

Home Builders Federation

Matter 3

DARTFORD LOCAL PLAN EXAMINATION

Matter 3 – The Spatial Strategy and distribution of development

Issue

Whether the Spatial Strategy and the distribution of development are justified, effective and consistent with national policy.

Relevant policies – S1, S4, M13

33. Is the spatial distribution of development across the borough justified and what factors influenced the Spatial Strategy, for example physical and environmental constraints and the capacity to accommodate development?

Given the lack of flexibility in the Council's land supply we would have expected the Council to explore sites in addition to the distribution of development proposed in the local plan. The Council should have recognised this and should have undertaken a review of the Green Belt as part of this local plan. This review would have been able to consider whether boundaries could be amended to support development without having a significant impact on the purposes of this designation and if there were exceptional circumstances to justify such an amendment.

34. What alternative options for the spatial strategy were considered?

It would appear that the only strategy considered by the council was a capacity driven strategy that looked to maximise delivery on brownfield sites. It is not unreasonable to take forward such a strategy where this meets needs and will provide a consistent supply of developable land across the plan period. However, as set out in our matter 9 statements the Council's supply of land does not meet needs in full over the plan period and from 2024/25, they will not be able to show a five-year housing land supply. This suggests that the Council should have examined alternative options that would have met needs in full and ensured sufficient flexibility across the plan period to maintain a five-year housing land supply at all times.

35. Why was the submitted approach chosen and is it an appropriate strategy having regard to reasonable alternatives?

This is principally for the Council to answer but as outlined above the Council did not consider whether there were sustainable sites that could have been brought forward through amendments to the Green Belt boundary that would have ensured needs were met in full including an appropriate buffer to provide the necessary flexibility in supply that would ensure those needs were met.

36.Is the Plan sufficiently clear about the scale of development envisaged in each settlement/ area?

No comment

37.Is the focus of the Spatial Strategy on large-scale brownfield sites justified?

The HBF would not disagree with a focus on brownfield sites, such an approach is consistent with national policy. However, if this strategy does not meet needs in full and leads to an unreliable land supply that could see the plan being considered out of date soon after its adoption, then we would suggest the Council should have looked at alternative strategies that would have provided a more balanced supply of sites in meeting its housing needs. Given the Council has exhausted its supply of brownfield land through this local plan the only available option is to amend Green Belt boundaries in order to identify sufficient supply to meet needs in full. Ideally this should be progressed through this local plan.

38.In other respects, is the approach in Policy S1 justified, effective and consistent with national policy?

No comment.

39.Is table 2 justified and will it be effective?

No comment

40.How will the need for pre-school and special educational needs places be addressed?

No comment

41.Does the plan identify any settlement/ development boundaries and if so, what is the approach to development in such areas?

No comment

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