

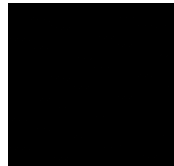
# Housing Delivery Forum

## May 2020

Hosted by Stuart Watson – Senior Policy Planner Dover District Council



To avoid sound interference please  
Mute your microphones.



There will be a panel Q&A session at the end of each section.

**The panel includes:**

Lois Jarrett, Head of Planning Regeneration and Development,  
Ashley Taylor Planning Policy and Projects Manager,  
Rebecca Burden Principal Policy Planner,  
Peter Wallace Development Management Team Leader

# **Local Plan Time Table update**

**Ashley Taylor**

# **Local Plan Time Table update**

## **Questions and Answers**

# **Housing Delivery Action Plan June 2020**

**Stuart Watson**

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# 1. Introduction

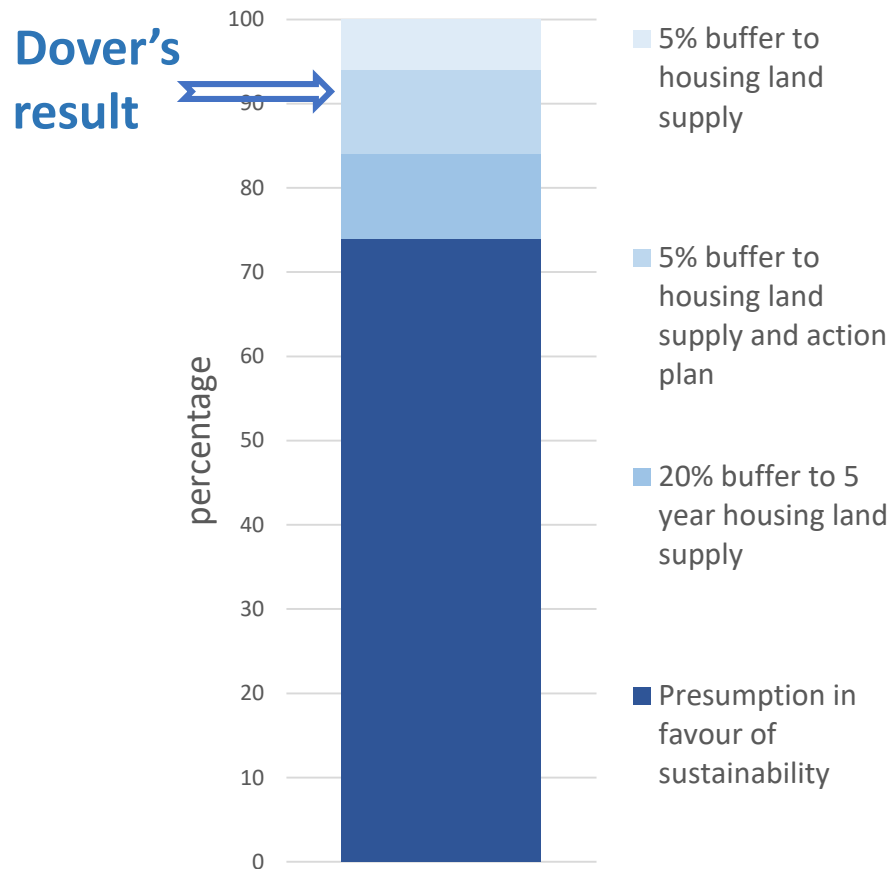
The 2018 NPPF and PPG introduced the Housing Delivery Test (HDT). The test measures the number of homes required over a three year period against the number of homes delivered and calculates the result as a percentage.

The latest HDT covers the monitoring years 2016/17, 2017/18 and 2018/19 and results were published on the 13<sup>th</sup> February 2020.

Dover scored a **92% 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 Plan 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 2019 results.



Dover performance against the latest HDT

# 2. HDT Forecast

The HDT determines the level of consequences applied to the 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%

Looking forward, based on the average historical delivery of homes in the District over the last three monitoring years and the potential impact from the COVID-19 pandemic, it’s likely **the Council’s performance against the HDT will deteriorate unless a series of short term and implementable actions are undertaken.**

92%			80%			74%			73%		
2016/17	2017/18	2018/19	2017/18	2018/19	2019/20	2018/19	2019/20	2020/21	2019/20	2020/21	2021/22
Current HDT Action Plan			Action Plan and 20% Buffer			Presumption in favour of Sustainability			Presumption in favour of Sustainability		

Dover’s forecasted HDT performance

# 3. HDAP Methodology

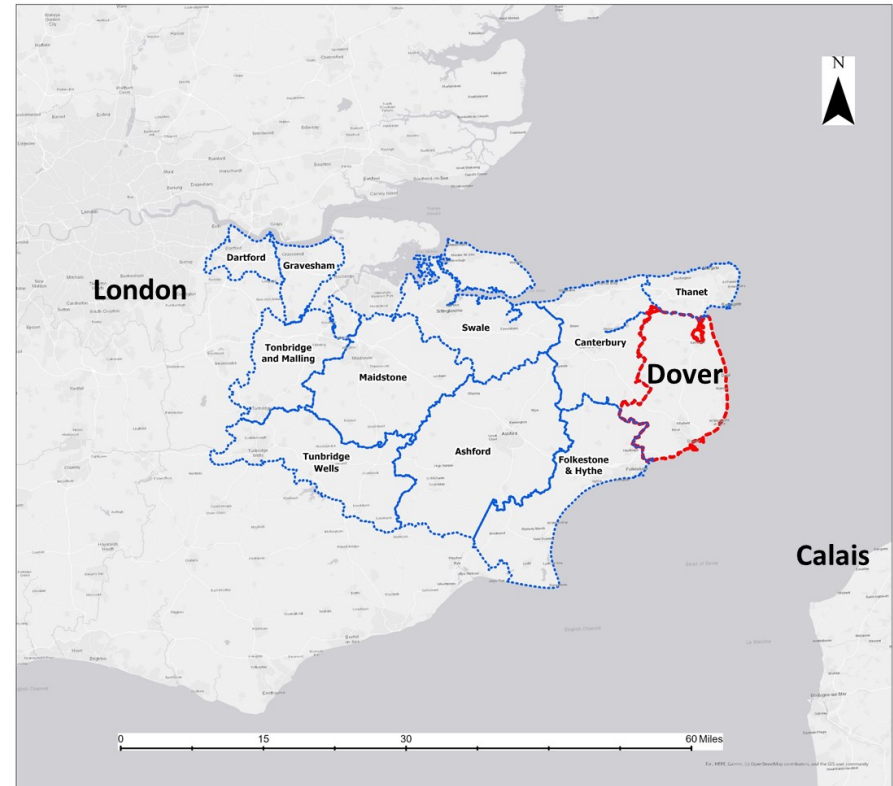
The HDAP using the National Planning Practice Guidance (NPPG) has reviewed and carried out the following:

- Dover District profile, demographic and infrastructure;
- Natural and built environment constraints for the District;
- Development Plan progress;
- 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 the Council will take to support housing delivery; and,
- Monitoring and review 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 Easry 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

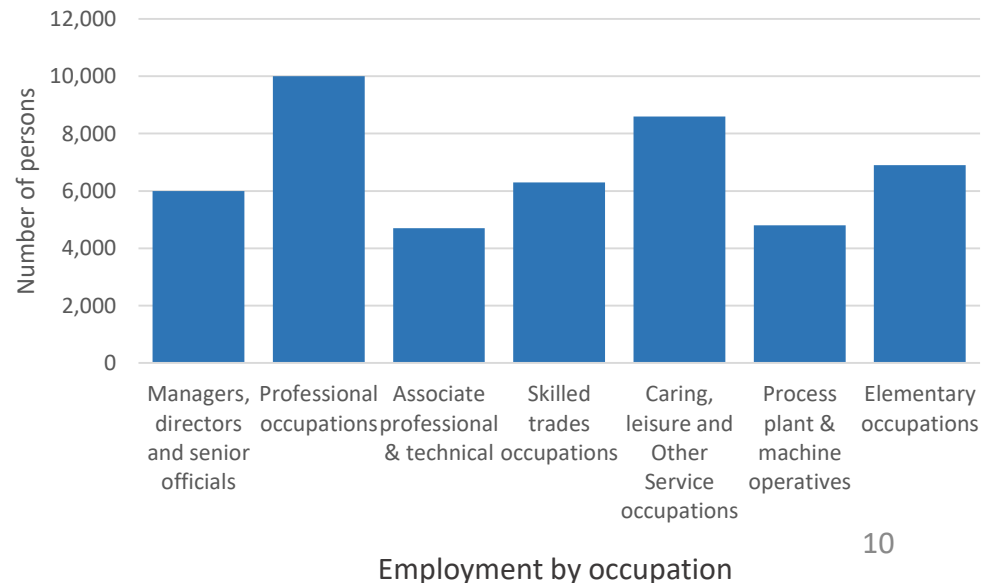
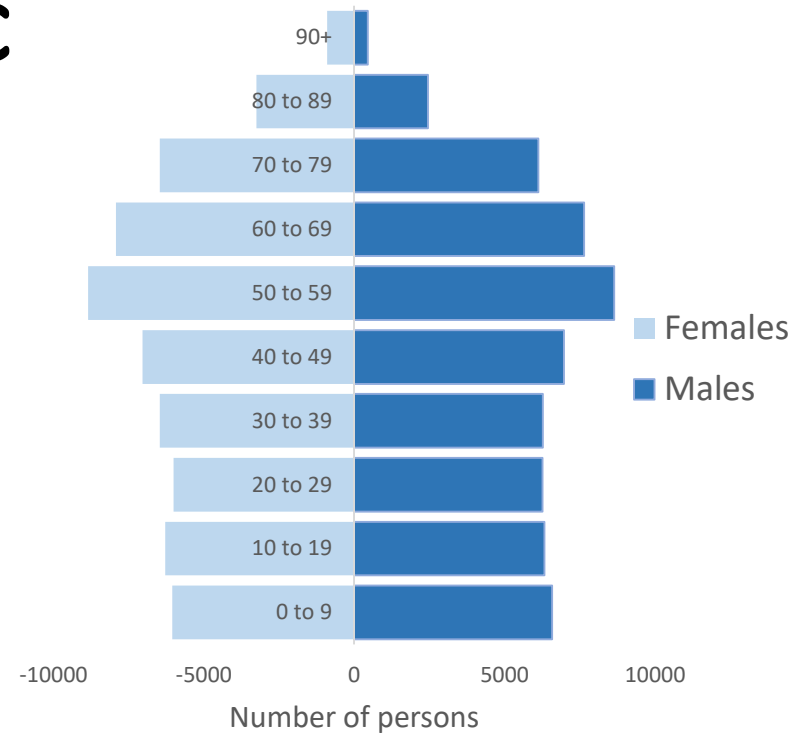
- 117,000 (57,800 males , 59,200 females)

## Education

- Percentage of working age residents with no qualifications 7%, 1.4% higher than the South East
- Percentage of working age residents with NVQ level 4 or higher 36.5%, 5.7% lower than the South East

## Employment

- Jobs in the district 42,000
- 29.1 businesses per 1,000 population
- 4.6% Unemployment rate, 1.5% higher than the South East

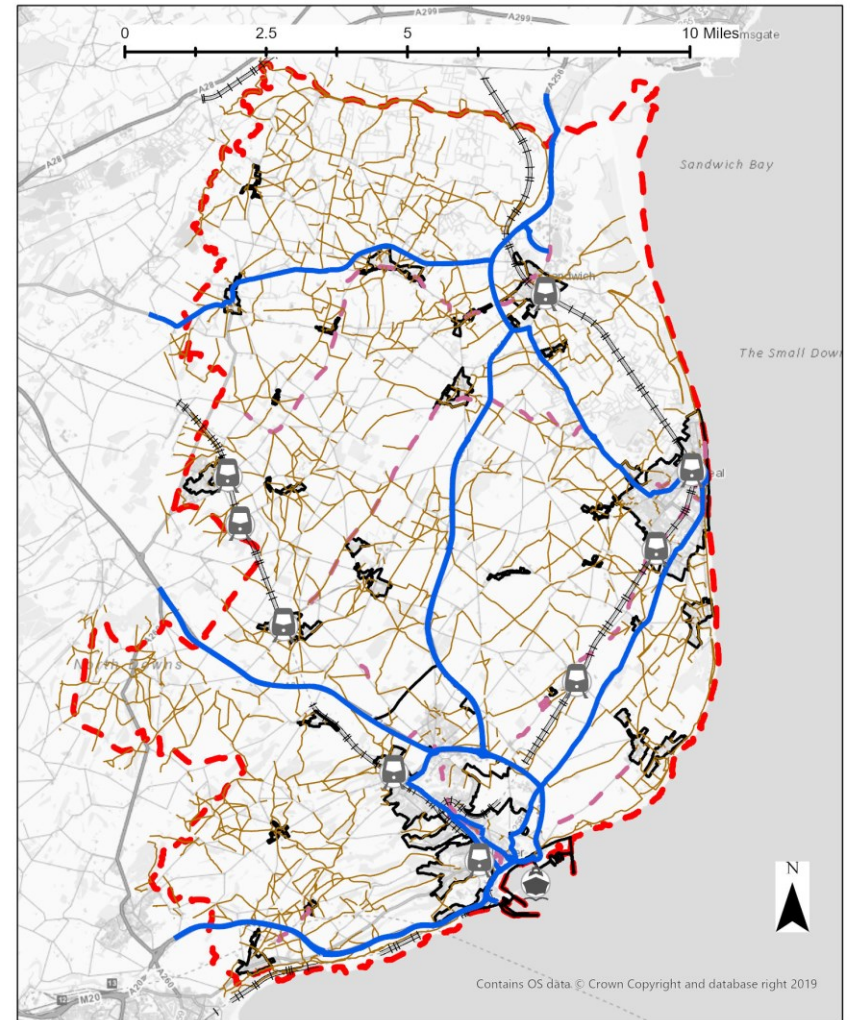


# 6. Infrastructure









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
- An abundance of Public Right of Ways



## Legend

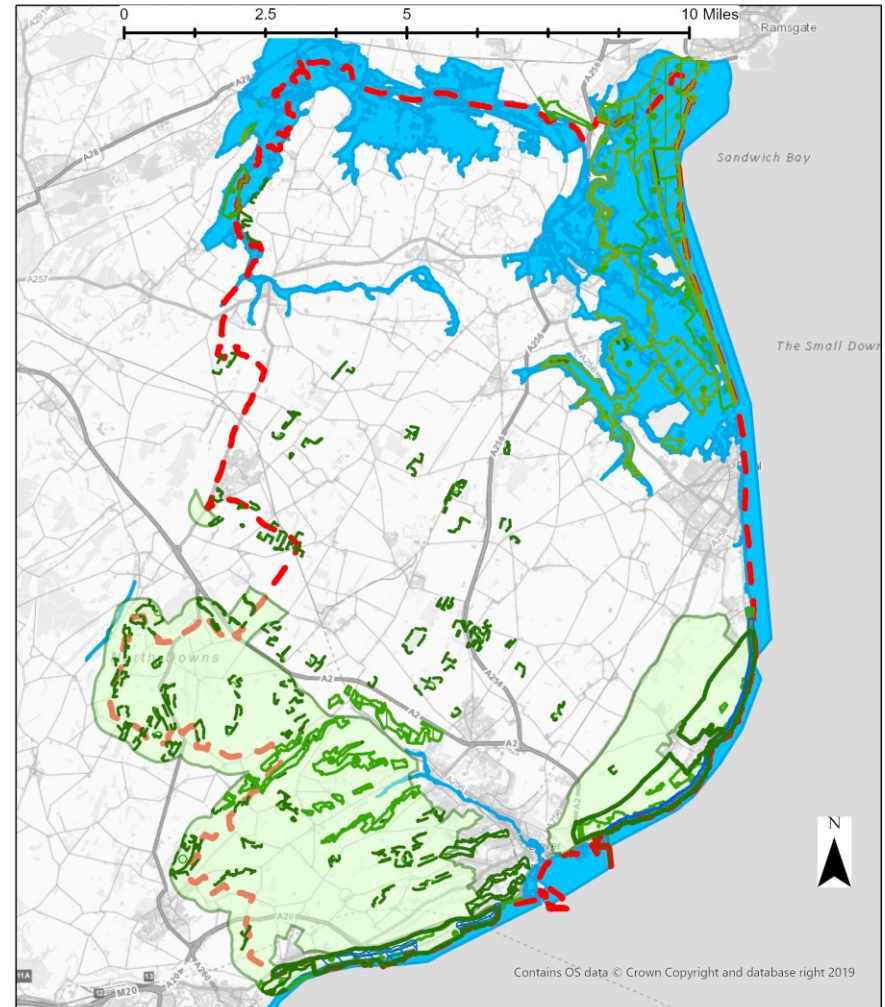
- |   |                 |   |                      |   |                       |
|---|-----------------|---|----------------------|---|-----------------------|
|  | Railway_Station |  | Strategic_Roads      |  | Settlement_Boundaries |
|  | Railway_Lines   |  | Cycle_Route          |  | District Boundary     |
|  | 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.
- 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                    |                   |

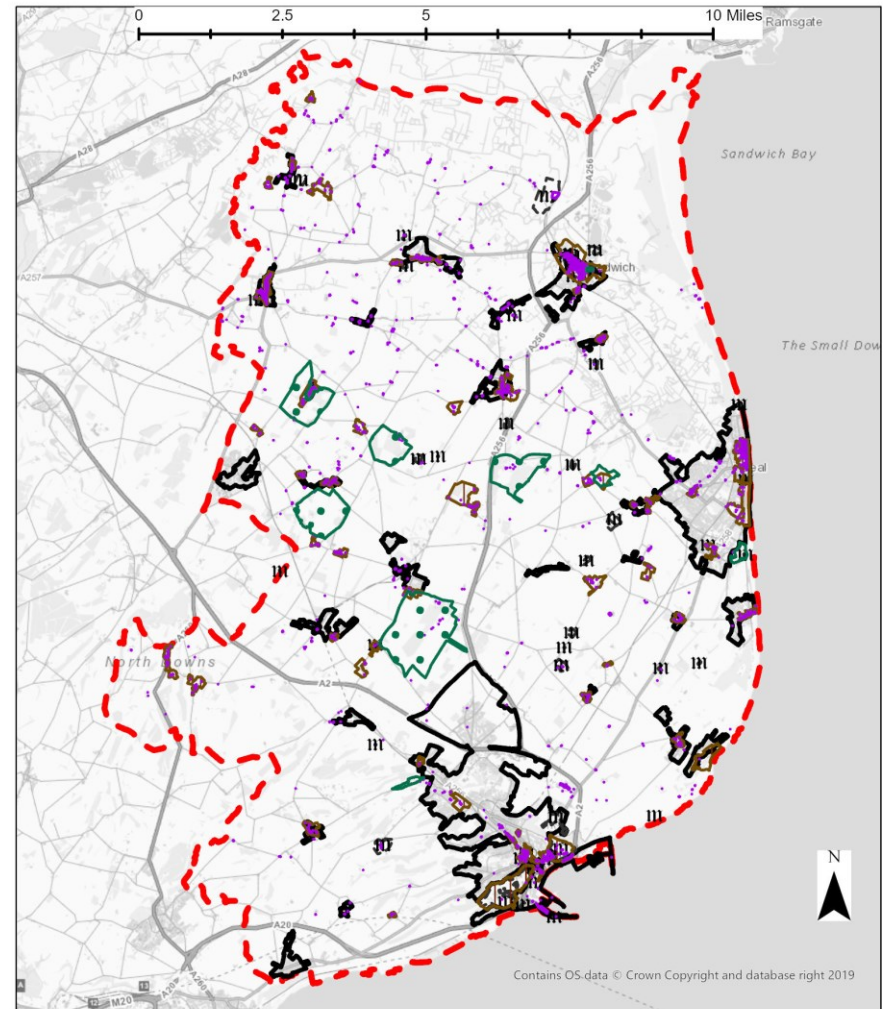


# 8. Built Environment

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.
- 39 Grade 1 listed buildings.
- 1,781 Grade II and 110 Grade II\* listed buildings.
- 50 Scheduled ancient monuments.
- 5 Registered parks and gardens.

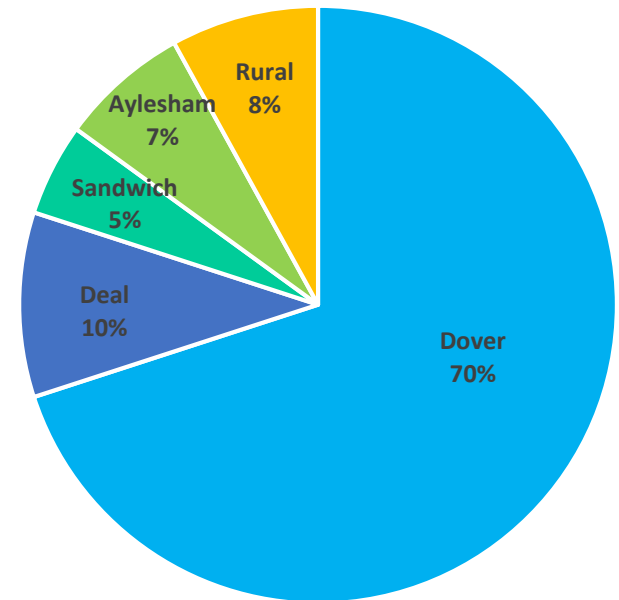


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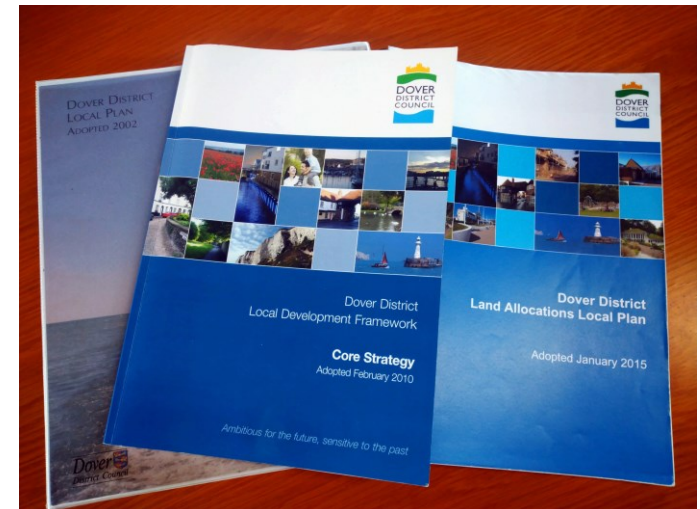
- District Boundary
- Settlement\_Boundaries
- Scheduled\_Monuments
- Conservation\_Areas
- Listed\_Building\_Polygons
- Historic\_Parks\_&\_Gardens

# 9. Development Plan

- **2010 Core Strategy** adopted, Plan for 14,000 new homes, with the aim of delivering a minimum of 10,100 homes by 2026
- Urban extension led housing strategy with 70% of completions planned within Dover.
- Provide a better mix of housing, with the focus on delivering more family housing in the District
- **2015 Land allocations Local Plan** adopted , additional land allocated for 2,465 dwellings.
- 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.
- 2022 target for new Local Plan adoption

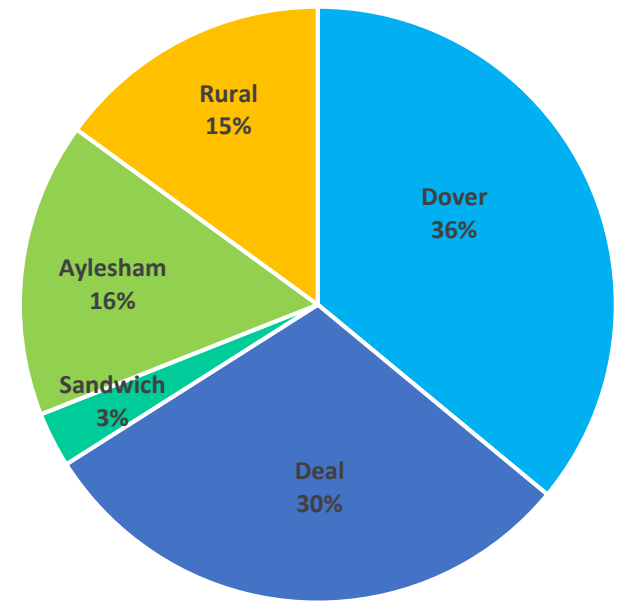


Distribution of housing allocations in the Core Strategy

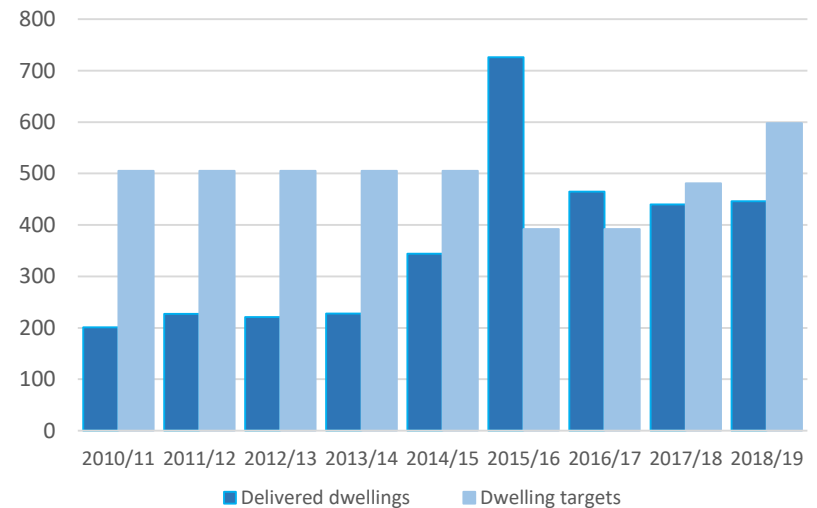


# 10. Housing Delivery

- The majority of new dwellings spread between Dover and Deal, rather than just Dover. Substantial completions have also occurred in Aylesham and the rural villages
- Between 2010/11 and 2018/19, 3,298 dwellings have been completed, 73% of the Core Strategy target of 4,545
- Completions significantly increased from 2015/16 with the introduction of the Land Allocations DPD, and performed better measured against the HDT transitional arrangement and Core Strategy targets.
- Completions in 2018/19 performed well compared to the Core Strategy target but poorly against the Local Housing Need calculation.
- Further details can be found in the Council's AMR and Housing Technical Paper 2019



Location of Housing Completions  
2006-2019



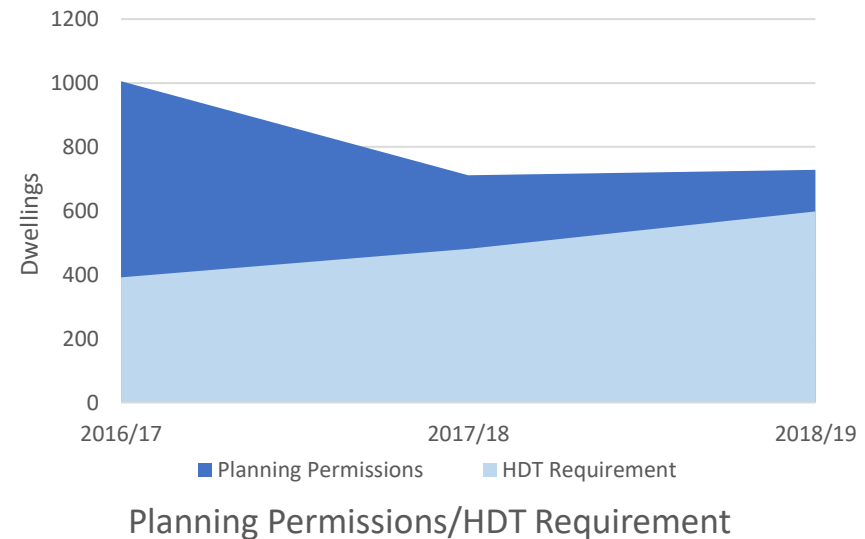
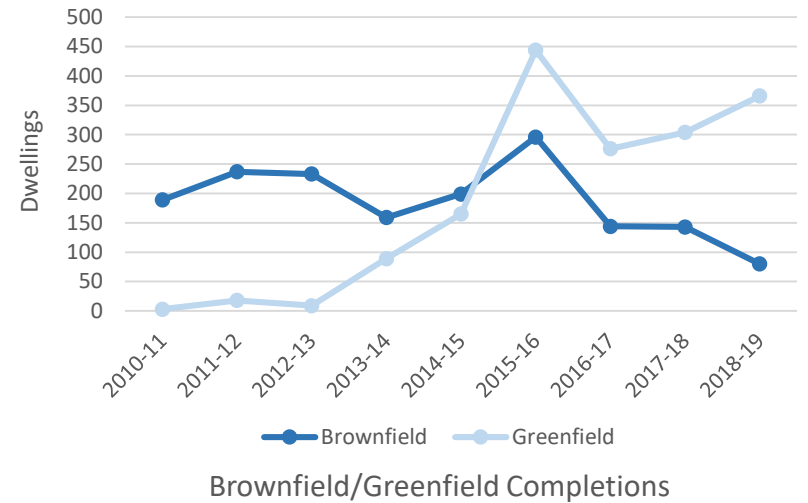
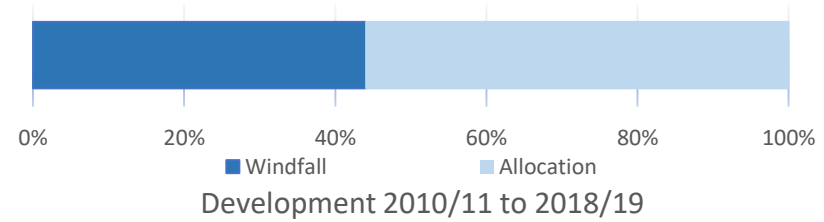
Completed dwellings measured against target

# 11. Delivery Analysis

- 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.
- Whitfield, 2010 core strategy allocation for 5,750 dwellings, to date has minimal delivery, 100 completions up to 2018/19. Land controlled by few owners carrying out the development.

## Development Management Performance 2016/17 to 2018/19:

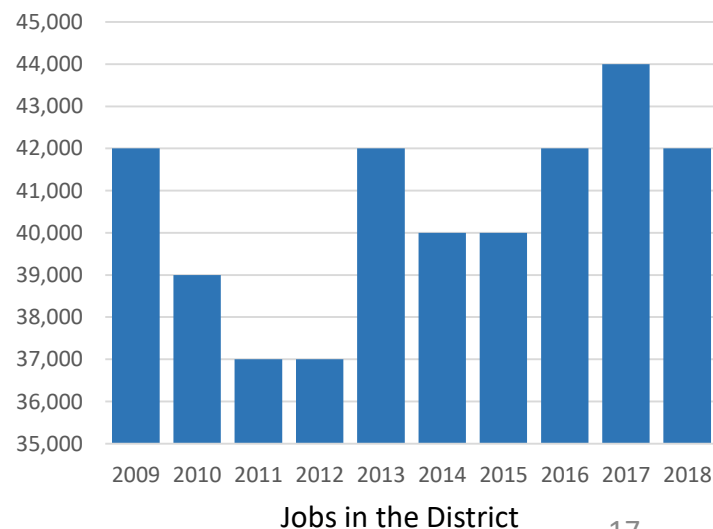
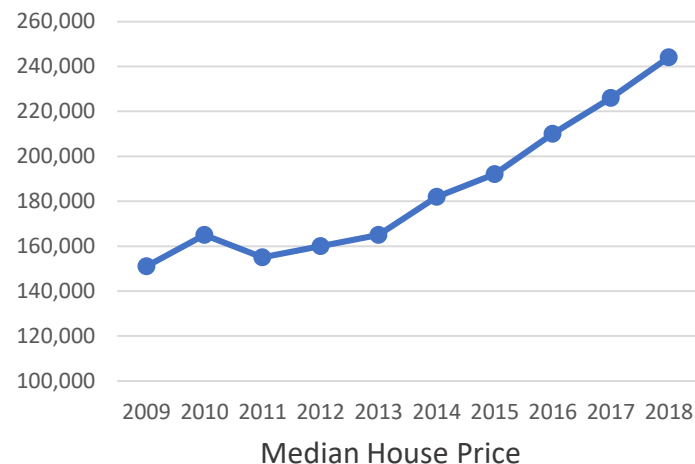
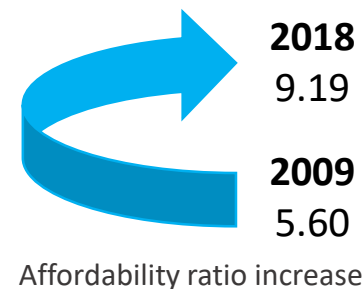
- 588 planning applications for dwellings,
- 70% of applications were granted and 70% were decided in time.
- 2,445 dwellings permitted compared to HDT requirement of 1,471.





# 12. External Factors Affecting Delivery

- In 2018 the average cost of a home in Dover District was **9.19** times the average work place earnings, an increase of nearly 4 fold since 2009 (ONS 2020).
- In the 10 years between 2009 to 2018, the median house price increased **62%**, compared to a median work based earnings decrease of 1% (ONS 2020). Job creation during this time remained stagnate at 42,000.
- Localised traditional port and farming economy, distant from the economic hub of London – 1 hour 59 minutes by car ([ukdistance.com](http://ukdistance.com)), and 1 hour 13 minutes by train ([trainline.com](http://trainline.com)).
- In 2017 the estimated 1ha residential land price for the District was £2.4m an increase of £1.3m, more than double the value in 2014 (Kent County Council 2017).



# 13. Summary

## Delivery Issues

- AONB and Flood risk land constraints around main settlement areas.
- Dated Core Strategy based on Regional Spatial Strategy housing targets.
- Market led windfall housing out side 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.

## Challenges

- Identify suitable land for development that is available, deliverable, in a sustainable location and not constrained.
- Increasing housing affordability ratio trend driving up local housing need.
- Time required to produce a new Local Plan that is NPPF 2019 compliant and meets the Local housing Need methodology.
- Protection of the natural environment including the AONB and coastlines and the setting of heritage assets.

## Problems

- Highly deliverable areas for housing around Deal and Sandwich that suffer from many constraints.
- Low work based earning 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 low salary increases and job creation.

## 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 allocations to meet housing target that has not delivered completions.
- Dover economy reliant on traditional employers and is distant from the regional employment hub of London.

# 14. 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.

# 15. Initiatives: Local Plan

Action	Purpose	Timeframe	Priority	Implementation	Outcome
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	Regeneration and Delivery Team	Enable developers to identify sites Council are considering for the Local Plan.
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	Regeneration and Delivery Team	Provide a level of certainty to developers on sites the Council consider potentially suitable for allocation in the Local Plan.
Further targeted call for sites	To help identify additional sites that would be beneficial for consideration within the Local Plan.	Short term	Medium	Regeneration and Delivery Team	Provide an update of additional suitable sites for allocation within the Local Plan.
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	Regeneration and Delivery Team	Provide a high level of certainty to developers on sites the Council consider potentially suitable for allocation in the Local Plan.
Submit Local Plan for adoption	Allow the Local Plan and development sites to be tested through examination on their deliverability.	Medium term	High	Regeneration and Delivery Team	Allow the council strategy and allocated sites be tested through external examination.
Adopt Local Plan	Give certainty to developers on the Councils intention towards developing sites within the District.	Long term	High	Regeneration and Delivery Team	Council will permit allocated development sites that have planning applications that meet policy criteria.

# Initiatives: Development Management

Action	Purpose	Timeframe	Priority	Implementation	Outcome
Review S106 time frames	To identify any potential blockages in the S106 process.	Short term	Low	Regeneration and Delivery Team	Determine whether S106 are blockage to issuing planning decisions. If they are a blockage to identify why.
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.
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.
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.
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.
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.

# Initiatives: Delivery of sites

Action	Purpose	Timeframe	Priority	Implementation	Outcome
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	Regeneration and Delivery 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.
Produce new Local Plan monitoring indicators	More detailed analysis of housing delivery performance.	Medium term	Medium	Regeneration and Delivery Team	Identification of housing deliverability performance and emerging trends that may require further actions to increase deliverability.

# 16. Monitoring and Review

- Future HDAP will monitor and review the implementation and progress of actions in this plan.
- Future HDAP will consider progress of actions and will propose changes based on the success of actions.
- Actions will be considered as part of the drafting of the new Local Plan for Dover District.
- New Local Plan monitoring indicators to include where appropriate HDAP actions and report them annually through the Dover District Councils Authority Monitoring Report.
- Engagement with site promoters through a housing deliverability forum and the forum to participate in review of the HDAP.

# **Housing Delivery Action Plan**

## **Questions and Answers**



# **HELAA update**

**Rebecca Burden**

- Officers have been undertaking a Housing and Economic Land Availability Assessment to inform the preparation of the new Local Plan
- The HELAA has been prepared in accordance with the government's methodology set out in the Planning Practice Guidance
- An overview of the HELAA work was published on the Council's website at the end of March 2020.
- The purpose of the HELAA is to identify a future supply of land in the District which is suitable, available and achievable for housing development uses over the Plan period to 2040.
- The HELAA is a technical piece of evidence required by the National Planning Policy Framework to support Plan making.
- However, the HELAA does not in itself determine whether a site should be allocated for development.
- This is the role of the Local Plan and will depend upon the extent of policy and practical constraints identified in the HELAA assessment and the choices ultimately made by the Council taking account of the outcomes of the Sustainability Appraisal and other evidence.

- Work on the HELAA is on-going and the findings presented on the Council's website provide a high level assessment of the suitability and availability of sites submitted as part of the call for sites in 2017, as well as other sites identified in accordance with the methodology.
- To date the HELAA has focussed on sites for housing with an Economic Land Review being undertaken at present.
- The HELAA is published for information only at present, however the Council will be consulting on the draft Dover District Local Plan later this year or early in 2021 and representations on sites will be invited at that stage.
- In the meantime officers are intending to write to site promoters to request further information where required. This will then be fed into the assessment process.

# **HELAA update**

## **Questions and Answers**

# **Evidencing Housing Deliverability**

**Stuart Watson**

# Policy and Guidance

## **NPPF paragraph 67.**

Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

Planning policies should identify a supply of:

**a) specific, deliverable sites for years one to five of the plan period; and**

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

## **NPPF paragraph 73**

Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and **update annually a supply of specific deliverable sites** sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old...

# Policy and Guidance

## NPPF Glossary Definition

**Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

**Developable:** To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

## In summary

Sites considered deliverable unless there is evidence they are not, include:

All minor development sites with planning permissions 9 dwellings or under, or where number of dwellings is not given under 0.5ha;

Major sites with full planning permission;

Major sites with outline planning permission and with approved reserved matters

Major sites with prior notifications.

Sites requiring evidence they are deliverable, include:

Major sites allocated within the Development Plan;

Major sites with Permission in Principle;

Major sites identified on the Brownfield Register; and,

Major sites with Outline Planning Permission.



# Determining phasing and build out rates:

- Promoters for sites of 5 or more dwellings contacted for latest phasing and build out rates;
- Small sites of 1 to 4 dwellings are determined by the phasing assumptions table;
- Promoter contact attempted by email, letter and telephone;
- **Deliverability evidence** now requested on major sites without detailed planning consent;
- Promoter Feedback reviewed against average lead-in times and build out rates for the district, policy requirements and historical site performance;
- Sites with no feedback are phased based on site phasing assumptions table;
- Site phasing assumptions table is determined by historical lead-in times and build out rates for the District.

## Average Lead-in times

		Outline	Full Plans	Reserved matters
<b>Average (years)</b>		2.2	2.0	2.1
<b>Average (days)</b>		807	742	770
<b>Year of Decision</b>	2018/19	*	408	*
	2017/18	*	527	610
	2016/17	*	555	440
	2015/16	734	614	571
	2014/15	761	503	909
	2013/14	*	776	474
	2012/13	922	551	*
	2011/12	813	1553	*
	2010/11	*	1192	1616
	* no data			

## Average Build Out rates

Site size	1 to 4	5 to 9	10 to 24	25 to 49	50 to 99	100 to 199	200+
<b>Overall Average</b>	1	5	10	19	26	60	71
<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	*
* no data							

# Phasing assumptions Table

- Bench mark to review sites with survey feedback
- Baseline for sites with no survey feedback
- Major sites without detailed consent are phased based on whether there is **deliverability evidence**.

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
<b>Minor sites upto 9 dwellings</b>										
Full plans/ Reserved matters/ Prior Notifications under construction	■									
Full plans/ Reserved matters/ Prior Notifications: Not started - greenfield		■								
Full plans/ Reserved matters/ Prior Notifications: Not started - Brownfield			■							
Outline permissions				■						
Allocations - Deliverability Evidence					■					
Allocations - No Deliverability Evidence						■				
<b>Major sites 10 dwellings or more</b>										
Full plans/ Reserved matters/ Prior Notifications under construction	■									
Full plans/ Reserved matters/ Prior Notifications not started		■								
Full plans awaiting S106			■							
Outline permissions - Deliverability Evidenced			■							
Outline permissions - No Deliverability Evidenced						■				
Outline permissions awaiting S106 - Deliverability Evidenced				■						
Outline permissions awaiting S106 - No Deliverability Evidenced						■				
Allocation - Deliverability Evidenced					■					
Allocation - No Deliverability Evidenced, Strong intent to develop						■				
Allocation - No Deliverability Evidenced, Intent to develop							■			
Allocation - no short term intent to develop										■

■ first year of phased delivery

# Ways to Evidence Deliverability

**NPPG 2019** Such evidence, to demonstrate deliverability, may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.
- Plan-makers can use the [Housing and Economic Land Availability Assessment](#) in demonstrating the deliverability of sites.

# Types of evidence:

Council led evidence:	Site promoter led evidence:
HELAA site assessment (viability, achievability);	Site assessments (contamination, archeological);
Bench marking of development typologies;	Viability assessments;
Statements of Common Ground;	Time table for detailed consent with evidence:  Confirmation of financial support for the project; CV's for project management team and key project staff; Project profile; Up to date business plan; Capital cost breakdown for the project;
Monitoring of discharge of conditions;	

## What is reasonable evidence?

Site size?

Urban/Rural?

Stage of plan making?

Potential allocation/allocated?

Implications of no evidence?

# **Evidencing Deliverability**

## **Questions and Answers**