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# Examination Statement

## Savills on behalf of Countryside

Dartford Borough Council Local Plan

Examination in Public

September 2022

# 1. Introduction

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- 1.1. This Examination Statement is submitted by Savills on behalf of Countryside. Countryside Properties is a FTSE 250 top ten housebuilder, recognised as being at the forefront of the delivery of sustainable development and new communities. Countryside Properties has a strong local presence with offices in Sevenoaks and Brentwood and have a wealth of local experience.
- 1.2. Countryside Properties Representations to Dartford Borough Council (DBC) Regulation 19 Local Plan consultation has been given the following reference: **1484**.

## 2. Response to Inspectors Initial Matters, Issues and Questions

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### 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.**

##### **Q1 Has the calculation of Local Housing Need been carried out correctly?**

Countryside Properties do not dispute the Council's approach to assessing the local housing need. However, we would take this opportunity to re-emphasise the need for this figure to be treated as a minimum in accordance with Paragraph 61 of the NPPF.

##### **Q2 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?**

Countryside Properties considers the plan period to be unsound as currently stated. The approach to defining the plan period is not consistent with national policy or the approach to establishing housing needs set out in the Planning Practice Guidance.

As set out within our regulation 19 representation<sup>1</sup>, the Standard Method should use the current year as the start of the base period with the most recent work place-based affordability ratios setting the appropriate uplift for an area above the base period (as set out in paragraph 2a-004 of PPG). Given that the standard method seeks to encompass under, or over, delivery from previous years through the affordability adjustment, it is not consistent with national policy to include delivery from years prior to the point (i.e. before 2020) at which the standard method is calculated.

Countryside Properties therefore considers that the base date for the Local Plan period should be amended in order to set a more logical point at which to commence the plan period – in this case 2020/21.

##### **Q3 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?**

In Countryside Properties view, the proposed housing requirement is not currently appropriately forecasted nor justified for the plan period. The Local Plan seeks to provide an average annualised figure of 790 dpa (15,800 units in total over the Local Plan period). This equates to a very marginal increase of approximately 5% in housing need from the minimum standardised requirement of 776 dwellings per year.

Paragraph 2.57 (p43) of the revised Local Plan demonstrate that the Local Plan's housing requirement has been informed through capacity of available existing brownfield sites as opposed to positively planning for housing need, including addressing affordable housing needs.

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<sup>1</sup> ID 1484, page 9, para number 3.21

Countryside Properties does not dispute that Dartford's minimum housing need over the Plan period is 776 dpa in line with the Standard Methodology. However, a Local Plan needs to be prepared in accordance with the NPPF, insofar as it should be positively prepared and account for the housing need of the Borough. The NPPF also requires that any plan be sufficiently flexible and to be able to adapt to change. There is currently limited flexibility in the expected housing requirement per annum.

The PPG states that:

*'An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes'.* (paragraph: 024 Reference ID: 2a-024-20190220)

As detailed in our Regulation 19 reps<sup>2</sup> the Council has failed to satisfactorily assess and evidence the extent to which the proposed quantum of development, policies and allocations will deliver against its identified need for affordable housing.

Based on the Council's own assessment<sup>3</sup> 790 dpa would only yield a maximum of 205 affordable housing per annum, 66% of the need (263dpa). This yield is itself over-optimistic given thresholds in Policy M7, Permitted Development, target of 20% in central Dartford and the Council's viability evidence. In order to meet Dartford's Affordable Housing Need of 263 homes per annum, the housing supply requires an uplift in the overall housing numbers to 1,000 homes per annum. An increase of +210 homes pa on the current 790 dwellings per annum target.

In respect of the unmet needs identified in neighbouring areas there are identified unmet needs in London and more specifically in Bexley and more should have been done to consider how Dartford could have addressed these needs in this local plan.

The Council should have undertaken a Green Belt review and considered whether there were exceptional circumstances to amend Green Belt boundaries. However, the Council considered this to be unnecessary, a position which is unsound given the above.

**Q4 What is the extent of any under/ over delivery between the plan start date and the base date of the standard methodology calculation?**

Countryside Properties anticipates that the Council will need to explain the general approach to any under/over delivery as it is not currently clear within the Local Plan's available evidence base.

**Q5 Is policy S4 clear as to the total quantum of housing being planned for over the full plan period?**

Countryside Properties does not consider S4 to be clear as it fails to set out the total quantum of housing for the whole plan period. Policy S4 should therefore be amended to add additional clarification on this matter.

**Q6 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?**

No. As noted within our Regulation 19 representation<sup>4</sup>, the plan period to 2037 does not accord with paragraph 22 of the NPPF, which requires that strategic policies look ahead over a '*minimum 15 year period from adoption*'. In order for the Council to meet the requirement to cover a minimum of 15 years, the Local Plan should have been adopted in 2021. At this point in time, the current housing supply trajectory would only be able to cover a 14 year period and therefore not consistent with paragraph 22.

To ensure the soundness of the plan, Countryside Properties recommends that additional housing provision is provided proportionate to any extension to the plan period.

**Q7 How would the plan be able to respond if unmet need from Gravesham is clearly quantified in future?**

Countryside Properties considers the Local Plan to be unsound based on its current inability to respond to any unmet needs from Gravesham. Policy S4 should include a mechanism for an immediate review in the event that Gravesham cannot meet its housing needs in full.

**Issue 2 Whether the plan will be effective in delivering sufficient affordable housing to meet the needs of the Borough**

**Q8 Is the plan sufficiently clear as to the overall level of affordable housing need in the Borough that is required?**

No. Neither the supporting text nor the policy state how many affordable homes are needed within Dartford.

As detailed in our Regulation 19 reps<sup>5</sup>, the Council's evidence base does not support that the identified affordable housing need of 263 dwellings per year will be met. As set out in our response to MIQ3, our analysis details that insufficient consideration has been given to the extent to which the quantum of homes and policies will address need.

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<sup>5</sup> ID 1484, Para 3.46-3.50, p13-14

**Q9 Is the required level of affordable housing in Central Dartford and elsewhere in the Borough justified? Would it be viable? Would it be sufficiently flexible?**

Whilst we agree that viability requires different levels of affordable housing to be set, we are concerned that the Council has not considered the overall effects of the proposed policies and allocations in combination with other considerations to assess the likely overall yield of affordable housing when assessed against need.

As set out within our Regulation 19 representations<sup>6</sup>, the total annual affordable housing need in Dartford of 263 dwellings per year (as set out in Chapter 5 of the HDH report<sup>7</sup>) represents 33.2% of the annual dwelling growth of 790 dwellings in the Borough as assessed using the Standard Method. This is not considered to be realistic or achievable due to;

- thresholds in Policy M7, many smaller schemes will not require affordable housing;
- homes created through permitted development do not yield affordable housing;
- targets in Policy M7 requiring 20%, which is well below need;
- Councils own viability assessment which highlights that achieving the proposed policy compliant levels of affordable housing will be 'challenging' and implies in some instances 'outcomes will vary and negotiations may be involved' (para 3.3.22, p73); and
- Lack of consideration of yield from extant consents.

Notwithstanding the above, the Council's own evidence in Dartford and Ebbsfleet Housing Needs Assessment<sup>8</sup> (HDH, 2019) footnote 79, p92) Appendix H) concludes that an affordable housing target of 35% would result in the delivery of around 26% of all new housing as affordable. Based on the 790 dwellings per annum, this equates to 205 affordable houses per annum against a need of 263 dwellings. This would then lead to a 33% under provision against Dartford's affordable housing need. Overall, this annual shortfall of 58 affordable homes equates to an overall shortfall of 1,160 affordable houses across the plan period.

The Council has not assessed the extent to which the plan will under-deliver against affordable housing need and how this could be rectified by both increasing its overall housing target and its spatial distribution of growth.

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<sup>6</sup> ID 1484, page 10, para number 3.29

<sup>7</sup> <https://www.dartford.gov.uk/downloads/file/339/dartford-and-ebbsfleet-housing-needs-assessment>

<sup>8</sup> <https://www.dartford.gov.uk/downloads/file/339/dartford-and-ebbsfleet-housing-needs-assessment>

**Q10 Are the expectations for the proposed tenure mix justified?**

No comment

**Q11 Is the plan sufficiently clear on the expectations for the sizes of the affordable housing units that will be required?**

No comment

**Q12 How will any commuted sum payments be calculated and where is this set out in the plan?**

No comment

**Andrew Watson**  
Director

