

# Dover District Council Housing Delivery Action Plan July 2022



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# 1. Introduction

The 2018 NPPF and NPPG introduced the **Housing Delivery Test (HDT)**. The test measures the number of homes required over a three year period against the number of homes delivered and calculates the result as a percentage.

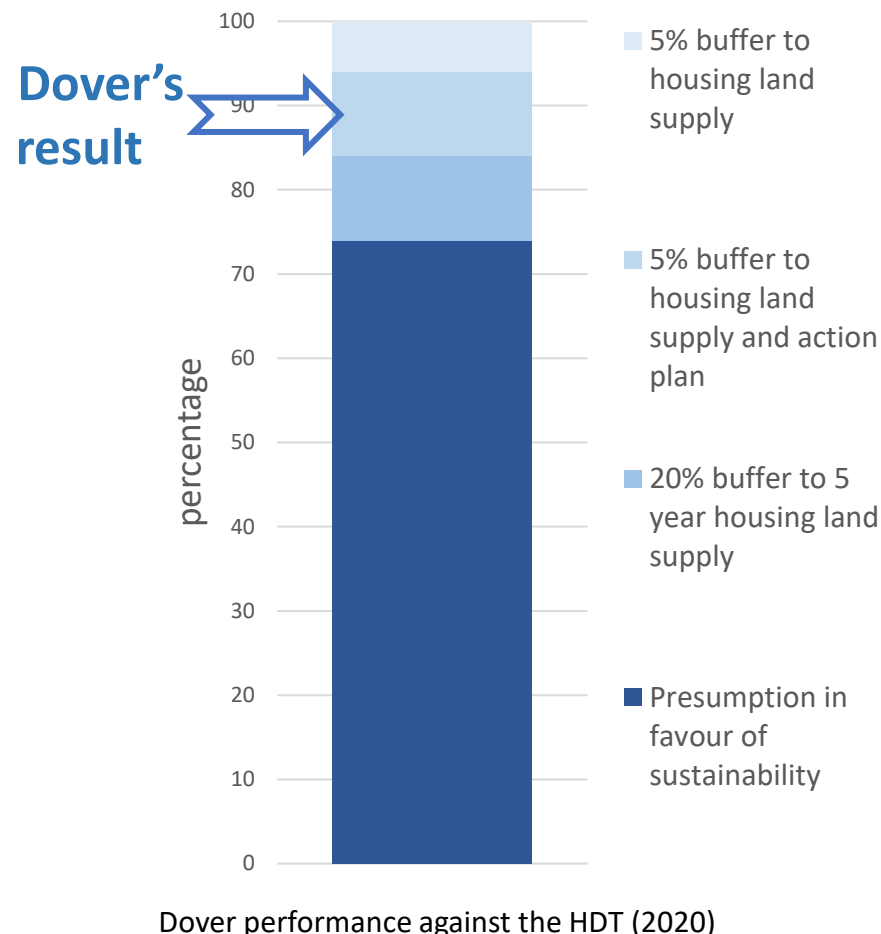
The latest HDT covers the monitoring years 2018/19, 2019/20 and 2020/21 and the results were published on the 14<sup>th</sup> January 2022.

Dover scored a **88% result** against the test and this requires the Council to:

- Apply a **5% buffer** to 5-year housing land supply; and,
- Produce a **Housing Delivery Action Plan (HDAP)**. The HDAP should identify reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.

The HDAP contained within this document has been produced within 6 months of the HDT 2021 results and acts as a further update to the HDAP produced in June 2021.

The HDT published in January 2022 took account of the impact the COVID-19 pandemic had on house building, and removed four months from 2021's housing delivery requirements – reducing it from 557 dwellings to 397.



# 2. HDT Forecast Results

The HDT determines the level of consequences applied to the local authority where the delivery of the housing requirement has not been met. Depending on the level of delivery, these are:

- the authority should publish an action plan if housing delivery falls below 95%;
- a 20% buffer on the local planning authority’s 5-year land supply if housing delivery falls below 85%;
- application of the presumption in favor of sustainable development if housing delivery falls below 75%.

Using the average historical delivery of homes within the District over the previous 3 monitoring years and projecting it against the Local Housing need, the HDAP 2021 anticipated a result of 75% against the latest HDT, however as a result of the four-month reduction to the housing delivery requirement due to the COVID-19 pandemic, the result was 88%.

Using the historical delivery assessment against expected housing delivery targets, it is likely that over the next three monitoring years **the Council’s performance against the HDT will substantially improve and that no actions will be required.** It is anticipated these substantially improved results will occur through the continual implementation and progression of the actions as set out in the HDAP 2020 as updated in 2022.

Monitoring year	2020/21	2021/22	2022/23	2023/24
<b>Performance</b>	88% (current HDT result)	<b>102%</b>	<b>105%</b>	<b>95%</b>
<b>Years of assessment</b>	2018/19, 2019/20, 2020/21	2019/20, 2020/21, 2021/22	2020/21, 2021/22, 2022/23	2021/22, 2022/23, 2023/24
<b>Consequences</b>	Action Plan and can choose a 5% Buffer to 5- year supply	<b>No actions</b>	<b>No actions</b>	<b>No actions</b>

Dover’s forecasted HDT performance

# 3. HDAP Methodology

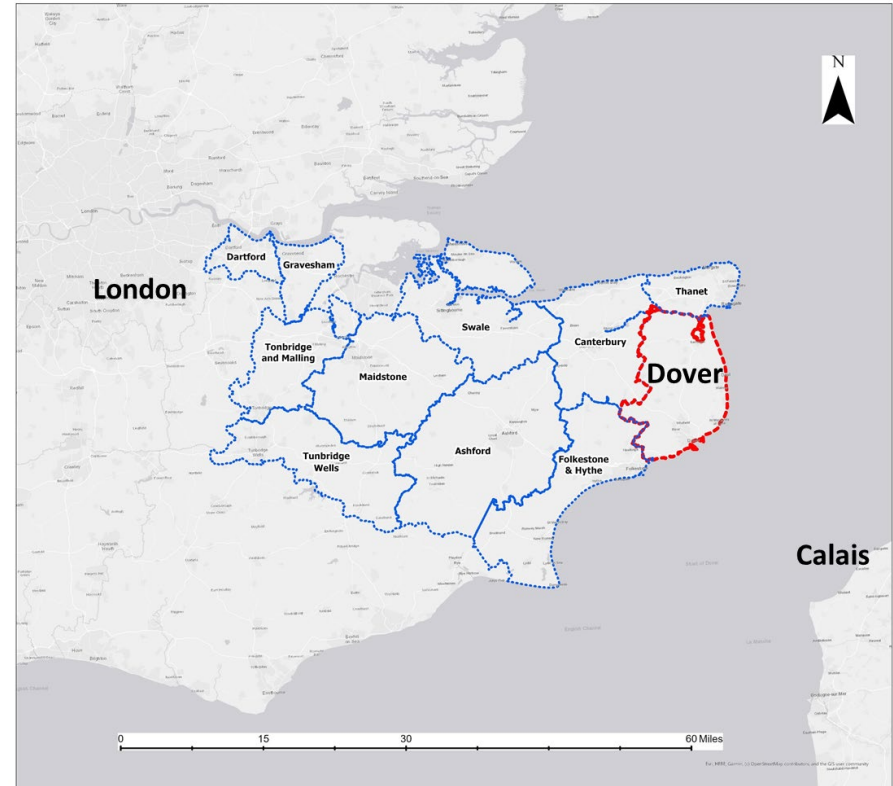
The HDAP using the National Planning Practice Guidance (NPPG) has reviewed and carried out the following:

- Dover District profile, demographic and infrastructure;
- Natural and built environment constraints for the District;
- Development Plan progress;
- Planning applications analysis and 5-year housing land supply
- Housing and delivery analysis;
- Factors external to the Councils control influencing housing delivery;
- Summary of District delivery issues, challenges, problems and weaknesses;
- NPPG suggested HDAP initiatives;
- Initiatives to support housing delivery and review; and,
- Monitoring of the HDAP.



# 4. District Profile

- The Dover District is located in South East of England in the county of Kent.
- The District was formed in 1974 by the merger of the boroughs of Deal, Dover, and Sandwich and Eastry Rural District.
- Neighbouring local authorities include:
  - Folkestone & Hythe
  - Canterbury
  - Thanet
- The District contains two urban areas (Dover and Deal), a market town (Sandwich) a rural service centre (Aylesham) and rural villages.
- The District is bordered to the south and east by the English Channel and contains a gateway shipping port to Europe.
- Dover Town is 79 miles from London and 29 miles from Calais.



# 5. District Demographic

## Population

- 118,500 (58,500 males 60,100 females) (ONS 2020)

## Education

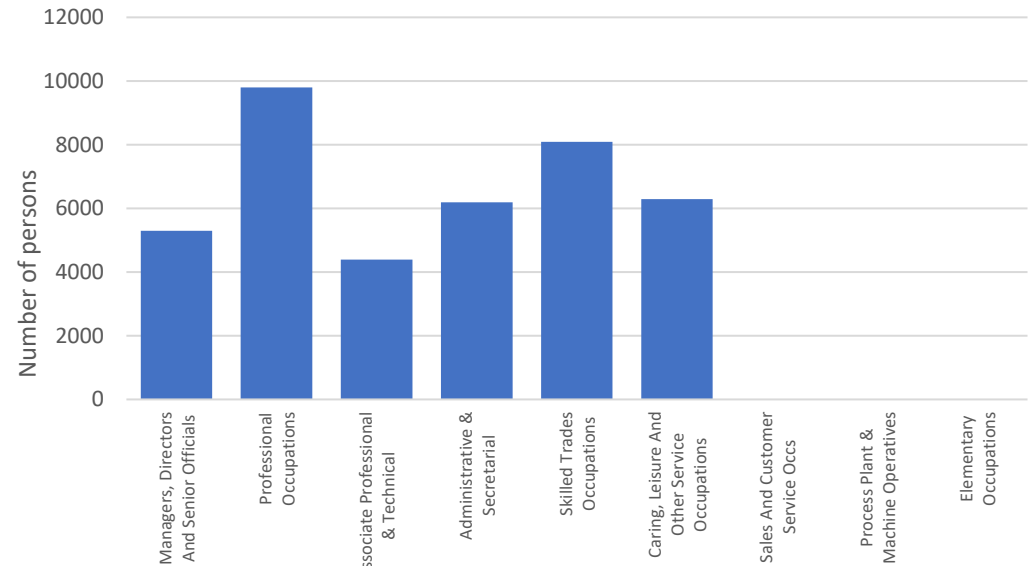
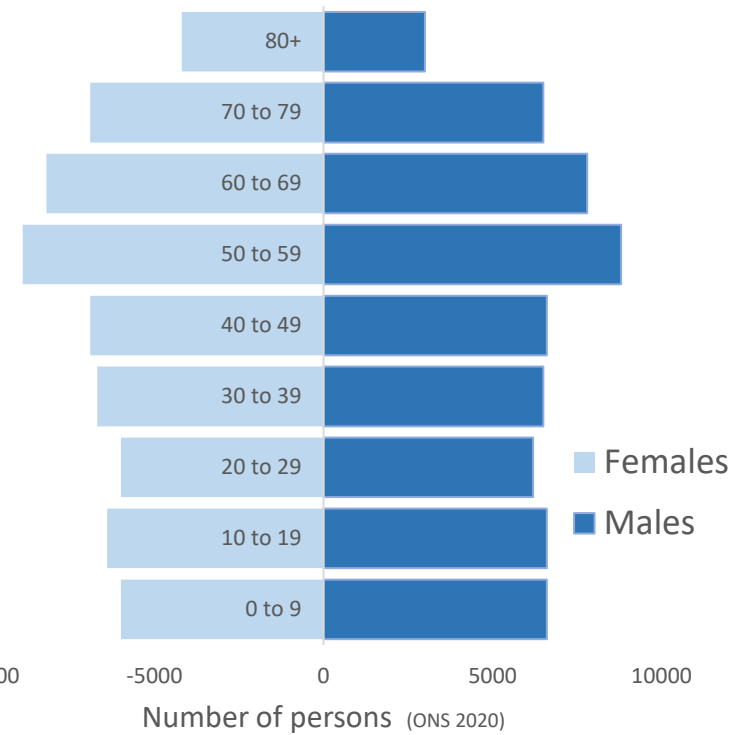
- Percentage of working age residents with no qualifications 6.4%, 0.6% higher than the South East (ONS 2019).
- Percentage of working age residents with NVQ level 4 or higher 34.5%, 10.6% lower than the South East (ONS 2021).

## Employment

- Jobs in the district 42,000 (ONS 2020)
- 35.4 businesses per 1,000 population (ONS 2020)
- 4.0% Out of Work claimants, 0.9% higher than the South East (ONS 2022)

## Earnings

- Residents on average earnt £607.90 per week, £27.10 less than the South East (ONS 2021)



Employment by occupation (ONS 2021).

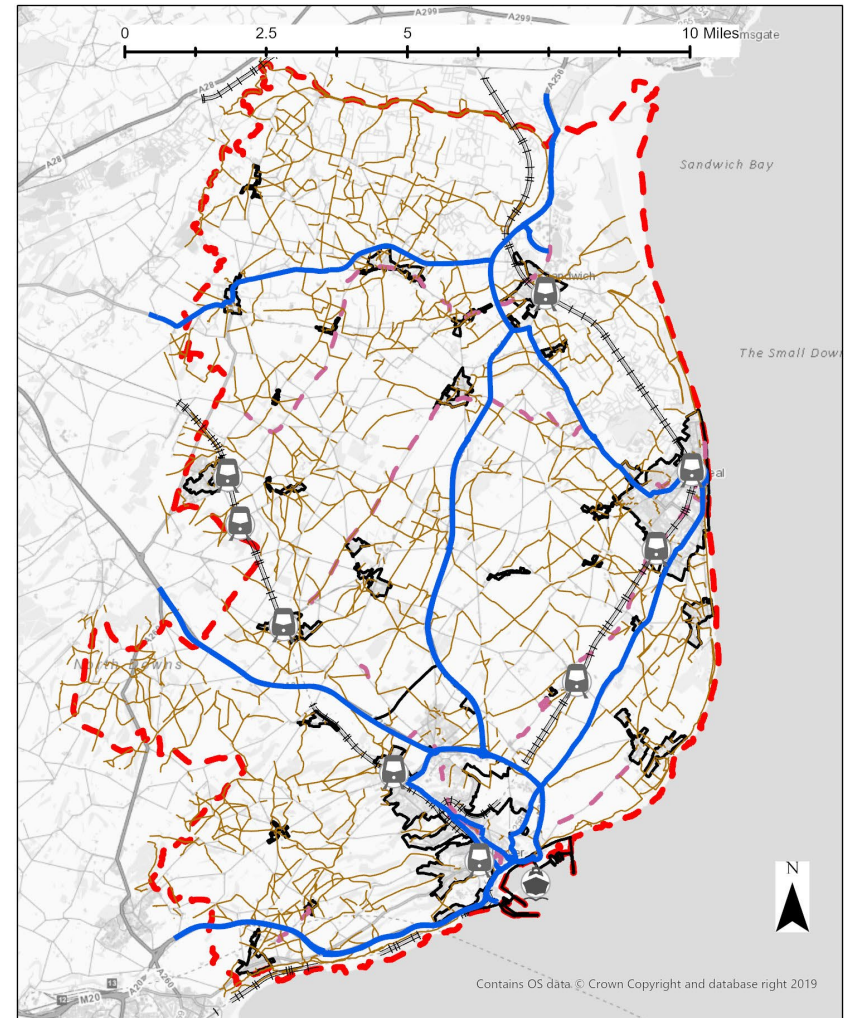
Where no data reported, sample size was too small.

# 6. Infrastructure








Containing Dover port, a gateway location to the South East region, the District has strong rail and road links with the North and West of Kent.

The District contains:

- The Port of Dover;
- 9 train stations;
- 4 major A Roads (A2, A20 , A256, A257);
- Cycle ways, including Kent coastal cycleway; and,
- An abundance of Public Right of Ways.



## Legend

	Railway_Station		Strategic_Roads		Settlement_Boundaries
	Railway_Lines		Cycle_Route		District Boundary
	Ferry_Port		Public_Rights_of_Way		

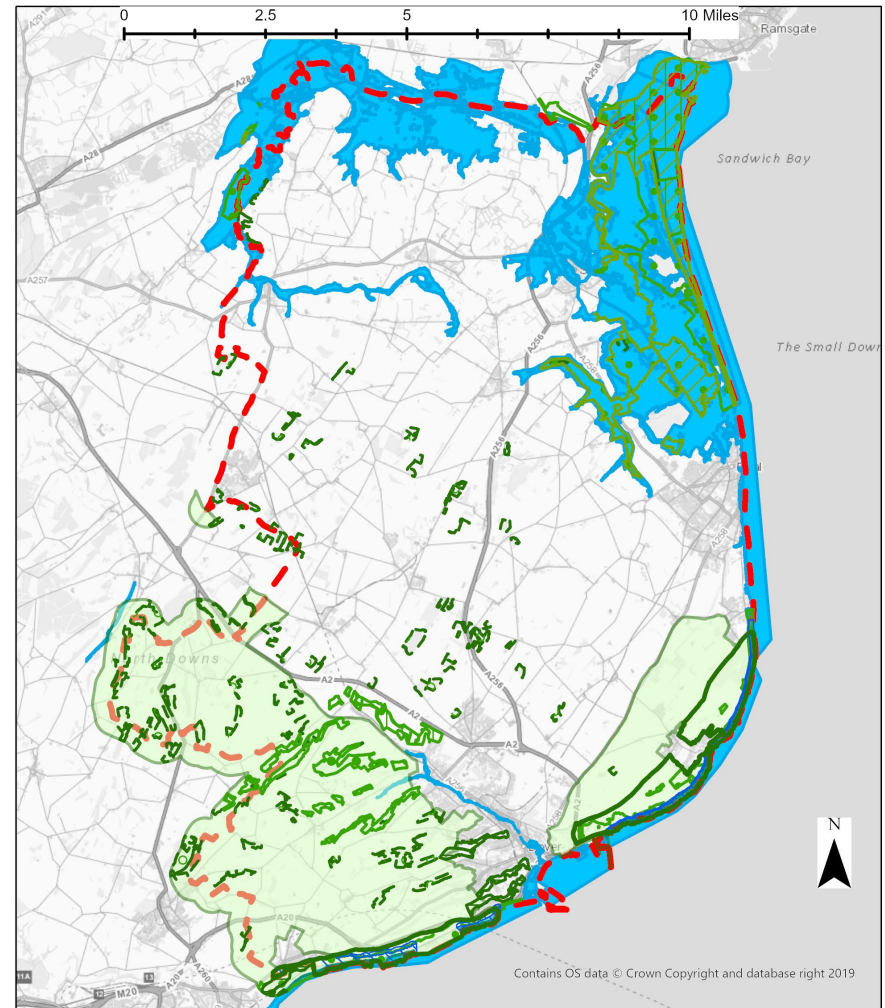


# 7. Natural Environment

Located on the south eastern edge of the British Isles, the District is a mixture of urban settled areas and rural hinterland. The District covers an area of 31,982 ha and has 32 kilometers of coast line.

The District contains:

- 7.7% of the District is developed land;
- AONB covers 25% of the District;
- National flood zone 3 covers 11.6% of the District, concentrated in the north of the District;
- 2 stretches of heritage coast; and,
- Cluster of environmental policies in the south of the District



## Legend

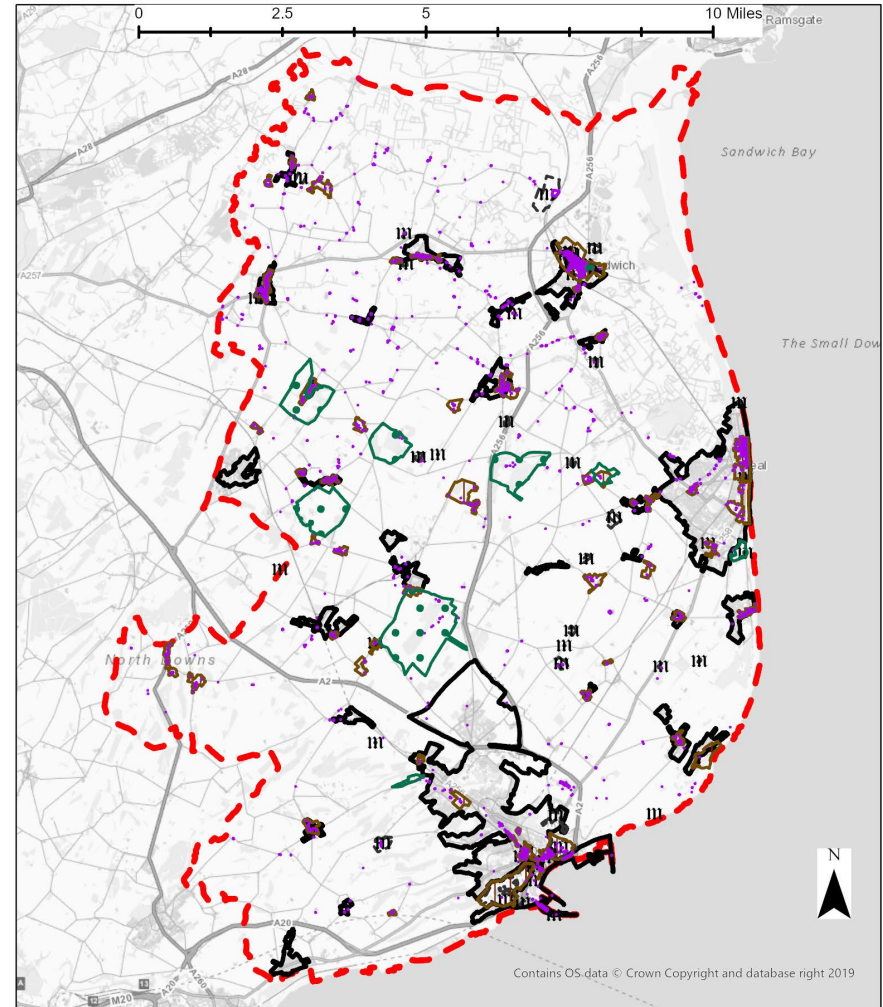
- |                                     |                                 |                   |
|-------------------------------------|---------------------------------|-------------------|
| Heritage Coast                      | National Nature Reserves        | District Boundary |
| Area of Outstanding Natural Beauty  | Local Nature Reserves           |                   |
| RAMSAR                              | Ancient Woodland                |                   |
| Special Protection Areas            | Coastal Change Management Areas |                   |
| Site of Special Scientific Interest | Flood Zone 3                    |                   |

# 8. Built Environment

The District is blessed with a rich built heritage that reflects its coastal location, military importance and close proximity to Europe.

The District contains:

- 1 Secondary Regional Centre (Dover),  
1 District Centre (Deal),  
2 Rural Services Centre (Sandwich and Aylesham,  
5 Local Centre's and many villages and hamlets;
- 57 conservation areas;
- 38 Grade 1 listed buildings;
- 1,778 Grade II and 110 Grade II\* listed buildings;
- 50 Scheduled ancient monuments; and,
- 6 Registered parks and gardens.



## Legend

- District Boundary
- Settlement Boundaries
- Scheduled Monuments
- Conservation Areas
- Listed Building Polygons
- Historic Parks & Gardens

# 9. Development Plan

## 2010 Core Strategy:

- adopted 2010,
- Plan for 14,000 new homes
- Aims, to deliver a minimum of 10,100 homes by 2026.
- Urban extension led housing strategy with 70% of completions planned within Dover area.
- Provide a better mix of housing, delivering more family housing in the District.

## Land allocations Local Plan:

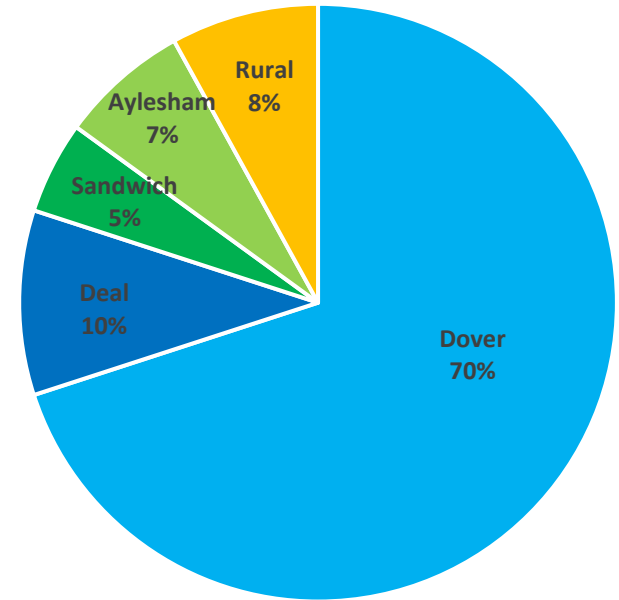
- adopted 2015,
- additional land allocated for 2,465 dwellings.

## New District Local Plan:

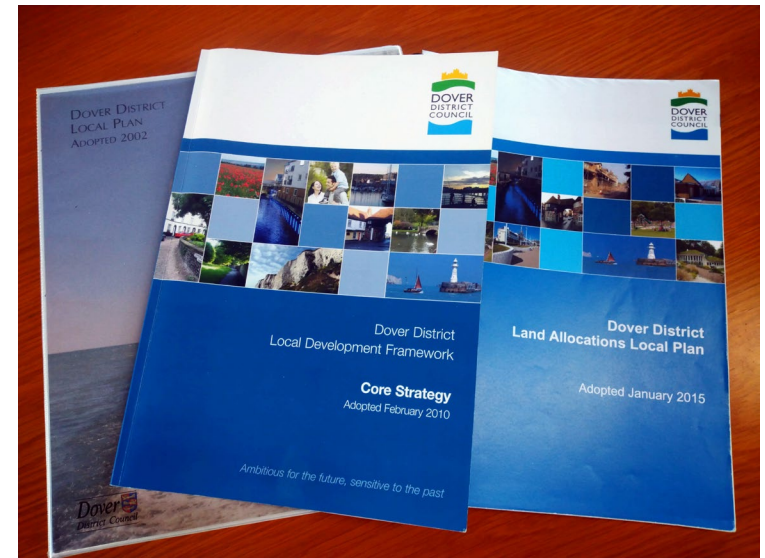
- 2017 Council agreed to commence work on a new Local Plan.
- 2017 Call for sites to support the production of the new Local Plan.
- 2020 Housing Economic Land Availability Assessment latest findings published.
- Regulation 18 issues and options, draft Plan 8 week consultation January to March 2021
- 2023 target year for adoption of the new Local Plan.

## Neighbourhood Plans:

- Worth adopted 2015
- Ash adopted 2021



Distribution of housing allocations in the Core Strategy



# 10. New Local Plan update

## New Dover District Local Plan

Regulation 18 issues and options and draft plan 8 week consultation January to March 2021.

Housing, the Regulation 18 version of the Plan seeks to:

- provide 11,920 homes with 10% buffer
- 30% affordable housing outside of Dover town,
- 42 Gypsy and Traveller pitches,
- Facilitate Self Build and Custom House building (SBCH)
- Set criteria for residential windfall development
- Provide a mix and type of housing for the Districts various community groups and emerging populations trends.

Representations to the Regulation 18 Consultation were published in Autumn 2021.

Regulation 19 Consultation due Autumn 2022.

## Targeted call for sites

Alongside the regulation 18 consultation. Sought additional housing site options on:

- sites 1ha and under,
- Gypsy and travellers,
- SBCH.

Sites considered as part of drafting the Regulation 19 version of the Local Plan.

**Public Residents Teams Live 23 Feb 21**

**Dover District Local Plan**

**Local Plan Consultation Event**  
**23rd February 2021**

Presentations by:  
Ashley Taylor, Planning Policy and Projects Manager  
Stuart Watson, Senior Policy Planner  
Rebecca Burden, Principal Policy Planner

[www.doverdistrictlocalplan.co.uk](http://www.doverdistrictlocalplan.co.uk)

**Targeted Call for Sites 2021 – What we are seeking**

Sites between 0.25 and 1ha for housing	Employment floor areas of 500sqm or greater
<p>Identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. (NPPF P96(a))</p>	<p>Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. (NPPF P80)</p>
<p>Local planning authorities should set pitch targets for gypsies and travellers and pitch targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area. (PPTS P9)</p> <p>Also, when undertaking housing needs assessments, The Housing Act 2016, section 124, places a duty on Local Authorities to consider the needs of travelling persons who do not meet the definition of travellers set out within the PPTS 2015.</p>	<p>Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. (NPPF Annex 2)</p>
<p><b>Local Green Spaces</b></p> <p>The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. They must be:</p> <ol style="list-style-type: none"><li>in reasonably close proximity to the community it serves;</li><li>demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and,</li><li>local in character and is not an extensive tract of land. (NPPF P99 and P100)</li></ol>	<p><b>Gypsy and Traveller Sites</b></p>
<p><b>Gypsy and Traveller Sites</b></p>	<p><b>Self Build Custom Housebuilding Sites</b></p>

NPPF: National Planning Policy Framework 2019. Accessible from: [https://assets.publishing.service.gov.uk/government/uploads/attachment\\_data/file/210337/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/attachment_data/file/210337/NPPF_Feb_2019_revised.pdf)  
PPTS: Planning policy for traveller sites 2015. Accessible from: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/257420/ptsl\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/257420/ptsl_planning_and_travellers_policy.pdf)

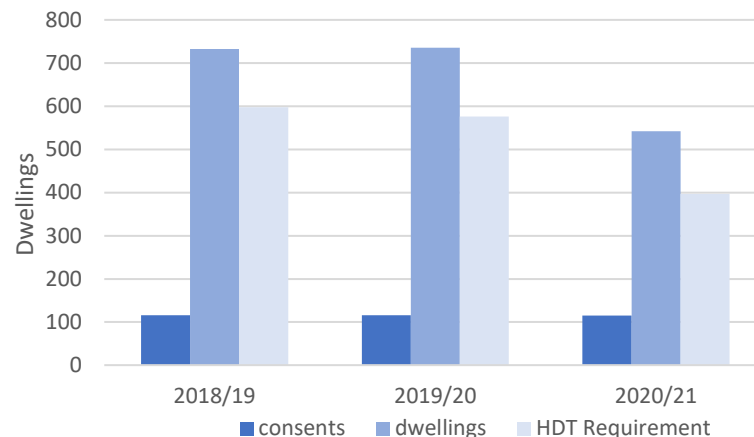
# 11. Planning applications

Between 2019 to 2021:

There were 962 planning applications for dwellings;

86% of applications for dwellings were granted and 76% were decided in time; and,

2,011 dwellings were permitted over three years compared to HDT requirement of 1,570.

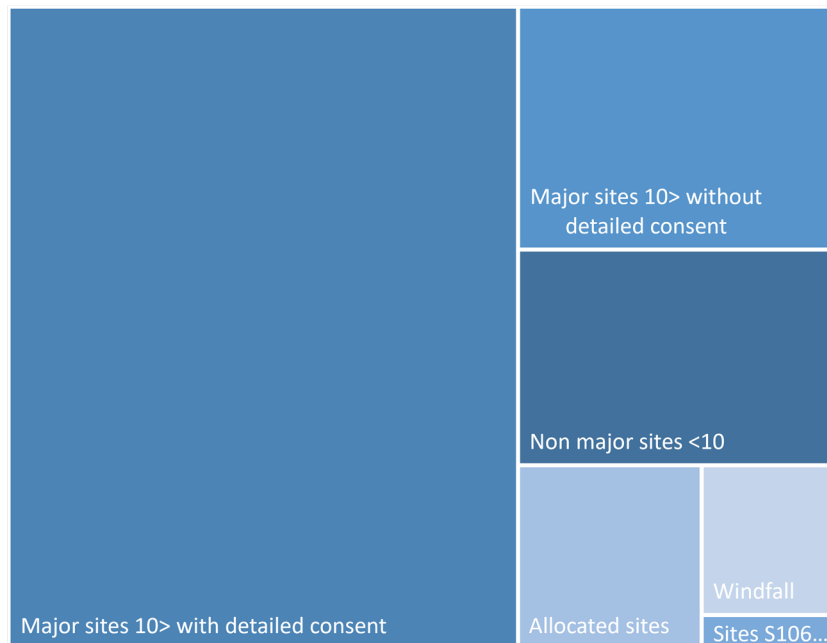


## 5-Year Housing Land Supply

After the HDT results were published in January 2022 the Council could demonstrate over 6.35 years' worth of housing land supply measured against its Local Housing Need figure.

The majority of the supply consisted of both minor sites with under 10 dwellings and major sites of 10 dwellings or more with detailed planning consent.

The 5 year supply also indicates that currently the Council has granted enough planning consents to meet its Local Housing Need.



# 12. Housing Delivery

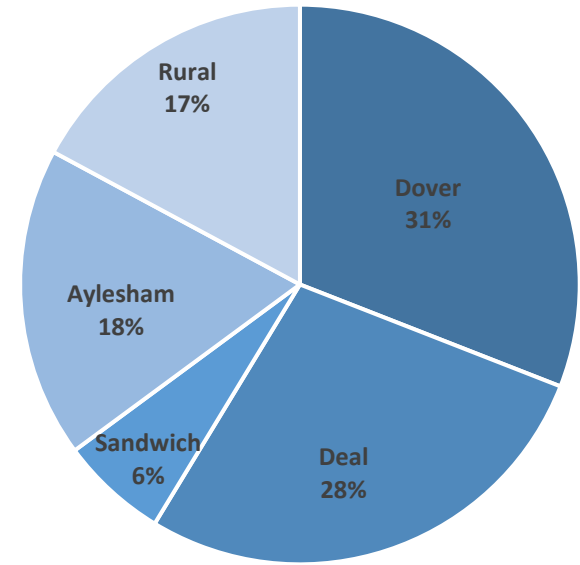
The majority of new dwellings spread between Dover and Deal. Substantial completions have also occurred in Aylesham and the rural villages.

Between 2010/11 and 2020/21, 4,290 dwellings have been completed, 77.2% of the Core Strategy target of 5,555.

Completions significantly increased from 2015/16 with the introduction of the Land Allocations DPD.

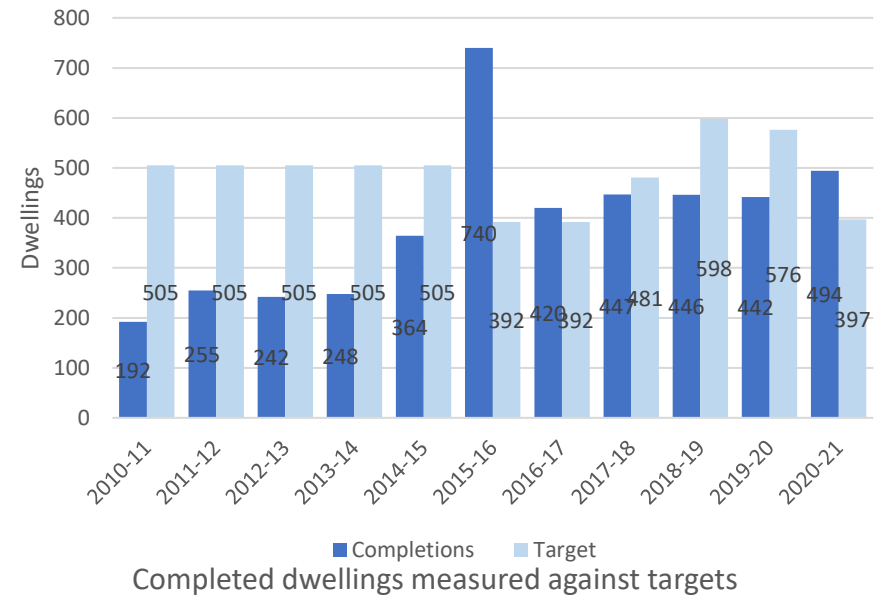
Completions since 2015/16 have performed well compared to the Core Strategy target but worse compared to the Local Housing Need calculations.

At lower than 2%, there has been a very low rate of non implementation of planning consents for new homes.



Distribution of completions 2010 to 2021

	Expired permissions	Extant stock	Percentage
Average	88	4823	1.93%
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			



# 13. Delivery Analysis

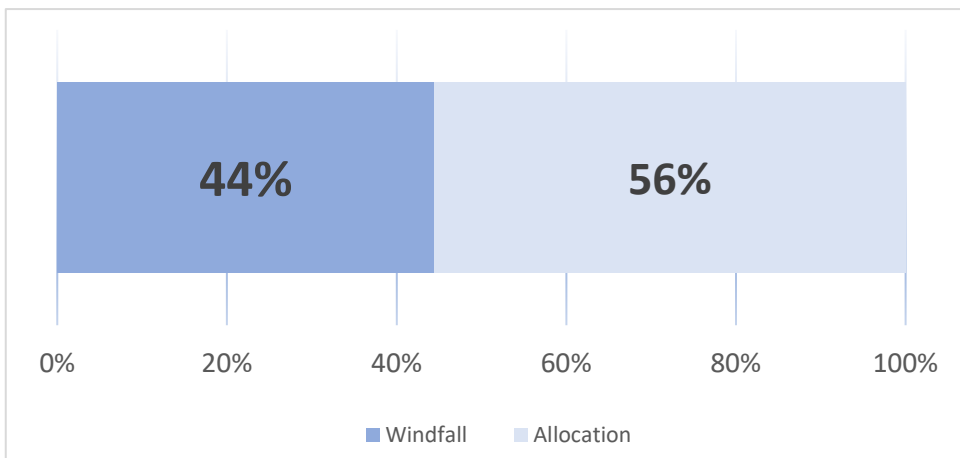
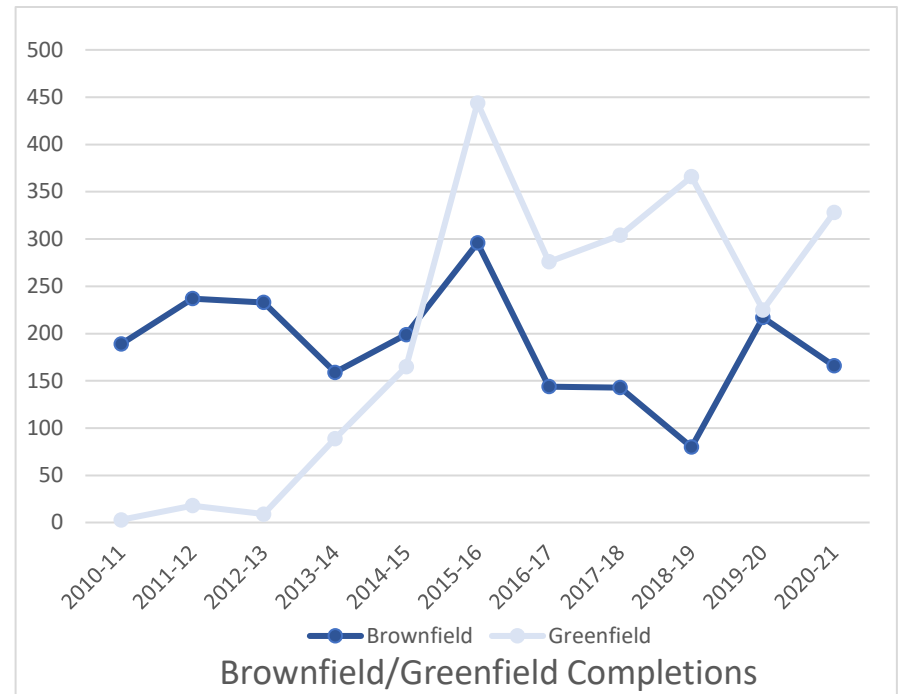
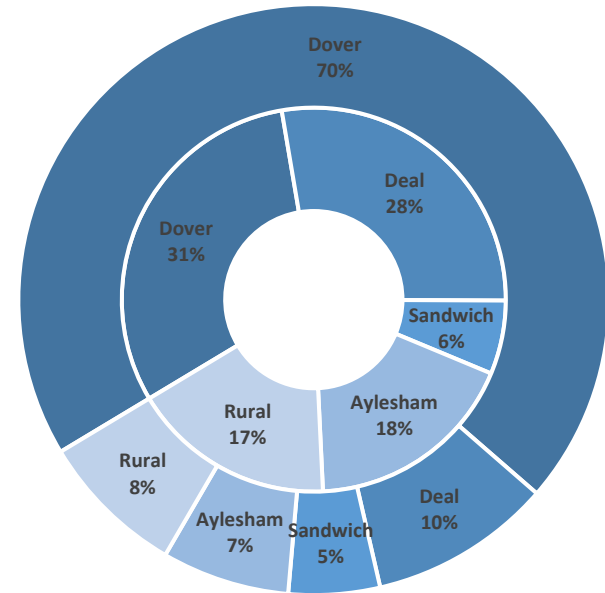
Development Plan led strategy has not worked to date with Dover area contributing 30% of completions against a target of 70%.

Whitfield, 2010 core strategy allocation for 5,750 dwellings, has had minimal delivery, circa 250 completions up to 2020/21. Issues of: land controlled by multiple owners who have been carrying out the development; and infrastructure constraints.

Windfall development on predominately brownfield land has contributed 44% of completions since 2010.

Delivery since 2010/11 has been evenly split between Greenfield and Brownfield land, with allocated greenfield land making a significant contribution since 2013/14.

Core Strategy targets outer ring  
Actual completions inner ring



# 14. External Factors Affecting Housing Delivery

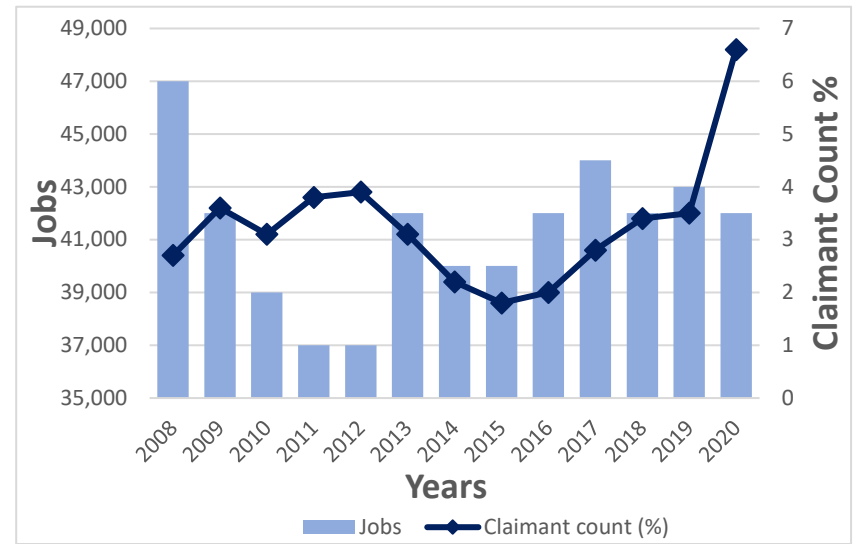
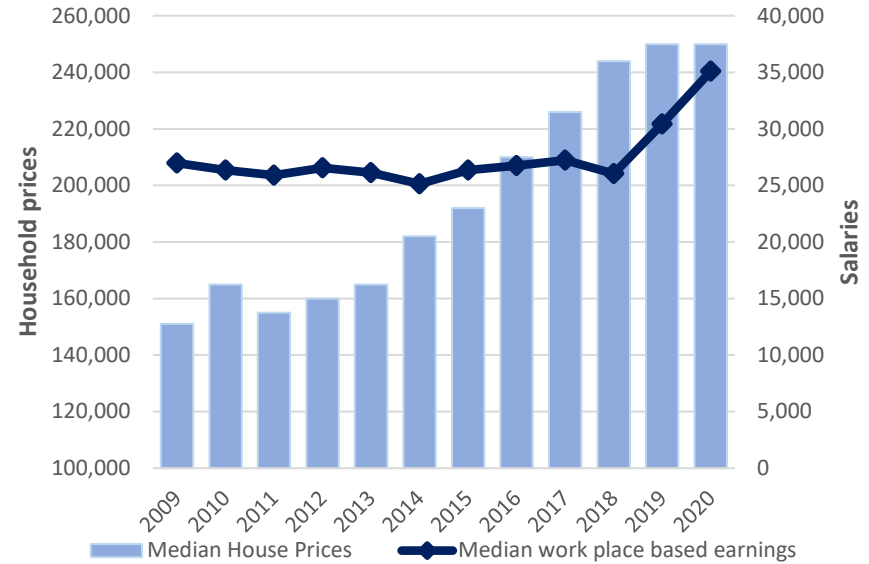
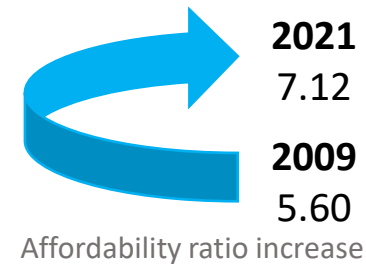
In 2021 the average cost of a home in Dover District was **7.12** times the average workplace earnings (ONS 2022).

In the 11 years between 2009 to 2020, the median house price rose sharply, compared to a predominantly stagnant median work-based salary earnings (ONS 2022).

Between 2008 and 2020 the number of jobs within the District went through turmoil and have not recovered to previous highs. Claimant count for out of work benefits stayed stable then rose sharply in 2020 (ONS 2022).

The Districts economy is one of predominately traditional port and farming economy activities. Dover's port activities have been experiencing a long term period of decline and change through the introduction of the Channel Tunnel in neighbouring Folkestone and Hythe District through to recent increases in border controls resultant from Britain's exit from the European Union.

At present, the Northwestern part of the District, an area where considerable housing development has occurred and further is planned, is currently subject to Natural England Nutrient Neutrality Guidance currently restricting granting of planning permissions.





# 15. Summary

## Delivery Issues

- Rising cost of housing compared to stagnant workbased salaries.
- Dated Core Strategy based on Regional Spatial Strategy housing targets.
- Market led windfall housing outside of Dover, in areas not identified for growth within the Development Plan.
- History of market led windfall development on brownfield land rather than on allocated sites.
- Recent increase in development on greenfield land has provided uplift in housing delivery.
- Constraints associated with delivery of Whitfield Urban Expansion

## Challenges

- Identify suitable land for development that is available, deliverable, in a sustainable location and not constrained.
- Time required to produce a new Local Plan that is NPPF 2021 compliant.
- Protection of the natural environment including the AONB and coastlines, and the setting of heritage assets.
- Ensure medium to long term housing land supply.
- Substantial landscape and environmental constraints in the North and South of the District.
- Natural England Nutrient Neutrality Guidance currently restricting granting of permissions in part of the District.

## Problems

- Highly deliverable areas for housing around Deal and Sandwich that suffer from many constraints.
- Low work-based earnings compared to dwelling prices, with a steep rise in house prices over last 10 years.
- Rising land values over recent years impacting on viability of housing schemes.
- Dover is an area of stagnant economic development with traditional employment in slow long term decline.

## Weaknesses

- Dated Development plan not compliant with the latest NPPF.
- Land allocated for housing in the Development Plan based on lower superseded housing targets.
- Historic reliance on single large strategic allocation to meet housing target, that has not delivered expected completions.
- Dover economy reliant on traditional employers going through long term decline and transition.

# 16. NPPG Suggested Initiatives

The following actions have been suggested in the NPPG to address issues that affect the delivery of housing and have been considered as part of Dover District Councils HDAP.

- Review Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development;
- Work with developers on the phasing of sites, including whether sites can be subdivided;
- Offer more pre-application discussions to ensure issues are addressed early;
- Consider the use of Planning Performance Agreements;
- Carry out a new Call for Sites, as part of plan revision, to help identify deliverable sites;
- Revise site allocation policies in the development plan, where they may act as a barrier to delivery;
- Review the impact of any existing Article 4 directions for change of use from non-residential uses to residential use;
- Engage regularly with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how these can be addressed;
- Establish whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites;
- Ensure evidence on particular sites is informed by an understanding of viability;
- Consider compulsory purchase powers to unlock suitable housing sites;
- Use Brownfield Registers to grant permission in principle to previously developed land; and,
- Encouraging the development of small and medium-sized sites.

# 17. Initiatives: Local Plan

Local Plan							
Published	Action	Purpose	Timeframe	Priority	Implementation	Outcome	Status
June 2020	Publish updates on Housing Economic Land Availability Assessment	Inform stakeholder of the sites the Council consider suitable and available for consideration within the Local Plan.	Short term	High	Local Plan Team	Enable developers to identify sites Council are considering for the Local Plan.	Implemented 2021 Further update 2022
June 2020	Regulation 18 draft Local Plan consultation	Inform stakeholders and site promoters of the Council preferred sites for allocation within the Local Plan.	Short term	High	Local Plan Team	Provide a level of certainty to developers on sites the Council consider potentially suitable for allocation in the Local Plan.	Implemented 2021
June 2020	Further targeted call for sites	To help identify additional sites that would be beneficial for consideration within the Local Plan.	Short term	Medium	Local Plan Team	Provide an update of additional suitable sites for allocation within the Local Plan.	Implemented 2021
June 2020	Regulation 19 Local Plan pre submission consultation	Present to stakeholders the development sites the Council consider suitable, available and deliverable as part of the Local Plan.	Medium term	High	Local Plan Team	Provide a high level of certainty to developers on sites the Council consider potentially suitable for allocation in the Local Plan.	Expected 2022
June 2020	Submit Local Plan for examination	Allow the Local Plan and development sites to be tested through examination on their deliverability.	Medium term	High	Local Plan Team	Allow the council strategy and allocated sites to be tested through external examination.	Expected 2023
June 2020	Adopt Local Plan	Give certainty to developers on the Councils intention towards developing sites within the District.	Long term	High	Local Plan Team	Council will permit allocated development sites that have planning applications that meet policy criteria.	Expected 2024

# Initiatives: Development Management

Development Management							
Published	Action	Purpose	Timeframe	Priority	Implementation	Outcome	Status
June 2020	Review S106 time frames	To identify any potential blockages in the S106 process.	Short term	Low	Local Plan Team	Determine whether S106 are blockage to issuing planning decisions. If they are a blockage to identify why.	In progress
June 2020	Evaluate benefits of Planning Performance Agreements (PPAs)	Where PPA's have been used identify the value they provide to the planning application process.	short term	Low	Development Management Team	Evaluate benefit of PPAs and identify any potential areas for improvement in the process that could support planning applications.	In progress
June 2020	Discharge of conditions tracker	To better understand the discharge of condition process and identify where there maybe blockages.	Short term	Medium	Development Management Team	Identify where there are delays in the processing of conditions discharges. This will inform if there's a need to formulate remediation actions.	Implemented 2021
June 2020	Team restructure	To provide opportunities to facilitate specialisms that can expediate planning matters.	Short term	Medium	Development Management Team	Specialism allowing officers to understand and progress more efficiently specific types of planning application issues.	Implemented 2022
June 2020	Creation of external Design Review Panel	To inform the pre application process on design related matters	Medium term	Medium	Development Management Team	To promote good design on schemes before a planning application is submitted, thereby reducing planning application refusals on design grounds.	In progress
June 2020	Major Sites/Applications Tracker	To better understand the range of sites and their progress from informal enquiry/pre-app engagement through to permission/condition discharge and build-out.	Medium Term	Medium	Development Management Team (with input from Economic Development and Tourism)	Evaluate: Scope/range of major development opportunities; resources required to support relevant projects; progress on major pre-apps/applications; and when contact with developers is required to progress delays post event stage and/or permission.	Implemented 2021
June 2022	Review of decision making process	To identify any potential blockages and areas for stream lining.	Medium term	Low	Development Management Team	Shortern time frame for decision making. Prevent delays to decisions being issued.	New initiative - in progress

# Initiatives: Delivery of sites

Delivery of sites							
Published	Action	Purpose	Timeframe	Priority	Implementation	Outcome	Status
June 2020	Engaging with site promoters of HELAA sites, outline planning permissions and existing allocations	Identify constraints to delivery of sites within the Local Plan and those being considered.	Short term	High	Local Plan Team	Inform site promoters on the Local Plan progress and sites suitable for potential allocation, Agree phasing and delivery assumptions and requirements for demonstrating deliverability of sites.	Implemented Forum 2020  Pre Local Plan EIP submission forum 2022
June 2020	Produce new Local Plan monitoring indicators	More detailed analysis of housing delivery performance.	Medium term	Medium	Local Plan Team	Identification of housing deliverability performance and emerging trends that may require further actions to increase deliverability.	In progress for Regulation 19 draft Local Plan
July 2021	Work closely with the landowners, housebuilders and infrastructure delivery providers to assist in speeding up development of the Whitfield Urban Expansion	To ensure the timely delivery of dwellings to meet the housing targets of the new Local Plan	Short term	Medium	Local Plan and Development Management teams	There are now 4 major house builders/land promoters with an interest in the site, and we are working with them to bring forward a revised SPD and delivery strategy.	In progress
June 2022	Unlocking strategic infrastructure - Whitfield roundabout	Working with National Highways and Kent County Council to identify mitigation scheme/s which will unlock development.	Short term	High	Local Plan Team	Enable Phase 2-3 Whitfield Urban Expansion and other developments to come forward	New initiative - in progress

# 18. Monitoring and Review

- Future HDAP will continue to monitor and review the implementation and progress of initiatives in this plan.
- Future HDAP will continue to consider progress of initiatives and will propose changes where appropriate.
- New initiatives will be considered as part of progressing the new Local Plan for Dover District and the continuing review of Development Management procedures.
- New Local Plan monitoring indicators to include where appropriate HDAP initiatives and report them annually through the Dover District Councils Authority Monitoring Report.
- Engagement with site promoters on housing deliverability to inform the delivery of major sites emerging through the new Local Plan