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PERSIMMON SOUTH EASTwww.persimmonhomes.com

Planning Policy Team
Dartford Borough Council
Civic Centre
Home Gardens
Dartford
Kent DA1 1DR
27 October 2021

Dear Sir/Madam,

Response by Persimmon Homes South East to the consultation on the Dartford Local Plan

Thank you for presenting Persimmon Homes South East (PHSE) with the opportunity to inform the formulation of the pre-submission Dartford Local Plan (DLP). This letter forms the formal response of PHSE to the second Regulation 19 Consultation.

As one of the largest housebuilders in the UK, Persimmon has traditionally been very active within Kent, and is therefore a key stakeholder in the area. The Company has a keen interest in supporting and ensuring the delivery of a DLP that provides opportunities for the sustainable growth of Dartford and the wider area.

In preparing these representations we have assessed the DLP against the relevant legislation and national policy requirements for 'plan making'. Notably the requirement that the Plan must be 'sound'. Whilst we remain broadly supportive of the Draft Plan, we request some amendments to the Draft Plan.

Duty to Cooperate

As the Borough Council will be aware, the Duty to Cooperate places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. We do not believe, given the above, that the SoCG with neighbouring London Boroughs can be seen as demonstrating actively

and ongoing engagement at this stage of the plan making process – we would expect there to be a rolling program of engagement to address matters as they arise through the consultation on the Reg 18 and Reg 19 plan. Thus, the SoCG would need to be updated accordingly.

In particular we would expect a clear commentary in the SoCGs with the relevant London Boroughs on how the Council has considered its role in meeting the unmet needs of London. Paragraph 174 of the new London examination report outlined that the contribution of small sites was overestimated and that the deliver of new homes has been reduced from 65,000 to 52,000 homes per annum. Given average delivery over the last five years of just under 33,000 additional dwellings we are concerned that the capital will struggle to even deliver the 52,000 homes identified in the examination report.

This issue needs to be thoroughly examined and addressed in the SoCG that are submitted prior to submission of the Plan. Which means Dartford Borough Council need to liaise with neighbouring London boroughs about where they now are with this issue and the DLP needs to clearly demonstrate why it cannot, if that is the case, help address London's unmet need.

Whether the Plan should provide for more than the minimum local housing figure

The plan should, given ID: 2a-010 of the PPG, consider whether it might be appropriate to plan for a higher housing need figure than the standard method indicates given issues such as local affordability.

The Housing Needs Assessment 2019 (HNA) identifies a net affordable housing need of 263dpa - around 33% of the Borough's housing requirement. Policy M7 of the DLP looks to deliver 35% affordable provision, whilst acknowledging that not all sites provide affordable housing. The Council's HNA suggests on page 92 that a 35% affordable housing target, such as the one adopted by the Council, would deliver 26% of all housing as affordable units. This equates to 205 affordable homes per annum – 58 homes short of the need for such homes each year. In order to deliver sufficient affordable homes to meet the needs of Dartford's current and future population will require the Council to deliver more homes overall.

The Plan Period

The Government's Planning Practice Guidance (ID: 2a-004-20190220) indicates that when setting the baseline, the projected average annual household growth over a 10 year period should be calculated

and that “this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period”. In accordance with National Planning Policy Guidance the plan period should start at 2020/21 if it is to address the Objectively Assessed Housing Need identified by the Standard Method.

In addition to the above, paragraph 35 of the NPPF states that in order for a plan to be effective it must be deliverable across its plan period. Using the Council housing supply estimates in the Strategic Housing Land Availability Assessment (SHLAA) we are concerned that whilst the Council can show a five-year housing land supply in 2022/23, just two years later there is no five-year housing land supply for a six-year period. Effectively for those years the plan will be considered out of date.

We would like to urge the Council to identify and bring more sites forward for development in order for housing delivery to be effective across the plan period.

Conclusions

Persimmon Homes are broadly supportive of the Draft Plan. Notwithstanding our broad support for the Plan, we would ask for the following key changes to DLP:

- The Council needs to provide more up to date statements of common ground with neighbouring authorities;
- Unmet needs of London must be taken into account in plan preparation; and
- Housing supply must meet five-year land supply across the plan period.

I hope that the above information is useful. If you require any further assistance, please do not hesitate to contact me.

Yours sincerely

Calvin Coxside

Development Planner

Persimmon Homes South East