

Dover District Council

Housing Land Supply



2025 – 2030
(updated September 2025)

**PLANNING
& DEVELOPMENT**

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1. Executive Summary

- 1.1 This report is based on annual housing data from the 1st April 2024 to 31st March 2025 monitoring period, with updates to application progress as of September 2025.
- 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 (2025-2030). 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 3,745 dwellings** within the Council's housing land supply that are deliverable within the five-year requirement period **(equating to 5.8 Years of supply)**.
- 1.4 The latest confirmed Housing Delivery Test 2022-23 (HDT) result is **103%** for the reporting years 2020-21, 2021-22 and 2022-23 as confirmed by the [Department for Levelling Up, Housing and Communities \(DLUHC\) publication in December 2024](#).
- 1.5 Analysis of Housing Delivery for the 3-year period; 2022-23, 2023-24 and 2024/25 period against the annual target of 611 homes shows that the HDT result is expected to remain at 103%.

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

2. Introduction

- 2.1 The National Planning Policy Framework (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.
- 2.2 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](#).
- 2.3 This document sets out Dover District Council's assessment of its housing land supply based on extant planning consent data from the 2024/25 monitoring period, updates on planning applications and information from applicants/landowners in 2025 and covers the 5-year period from 1 April 2025 to 31 March 2030.

3. Housing Requirement

- 3.1 The NPPF² 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 (2024) housing requirement is based upon.
- 3.3 The details of how this calculation was undertaken are provided in [Appendix 1](#). This shows that using household growth projections of 2014 and affordability ratio of 9.57 released 23 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.

² [National Planning Policy Framework](#) 2024

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" - GOV.UK \(www.gov.uk\)](#)

- 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.
- 3.5 However, due to the recent adoption of the Local Plan in 2024 the 2024 NPPF (paragraph 78) and guidance in Planning Practice Guidance⁴, state that as the plan was adopted in the last 5 years and the strategic policies are not considered out of date, and there has not been significant under delivery 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.**

Appropriate buffer and Housing Delivery Test

- 3.6 [Paragraph 78 of the 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.
- 3.7 For Dover, a 5% buffer in addition to the housing requirement is required in accordance with paragraph 78a to ensure choice and competition in the market for land. This is included in the calculations in this report.
- 3.8 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.
- 3.9 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](#).
- 3.10 With regards to the latest confirmed HDT result, the Council has a **result of 103% 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 [Paragraph: 005 Reference ID: 68-005-20190722](#)

3.11 For future estimated HDT results, there were 621 new dwellings (net) completed during the monitoring year 2024/25. The number of household completions⁵ 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 in [Table 1](#) and would result in 103%. This is an estimate of the HDT result until such time it is confirmed by MHCLG.

Table 1 Estimated Housing Delivery Test Result for 23/24 and 24/25

HDT YEAR	2022/23	2023/24	2024/25	Total
Total Completions	556	710	621	1,887
Housing Requirement	611	611	611	1,779
Percentage	91%	116%	101%	103%

⁵ 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>

4. 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.

Components of the Housing Supply

- 4.2 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 allowance based on historically evidenced completion rates, and an allowance for windfall development that does not have yet have planning permission.
- 4.3 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 [Appendix 2](#):
- Appendix 2 – Worksheet Tab A2 -Phasing of Non-Major Sites under 10 units with consent
 - Appendix 2 – Worksheet Tab A3 - Phasing of Major Sites with detailed consent
 - Appendix 2 - Worksheet Tab A4 - Phasing of Major sites without detailed consent
 - Appendix 2 - Worksheet Tab A5 - Phasing of Existing Development Allocations
 - Appendix 2 – Worksheet Tab A6 - Phasing of Whitfield Urban Expansion

Deliverability Assessment

- 4.4 What constitutes a “deliverable site” which can be included within land supply calculations is defined within [Annex 2 of the NPPF](#). The definition reads as:

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 5 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 5 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 5 years.

4.5 Sites in category a) are considered deliverable unless clear evidence shows otherwise. National Planning guidance ([Housing Supply and Delivery](#)) provides more detail on how deliverability can be evidenced for sites which fall in part b) such as those with outline consent for major development or are allocated in the development plan. This suggested evidence includes but is not limited to:

- *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 in this Report

4.6 To meet the requirements of national guidance with regards to 'deliverability' and 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 and allocations without consent are subject to an annual site survey.

- 4.7 Regular contact is maintained with representatives of major sites with extant planning permission and site allocations within the development plan. As a minimum, the Council seeks comments regarding the anticipated phasing from these representatives at least once every 12 months.
- 4.8 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.
- 4.9 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 and phasing obtained, the evidence reviewed against historical average lead-in times and build out rates of sites.
- 4.10 In some circumstances, the phasing of large sites extends beyond the 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 units are considered deliverable within and beyond the 5-year supply period.

Historic Lead-in Times and Build-Out Rates

- 4.11 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.
- 4.12 Tables [2](#) and [3](#) 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 from landowners/site promoters/applicants and other sources have also been taken into consideration when assessing specific site delivery and phasing. Therefore, not all phasing of sites will directly align with the methodology in [Figure 5.1](#), but it is used as a starting point for phasing assessments.

Table 2 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

The data in the below table, shows the average number of units built, by site size each monitoring year.

* No data available

Table 3 Average Build Out Rates – Previous 11 years

Site Size	1 to 4	5 to 9	10 to 24	25 to 49	50 to 99	100 to 199	200 +
Overall Average	1	5	9	20	30	45	44
2024/2025	1	2	6	13	21	12	0
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 upto 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

- 4.13 In accordance with the NPPF definition of deliverability (category a), 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.
- 4.14 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 have all been phased for completion within the land supply period using the methodology outlined above in [Figure 5.1](#) as there is no evidence to the contrary.
- 4.15 In total, there are 490 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](#), Worksheet A2.

Major Sites with Detailed Planning Consent

- 4.16 Major sites with detailed planning consent (Full consent, Reserved Matters and prior approval) are considered 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 are phased as starting within the five-year period, but this is also informed by site promoter evidence and reviewed against the phasing methodology and historical average delivery rates. Some of the larger sites also have some expected delivery outside of the 5-year period due to expected build out rates.
- 4.17 In total, there are 1,751 dwellings from these types of sites which are considered deliverable within the five-year period. The details of all sites included within this component of the supply, phased trajectory, and commentary regarding site progress and deliverability for each are set out within [Appendix 2](#), Worksheet A3.

Major Sites Without Detailed Planning Consent

- 4.18 Major sites with outline planning permission will only be considered to be deliverable in accordance with the NPPF (category b) if there is clear evidence that the housing completions will begin on site within the five-year period.
- 4.19 A very cautious approach has been taken when including major sites with outline planning permission within the 5-year housing land supply. And only those sites where there is detailed planning application activity are included. This may include the submission of a reserved matters application, and/or detailed evidence on lead-in times and delivery rates being supplied by the site developer/landowner.
- 4.20 In total, there are 263 dwellings on major sites with outline planning permission considered deliverable within the five-year period. The details of all sites included within this component of the supply and phased trajectory for each are set out within [Appendix 2](#), Worksheet A4.

Allocations

- 4.21 Site allocations set out in [Dover District Local Plan \(2024\)](#) and [Ash Neighborhood Plan \(2021\)](#) are considered deliverable in accordance with the NPPF (category b) where there is clear evidence that the housing completions will begin on site within five years.
- 4.22 As with major sites with outline planning permission, a very cautious approach has been taken with respect to including allocations within the housing supply. Sites where there is current planning activity including detailed evidence from landowner/developer lead-in times and delivery rates are included, in addition to information on planning applications determined since the 31st of March 2025, or applications awaiting determination. On major allocations where no recent phasing information has been provided by the developer/landowner, these have been phased outside of the 5-year period. On minor allocations, 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 or has been assessed based on site size and historic build out data for non-major sites.
- 4.23 In total, there are 571 dwellings on allocated sites without consent considered deliverable within the five-year period. The details of all

sites included within this component of the supply and phased trajectory for each are set out within [Appendix 2](#), Worksheet A5.

Whitfield Urban Expansion

- 4.24 The largest strategic allocation in the district is Whitfield Urban Expansion (WUE) allocated in total for 6,350 homes in the Local Plan (2024) (Policy SAP1). It was first identified as a strategic allocation in the Core Strategy 2010 for 5,750 new homes and progress has been made on Phase 1 and 1A, which were granted outline consent for 1,350 homes, many of which have full consent and have been built out. There are full consents under construction, and applications awaiting determination, including those for Phase 2. Due to the complexity of the site, the supply of WUE has been included in [Appendix 2](#), Worksheet A6. Whitfield UE and not duplicated in the categories listed above.
- 4.25 The supply expected from this site in the 5-year period is 525 dwellings, made up of 373 units with full consent, 110 with outline consent (with Reserved Matters received and awaiting determination) both in Phase 1 and 42 from Phase 2 applications with resolution to grant (outline/hybrid applications). This phasing is based on detailed information from the multiple developers on-site and historic build out records.

Windfalls

- 4.26 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](#) to be 'windfall'.
- 4.27 The NPPF (para 75) 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.
- 4.28 An annual review of the average number of windfall dwellings completed within the district is undertaken, updated to 2025 to reflect a 11-year period. This approach identifies an overall historic average windfall delivery rate of 231 dwellings per annum.

Table 4 Historic Windfall Completions

	Completions		
Year	Windfalls on sites of 5 or more units	Windfalls on sites of less than 5 units	Total Windfalls
Average	149	82	231
2024/2025	243	100	343
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

4.29 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.

4.30 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.

- 4.31 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.
- 4.32 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 to avoid any double counting from windfall sites that have already received planning permission and are counted within the first 3 years.
- 4.33 The updated data in [Table 4](#) 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.

Summary of Supply Assessment

- 4.34 A robust and cautious approach has been taken in identifying and evidencing sites that contribute to the Council's housing land supply calculation. The approach included:
- All extant sites with detailed planning consent have been subject to a site visit in 2025 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 extant 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 Council's Development Management team on site progress towards gaining detailed planning consent: and,
- Consideration of all available evidence on site progress, with review against the historically evidence phasing and deliverability methodology.

4.35 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](#) below sets out the information above in a summary for each year of the requirement.

5. Housing Supply Conclusion

Table 5 – DDC Housing Supply 2025-2030

(Supersedes Table 3.2 of the Adopted Local Plan 2024)

			Land Supply					
			2025/26 Year 1	2026/27 Year 2	2027/28 Year 3	2028/29 Year 4	2029/30 Year 5	Total 1 April 2025 31 March 2030
Housing Requirement	A	Housing target per year	611	611	611	611	611	3,055
	B	Plus, the required buffer of 5% requirement (3,055 X 0.05)	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) with consent	167	258	73	0	0	498
	E	Major sites (>10 dwellings) with full consent	360	495	452	319	125	1751
	F	Major sites (>10 dwellings) with outline consent	0	0	65	101	97	263
	G	Whitfield Urban Expansion (All Phases)	72	85	82	122	164	525
	H	Estimated Future Windfall	0	0	0	70	70	140
	I	Development plan allocations without consent	0	0	43	143	385	571
	J	Total Housing Supply (D + E + F + G + H + I)	599	838	715	755	841	3748
	K	Housing Supply Surplus (J - C)	-43	196	73	113	199	540
Total	L	Total Five Year Supply Total Housing Supply (J / C X 5)	4.7	6.5	5.6	5.9	6.6	5.8

5.1 [Table 5](#) above provides an overview of the Council's deliverable 5-year housing supply.

5.2 **As of 31st March 2025 there is 5.8 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.**

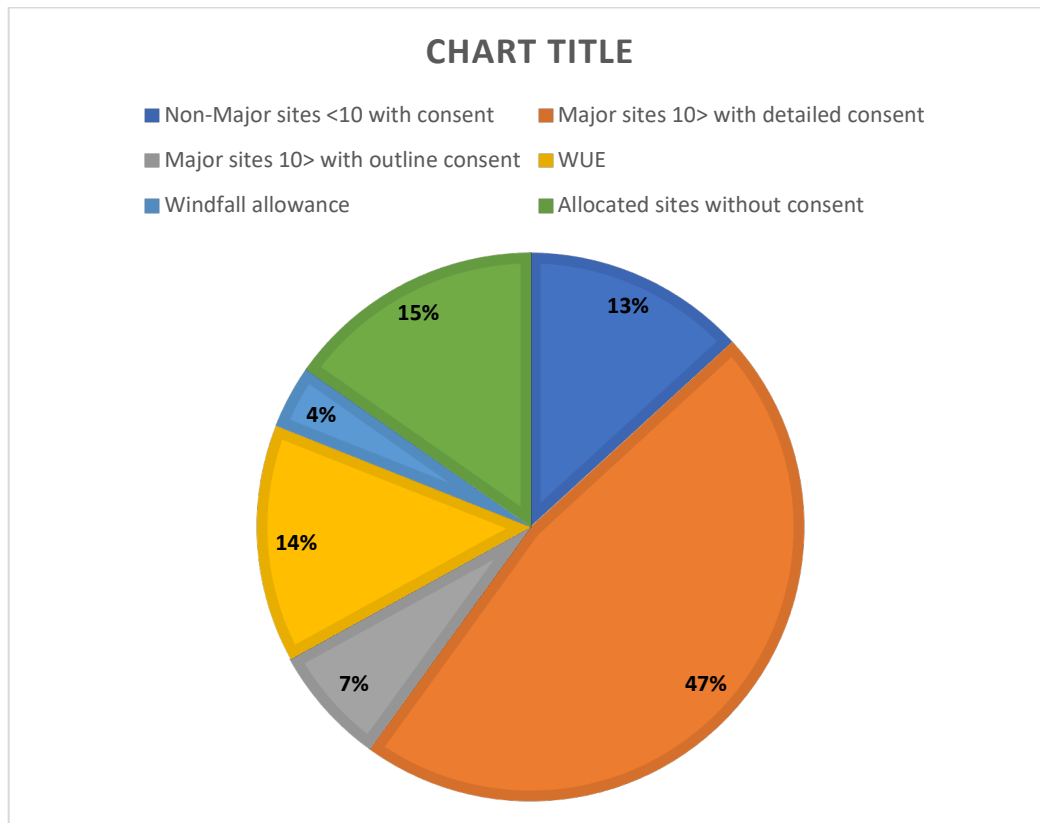


Figure 5.2 - Housing Land Supply Components

5.3 Figure 5.2 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.

5.4 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 the appendices.