
EXAMINATION STATEMENT

Matter 4 – The Approach to Site Allocations

Dartford Local Plan

Representations on behalf of
Storefield Group Ltd

September 2022

EXAMINATION STATEMENT

MATTER 04 – THE APPROACH TO SITE ALLOCATIONS

DARTFORD LOCAL PLAN

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

SEPTEMBER 2022

Project Ref:	33391/A5
Status:	Final
Issue/Rev:	01
Date:	September 2022
Prepared by:	JM/HE
Checked by:	HE
Authorised by:	HE

Barton Willmore, now Stantec



Ref: 33391/A5/HE
Date: September 2022

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore, now Stantec.

All our stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

	PAGE NO
1.0 INTRODUCTION	01
2.0 RESPONSE TO QUESTIONS	02

Q.47. Please can the Council confirm the current planning status of each of the site allocations?

Q.48. Is there any evidence to support the proposed housing delivery rates that accompany each source of supply?

Q.49. How have the proposed site allocations been selected? What methodology was used to select sites? Is it justified?

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 4 relating to the approach to site allocations. This Matter Statement is inter-related with Matter 5 and 6 statements (prepared separately) which consider the individual allocations.
- 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 4: APPROACH TO SITE ALLOCATIONS

Whether the approach to the site allocations is justified, effective and consistent with national policy

Q.47. Please can the Council confirm the current planning status of each of the site allocations?

2.1 It is our understanding that all the sites identified as residential (or mixed-use) 'allocations' have previously been supported by the Core Strategy (2011) and some are supported by extant planning permissions, as summarised below:

Dartford Town Centre

- Westgate Allocation (Policy D4) – Core Strategy Town Centre Key Sites 2 and 3. Planning permission granted 14 April 2022 (20/00409/FUL). Work yet to commence.
- Land East of Lowfield Street (Policy D5) – Core Strategy Town Centre Key Site 6. Planning permission granted 07 September 2017 (16/01919/FUL) and 30 April 2020 (19/00600/FUL). Under construction.
- Priory Centre (Policy D6) – Core Strategy Town Centre Key Site 5 (for retail). No application.

Ebbsfleet and Swanscombe

- Ebbsfleet Centre (Policy E4) – Core Strategy Ebbsfleet Valley Strategic Site. No applications.
- Alkerden and Ashmere Allocation (Policy E5) – Core Strategy Ebbsfleet Valley Strategic Site. Numerous applications for various parcels (see Matter 6 statement). Partly under construction.

2.2 The Council should provide evidence, corroborated by the owners / promoters / developers of the proposed allocations, to demonstrate these sites are likely to deliver the quantum of growth identified within the Plan period.

2.3 This is especially important for those sites which have not yet come forward for development despite being supported by and identified to deliver within the Plan Period for the Core Strategy (adopted 2011, Plan period up to 2025/26).

2.4 There is prevailing uncertainty regarding many of the Local Plan allocations.

Q.48. Is there any evidence to support the proposed housing delivery rates that accompany each source of supply?

2.5 The Local Plan itself is silent on anticipated delivery rates for each source of supply, with only a high-level breakdown of supply sources provided in Table 1 and a housing trajectory graph at Appendix C.

2.6 Table 1 identifies circa. 5,800 homes to be delivered across 5no. 'allocated sites' (D4 – D6 and E4 – E5 as described above). Considering 3no. of these sites do not yet have permission, this is an exceptionally high delivery expectation.

2.7 The SHLAA (Appendix D, Sept 2021) (HOU-2) provides a 'Phased Housing Land Supply' which indicates expected delivery rates. The Phased Housing Land Supply trajectory identifies the following elements of supply:

- No planning permission and no application submitted – 5,760 dwellings;
- No planning permission and no application submitted, but with pre-application engagement – 1,425 dwellings;
- No planning permission but with an application submitted – 749 dwellings;
- Outline consent – 831 dwellings;
- Resolution to grant Full consent – 328 dwellings;
- Full consent – 2,960 dwellings;
- Small sites (approved) – 77 dwellings; and
- Small sites (windfall) – 325 dwellings.

2.8 Appendix E of the SHLAA identifies the site trajectories are based on site assessments, good practice principles and local evidence, however this is lacking in site-specific detail.

2.9 In the light of the relatively limited number of sites, we would expected the Local Plan evidence base to include signed delivery statements from landowners / promoters / developers to provide the necessary level of detail to justify delivery rates identified.

2.10 Trajectories identified for the identified allocations are discussed in our responses to Matter 5 and Matter 6.

Q.49. How have the proposed site allocations been selected? What methodology was used to select sites? Is it justified?

- 2.11 The SHLAA Methodology (Sept 2021, HOU-5) details the 'step-by-step' filtering process completed which considers whether a site is 'available', 'suitable' and 'achievable' such that it can be considered a developable / deliverable site.
- 2.12 The SHLAA Findings (September 2021, HOU-2) summarises that following this methodology, 231No land parcels were considered, of which 87 (38%) were concluded to be developable / deliverable against SHLAA criteria. Of these, 37No (43%) already had extant planning permission at the time of the assessment.
- 2.13 Of the 144No land parcels not considered developable / deliverable the majority (59) failed due to locational and accessibility constraints, followed by those not available (31), those disqualified, i.e. too small (23), and those with physical / environmental factors impacting suitability (18).
- 2.14 It is possible that the SHLAA may have discounted too many sites presently deemed "unsuitable", due to oversights or insufficient technical understanding at the time of the original assessment (which could have been overcome following the submission of further detailed information).
- 2.15 Unfortunately this has proved to be the case in having regard to our Client's site (@ Stone Pit 9), which the SHLAA did confirm was sustainably located and well served by public transport. However, the SHLAA went on to consider the site as "unsuitable" for two principal reasons (at that time):
- Potential for gas emissions and risk to development; and
 - Potential for impacts upon groundwater.

- 2.32 In this regard the SHLAA notes:

This is an example of one of the remaining former landfill sites in Dartford that are typically capped, grassed and undulating, but may remain unstable and subject to gas emissions due to the gradual degradation of the waste. In this instance, it has not been established that landfill gas will not form a hazard to future development on the site and/or existing residential development in the vicinity or that adverse impacts of groundwater will not be caused.

There would be a need for the developer to carry out and submit the results of site investigations in this regard to indicate whether the land could be safely and satisfactorily developed. Development would also need to take into account transport, air quality, heritage, landscape and ecological issues, potentially minerals safeguarding. Any development would need to incorporate the PROW and protect the trees subject to the TPO.

- 2.33 Our Client subsequently commissioned 2No engineering reports regarding the salient gas and groundwater issues at the site – and these were duly submitted as part of our Reg 19 LP submissions. Despite various attempts, we were unfortunately unable to engage further with DBC Officers.
- 2.34 The 2No technical reports demonstrate that **there are no insurmountable matters** that cannot be appropriately addressed via established mitigation measures and suitably designed engineering procedures. Indeed, redevelopment of the site would actually reduce permeable drainage through former landfill resulting in betterment in this regard. Drainage solutions would also entail infiltration away from landfill sources or other potential measures (inc off-site treatment).
- 2.35 The Site could therefore make a very real meaningful contribution towards helping to meet Dartford's residential and/or employment needs in the Borough for which there remains uncertainty in the Local Plan (as presently crafted).
- 2.36 We consider that flexibility should be embedded in the Plan regardless, to ensure that it can accommodate needs not anticipated in it (NPPF para 82 (b)).
- 2.37 Indeed, it is noted that the importance of responsiveness and flexibility in Plans is specifically recognised in the **Department for Transport's 'Future of Freight: A Long Term Plan' (2022)**¹:

The planning system will be key to enabling the growth and innovation of the freight sector to better meet current and future challenges. By ensuring the planning system can be more responsive to the needs of the sector, and industry can be more engaged in planning, freight will be able to secure sufficient land of the right type in the right places and at the right time to support growth, innovation and improved productivity with the appropriate accompanying infrastructure.
(para 5.3)

¹ [Future of Freight \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/104444/future-of-freight-a-long-term-plan.pdf)

- 2.38 This is particularly relevant for Dartford's Local Plan, as the DELR advises that the floorspace requirement identified has been based on current development activity/data in the Borough and assumptions on growth in new job-generating activity (para 4.6), and it is not clear if the DELR has considered the risk of this approach underestimating future need due to the sector having been constrained by land supply in the past.
- 2.39 We consider our concerns regarding the Plan period and need for flexibility could be resolved either through further site-specific allocations (inc our Client's site @ Stone Pit 9) or through a more positively worded criteria-based policy approach. [See our response to Matter 7]