422	4,306
LHN 611*5	3,055	3,055	3,055	3,055	3,055
LHN 10% EIP buffer	306	306	306	306	306
Total 5 year Housing need	3,361	3,361	3,361	3,361	3,361
Balance	783	1,198	1,306	1,062	946
<b>5 year supply (supply/requirement) *5</b>	<b>6.16</b>	<b>6.78</b>	<b>6.94</b>	<b>6.58</b>	<b>6.41</b>

Table 14. Local Plan Rolling 5 year Housing Land Supply

## 10. 10. Gypsy and Traveller Strategy and Supply

### Introduction

- 10.1 The Gypsy Traveller Accommodation Assessment (GTAA) 2018 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. An update was carried out to the GTAA (March 2020) to assess the need for pitches and to confirm potential sources of site supply during the Local Plan period 2020 to 2040. The update identified a cultural need for 26 pitches and a PPTS need for 16 pitches, totalling 42 pitches between 2020 and 2040; (2.1 pitches a year)
- 10.2 The PPTS need is defined within policy as “Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.” To be classified as Gypsy & Traveller under this need, persons must satisfy the criteria of: whether they previously led a nomadic habit of life; the reasons for ceasing their nomadic habit of life; and, whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstance.
- 10.3 The second pitch need is 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.

## **PPTS 2015 Policy B: Planning for traveller sites**

10.4 The Government approach to meeting Gypsy and Traveller need is set out within the document Planning Policy for Traveller Sites (PPTS 2015), which requires the following of local planning authorities:

- make their own assessment of need;
- work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites;
- encouraged to plan for sites over a reasonable timescale;
- promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites;
- plan-making and decision-taking should aim to reduce the number of unauthorised developments; and,
- ensure that Local Plans include fair, realistic and inclusive policies.

10.5 In terms of the aim to provide sites to meet the identified need, the PPTS 2015 provides further detail within criteria 10a and 10b of the document. These two criteria state:

10. Local planning authorities should, in producing their Local Plan:

- a) identify and update annually, a supply of specific deliverable<sup>24</sup> sites sufficient to provide 5 years' worth of sites against their locally set targets;
- b) identify a supply of specific, developable<sup>25</sup> sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.

10.6 Criteria 10a) places a requirement to identify a 5 year supply of sites, criteria b) allows more flexibility in that sites identified have to have a reasonable prospect of being available and viable.

10.7 The Reg 18 draft local plan proposed the following to meet the identified need:

- 10 pitches available through vacancies due to turnover on existing sites .
- 9 pitches provided through suitable intensification of existing sites (DM Policy 10).
- Land allocated for large site intensification at the site to the south of Alkham Valley Road / Land to the rear of The Meadows for up to 10 pitches (SA Policy 2).
- Land to be allocated as part of the strategic allocation to the south of Aylesham for 10 pitches (Strategic Policy 6).

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<sup>24</sup> To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within five years. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

<sup>25</sup> To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged

10.5 The sources of supply listed above identified 39 pitches towards meeting the need for the Local Plan, with a residual need for 3 pitches. This residual need was attempted to be addressed through the Council's Targeted Call for Sites exercise held alongside the Regulation 18 consultation from January to March 2021.

### Update on Regulation 18 identified sites

10.6 The sites identified as having vacant pitches and those proposed for intensification through Local Plan policy were surveyed by officers of DDCs Local Plans team in September 2021. The purpose of the survey was to identify if occupations had occurred on vacant pitches and to reconfirm capacity for additional pitches on sites for intensification.

10.7 Generally, the GTAA 2020 update considers a pitch to be suitable to contain a static, tourer, amenity block and some parking and be at a density of 18 pitches per hectare or a pitch being 0.06ha in size. It is important to note that there is no definition of what a pitch should contain or a what minimum pitch size should be in national policy, and it is appropriate existing design and density capacities are considered on sites proposed for intensification.

### Vacant pitches survey results

10.8 Table 13 below sets out the sites with vacant pitches identified within the GTAA 2020 update and the findings of the DDC officer survey September 2021. In summary, 5 of the vacant pitches are now occupied and 5 are still vacant.

Site Address	Vacant pitches	Survey September 2021
Plot 1B, Land at Hay Hill, Ham, Eastry, CT13 0ED	2	2 pitches vacant
Subdivision of either Plot 3 or 4; hardstanding and electric points provided; est. 4 pitches, Ham, Eastry, CT13 0ED	4	4 pitches occupied
Cobbs Yard, Longmete Road, Preston CT3 1DN	3	1 pitch occupied, 2 vacant
Hollyoak, Marshborough Road, Marshborough, Nr Ash CT13 0PF	1	1 pitch vacant

Table 13. Vacant pitches 2021 survey

### Sites for intensification survey results

10.9 The sites proposed for intensification in the draft Local Plan were surveyed in September 2021 to confirm capacity conclusions in the GTAA 2020 update. In summary, Table 14 below shows that the survey confirmed the capacity of additional pitches on sites as presented in the Regulation 18 draft Local Plan.

Site Address	Additional Pitches	Survey September 2021
Plot 1A, Land at Hay Hill (the Oaklands), Ham, Eastry, CT13 0ED	2	Confirmed capacity for 2 additional pitches
Plot 2B Land at Hay Hill (Bluebell Place) Ham, Eastry, CT13 0ED	1	Confirmed capacity for 1 additional pitch
Plot 3 Land at Hay Hill (strawberry Place), Ham, Eastry, CT13 0ED	2	Confirmed capacity for 4 additional pitches, Undetermined planning application for an additional 8 pitches (+4 on policy requirement, however revised scheme for 6 pitches +2 requested from applicant)
Romany Acres, Belsey Lane, Ewell Minnis, CT15 7DY	4	Confirmed capacity for 4 additional pitches, Exposed western boundary to AONB beyond

Table 14. Intensification sites 2021 survey

#### Draft Site Allocations update

10.11 The Regulation 18 draft of the Local Plan proposed two sites for G&T allocation. In summary, the site to the south of Alkham Valley Road / Land to the rear of The Meadows for up to 10 pitches (SA Policy 2) has gained planning consent in September 2021 for 10 additional pitches. The second draft allocation a parcel within the proposed strategic allocation at South Aylesham (Strategic Policy 6) has issues including the site promoter not supporting the location and highways accessibility and as a result has been removed from the Local Plan.

#### **Targeted Call for sites (TC4S)**

10.12 The results of the TC4S have been incorporated into the HELAA update 2022. There were 5 sites submitted for Gypsy and Traveller site consideration within the TC4S exercise in 2021. In summary:

- 1 site, Half Acres, Short Lane, Alkham (TC4S044), is considered suitable for 3 pitches (this site has subsequently been granted consent for 1 pitch)
- 1 site, Sherley Farm, Reach Road, St Margaret's at Cliffe (TC4S050) is considered potentially suitable for allocation of 1 pitch; and,
- 3 sites are considered unsuitable.

#### **Selection of sites for allocation**

10.13 A number of the site options for G&T allocation or retention are located in the AONB. Further consultation took place with the AONB Unit to consider which if any of the sites would be suitable for allocation in the Plan or where impacts on the AONB could be mitigated. This work resulted in one site being considered acceptable – Half Acres, Short Lane – due to its location on the edge of the existing settlement boundary and established nature as a G&T site. The other AONB sites (Sherley Farm and Romany Acres) have been discounted due to harm to the AONB.





## **Gypsy and Traveller Conclusions**

- 10.16 The strategy for meeting Gypsy and Traveller need including, occupations since April 2020, extant supply and Regulation 19 sites would result in a shortfall of 9 pitches against the Local Plan need for 42 pitches. The sites identified are deliverable and available, meaning they will meet the needs of the Plan in the short and medium. With regards to the long term of the Plan, the PPTS 2015 Policy 10.b makes clear that 'only where possible' should sites be identified in the long term (years 11 onwards) in plan making.
- 10.17 To this address this, the Regulation 19 version of the Local Plan contains a specific policy for Gypsy and Traveller windfall sites (H4) that among other matters contains strong criteria on: requiring demonstration that the need cannot be met on sites identified through the Plan thus ensuring the primacy of sites identified through the Plan. To ensure the quality of potential windfall site there is also strong criteria on site design and climate change. It should also be noted that at present, the Council has a number of planning applications for Gypsy and Traveller need pending decision that may count as windfall gain and reduce the Plans deficit.

## Appendix 1 : October 2018 workshop results

### Group A – Housing



Policy DM1: Settlement Boundaries	
Suggested change:	Rationale:
<p>Need policy as you need some idea of where development is acceptable.</p> <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"> <li>- Too prescriptive.</li> <li>- Good opportunity on the edge of settlements</li> <li>- Cannot pigeonhole sites as come out of the wood work</li> <li>- Should be more flexible</li> <li>- Need windfall sites</li> <li>- Do not want sporadic development</li> <li>- Should be some form of exception rule</li> <li>- Helpful to start somewhere!</li> <li>- Creates too much uncertainty</li> <li>- Define what is acceptable – development found on settlement confine – rare occasion could be acceptable if no harm to the countryside.</li> <li>- Carefully drawn with landscape protection and to allow for the expansion.</li> <li>- Confines must be logical (needs an additional policy in the plan to justify development beyond confines).</li> <li>- Pre-NPPF. Not positively worded as it could be missing some flexibility</li> <li>- Do you still need confines? Some LPAs refer to the built environment. Other Councils (e.g. Wealdon) identify broad areas for growth.</li> <li>- Positively plan for growth if it addresses local housing need.</li> <li>- Start the text in the policy more positively as it is currently worded negatively.</li> <li>- Should the policy be linked to the settlement hierarchy?</li> <li>- Combine policy DM1 and CP1.</li> <li>- Expand CP1.</li> </ul>
Policy DM5: Provision of Affordable Housing	
Suggested change:	Rationale:
<ul style="list-style-type: none"> <li>- Needs to set out a starting position</li> <li>- Major re-write required to make it consistent with NPPF</li> <li>- Elements – larger sites or smaller site financial contribution</li> </ul>	<ul style="list-style-type: none"> <li>- Needs flexibility</li> <li>- Logistics of delivering affordable housing on small sites is sometimes very difficult</li> <li>- Criteria of 10 dwellings is no longer compliant with NPPF</li> <li>- Policy currently does not mention infrastructure</li> <li>- Do not want to make the policy town-specific?</li> <li>- Brought in line with the NPPF.</li> </ul>

	<ul style="list-style-type: none"> <li>- At the moment it is 30% or nothing</li> <li>- At the moment do not negotiate</li> <li>- Should the policy offer the possibility for a financial payment or should you set out what you want to achieve</li> <li>- Needs to be above '10' units to be in line with NPPF</li> <li>- Threshold out of date</li> <li>- Very long policy could be shortened</li> <li>- Simplify into categories</li> <li>- Is 30% across the District or should it be different? Up to date summary of need</li> <li>- Could define the viability more</li> <li>- Need to caveat the viability to be in line with NPPF. This could be in a SPD?</li> </ul>
<b>Policy DM6: Rural Exception Affordable Housing</b>	
<b>Suggested change:</b>	<b>Rationale:</b>
Tweaking the policy in terms of looking at Entry Level exception sites (para. 71 of the NPPF)	<ul style="list-style-type: none"> <li>- Updated to reflect para. 71 of the NPPF</li> <li>- Does this cover starter homes?</li> <li>- Is it covered by other policies?</li> <li>- Need more justification than the needs of the PC</li> <li>- Relook at the policy in light of the NPPF</li> <li>- Should start by tightly defining the confines and then this policy should look at those exceptions</li> <li>- Could make the policy very permissible</li> <li>- Principle something to retain</li> </ul>
<b>Policy DM8: Replacement Dwellings in the Countryside</b>	
<b>Suggested change:</b>	<b>Rationale:</b>
<p>Tweak or delete!</p> <p>Do you need this policy?</p> <p>Out of date?</p>	<ul style="list-style-type: none"> <li>- Picking out the criteria that are still appropriate</li> <li>- At the moment there are two different objectives: permanent structure/lawful use in criterion (i)</li> <li>- Must be in a generic design policy</li> <li>- Criteria (ii) – very restrictive (existing dwelling and context)</li> <li>- Criteria (iii) – of no architectural or historic value – what is this?</li> <li>- Unsure what it's aiming to achieve?</li> <li>- Flood-risk dealt with already – no need for this in the policy (lose last part of the policy)</li> <li>- First three criteria guide me to what I should be looking for</li> </ul>
<b>Policy CP1: Settlement Hierarchy</b>	
<b>Suggested change:</b>	<b>Rationale:</b>
<p>Local Centre:</p> <p>GP Surgery:</p>	<ul style="list-style-type: none"> <li>- Principles helpful but needs to be reviewed.</li> <li>- Possible refinement of the "hamlet"</li> <li>- Good starting point to look at the services and facilities</li> <li>- Trying to identify most sustainable settlement</li> <li>- Sustainability hierarchy.</li> <li>- Not the settlement itself.</li> <li>- Justification sound but whether it has the flexibility?</li> <li>- Need to consider how you treat hamlets.</li> <li>- Do not need to stick with the status quo – just because it is a hamlet , should it always be a hamlet?</li> <li>- Should be open-minded.</li> <li>- Expect some form of shop, some form of accessibility/connection to a larger settlement.</li> <li>- Possibly "function" in the text rather than the policy.</li> </ul>
<b>Policy CP2: Identified Need</b>	

<b>Suggested change:</b>	<b>Rationale:</b>
Do not need policy CP2	<ul style="list-style-type: none"> <li>- Informative rather than a policy</li> <li>- Do you need this in a policy?</li> </ul>
<b>Policy CP3: Settlement Distribution</b>	
<b>Suggested change:</b>	<b>Rationale:</b>
Do not need policy CP3	<ul style="list-style-type: none"> <li>- This information can be in a table in the LP rather than a policy</li> <li>- Do you need this as a policy?</li> </ul>
<b>SUGGESTED NEW POLICIES:</b>	
<b>Agricultural Dwellings</b> <ul style="list-style-type: none"> <li>- Circumstances for an agricultural dwelling (financial and function test).</li> <li>- Recognise vacant building credit</li> <li>- Circumstances that the conversion of a rural building would be acceptable</li> </ul> <p><b>BRT – there is currently</b> 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>	

<b>Table A: Housing</b>												
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 Allocated sites existing land use

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

PRE003/ PRE016/ PRE017	Apple Tree Farm, Stourmouth Road	GF	65		
DOV026	Westmount College, Folkestone Road, Dover	GF	60		
RIN002/ RIN004	Land at Ringwoud Alpines, Dover Road, Ringwoud	GF	10		
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	GF	35		
SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	GF	40		
SAN019	Sydney Nursery, Dover Road, Sandwich	GF	10		
SAN023	Land at Archers Low Farm, St George's Road, Sandwich	GF	35		
SHE004/ TC4S082	Land to the north and east of St Andrew's Gardens, Shepherdswell	GF	50		
SHE006	Land at Botolph Street Farm	GF	10		
SHE008	Land off Mill Lane, Shepherdswell	GF	10		
STM003	Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way	GF	40		
STM006	Land at New Townsend Farm, Station Road, St Margarets	GF	10		
STM007/ STM008	Land to the west of Townsend Farm Road, St Margarets (Site B)	GF	36		
STM010	Land located between Salisbury Road and The Droveaway, St Margarets-at-Cliffe	GF	10		
STA004	Land at Durlock Road, Staple	GF	3		
WHI001	Managed Expansion of Whitfield	GF	2200		
WIN003	Land adjacent to Staple Road	GF	20		
WIN004	Land adjacent to White Lodge, Preston Hill	GF	8		
WIN014	Footpath Field, Staple Road, Wingham,	GF	75		
WOO005	Beacon Lane Nursery, Beacon Lane, Woodnesborough	GF	5		
WOO006	Land south of Sandwich Road, Woodnesborough	GF	10		
WOR006	Land to the east of Jubilee Road	GF	10		
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	GF	15	<b>Total GF units</b>	<b>4291</b>

CAP009	Longships, Cauldham Lane, Capel-le-Ferne	PDL	10		
TC4S008	Bridleway Riding School, Station Road Deal	PDL	25		
TC4S047	104 Northwall Road, Deal	PDL	8		
TC4S032	Ethelbert Road garages, Deal	PDL	5		
DOV006	Land at Dundedin Drive (south), Dover	PDL	8		
DOV012	Western Heights	PDL	100		
DOV017a	Bench Street	PDL	100		
DOV017	Dover Waterfront	PDL	263		
DOV018	Mid Town	PDL	100		
DOV019	Albany Place Car Park, Dover	PDL	15		
DOV022B	Land in Coombe Valley, Dover	PDL	80		
DOV022C	Land in Coombe Valley, Dover	PDL	20		
DOV022E	Land in Coombe Valley, Dover	PDL	150		
DOV023	Buckland Mill, Dover	PDL	135		
DOV028	Charlton Shopping Centre, High Street, Dover	PDL	100		
TC4S026	Military Road, Dover	PDL	9		
TC4S027	Roosevelt Road, Dover	PDL	10		
TC4S028	Peverell Road, Dover	PDL	6		
TC4S030	Colton Crescent, Dover	PDL	10		
TC4S039	Chapel Hill, Eythorne	PDL	5		
NON006	Prima Windows, Easole Street/Sandwich Road, Nonington	PDL	35		
SAN004	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	PDL	40		
SAN006	Sandwich Highway Depot/Chippies Way, Ash Road, Sandwich	PDL	32		
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	PDL	35	<b>Total BF Units</b>	<b>1301</b>
				<b>Total Units Allocated</b>	<b>5592</b>
				<b>% GF</b>	<b>76.7%</b>
				<b>% BF</b>	<b>23.3%</b>

### Appendix 3 1ha or under 10% site requirement

Site Reference	Address	Area	Capacity
DOV017a	Bench Street	0.99	100
BR	Part of Wingham Court	0.97	15
EAS009	Eastry Court Farm, Eastry	0.84	5
SHE013	Land around Coldred	0.83	5
WIN003	Land adjacent to Staple Road	0.83	20
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	0.83	15
SHE006	Land at Botolph Street Farm	0.82	10
GTM003	Land to the east of Northbourne Road, Great Mongeham	0.77	10
CAP013	Land at Cauldham Lane, Capel-le-Ferne	0.76	5
BR	43-65 & land adjoining Randolph Road	0.75	30
BR	Former Barwick Site	0.74	24
WOO005	Beacon Lane Nursery, Beacon Lane, Woodnesborough	0.73	5
BR	Old Rectory	0.73	9
TC4S074	Land adjacent Courtlands, Kingsdown	0.71	5
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	0.7	35
BR	Charlton Green Sorting Office	0.69	65
BR	Land at North Barrack Site	0.68	30
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne	0.66	10
DOV028	Charlton Shopping Centre, High Street, Dover	0.63	100
WOR006	Land to the east of Jubilee Road	0.56	10
CAP009	Longships, Cauldham Lane, Capel-le-Ferne	0.49	10
BR	Delfbridge_10 Dover Road	0.48	8
BR	Three Tuns	0.48	8
TC4S023	Land adjacent to Cross Farm, Eastry, Near Sandwich	0.44	10
SAN019	Sydney Nursery, Dover Road, Sandwich	0.39	10
BR	The Qube	0.38	27
SHE008	Land off Mill Lane, Shepherdswell	0.38	10



DOV006	Land at Dundedin Drive (south), Dover	0.37	8
DOV022C	Land in Coombe Valley, Dover	0.37	20
BR	Land adjoining Mill Field, New Street	0.36	10
BR	Land off Ark Lane	0.35	41
DOV030	Land at Durham Hill, Dover	0.34	10
DOV008	Land adjoining 455 Folkestone Road, Dover	0.34	5
BR	Southern Water Pumping Station	0.33	14
ALK003	Land at Short Lane, Alkham	0.32	10
BR	Snelgrove House	0.31	65
AYL001	Land at Dorman Avenue	0.31	9
WIN004	Land adjacent to White Lodge, Preston Hill	0.31	8
BR	Dublin Man of War PH	0.3	8
BR	The former Magistrates Court	0.3	46
DOV019	Albany Place Car Park, Dover	0.28	15
TC4S047	104 Northwall Road, Deal	0.28	8
BR	Former Greyhound Public House	0.27	17
BR	Linwood Youth Centre	0.27	6
BR	Eastry Industrial Estate	0.25	4
STA004	Land at Durlock Road, Staple	0.24	3
TC4S027	Roosevelt Road, Dover	0.22	10
BR	Aylesham Sports Club	0.22	19
TC4S039	Chapel Hill, Eythorne	0.21	5
BR	Former United Reformed Church	0.2	16
TC4S030	Colton Crescent, Dover	0.2	10
BR	Land at 191 and Forge Bungalow	0.19	10
BR	7-8 Eastbrook Place	0.19	20
TC4S028	Peeverell Road, Dover	0.19	6
BR	Site of King Lear PH, Aycliffe	0.15	18
BR	Ryder House	0.13	8
BR	62 & 64 Stockdale Gardens	0.13	8
BR	1 Malvern Road	0.12	17
BR	Railway Hotel, 85 Station Road, Walmer	0.12	7
BR	The Qube	0.11	8
BR	20 & 24 Castle Avenue	0.11	8
BR	2-9 Cambridge Terrace	0.11	25
TC4S026	Military Road, Dover	0.11	9
BR	Rear of 162 Folkestone Road	0.1	6
BR	62 Castle Street	0.1	28

BR	Former Playground	0.1	20
TC4S032	Ethelbert Road garages, Deal	0.09	5
BR	Brambley Hedge Childrens Centre	0.09	10
BR	42 to 44 Kimberley Close	0.09	16
BR	Anchor Works	0.06	12
BR	65 Folkestone Road	0.06	10
BR	Bellrose Hotel 18-19	0.05	9
BR	Air Training Corps	0.04	7
BR	Beacon Church and Christian Centre	0.03	9
BR	50 & 51 Biggin Street	0.02	7
BR	3 Market Square	0.02	8
		<b>Total</b>	<b>1249</b>
		<b>% of LHN*0.1</b>	<b>11.40%</b>