

Dover District Council
Housing Delivery Action Plan
June 2020

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1. Introduction

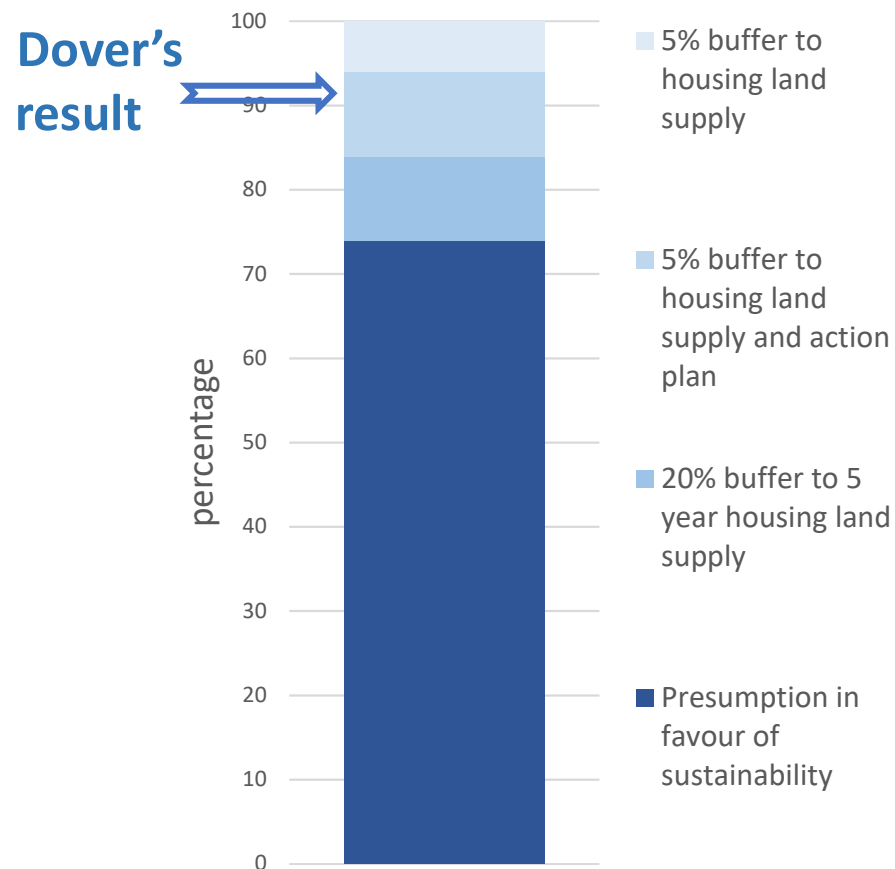
The 2018 NPPF and NPPG introduced the Housing Delivery Test (HDT). The test measures the number of homes required over a three year period against the number of homes delivered and calculates the result as a percentage.

The latest HDT covers the monitoring years 2016/17, 2017/18 and 2018/19 and the results were published on the 13th 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 initiatives are undertaken.**

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

Dover’s forecasted HDT performance

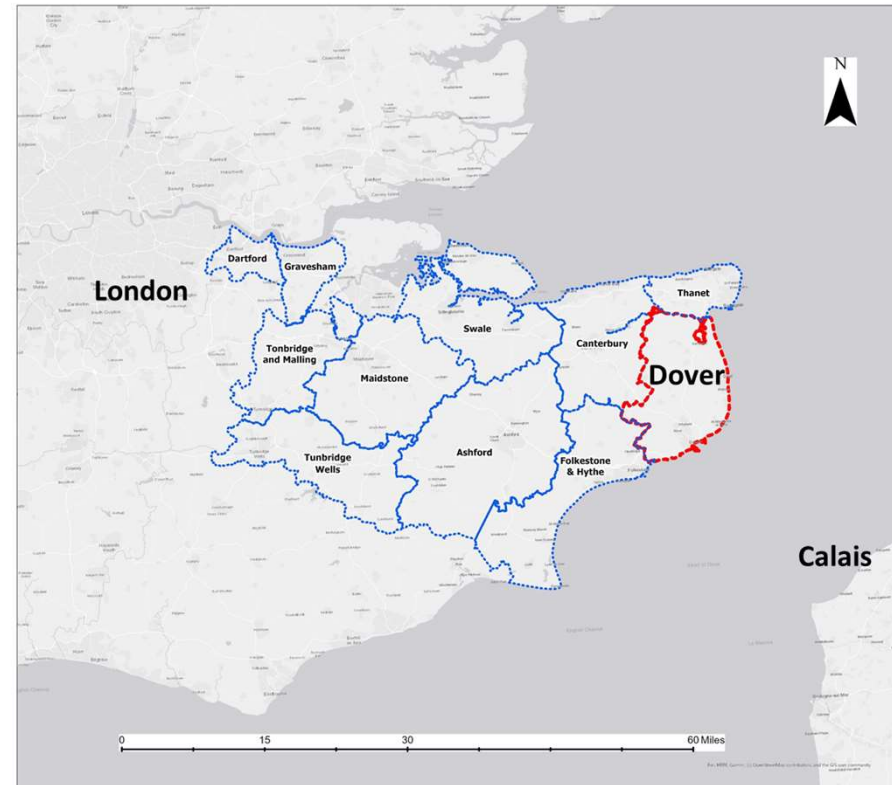
3. HDAP Methodology

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 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

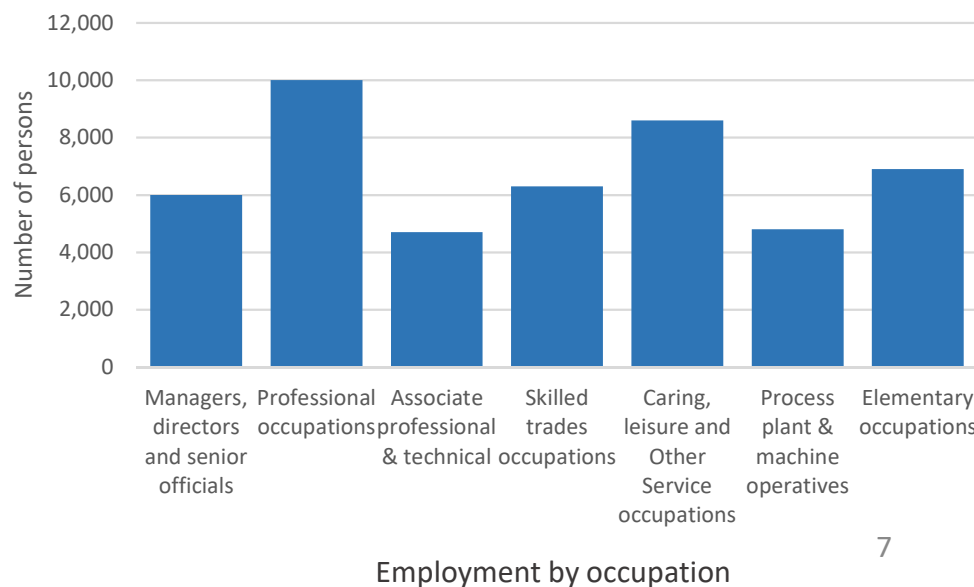
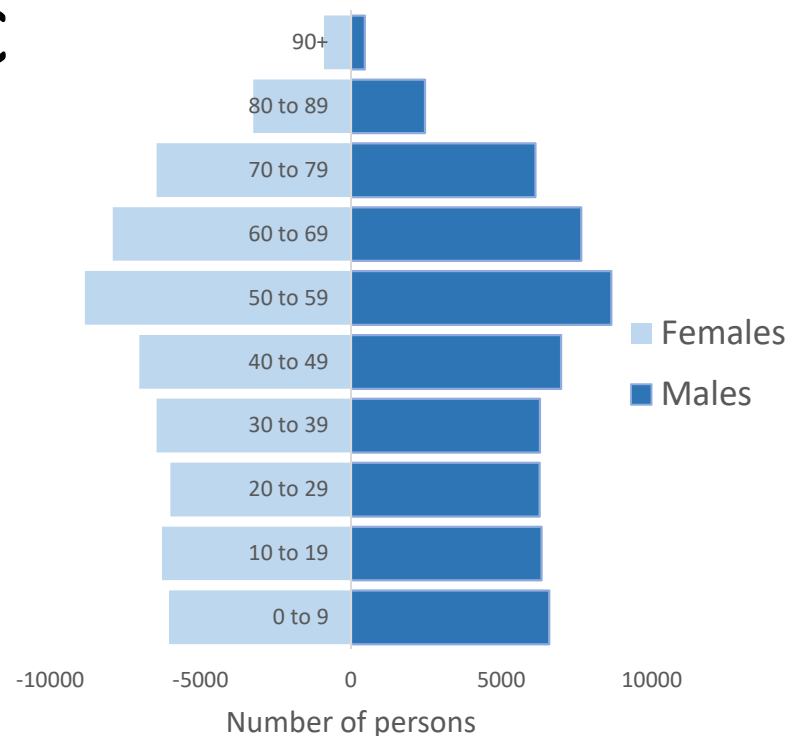
- 117,000 (57,800 males , 59,200 females),

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.

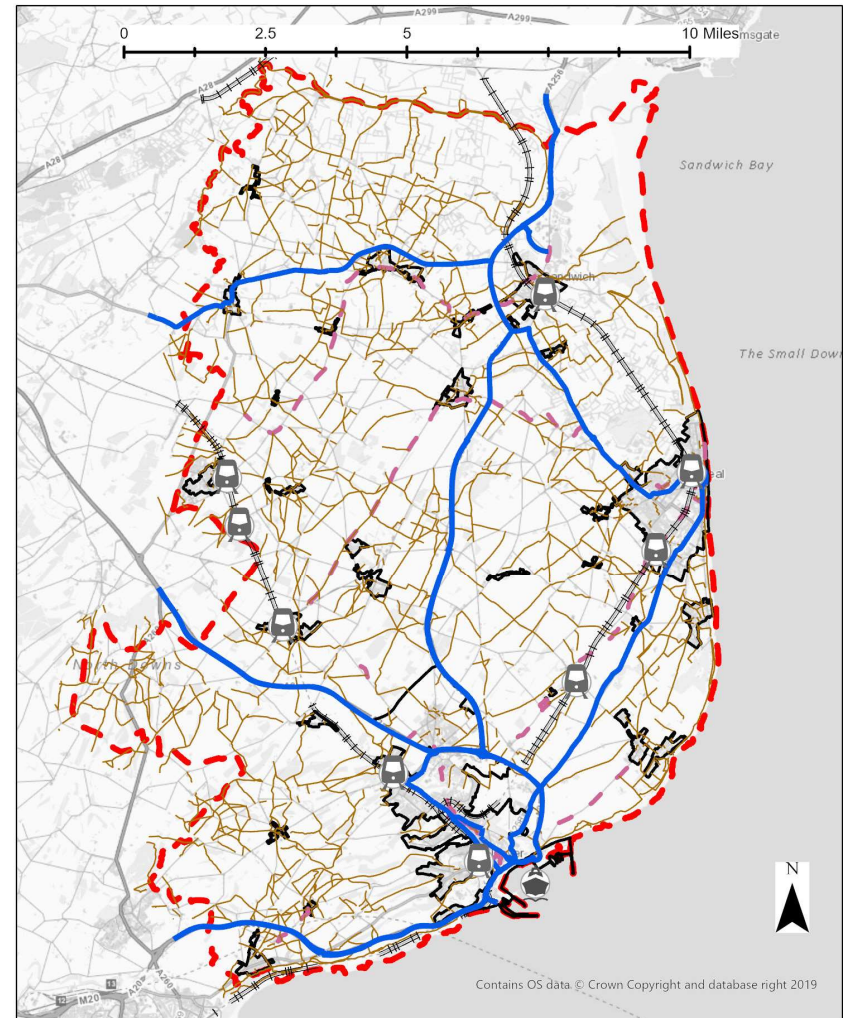


6. Infrastructure

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; and,
- An abundance of Public Right of Ways.



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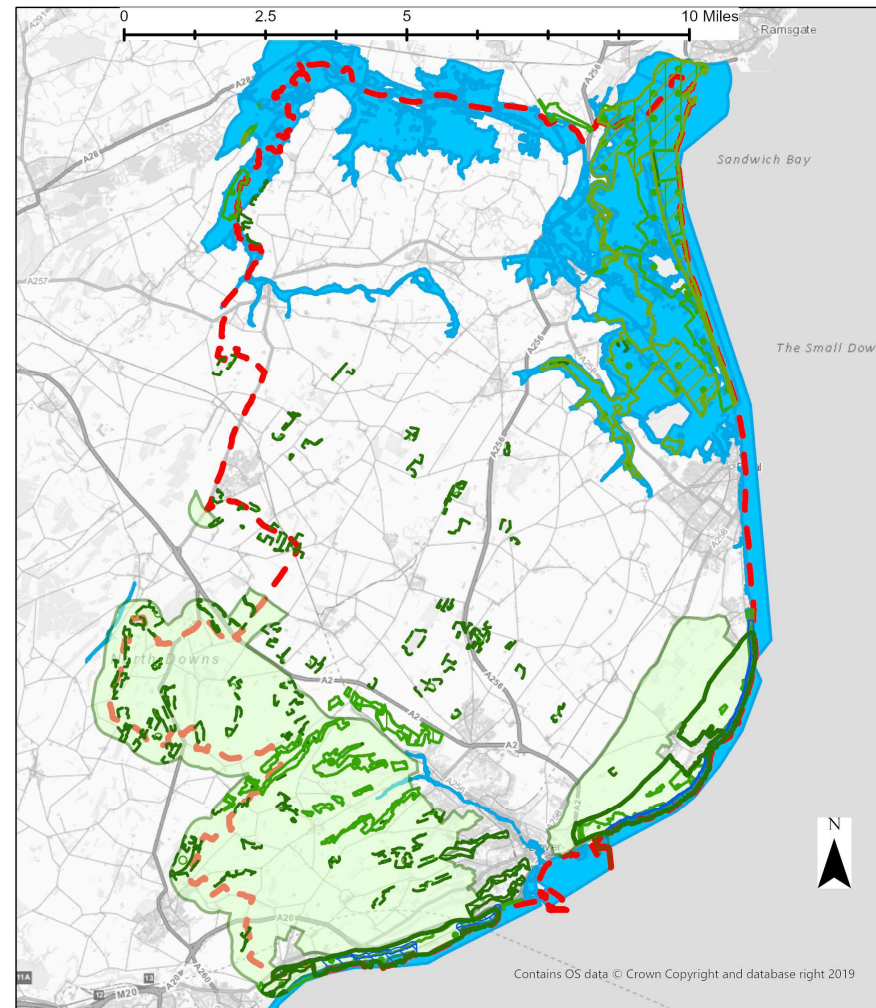
Railway_Station	Strategic_Roads	Settlement_Boundaries
Ferry_Port	Railway_Lines	District Boundary
	Cycle_Route	
	Public_Rights_of_Way	

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



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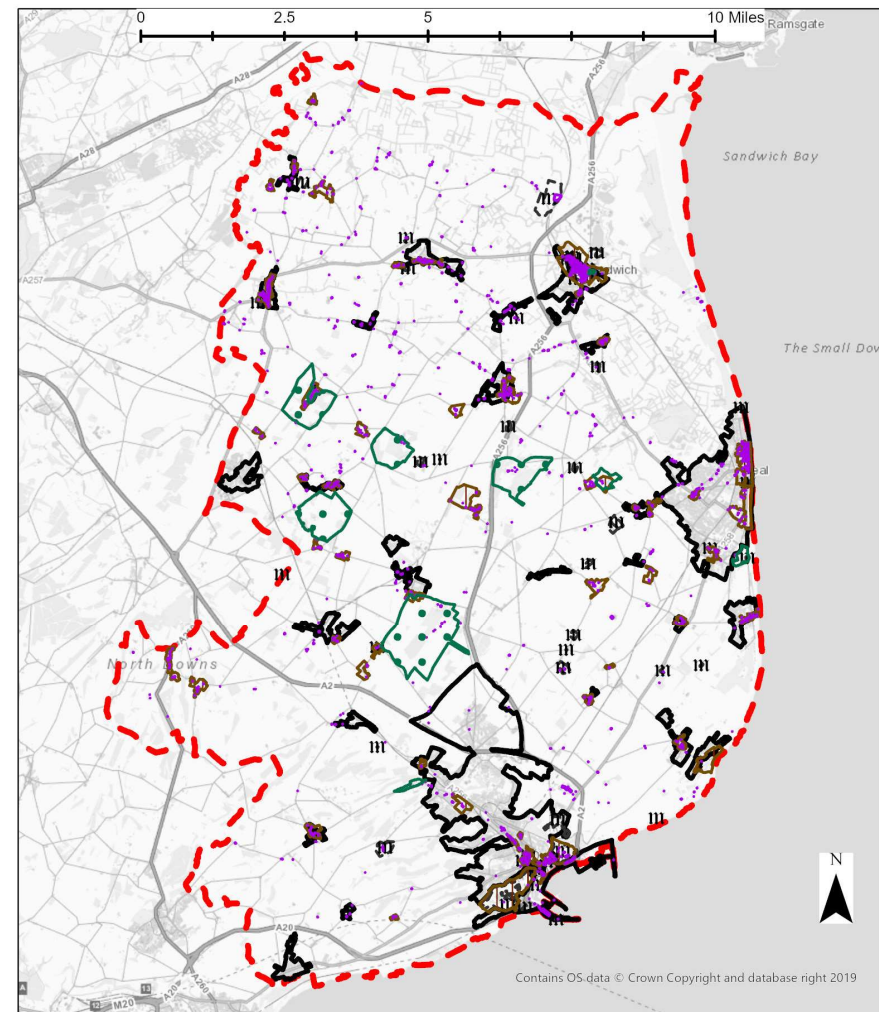
- | | | |
|-------------------------------------|---------------------------------|-------------------|
| Heritage Coast | National Nature Reserves | District Boundary |
| Area_of_Outstanding_Natural_Beauty | Local Nature Reserves | |
| RAMSAR | Ancient Woodland | |
| Special_Protection_Areas | Coastal_Change_Management_Areas | |
| 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; and,
- 5 Registered parks and gardens.

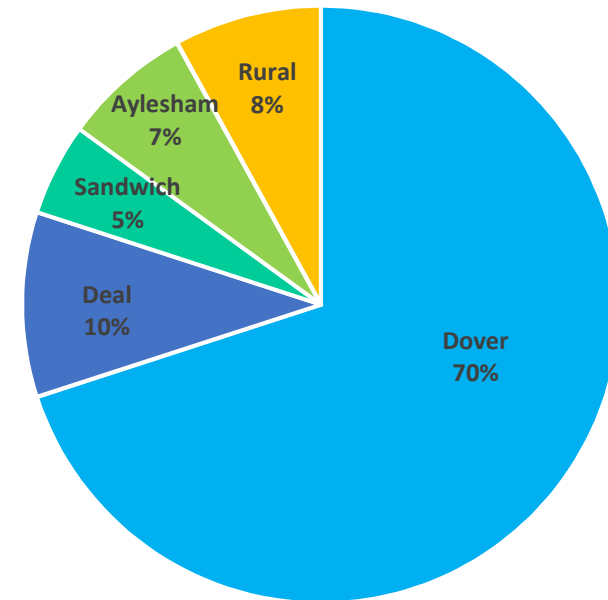


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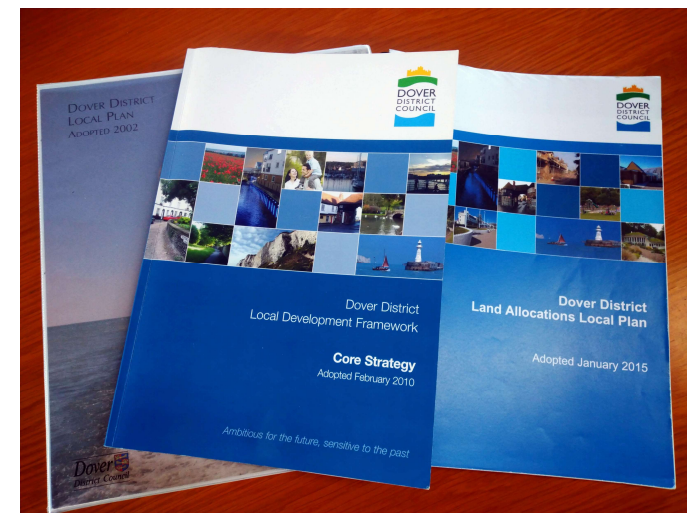
- District Boundary
- Settlement_Boundaries
- Scheduled_Monuments
- Conservation_Areas
- Listed_Building_Polygons
- Historic_Parks_&_Gardens

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.

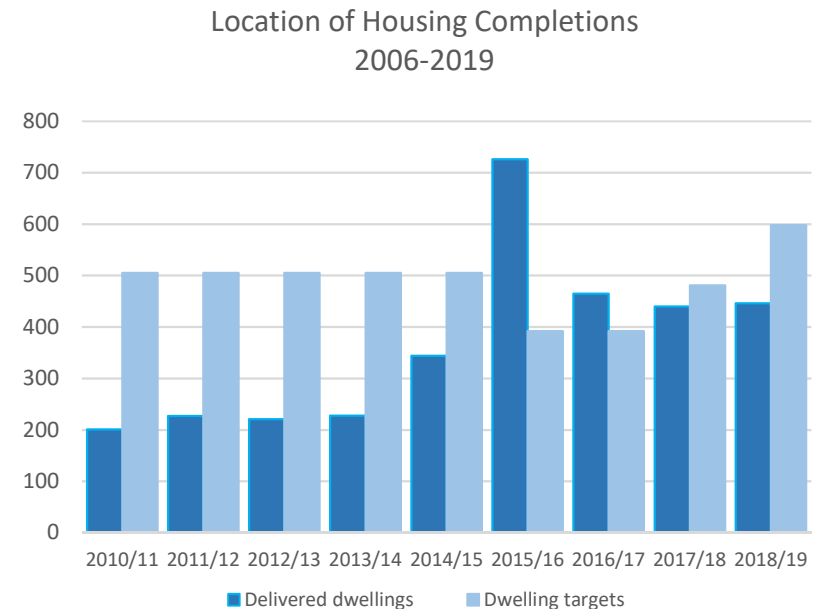
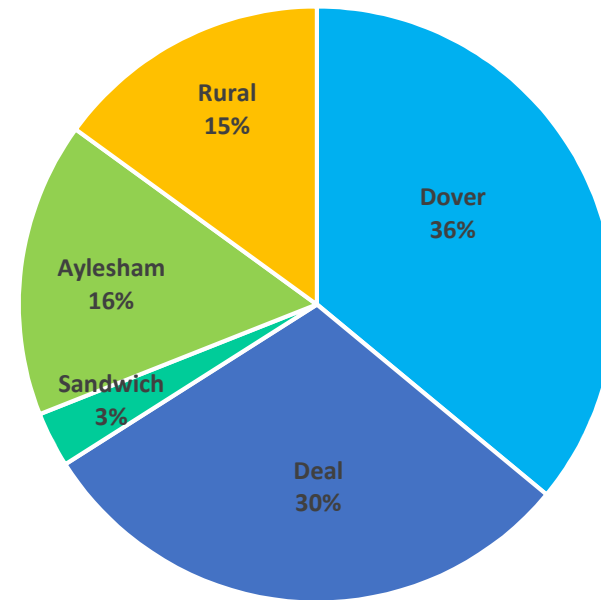


Distribution of housing allocations in the Core Strategy



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.

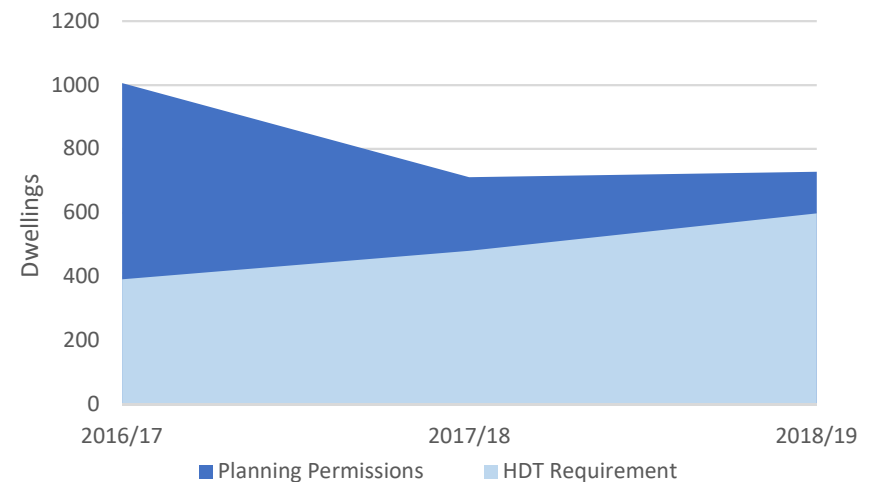
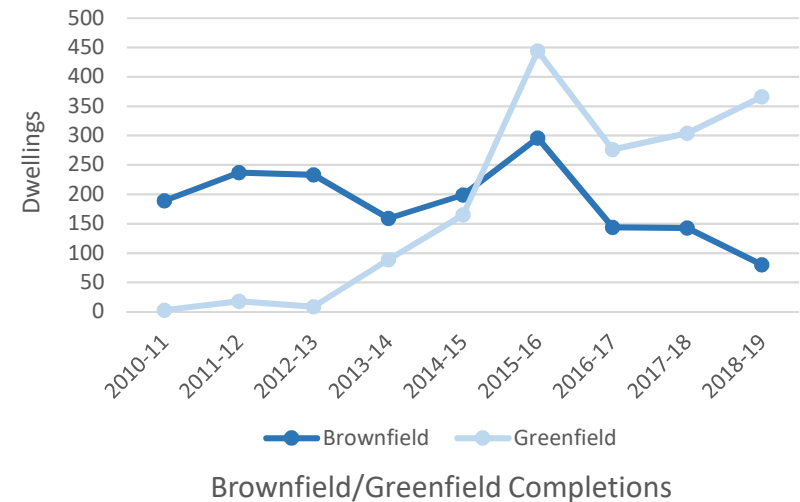
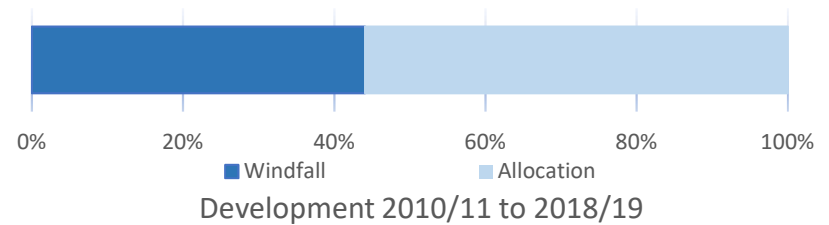


11. Delivery Analysis

- 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:

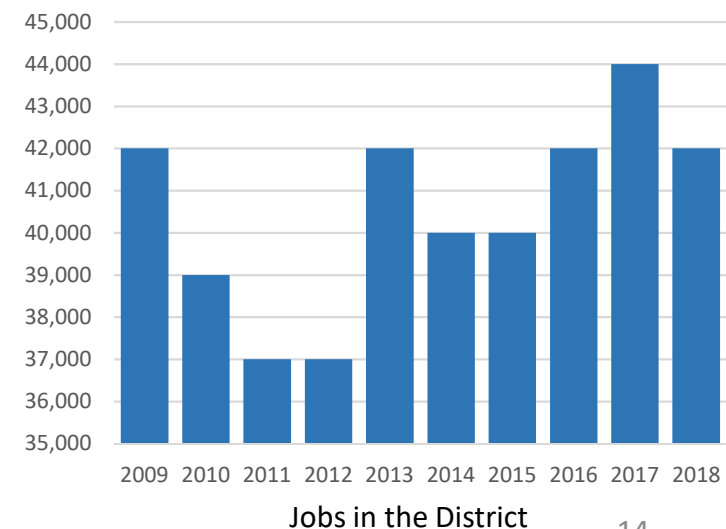
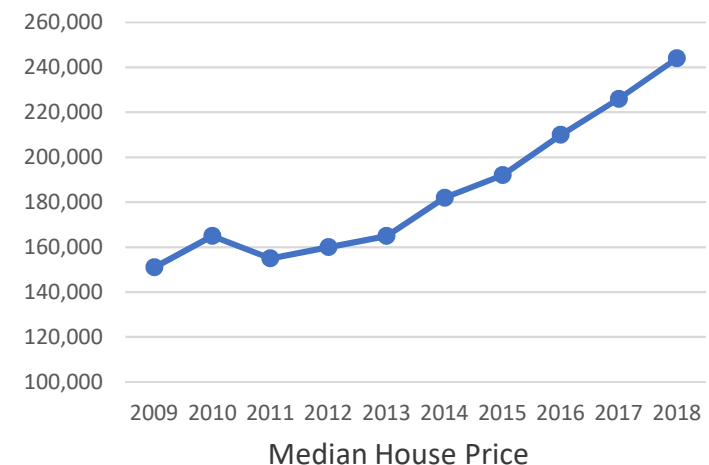
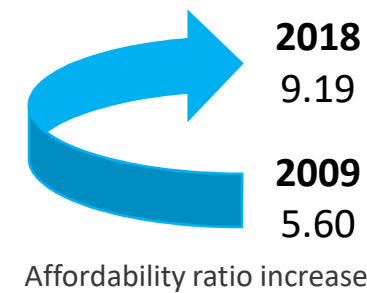
- 588 planning applications for dwellings;
- 70% of applications were granted and 70% were decided in time; and,
- 2,445 dwellings permitted compared to HDT requirement of 1,471.



Planning Permissions/HDT Requirement

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), and 1 hour 13 minutes by train (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.