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# EXAMINATION STATEMENT

## *Matter 2 – Meeting Dartford's Housing Needs*

### Dartford Local Plan

Representations on behalf of  
Storefield Group Ltd

September 2022

**EXAMINATION STATEMENT**

***MATTER 2 – MEETING DARTFORD'S HOUSING NEEDS***

**DARTFORD LOCAL PLAN**

**REPRESENTATIONS ON BEHALF OF:  
STOREFIELD GROUP LTD**

**SEPTEMBER 2022**

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Barton Willmore, now Stantec



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## CONTENTS

	PAGE NO
1.0 INTRODUCTION	01
2.0 RESPONSE TO QUESTIONS	02

- Q.1. Has the calculation of Local Housing Need been carried out correctly?*
- Q.2. Is the base date of 2017/18 justified and appropriate having regard to the use of the 2020/21 affordability ratio? Alternatively, should the base date be 2020/21?*
- Q.3. Is a proposed housing requirement appropriate and is it justified? How has the proposed additional 40 dwellings per annum above the standard method been calculated?*
- Q.4. What is the extent of any under/ over delivery between the plan start date and the base date of the standard methodology calculation?*
- Q.5. Is policy S4 clear as to the total quantum of housing being planned for over the full plan period?*
- Q.6. Do the strategic policies look ahead a minimum 15 year period from the anticipated adoption of the plan, as required by paragraph 22 of the Framework?*
- Q.7. How would the plan be able to respond if unmet need from Gravesham is clearly quantified in future?*

## **1.0 INTRODUCTION**

- 1.1 This Hearing Statement has been prepared by Barton Willmore, now Stantec on behalf of Storefield Group Ltd. We are acting on behalf of Storefield Group regarding its land interest at "Stone Pit 9" – presently an omission site as part of the emerging Local Plan.
- 1.2 This Statement is prepared in response to the Matters, Issues and Questions raised by the Inspector in respect of Matter 2 relating to 'Meeting Dartford's Housing Needs'.
- 1.3 Notwithstanding our Client's specific land interests, this Matter Statement has been prepared in objective terms in line with the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).
- 1.4 These representations have been considered in the context of the tests of 'Soundness' as set out at Para 35 of the NPPF. These required that a Plan is:
- Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;
  - Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

## 2.0 RESPONSE TO MATTER 2: MEETING DARTFORD'S HOUSING NEEDS

### **Issue 1: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to meeting housing needs.**

#### ***Q.1. Has the calculation of Local Housing Need been carried out correctly?***

- 2.1 DBC produced the 'Dartford and Ebbsfleet Residential Needs Assessment Update' (DERNA update, Aug 2021) since new data was available to inform, inter alia, comparison of the latest Standard Method calculation with the housing growth planned by the Council for the Local Plan period.
- 2.2 While the PPG states that 'local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted' (Ref ID: 2a-008-20190220), it is noted that in calculations for the Standard Method the DERNA update has used a local affordability ratio figure from a dataset that has since been superseded.
- 2.3 The DERNA update used a 'ratio of median house price to median gross annual workplace-based earnings' for the base year 2020 of 8.57, which is derived from an ONS dataset published in March 2021. It is noted that this was the most recent dataset available to the 2021 DERNA update.
- 2.4 However, the March 2021 ONS dataset has since been superseded by a dataset published in March 2022. In this most recent dataset, the median workplace-based affordability ratio for the base year 2020 has been revised from 8.57 to 8.73. Whilst this results in a minor uplift to the calculated minimum annual local housing need figure from 750 dpa to 756 dpa (rounded-up), the overall premise is that the Local Plan is not underpinned by relevant and up-to-date evidence, contrary to the NPPF. At the least, DBC's Local Plan and evidence base should now be revised to reflect the 756 dpa minimum annual local housing need figure that is based on the most recent and accurate ONS dataset available.
- 2.5 Notwithstanding the above, the Standard Method provides a minimum starting point in determining the number of homes needed in an area. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. Whilst DBC have set a housing requirement of 790 dpa, which is 34 dpa (or 40 dpa if based on DBC's calculation) above the Standard Method, we do not believe this is a sufficient uplift to account for DBC's circumstances. This is further discussed in our response to Q.3. below.

***Q.2. Is the base date of 2017/18 justified and appropriate having regard to the use of the 2020/21 affordability ratio? Alternatively, should the base date be 2020/21?***

- 2.6 In paragraph 1.5 of DBC's Local Plan, it is stated that 'a base year of 2017 for this Plan reflects the commencement of preparation after adoption of the last plan, and the government's local housing need method'. We find the approach contrary to the NPPF, specifically that 'strategic policies should look ahead over a minimum 15 year period from adoption' (emphasis added).
- 2.7 The intended adoption of the plan per DBC's most recent Local Development Scheme (July 2021) is Q3 2022, giving a 15 year period of 2022 to 2037. Though it should also be highlighted that this timetable is now significantly delayed given that the Stage 2 Hearings will commence in November 2022, thus pushing back the intended adoption date into 2023. Therefore, the Local Plan should cover the period to 2038 as a minimum.
- 2.8 Additionally, the Plan's evidence base used an affordability ratio base year of 2020/21 in the Standard Method calculation. Notwithstanding our points made to Q1 above on this issue, this approach is in general conformity to the PPG, where the baseline for annual household growth is determined using the current year as the starting point from which to count 10 consecutive years (the current year in this case being 2021 as per the DERNA update). This implicates that DBC are not justified in their approach in using 2017 as the base year, which should instead be 2021 at the very least to reflect the use of this base year in the Standard Method, and therefore the Local Plan should be prepared on such a basis.
- 2.9 Furthermore, DBC have also used 2017/18 as the base date to determine the projected housing supply of the Local Plan to 2031/32. This is contrary to the NPPF and the PPG where strategic policies should identify a 5-year housing land supply from the intended date of adoption of the plan. If taking the intended date of adoption of the plan as being 2023, then projected housing supply should be fully assessed from this base date up until the end of the 15-year horizon, which would be 2038 as a minimum.
- 2.10 For this and the above reasons, it remains unclear from the Local Plan and the evidence base what the implications are for revising the base year from which the minimum 15-year horizon is projected, especially in terms of projected housing requirement and supply and the implication on spatial strategy.

***Q.3. Is a proposed housing requirement appropriate and is it justified? How has the proposed additional 40 dwellings per annum above the standard method been calculated?***

- 2.11 Whilst we agree with the principle that DBC wish to set a housing requirement above the Standard Method, we do not believe there is a sufficient uplift to fully address the range of DBC's circumstances and challenges for the area.
- 2.12 The reasons given by DBC for setting the housing requirement of 790 dpa are it 'is expected to contribute towards meeting unmet needs of one or more of London Borough of Bexley, Gravesham Borough Council and/or Sevenoaks District Council should a need arise' (WS1-1, DBC). DBC further justify that residual annual surplus from projected supply over the Standard Method figure of 750 dpa is 'available towards unmet needs elsewhere over time', citing Appendix 2 that demonstrates a cumulative surplus figure of 646 dwellings in the projected supply over the 750 dpa Standard Method cumulative figure to the period 2037 (i.e., the difference of 15,646 dwellings over 15,000 dwellings).
- 2.13 While DBC contend that there is a projected surplus of 646 dwellings if based on the 750 dpa local housing need figure, the same is not true if based on the 790 dpa housing requirement figure that DBC have set. Based on the cumulative housing requirement figure to the period 2037 (i.e., 15,800 dwellings), there is a projected deficit in the housing supply of 154 dwellings.
- 2.14 That is not to say that DBC should set the housing requirement as the 750 dpa local housing need figure. In our opinion, DBC should still seek to exceed this. However, the issue lies in DBC's approach to addressing unmet need from neighbouring authorities as being insufficient, inflexible, and too narrow in scope. DBC's own representations on the matter conclude that there are clear links between the DBC and London Borough of Bexley (LBB) housing markets. The Statement of Common Ground (SoCG) between these two authorities state that:

**'it is noted that the new London Plan is not able to demonstrate that London's housing needs can be met within the Greater London area'.**

And that:

**'The parties agree that there is a housing land supply allowance in the plan period to March 2037 in the Publication Dartford Local Plan to contribute towards future needs outside Dartford. This allowance is not relied upon in the Bexley Draft Local Plan to meet its London Plan housing target. However, if there is a need then both parties consider that there could be scope to call upon Dartford's allowance'. (emphasis added)**

- 2.15 Additionally, DBC recognise that the 790 dpa figure is to also address unmet need arising from Sevenoaks District Council (SDC) and Gravesham Borough Council (GBC) respectively. Concerning SDC, the SoCG with this authority states:

**'...there is a case to be made for DBC to assist with some unmet needs from SDC (if required and if not met at source housing market area) in the future should they have the capacity to do so, and where consistent with DBC's sustainable development, and national policy.'**

- 2.16 Concerning GBC, it is clear from the SoCG with this authority that there is disagreement as to the scale of unmet need though, nevertheless, DBC do acknowledge they have not refused to assist in meeting GBC's averred unmet housing needs.
- 2.17 DBC's present buffer to meet the unmet need arising from LBB, SDC, and GBC respectively of 40 dpa or 800 dwellings over the Plan period represents about 5.3% above the Standard Method figure. Given DBC's own recognition and ambition that they should contribute towards unmet need from these respective authorities, it is clear that a 5.3% buffer is at risk of being sated and exceeded, especially from unmet need arising from LBB alone. Barton Willmore have previously recommended that the buffer should be increased closer to 20% (i.e., an additional 150 dpa or 3,000 dwellings over the Plan period). In line with the NPPF, this will provide flexibility and allow for choice and competition in the market for land.
- 2.18 As such (and given that the projected housing supply is insufficient to meet the required 15,800 dwellings over the Plan period – see point 2.12 above), the increased buffer could be met through a flexible policy approach to housing and/or provisioning additional allocations in the Local Plan, including in the urban area such as at our Client's Site at Stone Pit 9.
- 2.19 The Site could contribute c. 300 – 400 units (likely as flatted development) towards additional unmet needs as part of a mixed used scheme incorporating 4,000 – 5,000 sqm of employment floorspace, or up to 40,000 sqm if solely for employment purposes, that could also contribute towards meeting DBC's employment land needs (see our response to Matter 7).

***Q.4. What is the extent of any under/ over delivery between the plan start date and the base date of the standard methodology calculation?***

- 2.20 Our calculations on under/over delivery based on the information contained in the Strategic Housing Land Availability Assessment Findings (September 2021, HOU-2) indicate that there was a cumulative over supply of 191 dwellings against the 750 dpa Standard Method figure, and a cumulative over supply of 31 dwellings against the 790 dpa housing requirement.
- 2.21 However, as per our response to Q.3. above, the proposed housing requirement should be set higher at 900 dpa in order to fully address unmet need. When using 900 dpa as the housing requirement, this would result in a delivery shortfall of 409 dwellings between the plan start date and the base date of the Standard Method calculation (i.e., 2020/21). The delivery shortfall would have to be addressed through a full assessment of projected housing supply, including how the shortfall can either be addressed in the first 5 years of the Plan (Sedgefield method) or spread over the whole Plan period (Liverpool method).

***Q.5. Is policy S4 clear as to the total quantum of housing being planned for over the full plan period?***

- 2.22 As set out under Policies S1 and S4, the Plan places a priority on the development of brownfield land not within the Green Belt, and sites with good access by public transport and walking/cycling to a range of local supporting services/infrastructure. This priority is broadly in line with the NPPF. However, the Plan should not impose an embargo on suitable non-Green Belt land.
- 2.23 In terms of housing supply, **Policy S4** requires that 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 such a target could be supported in broad terms, in this instance it is considered that the stated target has simply been carried over from the Core Strategy without appropriate evidence/testing to justify the figure. This is evident at para 2.54 of the Plan which notes "The plan maintains the previous aim for 80% or more of homes to be on brownfield sites".
- 2.24 The evidence base (Residential Requirement Report – 2021) derives the 80% figure from previous delivery trends in the borough. Instead, the exercise needs to look forward and demonstrate the availability of brownfield land in the Borough, including for housing, commercial and other uses. This is not apparent from the evidence base and accordingly the Plan is not considered justified in this regard.

- 2.25 The Plan should have sufficient flexibility to acknowledge that there are available sites assessed in the SHLAA that may have only been discounted on technical matters that could be surmountable through further investigation and evidence, and therefore suitable. Therefore, there should be recognition in the Plan's policies to enable such sites to come forward for development during the Plan period to contribute towards the housing requirement.
- 2.26 Regarding our Client's Site, the SHLAA assessment confirms that the site qualifies as being sustainably located and well served by public transport. The SHLAA goes on to consider the Site as unsuitable for two principal reasons:
- Potential for gas emissions and risk to development;
  - Potential for impacts upon groundwater.
- 2.27 In planning policy terms, the Site does not (officially) count as "brownfield" or "previously developed land" – due to its former status as a landfill site and subsequent restoration. However, it is nevertheless an **area of land that has been previously developed** (i.e., it is not a "fresh greenfield" site), and therefore sequentially preferable in this context.
- 2.28 Our submission to DBC's Regulation 19 consultation included in the appendices two technical reports addressing the issues of gas emissions and groundwater. The reports concluded that future residential receptors at the Site would not be impacted by gas hazards owing to mitigation methods. Equally, development of the Site would not lead to negative impacts on groundwater sources. On the contrary, development of the Site would reduce permeable drainage through former landfill resulting in betterment in this regard. Drainage solutions could entail infiltration away from landfill sources or other potential measures (including off-site treatment).
- 2.29 The SHLAA refers to other matters to be considered including transport, air quality, heritage, landscape, ecology, minerals, and TPO trees. These matters can be addressed through development management policies and considered through the submission of technical reports at the planning application stage.
- 2.30 The Site is considered a sustainable site in the urban area of Dartford (Stone area) and can be delivered with appropriate mitigation to avoid potential environmental hazards. In this regard, the Plan should be flexible and positively prepared to enable previously developed and sustainable sites like Stone Pit 9 to come forward for redevelopment within the Plan period.

***Q.6. Do the strategic policies look ahead a minimum 15 year period from the anticipated adoption of the plan, as required by paragraph 22 of the Framework?***

2.31 No – please refer to our response to Q.1. above.

***Q.7. How would the plan be able to respond if unmet need from Gravesham is clearly quantified in future?***

2.32 The Plan in its submitted form does not have the flexibility or any contingency in place to respond to unmet need from Gravesham, nor indeed from other neighbouring authorities in-combination or otherwise.

2.33 As discussed above in our response to Q.3., increasing the buffer from 5.3% to 20% could ensure sufficient headroom in the housing requirement figure to account for (undefined) unmet need. However, the Plan should also include a review mechanism should unmet need arising from GBC, SDC, and/or LBB be quantified in the future. This review should also entail a comprehensive assessment of projected housing supply to fully meet the local housing requirement, and a review of the Plan's overall spatial strategy.