



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.

- 1.1 We will consider **MIQs 1 to 7** together.
- 1.2 In general, CPRE Kent considers the current standard method for assessing local housing need to be flawed. We have also seen the negative impact of unplanned windfall development occurring in Boroughs and Districts across Kent where they have been unable to meet the 5-year housing land supply.
- 1.3 Since making our representations it has become clear that use of the current standard methodology to dictate local housing requirements, based on 2014 household projections, will imminently be scrapped. Despite this, it is recognised that this plan must be assessed against the NPPF as it currently stands.
- 1.4 We are therefore concerned that Policy S4, as currently worded, could lead to unintended consequences of unplanned and unsustainable windfall development, with greenfield sites being allowed ahead of planned-for brownfield sites.
- 1.5 This is because the currently unclear wording of Policy S4 would see an avoidable increase of 40dpa for the purposes of both the five-year Housing Supply test and the Housing Delivery Test. Specifically, the standard method requirement, as recognised within the supporting text and evidence base, is 750dpa and not the 790dpa the wording of the policy would currently commit the Borough to providing.
- 1.6 Although it's recognised that the 5-year supply is being met, this is currently very marginal at only 5.5 years, when assessed against the Policy S4 requirement of 790dpa. It would therefore not take much of a slow-down in housing delivery for Dartford to find itself failing the five-year supply test, and then the housing delivery test.
- 1.7 With the economy slowing down and the cost-of-living crisis taking hold, we would suggest there is a very real risk of such a slow down occurring, at least in the early part of the plan period. Such a slow down would be for reasons outside the Council's control.
- 1.8 In such circumstances, we would argue that formally committing to a higher than required housing requirement - and the risk of unplanned unsustainable windfall development that comes with it - is not an effective, nor justified strategy and therefore does not meet the test of soundness. Such a scenario would potentially undermine the brownfield first strategy underpinning this plan, a strategy which CPRE Kent wholeheartedly supports.

1.9 We would therefore welcome a modification to Policy S4 which recognises, and is clear that, Dartford's objectively assessed need figure for the plan period is 750dpa. This could be worded in a way that continues to recognise the ambition of 790dpa, though does not commit the borough to this figure for the purposes of the purpose of the 5-year housing supply and housing delivery test.

1.10 This could be achieved with modification to paragraph 3 of Policy SP4 to something akin to:

*"New homes are required to be delivered at an average rate of ~~790~~ 750 per annum, **though with an ambition of 790 per annum**, with planning permissions and delivery closely monitored and managed".*

1.11 Also, and as set out in our detailed representations, we continue to remain unclear as to the extent of the capture of any over delivery between the plan start date and the base date of the standard method. Whilst we note that this has also now been raised as a question by the Inspector, and is for the Council to respond to, clearly we would expect to see any over delivery reduced from the overall plan requirement so as provide further robustness against future failure of the 5-year supply and housing delivery test, for the reasons set out above.