
Examination Statement

Savills on behalf of Countryside

Dartford Borough Council Local Plan

Examination in Public

September 2022

1. Introduction

- 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

Matter 3 : The Spatial Strategy and the distribution of development

Issue : Issue Whether the Spatial Strategy and the distribution of development are justified, effective and consistent with national policy. Relevant policies – S1, S4, M13 Spatial Strategy

Q33. 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?

Countryside Properties partially support the approach set out in Policy 1 relation to directing development towards sustainable locations inclusive of brownfield land. However, as detailed in our response to Q1.22, the Council has not assessed reasonable alternative options in detail. The Council has taken a binary approach to assessing the options of either 'rejecting a brownfield land focus' or 'more dispersed development that may include locations within the Green Belt.' This is not the case because:

- a) A brownfield land focus does not need to exclude all consideration of development within other areas (e.g. a brownfield land focus can be prioritised while considering development in other sustainable locations); and
- b) Rejecting a brownfield land focus does not necessarily mean more dispersed development (e.g. there is land available in Green Belt locations that would not necessarily result in a dispersed pattern of development).

The Council should have recognised the lack of flexibility in its land supply and the significant shortfall in address affordable housing needs. The Council should have undertaken a Green Belt Review and considered the role that well-connected sites, located in close proximity to existing settlements, could be released from the Green Belt in order to support sustainable patterns of growth, and to meet housing need.

Q34 What alternative options for the spatial strategy were considered?

The Council has adopted a capacity driven strategy that looked to see what can be accommodated on brownfield sites.

Whilst it is not unreasonable to assess a brownfield first approach, this can only be deemed appropriate if it meets needs and will provide a consistent supply of developable land across the plan period. However, the plan does not meet needs and 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. The Council should have taken a less binary approach and appraised alternative spatial options that would address needs in full and maintain a rolling five-year housing land supply.

Countryside Properties considers that DBC have failed to properly consider reasonable alternative options for the spatial strategy. As set out within our Stage 1 examination statement, the Council's Sustainability Appraisal (SA) (p82) states that:

'Given that Dartford's development needs can be met outside the Green Belt, the Council has not identified any exceptional circumstances for the release of Green Belt land in the Borough'.

However, contrary this, Dartford's housing needs are in excess of those assessed in the SA and the Council's evidence in the SHLAA demonstrates that these housing needs cannot be adequately met on land outside of the Green Belt. As a consequence, Countryside Properties considers DBC took a blinkered view and did not fully consider reasonable alternatives.

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

On the basis of the above, the Council will need to explain further the reasons why the submitted approach to the spatial strategy was chosen against taking forward the other reasonable alternatives. Our Stage 1 statement explains that the Council has taken a blinkered view in preparing its SA and did not assess reasonable alternative options in detail. The way the options were constructed skewed outcomes away from the consideration of undertaking a Green Belt review.

The Council did not undertake a Green Belt Review and 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.

Q36. Is the Plan sufficiently clear about the scale of development envisaged in each settlement/ area?

No comment.

Q37. Is the focus of the Spatial Strategy on large-scale brownfield sites justified?

Countryside Properties support the need to accommodate development on brownfield land. However, the Council should have assessed reasonable alternative options in detail in the case that brownfield sites do not come forward.

Q38. In other respects, is the approach in Policy S1 justified, effective and consistent with national policy?

Countryside Properties partially support the approach set out in Policy S1 in relation to directing development towards sustainable locations inclusive of brownfield land. However, this approach does not meet housing need in line with guidance, and therefore leads to inadequate land supply. The Plan should have considered the inclusion of well-connected sites located in close proximity to existing settlements to support sustainable patterns of growth and to meet housing need. This should have included an assessment of Green Belt sites.

Andrew Watson
Director

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