

Dover District Council

Housing Land Supply



2024 – 2029
(updated January 2025)

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Executive Summary

- 1.1 This report is based on annual housing data from the 1st April 2023 to 31st March 2024 monitoring period, with updates to application progress as of January 2025. It supersedes the report published in April 2024 and the housing land supply position set out in the Adopted Dover District Local Plan to 2040 (October 2024) which were both based on the 1st April 2022 – 31st March 2023 housing data.
- 1.2 For the purposes of this five-year housing land supply position, the Council has a Local Housing Need of 611 dwellings per annum¹, which equates to a requirement of 3,055 dwellings over the next five-year period (2024-2029). A 5% buffer is required in accordance with the National Planning Policy Framework (NPPF) 2024. This creates a total 5-year housing need of **3,208 dwellings**.
- 1.3 There **are 3,208 dwellings** within the Councils housing land supply that are deliverable within the five-year requirement period (**equating to 6.4 Years of supply**).
- 1.4 The latest confirmed Housing Delivery Test 2022-23 (HDT) result is **106%** for the reporting years 2020-21, 2021-22 and 2022-23 as confirmed by the Department for Levelling Up and Communities (DLUCH) publication in December 2024.

¹ Based on the agreed housing need figure in the Adopted Local Plan (October 2024)

Introduction

- 2.1 This document sets out Dover District Council's assessment of its housing land supply from 1 April 2024 to 31 March 2029. It is an update to the previous report published in April 2024 and the housing land supply position set out in the Adopted Dover District Local Plan to 2040 (October 2024) which are based on the 1 April 2022 – 31 March 2023 housing data.
- 2.2 The purpose of the update is to reflect the December 2024 revised National Planning Policy Framework (NPPF)² which this includes new guidance in respect of the housing land supply and the requirements for a buffer. It is however still based on the 1 April 2022 to 31 March 2023 housing data but includes updates with regards to Local Plan site allocation progress, planning application and site delivery information as of January 2025.
- 2.3 The NPPF 2024 requires all Local Planning Authorities (LPAs) to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where strategic policies are more than five years old. This should include a buffer, depending on local circumstances.
- 2.4 If the Council was unable to demonstrate a five-year housing land supply, the presumption in favour of sustainable development would apply, as set out in paragraph 11 of the NPPF and the corresponding footnote 8. This is to enable the development of alternative sites to meet the policy requirements. As set out in this report, this does not apply to Dover at present.
- 2.5 This report will be updated during 2025 to reflect the 1st April 2024 to 31st March 2025 housing data, once this is available.

² [National Planning Policy Framework - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework)

Housing Requirement

- 3.1 The NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the 'standard method' set out in national planning guidance.
- 3.2 At the time of local plan production,³ the methodology was to use the baseline of 2014-based Household Projections for calculating local housing need for Dover District. This is what the Adopted Local Plan housing requirement is based upon.
- 3.3 The details of how this calculation was undertaken is provided at the Appendix 1. This shows that using household growth projections of 2014 and affordability ratio of 9.57 released 23rd March 2022, the Local Housing Need figure for the five-year period this report covers is **611 dwellings per annum** which equates to 3,055 dwellings over the five-year period 2023/24-2028/29.
- 3.4 The 2024 updates to the NPPF and PPG set out a new housing need 'standard methodology', which would be different to that used for the Local Plan set out above. However, due to the recent adoption of the Local Plan and transitional arrangements set out in the NPPF, the council does not need to review the housing requirement adopted in the Local Plan and **the 611 per annum requirement will remain the requirement for the district at this time**. The changes do require the council to now include a 5% buffer on the need calculation (see below).

Methodology

- 4.1 National Planning Guidance requires the Council's assessment of housing land supply to be carried out robustly and based on up-to-date and sound evidence. This section sets out the methodology applied to the calculation of Dover District's housing supply.

Appropriate buffer

- 4.2 Paragraph 78 of the 2024 NPPF sets out the requirements for demonstrating land supply and which level of additional 'buffer' should be added to the housing requirements depending on local circumstances of delivery.

³ Government statement 1 April 2021 in response to Changes to the current planning system consultation August 2020 [Government response to the local housing need proposals in "Changes to the current planning system"](https://www.gov.uk/government/consultations/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system) - GOV.UK (www.gov.uk)

- 4.3 For Dover, a 5% buffer in addition to the housing requirement is required in accordance with paragraph 78a) (after being removed in the 2023 NPPF) to ensure choice and competition in the market for land. This is included in the calculations in this report.
- 4.4 Para 78b) requires a 20% buffer to be added in circumstances where there has been significant under delivery of housing over the past 3 years. The Housing Delivery Test (HDT) is an annual measurement of housing delivery in the area of relevant plan-making authorities. The HDT is a percentage measurement of the number of net homes delivered against the number of homes required over a rolling three-year period. Detailed guidance of how the test is applied is set out within the [Housing Delivery Test Measurement Rule Book](#).
- 4.5 With regards to the latest confirmed HDT result, the Council has a **result of 106% for the reporting years 2020-21, 2021-22 and 2022-23**, as confirmed by MHCLG publication in December 2024 [Housing Delivery Test: 2023 measurement - GOV.UK](#). Therefore the 20% buffer does not apply.
- 4.6 For future estimated HDT results, there were 710 new dwellings (net) completed during the monitoring year 2023/24. The number of household completions⁴ over the last three-year period, applied against homes required under the Local Housing Need requirements for each year (note these are based on calculations at the time) are set out below and would result in 110%. This is an estimate of the HDT result until such time it is confirmed by MHCLG.

Table 4.1 Estimated Housing Delivery Test Result for 23/24

HDT YEAR	2021/22	2022/23	2023/24	Total
Total Completions	683	556	710	1,949
Housing Requirement	557	611	611	1,779
Percentage	123%	91%	116%	110%

⁴ As reported as part of the Housing Flow Reconciliation and adjusted in line with the rule book- <https://www.gov.uk/government/collections/net-supply-of-housing>

Components of the Housing Supply

- 5.1 The Council's housing supply figure is comprised of the following factors: extant planning permissions (sites with planning consent but yet to be completed), site allocations as set out in the Core Strategy (2010) and Land Allocations Local Plan (2015) (the current Development Plan) and a small sites 'windfall' non-allocated sites) allowance based on historically evidenced completion rates.
- 5.2 For the purposes of this report the sites and units within the supply are broken down into the following components, which can be found in Appendices 2-6:

Non-Major sites <10 dwellings	Appendix 2
Major sites 10> dwellings with detailed consent	Appendix 3
Major sites 10> dwellings without detailed consent	Appendix 4
Existing development plan allocations	Appendix 5
Phasing Extant permissions outside of 5 years	Appendix 6

Deliverability

- 5.3 What constitutes a "deliverable site" is defined within the Glossary of the NPPF and Planning Practice Guidance. The definition now places an onus on LPAs to demonstrate the deliverability of any identified major sites (10> dwellings) without detailed consent. Minor sites (<10 dwellings) and major sites with detailed consent or prior notification are to be considered deliverable unless there is clear evidence that they will not be delivered within four years. The definition reads as:

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 four 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 four 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 four years.

5.4 National Planning guidance provides more detail on how deliverability can be evidenced and includes:

- *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.*

Common considerations and delivery assumptions

5.5 To ensure all information regarding the deliverability of sites included within the housing supply is as accurate as possible; all sites with extant (yet to be built) planning permission are subject to an annual site survey.

5.6 Regular contact is maintained with representatives of major sites with extant planning permission and that have been allocated within the development plan. As a minimum, the Council seeks comments regarding the anticipated phasing from these representatives at least once every 12 months.

5.7 Engagement with site representatives is in the form of an invitation to respond to either a paper or electronic questionnaire. The questionnaire is designed to identify a site's progress towards being

built out, with detail requested on anticipated stages of planning consent, development lead-in time and build out rates. Responses are captured and dated in either paper or electronic format.

- 5.8 The phasing of all sites will be dependent upon factors including where that site is in the planning process, date of any planning approval, the number and status of any pre-commencement conditions, remediation/contamination, upfront infrastructure, and other significant external factors. An officer assessment and conclusion is made by giving consideration to the planning status of the site, evidence of deliverability obtained, the evidence reviewed against historical average lead-in times and build out rates of sites.
- 5.9 In some circumstances, the phasing of very large for sites extends beyond the four (or five-year) trajectory and remaining development plan period. To ensure transparency, it is made clear in this document and appendices how much of the total extant units are considered deliverable within and beyond the supply period.

Historic Lead-in Times and Build Out Rates

- 5.10 Historic lead-in times and build out rates from sites in the district have been analysed to provide a consistent base line and methodology for reviewing obtained evidence of site deliverability and future phasing. This process allows for sites to be robustly reviewed where there has been limited to no evidence submitted after requests have been made to site promoters and developers and where the evidence presented by them may appear to be too optimistic or skeptical.
- 5.11 Tables 5.1 and 5.2 below outline the evidence accumulated from historical lead-in times and build out rates in the district. This evidence has been used to inform a phasing and delivery methodology for sites (as shown in Figure 5.1 below). However, officer assessments and information gathered on specific applications or sites have also been taken into consideration when assessing specific site delivery. Therefore, not all phasing of sites will directly align with the methodology in Figure 5.1.

Table 5.1 Average Lead-in Times

* No data available

		Outline	Full Plans	Reserved Matters
Average Years		2.2	2.0	2.1
Average Days		807	742	770
Year of Decision	2018/2019	*	408	770
	2017/2018	*	527	610
	2016/2017	*	555	440
	2015/2016	734	614	571
	2014/2015	761	503	909
	2013/2014	*	776	474
	2012/2013	822	551	*
	2011/2012	813	1553	*
	2010/2011	*	1192	1616

Table 5.2 Average Build Out Rates – Previous 10 years

* No data available

Site Size	1 to 4	5 to 9	10 to 24	25 to 49	50 to 99	100 to 199	200 +
Overall Average	1.0	5.6	9.0	15.3	34.2	48.2	46.2
2023/2024	1	2	6	10	41	21	5
2022/2023	1	7	17	29	53	*	*
2021/2022	1	6	8	17	39	26	18
2020/2021	1	5	10	13	51	40	8
2019/2021	1	6	7	17	10	49	24
2018/2019	1	6	8	7	33	96	104
2017/2018	1	7	8	7	31	*	72
2016/2017	1	6	10	*	25	*	51
2015/2016	1	5	11	13	42	91	77
2014/2015	1	6	5	25	17	15	57

Note: Officer assessments and information gathered on specific applications or sites have also been taken into consideration when assessing specific site delivery phasing. Therefore, not all phasing of sites will directly align with the methodology in Figure 5.1.

Figure 5.1 Phasing Methodology

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Minor sites up to 9 dwellings										
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						■				
Major sites 10 dwellings or more										
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

Non-major sites with planning permission

- 5.12 In accordance with the NPPF definition of deliverability, non-major sites (sites of less than 10 dwellings) that have detailed consent, outline planning permission or prior notification are considered deliverable during the period of their permission, unless there is clear evidence that the site will not be implemented or begin to deliver within the period set out.
- 5.13 There is no reason to apply any lapse rate to the deliverability of these sites as the presumption in the definition of deliverable in the NPPF is that these sites will be delivered unless there is clear evidence to the contrary. These sites will therefore be phased for completion within the land supply period using the methodology outlined above in Figure 5.1.
- 5.14 In total, there are 519 dwellings on non-major sites considered deliverable over the five-year requirement period and therefore included within the housing supply calculation. The details of all sites included within this component of the supply and phased trajectory for each are set out within Appendix 2.

Major sites with detailed planning consent

- 5.15 Major sites with detailed planning consent, reserved matters and prior approval will be considered to be deliverable in accordance with the NPPF unless there is clear evidence that homes will not be delivered within five years. In accordance with Figure 5.1, the majority of these sites will be phased as starting within the four-year period, but this is also informed by site promoter evidence and reviewed against the phasing methodology and historical average delivery rates.
- 5.16 In total, there are 1,656 dwellings from these types of sites which are considered deliverable within the five-year requirement period. This includes the 344 extant from the Whitfield Urban Expansion, and due to the scale and number of applications extant for this strategic site, the details are reported in their own singular row. The details of all sites included within this component of the supply, phased trajectory, and commentary regarding deliverability for each are set out within Appendix 3.

Major sites without detailed planning consent

- 5.17 Major sites with outline planning permission will only be considered to be deliverable in accordance with the NPPF if there is clear evidence that the housing completions will begin on site within the five year period.
- 5.18 A very cautious approach has been taken when including major sites with outline planning permission within the housing land supply. And only those sites where there is detailed planning consent activity are included. This may include the submission of a reserved matters application, and/or detailed evidence on lead-in times and delivery rates.
- 5.19 In total, there are 191 dwellings on major sites with outline planning permission considered deliverable within the five-year requirement period. The details of all sites included within this component of the supply and phased trajectory for each are set out within Appendix 4.

Allocations

- 5.20 Extant site allocations set out in Dover District Local Plan (2024) and Ash Neighbourhood Plan (2021) will only be considered to be deliverable in accordance with the NPPF if there is clear evidence that the housing completions will begin on site within five years.
- 5.21 As with major sites with outline planning permission, a very cautious approach has been taken with respect to including allocations within the housing supply. Only those sites where there is current planning activity including detailed evidence of developer lead-in times and delivery rates are included. If there is no new evidence of delivery, the phasing is set out in accordance with the Housing Trajectory adopted as part of the Local Plan in October 2024.
- 5.22 In total, there are 1,248 dwellings on allocated sites considered deliverable within the five-year requirement period. The details of all sites included within this component of the supply and phased trajectory for each are set out within Appendix 5. For further information on the phasing of these sites, please refer to Appendix Dii in the [Local Plan](#).

Other sites

- 5.23 The NPPF glossary offers examples of sites without detailed planning consent that could be included in the housing supply, providing there is clear evidence that housing completions will begin within five years. Examples include outline planning permissions, sites with consent subject to a S106 agreement and permissions in principle, and sites identified on a brownfield register.
- 5.24 The council has applied an overly cautious approach to sites included in the supply from these sources.

Windfalls

- 5.25 The NPPF defines windfalls as sites not specifically identified (allocated) in the development plan. The Council therefore considers all sites not allocated for housing in the Adopted Development Plan (Local Plan to 2040 (2024) and Ash Neighborhood Plan (2021)) to be windfall.
- 5.26 The NPPF states that local planning authorities can make an allowance for windfall development in their housing land supply if there is compelling evidence that they will provide a reliable source. And that, any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends.
- 5.27 An annual review of the average number of windfall dwellings completed within the district is undertaken, updated to 2024 to reflect a 10 year period. This approach identifies an overall historic average windfall delivery rate of 220 dwellings per annum. A summary of the sites and number of homes delivered on windfall completions can be provided on request.

Table 5.3 Historic Windfall Completions

Year	Completions		
	Windfalls on sites of 5 or more units	Windfalls on sites of less than 5 units	Total Windfalls
Average	140	80	220
2023/2024	295	95	390
2022/2023	136	61	197
2021/2022	311	77	388
2020/2021	113	92	205
2019/2020	133	84	217
2018/2019	50	62	112
2017/2018	58	99	157
2016/2017	89	60	149
2015/2016	116	87	203
2014/2015	94	83	177

5.28 As required by the NPPF, in applying a windfall allowance within the housing supply, there needs to be consideration of both future trends as well as historic windfall delivery rates. The most significant future impact is likely to be the adoption of the new Local Plan and Policy SP4, however the likely implications arising from this on the windfall allowance cannot be known until the plan has been in place for several monitoring years.

5.29 In view of this, and in taking an extremely cautious approach, the Council will only be applying a windfall allowance in the housing supply from sites of **less than five dwellings**. This takes into account the Strategic Housing and Employment Land Availability Assessment (HELAA) methodology of site selection for the new local plan in that only sites above this size are to be considered as potential new allocations. Historically sites of less than five dwellings have contributed significantly to new housing in the District and we anticipate that they will continue to do so.

5.30 It is recognised that windfall sites of five dwellings or more will also continue to make a significant contribution to the Council's housing

supply if they meet the requirements of the Local Plan policies (in particular SP4). Not taking this source of supply into account as part of the calculation may be viewed as overly pessimistic. However, it is considered that by taking such an approach, a significant buffer is built into the calculation, making it as robust as possible.

- 5.31 The Local Plan approach was to include the average windfall contribution from small sites of less than five new dwellings to the overall supply of housing is 70 dwellings per annum - based on the annual average of past trends. The contribution from small windfall sites is considered appropriate for years 4 and 5 years of housing supply (from 2024/25 to 2025/26) to avoid any double counting from windfall sites that have already received planning permission and are counted within the first 3 years.
- 5.32 The updated data in table 5.3 above shows this has increased to around 80 dwellings per annum, however, the council is again taking a cautious approach and for this report will continue to rely on **70 dwellings per annum in year 4 and year 5 from sites of less than 5** as set out in the Local Plan. This is considered justified as the position has been agreed as part of the Local Plan and remains the approach in this land supply update, however, it is overly pessimistic.
- 5.33 Itemised details on the sites that contribute to the windfall allowance can be provided on request by emailing planningpolicy@dover.gov.uk.

Summary of supply assessment

- 5.34 A robust and cautious approach has been taken in identifying and evidencing of sites that contribute to the Councils housing land supply calculation. The approach included:
- All extant sites with detailed planning consent having been subject 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 and allocations for updates on phasing and delivery rates, requests for evidence of deliverability from major sites without detailed planning consent;
- Review and engagement with the Councils Development Management team on sites progresses 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.

5.35 As a result of the work undertaken, the Council has a strong enough set of sites for housing to demonstrate over a five-year supply as required by the NPPF. As such, this indicates that the Council is in a position to ensure that there is a good prospect of needed supply being delivered. Table 5.1 below sets out the information above in a summary for each year of the requirement.

Table 5.1 – DDC Housing Supply 2024-2029 (Updated January 2025)

(Supersedes Table 3.2 of the Adopted Local Plan 2024)

								Land Supply
			2024/25 Year 1	2025/26 Year 2	2026/27 Year 3	2027/28 Year 4	2028/29 Year 5	Total - 1 April 2024 - 31 March 2029
Housing Requirement	A	Housing target per year	611	611	611	611	611	3,055
	B	Plus, the required buffer of 5% requirement (3,055 X0.05)	30.55	30.55	30.55	30.55	30.55	153
	C	Total Housing Requirement (A + B)	641.55	641.55	641.55	641.55	641.55	3,208
Housing Supply	D	Non-Major sites <10 dwellings	119	270	130	0	0	519
	E	Major sites 10> dwellings with detailed consent	523	541	378	161	53	1,656
	F	Major sites 10> dwellings without detailed consent	0	0	0	25	166	191
	G	Major sites 10> dwellings Whitfield Urban Expansion Phase 1/1A (extant)	100	100	100	44	0	344
	H	Estimated Future Windfall	0	0	0	70	70	140
	I	Development plan allocations	0	32	262	515	439	1,248
	J	Total Housing Supply (B + C + D + E + F + G)	742	943	870	815	728	4,098
Total	K	Total Land Supply = Total Housing Supply (J / C X 5)	5.8	7.3	6.8	6.4	5.7	6.4

Housing Supply Conclusion

- 6.1 Table 5.1 above provides an overview of the Council's deliverable 5-year housing supply.
- 6.2 **As of January 2025, there is 6.4 years of housing supply in Dover District. Accordingly, it is considered that the above assessment concludes that the Council can demonstrate a 5-year housing land supply for the purposes of the NPPF 2024.**

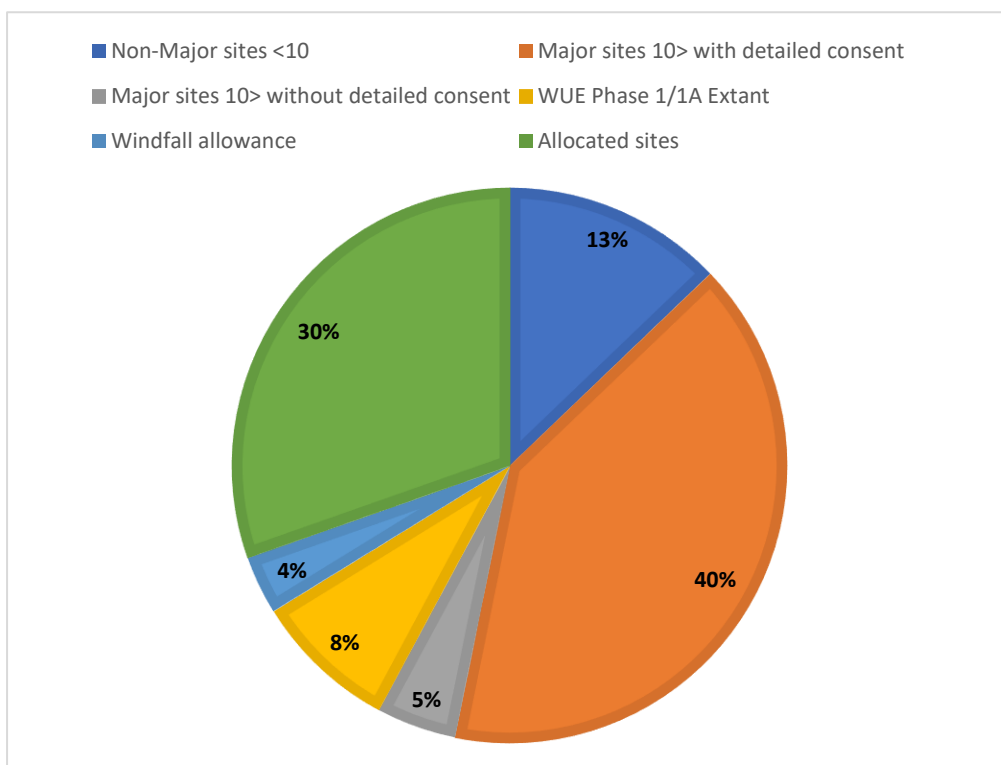


Figure 6.1 - Housing Land Supply Components

- 6.3 Figure 6.1 illustrates that over half of the sites contributing towards the land supply calculation are major sites with detailed consent, and this will provide a strong prospect of housing delivery.
- 6.4 For additional information purposes, sites with consent (full and outline) which have been phased outside of the 5-year land requirement period (fully or in part) are shown in Appendix 6.

All Appendices to this document, which detail specific sites / planning applications included in the calculations for this report and correlates with Table 5.1 above, can be found separately on the following page:
[Dover District Council Website.](#)