

DARTFORD LOCAL PLAN

Housing Policies Topic Paper

December 2021

DARTFORD
BOROUGH COUNCIL

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1 PURPOSE

- 1.1 Dartford Borough Council has produced a series of Topic Papers to support the Submission Dartford Local Plan 2021¹. This follows the publication of Pre-Submission (Publication) Local Plans² in February and September 2021. The Publication Local Plan was informed by previous consultations on the Local Plan in January 2020 (Preferred Options) and June 2018 (Strategic Issues)³.
- 1.2 The purpose of the five Topic Papers is to bring together relevant national planning policy and local evidence to justify the policies in the Submission Dartford Local Plan (referred to in this topic paper as the Local Plan).
- 1.3 This topic paper relates to the Housing Policies and sets out relevant information in relation to the following policies in the Local Plan:

Strategic Policies:

S4 Borough Development Levels (parts 1-5 only)*

Development Management Policies:

M7 Affordable Housing

M8 Housing Mix

M11 Extensions, New Dwellings and Garden Land

M12 Gypsy, Traveller and Travelling Showpeople Accommodation

* part 6 of the policy is addressed in the Business and Retail Topic Paper

- 1.4 Policy S4 sets out the Borough Development Levels. It contains a requirement for an average of 790 dwellings per annum which will be delivered through the identified housing land supply. The definitions for housing land supply and brownfield land are included in the glossary. It seeks a mixture of tenures and housing types, the more detailed requirements for which are outlined in policies M7 and M8. The criteria for extensions, new dwellings, and garden land set out in policy M11 seek to ensure that a range of dwelling types are retained. Policy M12 outlines the approach towards gypsy, traveller and travelling showpeople accommodation, further information on which is set out in the “Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report September 2021”.
- 1.5 The purpose of these policies is to deliver the Strategic Objectives set out in paragraph 2.2 of the Local Plan. The Strategic Objectives of most relevance to the Housing Policies include:

W1: Achieving cohesive, safe, walkable and attractive neighbourhoods, with a real sense of place and vitality that reflects the area’s heritage and potential, and whose residents enjoy a choice of homes suited to their needs and easy access to local everyday facilities, including education and healthcare.

¹ under section 20(1) of the Planning and Compulsory Purchase Act 2004

² under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

³ under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

W3: Providing well-designed new housing that is genuinely mixed, affordable and of varied tenure, sustainable, and promotes healthy living, to secure the quality of life of residents and the ability for them to continue residing at their home or within the Borough.

W4: Realising whole lifetime residential accommodation options and facilities, with accessible types and designs of living environments catering for people as their circumstances change.

I1: Continuing urban regeneration through optimising the re-use of accessible and suitable brownfield land primarily within the north of the Borough to meet future local housing and employment needs, and delivering new infrastructure for travel, schools/ skills, health, and other local services.

- 1.6 Part 2 sets out the relevant parts of national planning policy which relate to the various policies addressed in this topic paper. The outcomes of the Sustainability Appraisal for strategic policy S4 are set out in part 3 of the topic paper. The relationship with existing policy and local evidence to justify the various policies are dealt with in parts 4 (Borough Development Levels), 5 (Affordable, Mix and Retention of Housing) and 6 (Gypsies, Travellers and Travelling Showpeople) respectively.

2 NATIONAL PLANNING POLICY

- 2.1 Chapter 5 is the key part of the National Planning Policy Framework (NPPF) which relates to housing, though the overall presumption in favour of sustainable development is also relevant. Table 1 outlines the key NPPF requirements in relation to housing provision and provides a corresponding reference to the relevant part of the housing policies that achieve the requirement. The national policy in relation to gypsies, travellers and travelling showpeople is set out in the Planning Policy for Traveller Sites (PPTS) 2015 which needs to be read in conjunction with the NPPF. The PPTS requirements and the corresponding part of Local Plan policy M12 which achieves it is also set out below.

Table 1: NPPF Paragraph and Relevant Policy

NPPF Paragraph	Plan Policy
11(a) and (b) Plans should promote a sustainable pattern of development that meets the development needs of their area and, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas subject to exceptions	S4:1 requires decisions on planning applications to ensure that levels of development delivery are sufficient to meet the housing and other needs of the area. S4:3 sets out the requirement for the provision of 790 dwellings per annum which exceeds the objectively assessed need of 750 dwellings per annum. Para 2.57 makes clear that this higher figure is consistent with potentially supporting delivery of some unmet residential needs in the wider area, amongst other things.
61 To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach.	S4:3 sets out a figure of 790 dwellings per annum. The Dartford and Ebbsfleet Residential Needs Assessment and Update indicates that this exceeds the minimum number of homes needed using the standard method.
62 Planning policies should reflect the size, type and tenure of housing needed for different groups	S4:2 requires a genuine variety within residential developments through differentiation of housing tenures and housing types/design. M7 sets out the thresholds and amount of affordable housing which should be provided, and specifies that a mix of tenures is required. M8:1 outlines the sizes of housing which should be provided on developments to provide an appropriate mix.
68 and 74 There should be a clear understanding of the land available in the area through the preparation of a strategic housing	A new SHLAA has been prepared and has been used to inform the amount of residential development in S4:3.

NPPF Paragraph	Plan Policy
land availability assessment (SHLAA). The Housing Delivery Test will be applied	<p>S4:5 requires a rolling deliverable supply of housing land to be maintained, including the applicable supply buffer from the Housing Delivery Test.</p> <p>Appendix C sets out the housing trajectory including a deliverable five year supply with 10% buffer, and a developable supply beyond 10 years.</p>
66 The housing requirement figure for the whole area and designated neighbourhood areas should be set out.	<p>Policy S4:3 sets out the housing requirement figure for the Borough.</p> <p>Paragraph 6.9 indicates housing requirement figure for the designated Stone neighbourhood area.</p>
71 where there is an allowance for windfall sites, there should be evidence that they will provide a reliable source of supply.	Table 1 includes an allowance for non-identified (windfall) sites. This is justified in the SHLAA Findings Report Appendix E as a limited level based on a very reliable supply, and contributes to the 790 dwellings per annum set out in S4:3.
71 Plans should consider the case for setting out policies to resist inappropriate development of residential gardens.	M11:1 and M11:2 set out criteria to ensure that sufficient garden land is retained.
119 Make effective use of land, making as much use as possible of previously-developed or brownfield land	S4:4 states that planning decisions will have close regard to the target for 80% of new homes to be located on brownfield land.
PPTS Paragraph	Development Management Policy
9 and 10 Set a pitch and plot targets for gypsies, travellers and travelling showpeople and identify a 5 year supply of deliverable sites	M12:1 outlines the pitch and plot requirements to 2026 and the actions to deliver a five year supply of sites, including the allocation of two sites.
11 Set out criteria to guide land supply allocations where there is an identified need	<p>M12:1 includes actions which are being taken to meet identified need.</p> <p>M12:2 sets out criteria that will be applied.</p>
11 Where there is no identified need, include criteria-based policies to provide a basis for decisions	M12:2 sets out criteria that will be applied.
13 Ensure that traveller sites are sustainable according to a number of criteria	M12:2 sets out a number of criteria which will be applied in accordance with the PPTS, including scale relative to the surrounding community, the need to avoid significant detriment to residential amenity and the need to be located reasonably close to a range of services and facilities.

3 SUSTAINABILITY APPRAISAL

- 3.1 Sustainability Appraisal (SA) has been carried out at the Preferred Options and Publication stages of the Local Plan process (Preferred Options, first Publication Local Plan and second Publication Local Plan). The results have informed the housing policies taken forward in the plan.

Publication Local Plan February 2021 and September 2021

- 3.2 Chapter 5 of the SA sets out the appraisal results for each policy. The table of scores for policy S4 is shown in Table 2. The full results can be found on pages 114-116 of the Sustainability Appraisal. A full key of the symbols used in the SA can be found at appendix 1 and a brief description is provided below table 2.

Table 2: Policy S4 Sustainability Appraisal Scores

SA objective	S4
1. To ensure that everyone has the opportunity to live in a decent home.	++
2. To ensure ready access to essential services and facilities for all residents.	+
3. To strengthen community cohesion.	+
4. To improve the population's health and reduce inequalities.	+
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	++
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	+
7. To conserve the Borough's mineral resources.	-?
8. To conserve the Borough's soils.	++/-
9. To maintain and improve the quality of the Borough's waters.	-?
10. To reduce air pollution and ensure improvements in air quality.	+/-
11. To avoid and mitigate flood risk.	-?
12. To minimise the Borough's contribution to climate change.	+/-
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	-?
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	-?

SA objective	S4
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	-?

KEY:

- ++ significant positive effect
- ++/- significant positive and minor negative effects
- + minor positive effect
- minor negative effect
- ? effect is uncertain
- +/- an equal mixture of minor positive and minor negative effects

- 3.3 As can be seen, it is clear that the borough development levels policy has many positive effects when assessed against the SA objectives, particularly in terms of ensuring that everyone has the opportunity to live in a decent home (SA objective 1), ensuring ready access to essential services and facilities for all residents (SA objective 2), strengthening community cohesion (SA objective 3), improving the population's health and reducing inequalities (SA objective 4), facilitating a sustainable and growing economy and a vital and viable town centre (SA objective 5) and reducing the need to travel and encouraging sustainable and active alternatives to motorised vehicles to reduce congestion (SA objective 6).
- 3.4 In the case of some objectives, the borough development levels policy has the potential for negative as well as positive effects. These relate to: the likelihood that a proportion of homes will have to be located on greenfield land (SA objective 8); and the fact that some trips from new development will be made by private vehicles with resultant impacts on air quality and greenhouse gas emissions (SA objectives 10 and 12). There are also some potential negative impacts on a number of environmental SA objectives.
- 3.5 It is also appropriate to consider the SA objectives relevant to the housing policies and the assessment of the likely cumulative effects of the plan's policies on these. The cumulative impacts are assessed in full in Chapter 6 of the SA but the table of scores for these is also included in Appendix 1 of this paper. Objective SA1 (to ensure that everyone has the opportunity to live in a decent home) is the most applicable to the housing policies. As can be seen from the table of scores, the overall cumulative effect of the plan's policies on this objective is positive.

4 POLICY S4 (PART) BOROUGH DEVELOPMENT LEVELS

Relationship with existing policy

- 4.1 Table 3 shows the relevant text from proposed policy S4 (Borough Development Levels) and relates these to the relevant parts of policies from the existing adopted Core Strategy 2011. It is clear that the Council is continuing the approach of maximising the amount of development that can be achieved on sites. The Core Strategy was prepared in line with the South East Plan and the housing and employment figures contained within that Plan, with a background of previous Thames Gateway growth plans and guidance. This has led to some of the highest housing growth rates in the country, and the principles behind this regeneration approach are maintained.
- 4.2 The South East Plan was formally revoked by the government in 2013 and dwelling figures contained within Local Plans now need to follow the approach set out in the National Planning Policy Framework and the supporting Planning Practice Guidance. Paragraph 2.57 of the Local Plan sets out the rationale for the 790 dwellings per annum figure.

Table 3: Proposed and Existing Policies

Proposed Policy	Existing Policy
S4:1 Decisions on planning applications will ensure that levels of future development delivery are sufficient to provide for assessed housing needs and other development requirements, including for economic regeneration, and take account of infrastructure provision.	CS10:1 set out a housing target for the period 2006 to 2026 using a capacity based approach. CS7:1 outlined a jobs and employment floorspace target for 2006-2026 using a capacity based approach.
S4:2 Large developments should be delivered at a phased rate in accordance with agreed masterplanning to provide a flow and complementary range of development, facilities and infrastructure. Achieving genuine variety within residential developments, through differentiation of housing tenures and types/ design, will create vibrant places, and also help maintain rates of new home delivery and Borough housing supply as planned.	CS11:1 sought to achieve the delivery of a balanced relationship between homes, jobs and infrastructure from the outset of development. CS18:1 outlined the approach towards achieving a mix of housing sizes that meets needs and provides an appropriate long-term balance. CS19:1 set out the requirements for affordable housing to promote an appropriate tenure mix.
S4:3 New homes are required to be delivered at an average rate of 790 per annum, with planning permissions and delivery closely monitored and managed. Decisions will be based on this requirement and the identified housing land supply in order to ensure a	CS10:1 set out a housing target for the period 2006 to 2026 using a capacity based approach. CS10:2 and 3 outlined a positive approach towards housing proposals coming forward

Proposed Policy	Existing Policy
steady availability of deliverable land, and achievement of the planned supply at sustainable locations supported by infrastructure.	through the strategic site allocations and the broad locations for development.
S4:4 Planning decisions will have close regard to the target for 80% of the Borough's new homes in the plan period to be located on brownfield land.	Whilst not contained within a Core Strategy policy, the table in Appendix 3 (Monitoring Framework) indicates a target of 80% of residential development on previously developed land or land that has been degraded or despoiled through quarrying.
S4:5 A rolling five year deliverable supply of housing land will be maintained, including the applicable supply buffer (brought forward from within the Plan period to the level as required in the Housing Delivery Test).	None.

Local evidence

Dartford and Ebbsfleet Residential Needs Assessment and Update

Housing Market Area

- 4.3 Paragraphs 1.10-1.30 of the Dartford and Ebbsfleet Residential Needs Assessment (DERNA) 2019 consider the local housing market boundaries. It includes information on travel to work areas, migration flows and house prices in relation to Dartford Borough. It concludes as follows:

The analysis of Dartford and its neighbouring authorities presented above suggests that the most established linkages are those with the neighbours immediately to the west and east of the Borough – Bexley and Gravesham reflecting the pattern of migration flows around London to move radially outwards. It is interesting to note that the flows between Dartford and Bexley are strong both ways. Whilst the Gravesham SHMA concluded that Dartford was part of a housing market area with Gravesham and Medway, the latest information on market flows suggest that the interaction between Dartford and Gravesham is reducing. In fact, the authority with which Dartford appears most aligned appears to be Bexley, not only for the number of people moving between the area, but the similarity of the housing markets. As Bexley is considered as part of London administratively and is covered by the London Plan, and Dartford is not, it seems suitable to consider the Borough as its own housing market, although one with close links to neighbouring authorities. This approach aligns with what is suggested in the PPG.

- 4.4 Chapter 3 of the Dartford and Ebbsfleet Residential Needs Assessment Update (DERNA Update) 2021 provides updated information in relation to the Borough's local housing market boundaries using the latest data on migration flows. Paragraph 6.3 concludes as follows:

The original DERNA concluded that the influence of Gravesham on the Dartford housing market is reducing slightly, and that Dartford is becoming more closely aligned to Bexley. The results presented in chapter 3 suggest that these trends have continued, however the conclusion remains that the Borough is its own housing market, although one with close links to neighbouring authorities.

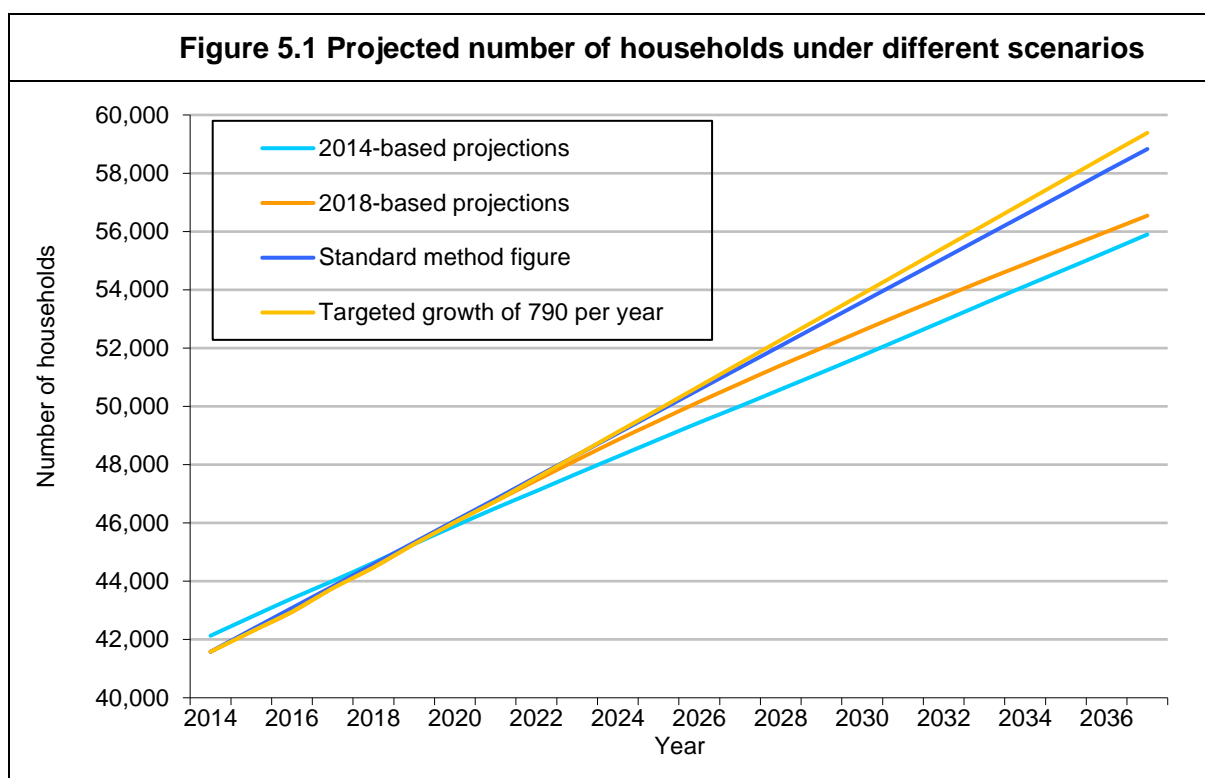
- 4.5 In light of the above, the Local Plan has been prepared on the basis that the Borough is its own housing market area and focusses on an approach which is consistent with meeting the Borough's own needs for housing as a minimum. However, it is recognised that the Borough has close relationships with some neighbouring Boroughs which are currently working on Local Plans and may have expectations of unmet current or future housing needs. This is recognised in paragraph 2.57 of the Submission Local Plan and addressed in more detail in the Duty to Cooperate Compliance Statement.

Housing Need and Number of Dwellings

- 4.6 The DERNA sets out the Borough's housing needs using the government's standard method (paragraphs 2.30-2.39). At the time the original DERNA document was produced, this figure was 797 dwellings per annum. Chapter 5 of the DERNA Update sets out the updated standard method figure which is now 750 dwellings per annum. This lower figure is largely as a result of slightly reduced projected household growth and slightly improved affordability of housing in the Borough.
- 4.7 The original DERNA includes the outputs from modelling to assess whether the Council should consider planning for more dwellings than the standard method local housing need figure to help meet the need for affordable housing (chapter 5). Paragraph 7.6 sets out the summary rationale in relation to needs and delivery for the recommended 35% affordable housing target on applicable sites (subject to viability).
- 4.8 Policy S4 of the Submission Local Plan makes provision for 790 dwellings per annum. The reasons for including a figure over and above the standard method requirement of 750 dwellings per annum is set out in paragraph 2.57 of the Plan as follows:

A Borough housing requirement of an average of 790 dwellings per year is set out in the Local Plan. This level, and the associated spatial strategy:

- Is based on the actual developable supply of housing land, accounting for the confirmed regeneration potential to achieve sustainable new homes in the Borough (Table 1);
 - Provides for the national objectively assessed need for the Borough and includes flexibility;
 - Boosts provision of new homes and supports plans for new local communities to continue to materialise now in planned locations, by providing a sufficient deliverable supply for 5 or more years from now; and
 - Is consistent with potentially supporting delivery of some unmet residential needs in the wider area.
- 4.9 The DERNA Update includes a useful figure which sets out the projected number of households under different scenarios and this is repeated below.

Figure 1 Projected Households

4.10 In relation to this diagram, paragraph 5.18 of the DERNA Update includes the following text:

The Council's figure of 790, as demonstrated in figure 5.1, exceeds both projections and therefore both addresses existing affordability imbalances (identified within the standard methodology calculation) and aligns with the government's objective to build more homes.

Past Housing Completions Records

4.11 Examination of Dartford Borough's published annual rates of new house building over the past 20 years is highly insightful. Grouping together annual completions into bands of 200 homes (Table 4), there has been a clear tendency to deliver in the range of 500 to 699 dwellings per annum, which has occurred on 10 occasions throughout the period. The table below also shows the lower delivery levels were in earlier years, and higher levels in more recent years.

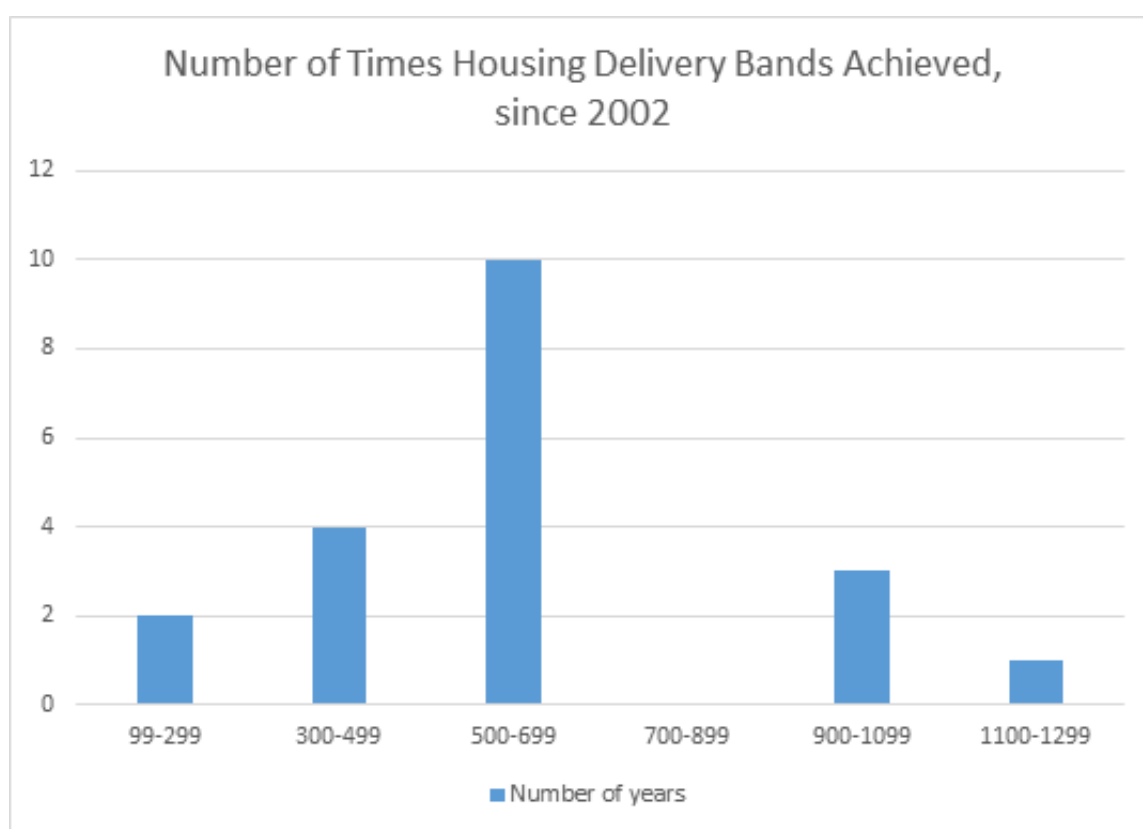
Table 4 Housing Delivery Bands

Band: Number of dwellings	Frequency: Number of years	Years
99-299	2	2006, 2010
300-499	4	2002, 2011, 2012, 2013

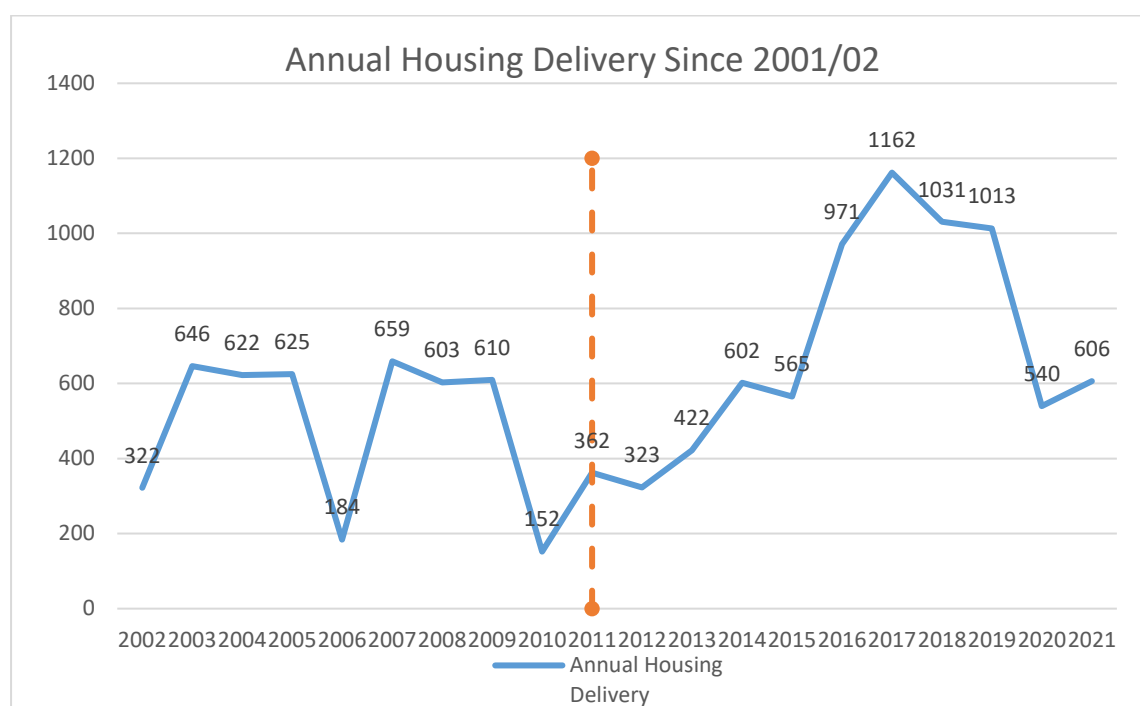
500-699	10	2003, 2004, 2005, 2007, 2008, 2009, 2014, 2015, 2020, 2021
700-899	0	N/A
900-1099	3	2016, 2018, 2019
1100-1299	1	2017

4.12 Figure 2 shows the frequency/ distribution of years falling within these bands, and graphically displays the recurrence of Dartford's market delivering between 500 and 699 dwellings a year, over this timescale:

Figure 2 Housing Delivery Bands



4.13 Reinforcing this, the mean average annual delivery over the period since 2001/2 has been 601 dwellings. Further investigation shows that within the most common band (tallest bar in Figure 2), delivery in all those years has actually been within 540 and 659 dwellings per annum range. This is illustrated below.

Figure 3 Housing Delivery

- 4.14 The vertical dotted line shows the point of adoption of the Core Strategy in 2011 and the impact of this growth agenda coming into force.
- 4.15 In summary, there have been some high residential delivery rates since the Core Strategy was adopted in 2011. However it remains the case that over the last 20 years Dartford Borough's housing delivery has very frequently been within the very narrow band of just +/- 10% of 600 homes a year. This has occurred a total of 10 times.
- 4.16 This shows the boost in supply represented by the standard method level, and the ambition within the Local Plan to maintain a significantly higher average residential requirement than past typical rates of delivery in Dartford.

Residential Requirement Report

- 4.17 The Residential Requirement Report 2021 shows how the Council has quantified the precise housing requirement, resulting in the proposed rate of 790 dwellings per annum in policy S4:3. The housing requirement optimises the developable regeneration potential of the Borough consistent with national policy. The standard method is applied (750 dwellings per annum), and with consideration to government policy and guidance, a specific requirement in excess of this is set in the Report.
- 4.18 The positive planning basis for the approach is drawn together from paragraph 4.12, with the rate of 790 dwellings per annum identified in paragraph 4.16.
- 4.19 It should be noted paragraphs 4.19 to 4.21 address the five year deliverable supply with details in Appendix B (which includes for certainty, 'Sedgefield' and 'Liverpool' methods). Section 5 summarises conclusions, confirming the 790 dwellings per annum

residential requirement rate as sound, and delivering national policy and Dartford's developable residential regeneration potential.

- 4.20 Outlining other report sections in turn: section 1 of the report set out its purpose and structure and the national policy context, as well as providing information on the existing approach in the Core Strategy.
- 4.21 Section 2 outlines housing delivery and brownfield land use trends, and resulting population growth levels. Dartford Borough's residential development is set in its proportionate context, including the Kent and national development rates:
- Paragraph 2.3 confirms Dartford Borough is the smallest local authority (in hectares) out of 13 in the Kent area.
 - Paragraphs 2.9 - 2.13 show Dartford Borough's past residential delivery rates to be circa 600 dwellings per annum. There have been fluctuations as a result of variable economic conditions in that period, and high delivery years have occurred in more recent times (post Core Strategy adoption).
 - Paragraphs 2.17-2.20 illustrate the proportionate growth outcomes of the recent housing delivery rates on Dartford as a small Borough in size. (On housing stock, the latest figures (2020) show Dartford's stock to total 47,849 units). As noted in paragraph 2.49 (supporting text for policy S4), the Borough is the second fastest growing non-unitary authority in England, with population growth of 10% over the last five years.
- 4.22 Section 3 considers policy/ national guidance needs in detail:
- Paragraphs 3.4-3.7 sets out that Dartford has applied the standard method in full. Paragraphs 3.8-3.10 considers, if the standard method level is to be achieved, the factors in guidance relating to boosting housing supply. Table 1 examines the application of each aspect of government guidance in this respect.
 - Paragraph 3.14 notes that the presence of unmet housing need in the wider area has been noted and considered, although specific quantities and firm information was constrained as authorities have limited confirmed data available, reflecting the stage of plan progress elsewhere. Paragraph 3.17 highlights a positive approach by Dartford in the face of uncertainty with a contribution towards wider unmet needs assisting plan-making and the confirmation of Statements of Common Ground.
 - Paragraphs 3.18-3.27 address national policy and other determinants of how a housing requirement for the Local Plan would be expressed (e.g. the case for and against having a requirement as a range or staggered). They also highlight the relevance of the SHLAA in identifying a level of residential development above the standard method rate.
 - Specifically on timescales against which housing supply is expressed, paragraph 3.21 notes a base year of 2017/18. The start of the housing trajectory is considered to be justified as it is when the work on the new Local Plan started and it is when the government proposed the new standard method for housing, which 'reset the clock' on housing supply measurement over time. It is also when the first Brownfield Land Registers were introduced, a key

component of maintaining the identified housing land supply. For context, the difference between aggregate supply and the requirement, from 2017/18 inclusive to March 2021 is a total of +30 units, i.e. the result is net total of 30 homes more constructed over the last four years than required under a rate of 790 dwellings per annum.

- Paragraph 3.22 notes the NPPF's (paragraph 68) expectation of developable sites for 15 years of the plan period, where possible. Applying this from 2017/18 leads to the 2031/32 point in Table 1 of the Plan (presenting a snapshot of housing sources for policy S4). This sets the output: quantifying a specific requirement rate.

SHLAA Findings September 2021 and Brownfield Land Register December 2021

- 4.23 The SHLAA has been produced in line with national guidance and a local methodology statement (subject to consultation), and following a 'call for sites' and extensive local site research. SHLAA results have been updated alongside the finalisation of the Local Plan, and are featured in Findings and Sites Compendium documents (the latter provides individual summaries of all sites outcomes).
- 4.24 The SHLAA underpins the housing trajectory included in Appendix C of the Local Plan (and paragraph 2.60 of the Plan). This confirms that the 790 dwellings per annum requirement set out in policy S4:3 can be achieved (cumulative housing delivery exceeds the aggregate requirement) until the final year of the Plan (2036/37). This extended period satisfies national policy for developable supply.
- 4.25 Section 3 of the SHLAA Findings document lists and maps deliverable and developable sites, and outlines some characteristics of deliverable/ developable sites. For example 44% of sites are anticipated to deliver between 5 and 9 dwellings. In section 4, the SHLAA deliverable/ developable supply and whole housing land supply situation as identified is sufficient (paragraphs 4.3 to 4.8) and considered robust and reasonable (paragraphs 4.9).
- 4.26 Appendix D of the SHLAA Findings indicates the projected trajectory and phasing of the deliverable and developable sites. On top of the deliverable/ developable sites, there are a small number of other sites that both have planning permission and are developable that are included in the trajectory. Additionally, a small proportion of small windfall sites (under 5 dwellings net) have been included. As explained in the SHLAA Findings Appendix E, the small sites with extant planning permission have been phased across the first three years (with a discount for non-implementation). A windfall allowance, based on historic delivery trends, has then been applied from year four onwards.
- 4.27 Appendix E of the SHLAA Findings shows that a robust and conservative approach has been adopted to the likely yield from windfalls, so that they are not over-estimated. The rate of 25 dwellings per year is justified on the basis of small sites alone (under 5 dwellings net). Moreover it was considered prudent on balance not to assume any windfall contribution from large sites.
- 4.28 A rigorous approach has been adopted to meeting NPPF definitions of 'deliverable' and 'developable'. This means that some sites that were 'near' developable or deliverable at the time of assessment are not included in the housing land supply. It

avoids undue optimism over whether or not developable sites have a reasonable prospect that they will be available, and applies caution in relation to timing and if all land is fully relied on within the identified supply. Paragraph 4.10 and Appendix F of the SHLAA Findings outlines implications/ an example of the relevance of this: how it can relate to market responsiveness and national and local policy; and how this approach has informed policy (most notably policy D7 and associated paragraph 3.59 in the Plan). In summary, and as noted in paragraph 2.65 of the Local Plan, there are additional sites confirmed as suitable but not yet available/ achievable which are not currently counted towards the housing land supply. These provide a potential additional source of housing that may emerge in the future.

- 4.29 Paragraph 2.61 of the Local Plan outlines the role of the SHLAA, plus flexibility in the housing land supply. This includes sites that may build out sooner than expected, for instance Ebbsfleet Central is not phased to achieve its full capacity in the plan period. Future changes (such as previously developed sites which are granted planning permission) will be confirmed as appropriate in the annual Brownfield Land Register to maintain the future housing land supply.
- 4.30 At submission stage an erratum has been issued to the SHLAA Findings September 2021 document. However this only concerns mapping and Appendix D. There are no changes to assessed status of any sites or capacities.
- 4.31 Local Planning Authorities are required to prepare, maintain and publish a register of previously developed (brownfield) land⁴. Dartford has constantly maintained a Brownfield Land Register since it's national introduction in 2017. After publishing the Plan, the Council produced the updated 2021 Brownfield Land Register in line with the applicable regulations. This December 2021 register includes four additional sites that that were not identified in the previous register nor the recent SHLAA Findings (September 2021). The four additional sites to the SHLAA have a total minimum capacity of 22 and a total maximum capacity of 80 dwellings.

⁴ under the Town and Country Planning (Brownfield Land Register) Regulations 2017

5 POLICIES M7, M8 and M11 AFFORDABLE, MIX AND RETENTION OF HOUSING

Relationship with existing policy

- 5.1 Table 5 shows a summary of the text from policies M7, M8 and M11 in the Dartford Local Plan compared to the relevant previous policies from the existing adopted Core Strategy 2011 and Development Policies Plan 2017. Several parts of policies have been updated in response to changing national policy.
- 5.2 In terms of policy M7 (Affordable Housing), the thresholds for the sizes of development where affordable housing needs to be provided remains the same as previously in the urban area and has been amended to align with national planning policy for other parts of the Borough. The other key change is from the previous requirement for 30% of dwellings on applicable developments to be affordable to a new requirement of 35% (except for Central Dartford where it is 20%).
- 5.3 Policy M8 drops previous policy requirements in relation to the provision of houses and flats and includes less specific requirements in terms of the sizes of dwellings required. Unless it can be demonstrated that it is not feasible, policy M8 introduces a requirement for all new build dwellings to be accessible and adaptable, and provides greater clarity on when wheelchair user dwellings should be sought. It also introduces a clearer requirement for the provision of self-build or custom-build dwellings on major developments.
- 5.4 Policy M11 essentially maintains the previous approach from 2017 in terms of the retention of a range of dwellings sizes and sufficient garden land, and the requirements for extensions and infill developments/ residential conversions.
- 5.5 The changes to policies M7 and M8 and the continuation of the approach in policy M11 are justified in the Dartford and Ebbsfleet Residential Needs Assessment and the Local Plan Viability Assessment (see relevant sections below).

Table 5: Proposed and Existing Policies

Proposed Policy	Existing Policy
M7: Affordable Housing <ul style="list-style-type: none"> Sets out the thresholds for the sizes of development when affordable housing provision will be required Supports the provision of sites providing all rented affordable housing where it is in a sustainable location and appropriate in scale Sets out target for affordable housing provision Ensure no segregation between different tenures Focus provision on-site 	<ul style="list-style-type: none"> CS19:1 DP9:1 CS19:1 None DP9:2
M8: Housing Mix <ul style="list-style-type: none"> Requires a mix of house types and includes thresholds for this 	<ul style="list-style-type: none"> CS18

Proposed Policy	Existing Policy
<ul style="list-style-type: none"> Sets out requirements for accessible, adaptable and wheelchair user dwellings Supports provision of specialist accommodation and care homes where sustainably located and need is demonstrated Requires provision for self or custom build housing on major developments 	<ul style="list-style-type: none"> DP8:2 None DP9:4
M11: Extensions, New Dwellings, and Garden Land <ul style="list-style-type: none"> Maintain a range of dwelling sizes and sufficient garden land and character of residential areas No unacceptable loss of garden ground and proposals also need to protect diversity of stock and local character Criteria for extensions, infill development and conversions Restriction on the conversions of smaller dwellings 	<ul style="list-style-type: none"> DP7:1 DP7:2 DP7:3 DP7:4

Local evidence

Dartford and Ebbsfleet Residential Needs Assessment and Update

Affordable Housing

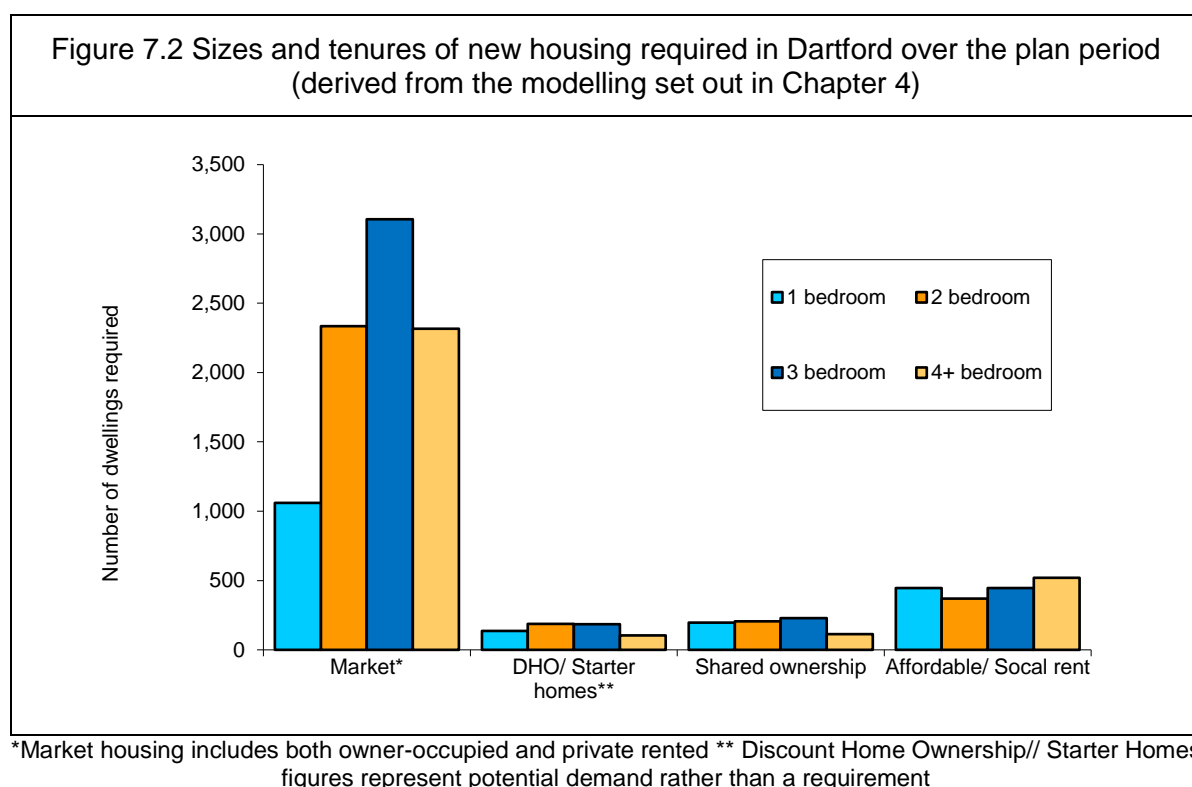
- 5.6 The DERNA considered whether the Council should consider planning for more dwellings than the standard method local housing need figure to help meet the need for affordable housing. In this respect, it found that this was not necessary and that affordable housing needs could be met if the requirement was set at 35%. This figure is justified through information set out in Chapters 3 (The cost and affordability of housing) and 4 (Type and tenure of future housing needed) in the DERNA.
- 5.7 In accordance with the recommendation in the DERNA, policy M7:2b of the Submission Local Plan includes a target of 35% of all dwellings to be affordable, except in Central Dartford where the target is 20%. The reason for the lower target in Central Dartford is set out in paragraph 5.25 below.
- 5.8 Chapter 4 of the DERNA also considers the types of affordable housing required to meet the Borough's needs over the plan period. In paragraph 7.10, it concludes that the overall requirement is for 14.9% of housing to be affordable/social rented and 11.3% affordable home ownership (of which 6.2% could be shared ownership and 5.1% discounted home ownership/ starter homes). Paragraph 7.11 frames these within the overall recommended target of 35% of all new housing as affordable. This results in the need for 20% of all new housing to be affordable/social rent and 15% affordable home ownership products, of which the majority should be shared ownership.
- 5.9 Paragraph 4.1 of the DERNA Update recognises that the government is mandating First Homes as the preferred discount home ownership model, with a requirement of

25% of affordable homes being First Homes. Chapter 4 of the DERNA Update profiles this affordable product within the current housing market in the Borough. In paragraph 6.4, it concludes that new build First Homes with a 30% discount are notably cheaper than entry-level owner-occupation in Dartford and will therefore address a gap in the housing market locally. It also recognises that shared ownership with a 25% equity share is a cheaper form of intermediate housing better able to assist households in affordable housing need.

- 5.10 The First Homes Written Ministerial Statement dated 24 May 2021 sets out transitional arrangements in relation to this affordable housing product. These are believed to apply as the Dartford Local Plan was first published before 28 June 2021 and subsequently submitted for examination before 28 December 2021. In any event, the Council considers that its general approach on housing mix is generally sufficient to address the government's First Homes approach.
- 5.11 Policy M7 of the Submission Local Plan requires development to provide a mix of affordable housing tenures. It does not specify with criteria the types of affordable housing which should be provided. Local Plan paragraph 5.61 which supports policy M7 includes the indicative guideline of 20% of total housing to be social/ affordable rented tenures and 15% of total housing to be affordable home ownership products (including First Homes provision). It is considered that this reflects the evidence and national policy requirements, including the transitional arrangements in relation to First Homes.

House Sizes

- 5.12 Chapters 4 and 6 of the original DERNA considered the type and tenure of future housing needed, and the requirements of specific groups of the population respectively. In terms of the sizes of dwellings needed for different tenures, it included the following figure which is also included as Figure 10 within the Submission Local Plan.

Figure 4 Sizes and Tenures of New Housing

- 5.13 As specified in paragraph 5.66 of the Plan, it is clear that, for market housing, the greatest need is for 3 bedroom homes, but with significant need for 2 and 4 bedroom homes. For affordable dwellings, the needs for different sizes of homes are more evenly spread. Policy M8:1 reflects the need for new developments to provide a mix in the size of dwellings to meet these needs. Policy M11:1 and 4 includes criteria to ensure that proposals for infill residential developments and conversions retain a range of dwelling sizes and do not result in the loss of existing family sized dwellings.

Accessible, Adaptable and Wheelchair User Dwellings

- 5.14 The DERNA considers the housing needs of older people (paragraphs 6.5-6.17) and those with disabilities (6.18-6.39). It projects that the population aged 65 or over is going to increase over the plan period; from 16,121 in 2019 to 24,784 in 2036, a rise of 53.7%. It also projects that there will be an increase in the number of households headed by someone over 65 from 10,185 in 2019 to 15,606 in 2036, an increase of 53.2%. The projections also indicate that the proportion of older persons living alone in Dartford will increase from 44.7% in 2019 to 47.3% in 2036.
- 5.15 Table 6.3 of the DERNA sets out projections for the numbers of people living in Dartford Borough who are likely to be living with a health condition and those who require assistance with activities, both in 2019 and by 2036. For example, it predicts that the number of people aged 65 and over who are unable to manage at least one mobility activity on their own will increase by 1,740 (57.6%). As another example, it predicts that people aged 18-64 with a serious personal care disability will increase by 148 (26.2%).
- 5.16 The study uses different data sources and modelling to estimate the requirements for accessible and adaptable homes over the plan period. It concludes that, by the end of

the plan period, there is a requirement for around 5,000 homes (about 9% of the total stock) which meet the M4(2) Category 2 accessible and adaptable homes standard. However, it notes that it is not possible to move those in need to the specific properties designed to meet their need and that the most effective way to overcome this is to ensure there is a broad choice of homes. It concludes that a greater choice will be provided if all new properties are designed to meet at least M4(2) standards, though this would be subject to an assessment of impacts on development viability.

- 5.17 In terms of wheelchair user housing, the DERNA notes that there are 24 applicants on the housing register who require wheelchair accessible housing. Figure 6.3 sets out the number of enquiries for Disabled Facilities Grants for home adaptations received by the Council since 2013, alongside the number of adaptations completed. The study makes clear that this will provide an indication of levels of expressed need but will underestimate total need. The DERNA states that it is difficult to model an estimate for the number of wheelchair user dwellings required over the plan period and it does not make any specific recommendations in this regard.
- 5.18 In a growing Borough it is important that new housing stock is designed to be accessible and adaptable so that it is future proofed for the following reasons:
 - It provides greater choice and addresses needs for occupants both now and in the future, i.e. it will allow more residents to stay in their homes for longer as their needs change
 - The significant majority of existing housing stock is not specifically designed to meet current and future accessibility needs
 - It will ensure that homes are suitable for non-residents/ visitors with mobility issues who may access the homes
 - It will make homes more usable for people with young children.
- 5.19 It is considered that this provides sufficient justification for the requirement in policy M8:2 that all new build dwellings should meet accessible and adaptable standards and for a limited proportion of wheelchair user dwellings to be provided on sites of 100 or more dwellings.
- 5.20 Local Plan paragraph 5.71 sets out that only a small proportion of wheelchair user dwellings are expected (where applicable) on developments. As this may be 1%, for instance, a sufficient threshold is necessary to confirm that the provision of a wheelchair user dwelling is not a stipulation for smaller developments. Therefore, the policy sets out a threshold of 100 dwellings.
- 5.21 Paragraph 5.70 of the Plan sets out site specific circumstances where it may be impossible for all dwellings to meet accessible standards, e.g. site topography, where flood risk mitigation is needed. This is recognised in the policy which requires any exemption from the policy requirements to be robustly evidenced.
- 5.22 As set out in paragraph 5.26 below, it has been demonstrated that policy M8 is not expected to have a material impact on the viability of development.

Local Plan Viability Assessment

- 5.23 The Local Plan Viability Assessment 2021 considers the potential viability of various policy cost options (see paragraphs 15 and 16 of the assessment). This includes a

focus on the likely viable proportion of affordable housing tenures (rented and intermediate i.e. affordable home ownership) as this has the single greatest impact on viability. The impact of the tested affordable housing proportions was considered whilst making other appropriate assumptions. These represent the likely targeted affordable housing tenure mix, technical housing standards (including accessible and adaptable housing (Building Regulation Standards Part M4(2) and M4(3)), appropriate dwelling sizes, water efficiency etc.)

- 5.24 In summary, after extensive scenario testing, paragraph 19 of the Assessment finds that: “Viewed as a whole, the emerging Local Plan proposals are considered to have reasonable prospects of viability and should therefore be able to meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms.”
- 5.25 In relation to affordable housing levels, paragraphs 4.2.3-4.2.4 of the Viability Assessment conclude that policy M7 suitably reflects the findings of the assessment that residential development within Central Dartford is likely to be under greater viability pressure than elsewhere in the Borough. The proposed 20% affordable housing policy headline/ target is considered suitable in this location, with a 35% headline/ target suitable across the rest of the Borough. The Central Dartford approach is necessary due to typically higher density developments (mostly apartment based) with expected higher development costs due to higher existing use values, and also increased construction costs and reduced net saleable area.
- 5.26 Paragraph 4.3.1 of the Viability Assessment considers the suitability of policy M8. In terms of this, policy proposals overall, and delivery of the Local Plan, paragraph 24 of the viability assessment notes: “The Council has a strong track record on development, delivering at a high level. This shows that the approach within national policy and as applied locally has been working overall. The Council expects this to be able to continue based on the approach now being continued and built on. In general, other policies tested in this assessment alongside the affordable housing are considered to be supportable overall. In the Council’s view, as previously noted, the overall approach is considered to be a relatively “light touch” one, based on national policy and proposing a fairly typical set of measures rather than overly onerous or additional ones...”

Self-Build and Custom Housing December 2020

- 5.27 Each year the Council submits relevant data regarding self-build and custom-build housing to central government. The most recent return was from December 2021 and confirmed that there are 28 individuals on Dartford Borough’s self-build register.

6 POLICY M12 GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

Relationship with existing policy

- 6.1 Table 6 outlines a summary of the text from policy M12 in the Submission Dartford Local Plan compared to the relevant previous policies from the existing adopted Core Strategy 2011 and Development Policies Plan 2017. There is a continuation of the approach to maintain a five year supply of deliverable land but policy M12:1 provides more clarity on the amount of gypsy and traveller pitches and travelling showpeople's plots required and the actions that will be taken to try to achieve this. The criteria for assessing planning applications set out in policy M12:2 is largely a continuation of the existing approach in policy DP10:3.

Table 6: Proposed and Existing Policies

Proposed Policy	Existing Policy
M12: Gypsy, Traveller and Travelling Showpeople Accommodation <ul style="list-style-type: none"> Sets out five year needs for gypsies, travellers and travelling showpeople and the actions to meet these needs Outlines criteria to which will need to be met for proposals for gypsy and traveller pitches and travelling showpeople plots 	<ul style="list-style-type: none"> CS20:3,4 and DP10:1,2 DP10:3

Local evidence

Gypsy and Traveller Accommodation Assessment

- 6.2 A Gypsy and Traveller Accommodation Assessment (GTAA) for the Borough was completed in October 2019. Section 3 of the GTAA sets out the methodology used to carry out the assessment and the Council considers that this is comprehensive and meets the requirements of national planning policy contained in the Planning Policy for Traveller Sites (2015). The methodology included: a desk-based review; stakeholder engagement; working collaboratively with neighbouring planning authorities; a survey of travelling communities (including attempts to complete an interview with the residents on all occupied pitches and plots and visits to all sites); and engagement with bricks and mortar households. Figure 7 of the GTAA lists the sites and the number of those who were interviewed on each site, together with the numbers of pitches/plots where it was not possible to make contact with the occupants. It is considered that there was a high level of contact with gypsy, traveller and travelling showpeople in the Borough in order to assess their needs.
- 6.3 Paragraph 1.13 indicates that there is a need for 70 pitches for gypsy and traveller households that meet the planning definition to 2035. Figure 2 indicates that the need from 2019-2024 is 48 pitches. Paragraph 1.23 sets out the need for 1 plot for travelling showpeople households that meet the planning definition and Figure 4 indicates that this is required in the period 2019-2024. In terms of transit site, paragraph 1.24 does not recommend that there is a need for any transit provision in the Borough at this time.

Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report

- 6.4 The Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report September 2021 (the Meeting Needs Report) provides an update to the needs for gypsies, travellers and travelling showpeople over the plan period and sets out how these needs are being addressed through the Local Plan.
- 6.5 As the GTAA is two years old, paragraphs 3.3 and 3.5 of the Meeting Needs Report provide adjusted need figures for the five year supply period to 2026 and subsequent years of the plan period. Paragraph 3.7 gives details of the planning permissions which have been granted since the GTAA was carried out in 2019 and paragraph 3.11 concludes that the resultant needs are for 34 traveller pitches and 1 travelling showpeople's plot to 2026. These are the figures outlined in policy M12 of the Local Plan.
- 6.6 Section 4 of the Meeting Needs Report sets out the measures that the Council has taken to try to meet the needs arising from sites within the Borough. This includes communication with the owners of sites and initial desktop assessments of existing sites. This identified the sites listed in paragraphs 4.5 and 4.8 of the report. For sites which require planning permission to accommodate additional caravans to provide pitches/ plots, the relevant sites are identified in policy M12:1b. Paragraphs 4.4 and 4.5 of the Meeting Needs Report make clear that further work is currently underway on carrying out site assessments, liaising with the occupiers and drawing up plans for sites where there are known needs arising which could potentially accommodate additional caravans. This relates to those sites identified in policy M12.1b and other sites.
- 6.7 The Meeting Needs Report also outlines the actions that the Council has taken to try to identify the potential for new sites to accommodate some of the current, five year and longer terms needs for travellers. Paragraphs 4.9-4.11 of the report set out the assessment of sites and areas within Central Dartford and Ebbsfleet Garden City. This indicates that there could be potential for a new site in Ebbsfleet Garden City (as set out in policy M12:1c of the Local Plan). Paragraphs 4.13-4.16 and Appendix C of the report indicate the communication that there has been with the Ebbsfleet Development Corporation in this respect. It was not possible to identify potential sites within Ebbsfleet Garden City for travellers at the current time. Consideration has also been given to whether or not any suitable land owned by Dartford Borough Council or Kent County Council (KCC) could be available for designation for traveller pitches (see paragraphs 4.17-4.19 of the report). In relation to this, paragraph 4.19 of the Report indicated that KCC had been approached. KCC responded on 14 October 2021 that it is not felt that they own any sites which are suitable and could potentially be brought forward for the provision of gypsy and traveller pitches in Dartford Borough. Therefore, no suitable land owned by either Dartford Borough Council or KCC has so far been identified.

APPENDIX 1 SUSTAINABILITY APPRAISAL EXCERPTS

Symbols – Key

++	This option is likely to have a significant positive effect on the SA objective(s).
++/-	The option is likely to have a mixture of significant positive and minor negative effects on the SA objective(s)
+	The option is likely to have a minor positive effect on the SA objective(s).
0	The option is likely to have a negligible or no effect on the SA objective(s).
-	The option is likely to have a minor negative effect on the SA objective(s).
--/+	The option is likely to have a mixture of significant negative and minor positive effects on the SA objective(s).
--	The option is likely to have a significant negative effect on the SA objective(s).
?	It is uncertain what effect the option will have on the SA objective(s).
+/- or ++/--	The option is likely to have an equal mixture of both minor or both significant positive and negative effects on the SA objective(s).

Sustainability Objectives and Cumulative Effects of Plan Policies

SA objective	Likely cumulative effect
SA 1: To ensure that everyone has the opportunity to live in a decent home	++
SA 2: To ensure ready access to essential services and facilities for all residents	++
SA 3: To strengthen community cohesion	++
SA 4: To improve the population's health and reduce inequalities	++/-
SA 5: Facilitate a sustainable and growing economy and a vital and viable town centre	++
SA 6: To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion	++/-
SA 7: To conserve the Borough's mineral resources	-
SA 8: To conserve the Borough's soils	++
SA 9: To maintain and improve the quality of the Borough's waters	+
SA 10: To reduce air pollution and ensure improvements in air quality	++/-
SA 11: To avoid and mitigate flood risk	+
SA 12: To minimise the Borough's contribution to climate change	++/-
SA 13: To conserve, connect and enhance the Borough's wildlife, habitats and species	++/-
SA 14: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment	+/-
SA 15: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape	+

Policies M7 and M8: Affordable Housing and Housing Mix

SA objective	M7	M8
1. To ensure that everyone has the opportunity to live in a decent home.	++/-	++
2. To ensure ready access to essential services and facilities for all residents.	0	0
3. To strengthen community cohesion.	+	+
4. To improve the population's health and reduce inequalities.	+	+
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	+	+
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	0	0
7. To conserve the Borough's mineral resources.	0	0
8. To conserve the Borough's soils.	0	0
9. To maintain and improve the quality of the Borough's waters.	0	0
10. To reduce air pollution and ensure improvements in air quality.	0	0
11. To avoid and mitigate flood risk.	0	0
12. To minimise the Borough's contribution to climate change.	0	0
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	0	0
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	0	0
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	0	0

Policy M11: Extensions, New Dwellings and Garden Lane

SA objective	M11
1. To ensure that everyone has the opportunity to live in a decent home.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To strengthen community cohesion.	0
4. To improve the population's health and reduce inequalities.	+
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	0
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	0
7. To conserve the Borough's mineral resources.	0
8. To conserve the Borough's soils.	0
9. To maintain and improve the quality of the Borough's waters.	0
10. To reduce air pollution and ensure improvements in air quality.	0
11. To avoid and mitigate flood risk.	0
12. To minimise the Borough's contribution to climate change.	0
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	+
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	+
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	+

Policy M12: Gypsy, Traveller and Travelling Showpeople Accommodation

SA objective	M12
1. To ensure that everyone has the opportunity to live in a decent home.	++
2. To ensure ready access to essential services and facilities for all residents.	+
3. To strengthen community cohesion.	0
4. To improve the population's health and reduce inequalities.	+
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	0
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	+
7. To conserve the Borough's mineral resources.	-?
8. To conserve the Borough's soils.	+
9. To maintain and improve the quality of the Borough's waters.	0
10. To reduce air pollution and ensure improvements in air quality.	+/-
11. To avoid and mitigate flood risk.	0
12. To minimise the Borough's contribution to climate change.	+
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	-
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	0
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	+