

Inspector's Matters, Issues and Questions

Matter 2: Meeting Dartford's Housing Needs

Response by Dartford Borough Council

30 September 2022

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Issue 1: General Housing Needs

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.

Relevant policy – S4

Question 1 – Local Housing Need Calculation

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

1. Yes DBC's calculation of Local Housing Need was carried out correctly in [HOU-8](#) the Residential Needs Assessment Update August 2021.
2. This sets out, at pages 21 to 24 (paragraphs 5.1 to 5.12), a step-by-step application of the 'standard method'. [HOU-8](#) concludes: "The final housing need in Dartford, as assessed using the revised Standard Method in 2021, is 750 dwellings per annum" (paragraph 5.12).

Question 2 – Base Date

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?

3. DBC is aware of the time that has now elapsed since drafting of the submitted Local Plan first commenced.
4. To reflect this, the housing trajectory has had a focussed update to take on board latest monitoring year data. This updating applies a base date for the Plan from 1st April 2022, covering 15 years to 31st March 2037 (see information detailed under Matter 9). With the first year of the plan forming 2022/2023 as proposed to be modified, this results in an appropriately forward focussed 15-year Local Plan period.
5. Regarding the Local Housing Need 'standard method', it is observed this has a range of dates associated. For instance, calculation of Local Housing Need has (as step 1), a baseline set using the 2014 for household projections (see [HOU-8](#) page 21 to 22, paragraph 5.4). And the applicable standard method uses affordability adjustment data originating from 2020 (the most up-to-date available).
6. Noting these dates, DBC has does not consider it is evident in, or a corollary of, national policy or guidance that the base date is set at 2020/21
7. DBC considers that using a base date for the Plan starting in the current year 2022/23, covering the 15-year period from 2022/23 to 2036/37 inclusive is appropriate and sound

Question 3 (First Part) – Housing Requirement Appropriate and Justified

Is a proposed housing requirement appropriate and is it justified?

8. The proposed housing requirement in policy S4 for an average of 790 dwellings per annum is appropriate having regard to national policy objectives, the sustainable

regeneration potential of Dartford and the delivery of an appropriate sustainable spatial strategy for the borough. This figure is justified by the evidence base.

9. The submitted Local Plan ([COR-1](#)) outlines the rationale for the requirement at page 43 paragraph 2.57, noting that it accounts for the confirmed regeneration potential to achieve new homes, provides for objectively assessed need in a flexible way, facilitates new local communities and supports growth in planned, sustainable locations, and provides a suitable buffer (which also has the potential to assist with supporting delivery of some unmet residential needs in the wider area should they arise). DBC has optimised its urban housing capacity. The requirements set in policy S4 underpin the achievement of this positive approach.
10. The housing requirement is appropriate in being aspirational but deliverable, as the NPPF ([NAT-1](#) paragraph 16a) seeks. Paragraph 2.59 of the submitted Local Plan notes:
“The requirement of 790 homes a year would be a large uplift on long term delivery in Dartford Borough (i.e. an increase of 32% from a previous average delivery rate of approximately 600 homes a year).”
11. In support of this, the topic paper [HOU-1](#) at pages 12 to 14 (paragraph 4.11 to 4.16) provides the evidence documenting past housing delivery rates, showing the significant boost represented by the proposed Local Plan housing requirement of 790 dwellings per annum.
12. The Housing Topic Paper [HOU-1](#) (pages 5 and 6) highlights consistency with the NPPF including paragraphs 11 and 6. DBC considers the above points show close alignment with the aims and specifications of national policy, and appropriate justification.

Question 3 (Second Part) – Calculation of Additional 40 Dwellings Per Annum

How has the proposed additional 40 dwellings per annum above the standard method been calculated?

13. As set out in the preceding paragraphs DBC took full account of national policy and evidence. DBC also gave specific regard to Planning Practice Guidance on planning for increased housing levels ([HOU-6](#) Table 1, page 14), expanding on the rationale and national policy for setting a requirement meeting, and going beyond, the Local Housing Need level, including contributing towards unmet housing needs in the wider area.
14. The Residential Requirement Report [HOU-6](#) considered the full range of factors informing DBC's housing requirement policy and levels, supporting exceeding Local Housing Need and ([HOU-6](#) paragraphs 4.9 to 4.11, pages 20 to 21). The Report noted also ([HOU-6](#) paragraph 4.12 page 21): “These external and internal considerations for the Borough do not define a specific residential requirement number for Dartford, above the standard method level.”
15. DBC therefore confirmed a specific sustainable annualised requirement rate, drawing from the developable housing land supply. This provides a final means for quantifying the exact requirement in a realistic manner, having determined an appropriate general level. This is set out at [HOU-6](#) paragraph 4.15 to 4.16 (pages 21 to 22), and was based on the previously submitted housing land supply documentation. This identifies a housing quantity, which when annualised and rounded to the nearest ten, equates to a rate of 790 dwellings per annum – which is the requirement..
16. This was evident from the housing land supply totals that are in the submitted SHLAA findings document [HOU-2](#) Appendix D. The ‘TOTAL (cumulative)’ row at the bottom of

the table ending on page 63 – for year [column] 2031/32- is 11,860 dwellings. Annualising this equates to 790.6 new homes. This enabled a contingency above Dartford's own housing need of 40 dwellings per annum over the Plan period. The ability for this quantum to be developed over the plan period is reconfirmed through the 2022 SHLAA Update.

17. This is supported by evidence in [HOU-8](#) modelling the 790p.a. requirement in context, as illustrated in Figure 5.1 on page 25. HOU-8, for example at page 26 paragraph 5.18, confirms the Local Plan housing requirement both addresses affordability and the government's objective for more new homes.

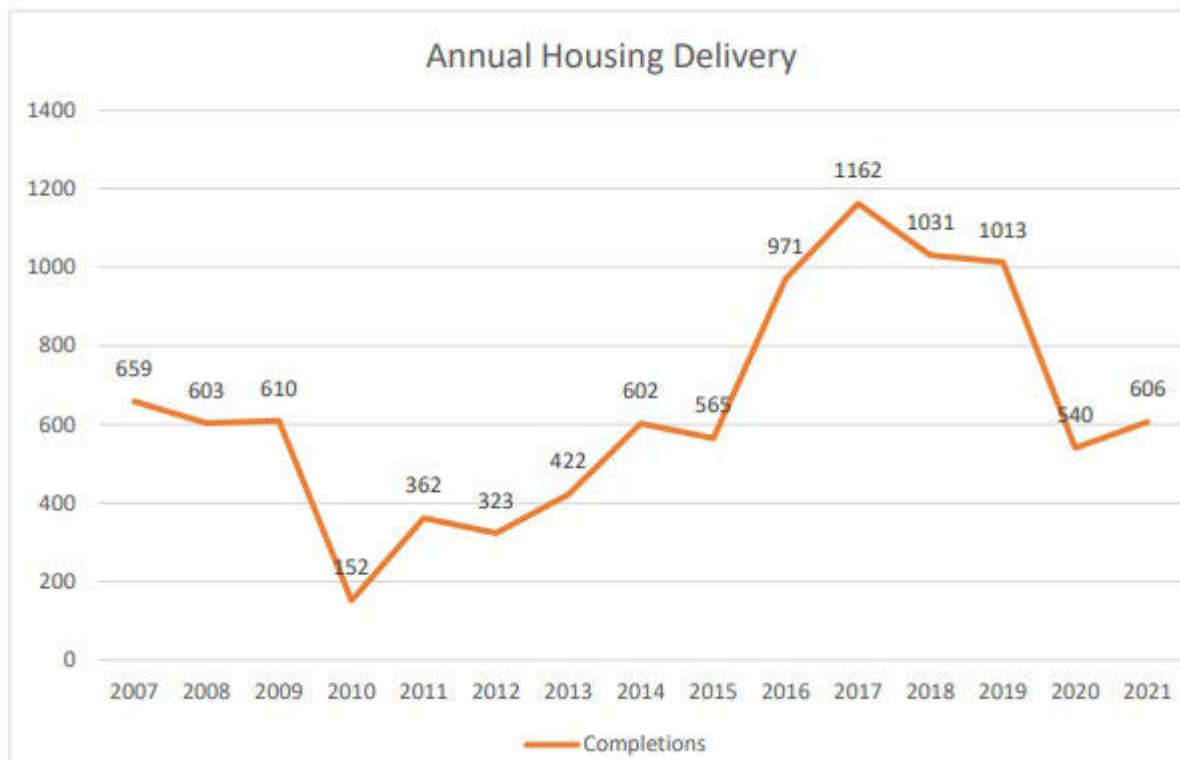
Question 4 – Under/ Over Delivery

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

18. The current AMR [MON-1](#) (page 14) set out DBC's past housing delivery, reproduced here as Diagram A:

Diagram A: Chart 3 from MON-1

Chart 3 Annual Rate of Delivery Since 2006



19. This can now be updated in line with the latest monitoring data (answer to Question 136 Matter 9) covering the year to 31st March 2022.
20. Table 1 below sets out annual completions from 2017/18 onwards, the variation from a 790per annum dwelling requirement arising each, and the resulting cumulative variation.

Table 1: Past Housing delivery against proposed requirement

<i>Year</i>	<i>2017/18</i>	<i>2018/19</i>	<i>2019/20</i>	<i>2020/2021</i>	<i>2021/2022</i>
Dwellings	1031	1013	540	606	540
Annual variation from a new of 790p.a. requirement (dwellings)	+241	+223	-250	-184	-250
Cumulative total variation (dwellings)	+241	+464	+214	+30	-220

21. As set out in answer the Question 2, DBC however considers that an updated start date of 2022/23 is logical and appropriate.

Question 5 – Quantum of Housing Need and Policy S4

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

22. Policy S4 criterion 3 has the following opening sentence: “New homes are required to be delivered at an average rate of 790 per annum, with planning permissions and delivery closely monitored and managed.”
23. DBC regards this as clear, and supported by the statement in the submitted Local Plan that confirms the total quantum over time in the reasoned justification (paragraph 2.60). However, this can now be amended to update the plan period and associated quantum.

Question 6 – 15 Year Period

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?

24. Yes on the basis the Local Plan will be adopted this monitoring/ financial year i.e. March 2023 or before, it will cover 2022/23 to 2036/37 a period of 15 years from and including the current year.

Question 7 – Unmet Need from Gravesham

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

25. Plan implementation, and future activities and contingencies, are set out in the Implementation and Monitoring section of the submitted Local Plan (pages 202 to 209), including co-operation with other Local Planning Authorities.
26. Ongoing co-operation is occurring with partners, and will continue further, including potential Statement of Common Ground updates which will take into account progress with other Local Plans). A revised Statement of Common Ground with Gravesham is anticipated.
27. This and other co-operation outcomes will be reported alongside Dartford's development and planning policy outcomes in the AMR; and the implications of new circumstances and information (e.g. revised Statements of Common Ground) will be studied against

the Implementation and Monitoring specifications in the Local Plan. This is outlined in response to Inspector's Initial Questions 2 and 3 ([EXAM-3](#) paragraph 1.8 page 4).

28. If it is concluded additional/ amended explanation or content is necessary, DBC would in principle consider the potential inclusion of further text in the Local Plan, for instance elaborating on submitted Local Plan paragraph 6.12/ Table 11 (page 204/ page 208), This would confirm the activities that would be undertaken in the event that an adjoining authority's draft Local Plan has clearly quantified and confirmed its unmet need. A potential draft modification wording is shown below at Appendix 1 for consideration.

Issue 2: Affordable Housing Needs

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

Relevant policies – M7, M8, M9, M10

Policy M7 - Affordable housing

Question 8 – Overall Affordable Housing Need

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

29. Paragraph 5.59 of the Submission Plan sets a headline target of at least 35% new housing on applicable sites to be delivered to meet the current national definition of affordable housing. It states that this is necessary to increase rates of new affordable housing delivery over the plan period, account for Borough needs. The Plan itself does not set out the overall figure for the amount of affordable housing that is required but this is set out in the supporting evidence.
30. The need for affordable housing is set out in the Residential Needs Assessment ([HOU-7](#)). It is assessed in two ways:
- Table 5.1 of the Residential Needs Assessment sets out a need of 263 affordable units per year (page 64 of [HOU-7](#)). This is calculated as per paragraphs 2a-018-20190220 to 2a-024-2019 of the PPG¹.
 - Table 4.4 of the Residential Needs Assessment disaggregates the overall housing requirement and suggest that 21.1% of all new housing should be affordable housing (page 56 of [HOU-7](#))
- If it is thought appropriate, a summary of the evidence base on affordable housing need and the basis for the identified percentage could be included as a modification to the supporting text to Policy M7.

Question 9 – Level of Affordable Housing Justification

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?

31. Policy M7(2)(a) sets out a target for 35% or more of all dwellings to be affordable except in Central Dartford where the target is 20% (page 135 of [COR-1](#)). The approach to the tenures of housing is further explained in paragraphs 5.59 and 3.37 of the Submission Plan (pages 132 and 66 of [COR-1](#)). It is considered that there would be greater certainty that the required level of affordable housing would be provided by including modifications to policy M7(2)(a) and paragraphs 5.59 and 3.37 setting out the 35% and 20% amounts as requirements rather than targets.
32. As set out in answer to question 8 above, the Residential Needs Assessment provides the justification for the 35% requirement and the Local Plan Viability Assessment shows that these affordable housing levels are viable. The key findings on viability assessment and affordable housing, which conclude that the 35% and 20% proportions are viable overall, are set out in paragraphs 5.25-5.26 of the Housing Policies Topic Paper (page

¹ Affordable Housing section at <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

23 of [HOU-1](#)). However, it is noted that policy M7(2)(a) refers to a target of 35% or more, paragraph 5.59 refers to the provision of at least 35% and paragraph 3.37 refers to 20% or more affordable housing (pages 132, 122 and 66 of [COR-1](#)). In light of the evidence, it is considered that the references to “or more” and “at least” could be removed via a modification to the plan.

33. Policy M7(2)(c) currently refers to viability and practical circumstances in terms of making provision off-site or paying a commuted sum instead of making provision on-site (page 135 of [COR-1](#)). Whilst the 35% and 20% requirements are supported by evidence from the Residential Needs Assessment and the Local Plan Viability Assessment (see paragraph 32 above), there may be exceptional circumstances where sites cannot achieve the required amounts of affordable housing for viability or practical reasons. Therefore, it is considered that the policy could be modified to apply this same exceptional circumstances clause to the amount of affordable housing.

Question 10 – Tenure Mix Justification

Are the expectations for the proposed tenure mix justified?

34. On the basis of evidence of needs, paragraph 5.61 of the Submission Plan states that there should ordinarily be provision of a higher proportion of social/ affordable rented provision than intermediate affordable housing products. It then supports this by setting out an indicative guideline that development should include 20% of total housing as social/ affordable rented tenures and 15% of total housing as affordable home ownership products and paragraph 5.62 sets out how the approach accords with the national policy requirements in respect of First Homes (page 133 of [COR-1](#)). Paragraphs 5.8-5.11 and 5.23-5.26 of the Housing Policies Topic Paper outline the key results from the evidence, particularly from the Dartford and Ebbsfleet Residential Needs Assessment and Update and Local Plan Viability Assessment, which justify this approach (pages 19-20 and 22-23 of [HOU-1](#)).

Question 11 – Size of Affordable Housing Units

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

35. Yes. Policy M8(1) of the Submission Plan sets out the sizes of dwellings that will be required on developments, stating that these should meet the accommodation needs of the local population (page 139 of [COR-1](#)). The latest data on dwelling size requirements for affordable housing units are set out in Figure 10 of the Submission Plan (page 136 of [COR-1](#)). Policy M8(1) is consistent with the indicative need for affordable housing sizes depicted in Figure 10. However, if it is considered appropriate, a modification could be made to policy M8(1) to make it clear that the requirements apply to both market and affordable housing.

Question 12 – Commuted Sum Payments Calculation

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

36. As set out in policy M7(2)(c) of the Submission Plan, the starting point is always that affordable housing provision should be made on-site and that it is only in certain exceptional circumstances where a commuted sum may be considered (page 135 of [COR-1](#)). It should be noted that opportunities to provide off-site affordable housing in the Borough are limited.

37. The Plan does not set out how any commuted sum payments will be calculated. This would be carried out on a site by site basis as part of negotiations on relevant planning applications between the applicant and DBC.
38. The Council has had experience of negotiating off-site affordable housing commuted sums under previous adopted planning policy. The starting point for an off-site commuted sum should be the costs of providing the affordable housing off-site, i.e. land costs plus build costs taking into account grant funding. However, these inputs can vary significantly over time. Development viability and the numbers of dwellings are also key factors.
39. A recent example was a planning permission for Block F within the larger Northern Gateway site (application ref 19/00613/COU) where an option for an off-site affordable housing contribution of £590,000 was agreed through a S106 unilateral agreement in the event that three shared ownership affordable housing units were not provided either on-site or within another phase of the development. This figure was based on the value the developer would expect to receive for the dwellings.

Issue 3: Housing Mix

Whether the plan will deliver an appropriate mix of housing to meet the various housing needs over the plan period and whether the policies for the design, mix and standards of housing justified, effective and consistent with national policy.

Housing for different groups

Question 13 – Housing for Different Groups

Does the plan accord with paragraph 62 of the Framework which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)?

40. Yes. Policy M8 of the Submission Plan sets out requirements for dwellings suitable for families with children, older and disabled people, and for the provision of plots for self-build or custom-build dwellings (page 139 of [COR-1](#)). The evidence to justify the policy approach is derived from the Dartford and Ebbsfleet Residential Needs Assessment ([HOU-7](#)) and outlined in paragraphs 5.12-5.22 and 5.26-5.27 of the Housing Policies Topic Paper (pages 20-23 of [HOU-1](#)). It should be noted that there are now 47 individuals on the Council's self-build register.
41. Policy M7 of the Submission Plan seeks that affordable housing is provided in accordance with needs (page 135 of [COR-1](#)). The justification for this approach is contained in paragraphs 5.6-5.11 and 5.23-5.25 of the Housing Policies Topic Paper (pages 19-20 and 22-23 of [HOU-1](#)). The Topic Paper summarises the key findings from the Dartford and Ebbsfleet Residential Needs Assessment ([HOU-7](#)) in relation to meeting the needs for these types of housing, the key parts of which are:
 - Chapter 4 – Disaggregation of overall housing need by size and tenure
 - Chapter 5 – Affordable Need
 - Chapter 6 – Requirements of Specific Groups
42. Policy M12 of the Submission Plan addresses the needs for gypsy, traveller and travelling showpeople accommodation (page 154 of [COR-1](#)). The key evidence for this approach is outlined in paragraphs 6.2-6.7 of the Housing Policies Topic Paper (pages 24-25 of [HOU-1](#)) which is set out fully in the Dartford Gypsy and Traveller Accommodation Assessment ([GAT-1](#)) and the Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report ([GAT-2](#)).
43. Chapter 6 of the Dartford and Ebbsfleet Residential Needs Assessment outlines the housing requirements of specific groups of the population. Paragraph 6.4 states that "...Student housing and the service families are not profiled in detail in this report as Dartford contains no higher education establishments nor Ministry of Defence bases" (page 69 of [HOU-7](#)). On this basis, it is not necessary for the plan to address the needs of students and service families.
44. The rented sector is a significant part of both market housing and affordable housing sectors. In this respect:
 - The needs for social/ affordable rented tenures are addressed in paragraph 5.61 of the Submission Plan and justified by the evidence to support the policy as set out in paragraph 41 above (page 133 of [COR-1](#)).

- The Residential Needs Assessment includes paragraphs 6.53-6.61 which set out the needs arising from the private rented sector (pages 85-88 of [HOU-7](#)) and paragraph 6.59 concludes that the private rented sector is under notable pressure in Dartford, as rent levels have risen at a greater rate than recorded nationally and regionally (page 87 of [HOU-7](#)).
- Paragraph 7.8 of the Residential Needs Assessment recognises the role that discount home ownership plays in reducing the requirement for private rented accommodation (page 92 of [HOU-7](#)) and policy M7(2)(a) along with paragraph 5.61 of the Submission Plan support such provision (pages 135 and 133 of [COR-1](#)). Paragraph 3.37 of the Submission Plan recognises the potential for build to rent homes to be located in Dartford Town Centre (page 66 of [COR-1](#)).

The Submission Plan approach does as much as possible to meet the needs of the rental sector by planning for a mix of affordable housing tenures and for a mix of housing sizes as set out in policies M7(2)(a) and M8(1) respectively (pages 135 and 139 of [COR-1](#)).

45. Further information on specialist accommodation for older people is set out in response to question 17 below.
46. In terms of build to rent, there is thought to be potential interest in developing such properties at the Ebbsfleet Central and Priory Shopping Centre allocated sites (policies E4 and D6 of the Submission Plan), as well as on the St James Lane Pit and Bluewater Chestnut Avenue East sites which have been found to be deliverable/ developable in the SHLAA (SHLAA site references 12 and 245). St James Lane Pit already has outline planning permission for residential development.
47. In relation to people wishing to commission and build their own homes, policy E5(2)(c) states that proposals should be designed to deliver provision of significant custom/ self-build dwellings on the Alkerden and Ashmere allocated site (page 102 of [COR-1](#)). The answer to question 95 makes clear that a reserved matters application for 67 custom-build units at Alkerden Gateway Parcel 7 was approved by the Ebbsfleet Development Corporation on 26 July 2021 (ref EDC/21/0056) and that this scheme is now under construction.

Policy M8 - Housing mix

Question 14 – Policy M8 Housing Mix

Is the proposed housing mix justified and supported by evidence? Would it be viable?

48. Yes. Policy M8(1) requires the majority of dwellings on all developments to provide 2 or more bedrooms. It also sets out a requirement for major developments to include provision for 3 and 4 bedroom homes, except in Central Dartford where sites of 100 or more dwellings will be required to make provision (page 139 of [COR-1](#)). The glossary defines major housing development as being development of 10 or more homes or on sites of 0.5 hectares or more (page 215 of [COR-1](#)).
49. Paragraphs 5.12-5.13 and Figure 4 of the Housing Policies Topic Paper set out the relevant key evidence from the Dartford and Ebbsfleet Residential Needs Assessment to justify the policy approach towards the sizes of dwellings required (pages 20-21 of [HOU-1](#)). The full justification for the approach is set out in chapter 4 and Figure 7.2 of the Residential Needs Assessment (pages 51-61 and 95 of [HOU-7](#)).

50. Paragraph 4.3.1 of the Local Plan Viability Assessment refers to the housing mix policy and makes clear that this has been considered within the assessment scope (pages 88-89 of [VIA-1](#)). Paragraph 19 finds that when “viewed as a whole, the emerging Local Plan proposals are considered to have reasonable prospects of viability and should therefore be able to meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms” (page 4 of [VIA-1](#)).

Question 15 – Policy M8 Accessible and Adaptable Dwellings

Is the requirement for all homes to meet requirement M4(2): Category 2 – Accessible and Adaptable Dwellings justified?

51. Before responding to this question, it is timely to note that in July 2022, the Government announced the outcome of the 2020 consultation on raising accessibility standards of new homes² stating:
- “73. Government proposes that the most appropriate way forward is to mandate the current M4(2)(Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes – option 2 in the consultation. M4(1) will apply by exception only, where M4(2) is impractical and unachievable (as detailed below). Subject to a further consultation on the draft technical details, we will implement this change in due course with a change to building regulations.”
52. The Government will now consult further on the technical changes to the Building Regulations to mandate the higher M4(2) accessibility standard. No timescale has been announced.
53. In response to the question, yes, the requirement for all homes to meet M4(2): Category 2 – Accessible and Adaptable Dwellings is justified. Paragraphs 5.14-5.16, 5.18-5.19 and 5.21-5.22 of the Housing Policies Topic Paper set out the relevant key evidence from the Dartford and Ebbsfleet Residential Needs Assessment to justify the policy approach which requires all new build dwellings to meet requirement M4(2): Category 2 – Accessible and Adaptable Dwellings (pages 21-22 of [HOU-1](#)). In appropriate circumstances, there may be exemptions to this requirement as recognised in the final sentence of policy M8(2) and set out in more detail in paragraph 5.70 of the Submission Plan (page 139 and 137 of [COR-1](#)).
54. The Local Plan Viability Assessment included testing against this policy requirement and paragraph 2.14.1 of the Assessment indicates that this took place on the basis of the following provision of accessible and wheelchair user dwellings:
- 95% of all new dwellings to be built to M4(2) ‘Accessible and adaptable dwellings’
 - 5% of all new affordable dwellings to be built to M4(3) ‘wheelchair accessible standards’ (page 45 of [VIA-1](#))
55. Paragraph 4.3.1 of the Viability Assessment considers the suitability of policy M8 (page 89 of [VIA-1](#)). The Executive Summary concludes at paragraph 24 that
- “The Council has a strong track record on development, delivering at a high level. This shows that the approach within national policy and as applied locally has been working overall. We expect this to be able to continue based on the approach now being continued and built on. In general, other policies tested in this assessment alongside the affordable housing are considered to be supportable overall. In our view, as we have noted, the DBC approach overall

² [Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK \(www.gov.uk\)](#)

is considered a relatively “light touch” one, based on national policy and proposing a fairly typical set of measures rather than overly onerous or additional ones. To compliment this, we understand that the Council intends to continue with a not too rigid, practical approach that also acknowledges the potential need to consider viability and other matters at decision making (planning applications) stage as far as relevant. This appears realistic overall.” (pages 5-6 of [VIA-1](#))

Question 16 – Policy M8 Wheelchair User Dwellings

What proportion of dwellings would be required to meet M4(3): Category 3 – Wheelchair User Dwellings?

56. The policy refers to the provision of “a limited proportion” of dwellings to meet the M4(3) requirement on sites of 100 or more dwellings rather than setting out a specific requirement (page 139 of [COR-1](#)). Paragraph 5.71 further states that “...large developments will be expected to provide some dwellings which meet M4(3) wheelchair user standards. It is not anticipated that provision would be outside a range of 0 to 5% of dwellings, to be negotiated on the basis of latest information on need...” (page 138 of [COR-1](#)).
57. The non-inclusion of a specific requirement for the provision of wheelchair user dwellings in the policy is a continuation of the approach in policy D8(2) of the Development Policies Plan 2017 (page 47 of [POL-2](#)). The monitoring reports indicate that planning permissions have been granted for M4(3): Category 3 – Wheelchair User Dwellings as follows:
- 2017-2018: 15 dwellings (page 19 of [MON-4](#))
 - 2018-2019: 2 dwellings (page 20 of [MON-3](#))
 - 2019-2020: 43 dwellings (page 18 of [MON-2](#))
 - 2020-2021: 37 dwellings (page 18 of [MON-1](#))
58. Paragraphs 5.17-5.22 of the Housing Policies Topic Paper set out the relevant key evidence from the Dartford and Ebbsfleet Residential Needs Assessment to justify the policy approach in respect of wheelchair user dwellings (page 22 of [HOU-1](#)). As indicated in paragraph 5.17 of the Topic Paper and paragraph 6.34 of the Residential Needs Assessment, it is difficult to model an estimate for the number of wheelchair user dwellings required over the plan period and it does not make any specific recommendations in this regard (page 22 of [HOU-1](#) and page 79 of [HOU-7](#)). On this basis, the Council does not set a proportion of dwellings to meet category M4(3) standards in policy M8.

Question 17 – Policy M8 Specialist Accommodation

Is policy M8 sufficiently clear on the expectations for specialist accommodation?

59. Planning Practice Guidance sets out a number of different types of specialist housing designed to meet the needs of older people, including
- Age-restricted general market housing
 - Retirement living or sheltered housing
 - Extra care housing or housing-with-care
 - Residential care homes and nursing homes³

³ See paragraph: 010 Reference ID: 63-010-20190626 at <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

60. The Dartford and Ebbsfleet Residential Needs Assessment examined the future requirement for two types of specialist housing; housing for older people and housing with care. The definitions for these are contained in footnotes 64 and 65 of the Assessment (page 72 of [HOU-7](#)). Table 6.2 shows a need for an additional 597 units of specialist accommodation over the plan period, of which 527 units should be housing for older people and 70 units housing with extra care (page 73 of [HOU-7](#)). Paragraph 6.14 of the Assessment also found a need for an additional 359 Registered Care spaces (nursing and residential care homes) over the plan period (page 73 of [HOU-7](#)).
61. Paragraph 1.22 and Figure 4 of the submitted Local Plan (pages 10-11 of [COR-1](#)) note that the total number of Dartford residents aged 80 years or more has remained fairly constant over the past five years. Results from the census 2021 confirm the Borough's relatively smaller older population compared to other authorities in Kent⁴. This data shows that people aged 65 and over account for 13.8% of Dartford Borough's population compared to 20.4% of Kent's population.
62. No suitable sites for specialist accommodation (i.e. housing for older people, extra care units for older people, nursing and residential care homes) arose from the SHLAA call for sites or through any of the Regulation 18 Local Plan consultations.
63. In addition, policy M8(3) sets out support for the provision of specialist accommodation and care homes on other suitable sites in the Borough (page 139 of [COR-1](#)).
64. In terms of allocations, policy E5(3)(b) indicates that specialist residential accommodation is expected to be delivered on the Alkerden and Ashmere site (page 102 of [COR-1](#)). As outlined in response to question 91, the landowner has identified an area of land in Ashmere which could deliver 250 units of specialist housing, expected to come forward in the form of an older persons' sheltered housing scheme. The land parcel is shown on the relevant map in response to question 47.
65. To illustrate that such accommodation is coming forward in the Borough, there have been recent applications/ completed developments for sheltered housing and care homes as follows:
- 09/01296/OUT – King Edward Avenue, Dartford – Outline application for the erection of a building to provide 69 sheltered apartments approved on 21 April 2010 which included a condition restricting occupation to persons of 55 years and over. A variation to reduce the number of units to 68 (15/01792/VCON) was approved on 11 March 2016. This development was completed in the 2016/2017 monitoring year.
 - 16/00499/FUL – Constance Grove, Dartford – Erection of a 75 bedroom care home was originally approved on 15 July 2016. This was subsequently increased to 77 bedrooms through a non-material amendment (20/00609/NONMAT) which was approved on 28 August 2020. This development was completed in the 2020/2021 monitoring year.
 - 19/00404/FUL – Plot 16a, The Bridge, Dartford – Erection of a 3 storey care home approved on 29 May 2019. Originally this was for 79 rooms but decreased to 71 rooms through a variation (20/00247/VCON) granted on 10 November 2020. This is expected to be implemented in the near future.
 - 18/01640/OUT – Blackshole Farm, Watling Street, Dartford – Outline application for the redevelopment of the site to provide a building comprising a care home comprising up to 5,469sqm of ground to second floor space and a 20 bed hospital

⁴ See pages 3 and 6 of the Census data profile by Kent County Council - https://www.kent.gov.uk/data/assets/pdf_file/0004/137533/2021-population-pyramid.pdf

ward together with car parks. There was a resolution to grant outline planning permission on 16 December 2021 subject to referral to the Secretary of State and to the completion of a section 106 agreement.

Policy M9 – Sustainable Housing Locations

Question 18 – Policy M9 General

Is the policy justified, effective and consistent with National Policy?

66. DBC considers that policy M9 is justified, effective and consistent with relevant parts of the NPPF. The key evidence to justify policy M9 is contained in table 3 (which sets out its relationship with existing adopted Local Plan policies) and paragraphs 4.16-4.20 of the Spatial Strategy Topic Paper (pages 13, 18 and 19 of [SPS-1](#)). Furthermore, the Sustainability Appraisal (SA) found policy M9 to have largely positive effects in relation to relevant SA objectives (pages 172-173 of [COR-8](#)). The Local Plan NPPF Compliance document sets out the parts of the NPPF which are relevant to policy M9 and how the policy complies with them, in particular paragraphs 69 and 119-120, which relate to small and medium sized sites and the use of brownfield land (pages 2 and 6 of [COR-18](#)).

Question 19 – Policy M9 Deliverable/ Developable Sites

Policy M9 indicates that sites in the SHLAA identified as deliverable/ developable will be permitted for residential development. Is this approach justified having regard to such sites accounting for around 10% of the housing requirement? Should these sites be allocated in the plan?

67. The submitted Local Plan is based on a simple and clear structure of setting out key strategic policies and plan objectives (section 2, pages 18-49 of [COR-1](#)), followed by the allocations and strategic policies pivotal in delivering the strategy (sections 3 and 4, pages 50-105 of [COR-1](#)). Section 5 sets out non-strategic policies including policy M9 (page 143 of [COR-1](#)).
68. This is consistent with chapter 3 of the NPPF on plan-making (pages 8-12 of [NAT-1](#)). Paragraph 21 of the NPPF states:
“Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.” (page 9 of [NAT-1](#)).
69. Paragraph 23 of the NPPF notes:
“[Plans] should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies).” (page 9 of [NAT-1](#))
70. It is therefore apparent that, where appropriate, national policy allows for non-strategic policies, amongst other means, to support delivery of sites. The approach in policy M9 is appropriate and justified, as outlined in evidence including in response to Inspector's Initial Questions 8 to 10:
a. It is proportionate to scale of housing supply expected from such sources.

- b. It reinforces the growth locations that are the focus of Policy S1 and the overall spatial strategy (paragraph 2.2 on page 4 of [EXAM-4](#)).
 - c. It has the flexibility to support high levels of sustainable development, as proven through the residential growth that has occurred in the Borough (paragraph 1.10 on page 3 of [EXAM-4](#)).
71. Dartford has accommodated substantial growth with the development strategy in place since the 2011 Core Strategy. Official 2021 [census results](#) released in June 2022 found: “In Dartford, the population size has increased by 20.0%, from around 97,400 in 2011 to 116,800 in 2021. This is higher than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800”.
72. It should be noted that the [census information](#) confirms that:
“Tower Hamlets saw the largest percentage growth in population in England, increasing 22.1% between 2011 and 2021. Dartford was second, increasing 20.0%.”
73. As outlined in paragraph 2.6 of DBC’s response to the Inspector’s Initial Question 10, Dartford’s approach is regarded as appropriate and maintains a deliverable Local Plan (page 5 of [EXAM-4](#)).
74. As demonstrated by the 2021 census results outlined in paragraph 71 above, Dartford’s residential sites policies have been demonstrated to be very effective in delivery. The above considerations show the approach to allocations and policy M19 in the submitted Local Plan is justified, and is a strategy consistent with national policy. DBC considers that with policy M9, no further residential allocations are necessary or suitable.

Policy M10 – Residential Amenity Space

Question 20 – Policy M10 General

Is the policy justified, effective and consistent with National Policy?

75. DBC considers that policy M10 is justified, effective and consistent with the relevant parts of the NPPF. The key evidence to justify policy M10 is contained in table 7 (which sets out its relationship with existing adopted Local Plan policies) and paragraph 1.60 of the Environment and Climate Change Topic Paper (pages 33 and 37 of [ECC-1](#)). Furthermore, the Sustainability Appraisal (SA) found policy M10 to have largely positive effects in relation to relevant SA objectives (pages 173-175 of [COR-8](#)). Whilst table 1 of the Environment and Climate Change Topic Paper indicates that policy M10 would contribute to the Borough’s resilience to climate change under paragraph 153 of the NPPF (page 7 of [ECC-1](#)), the policy would also help to ensure that new residential development creates places which promote health and well-being, with a high standard of amenity for existing and future users under paragraph 130(f) of the NPPF (page 39 of [NAT-1](#)).

Question 21 – Policy M10 Private Amenity Space Provision

Is criterion 3 likely to be effective as it only applies to new build development? Could it be clearer in respect of other development that may create a new dwelling such as through subdivision?

76. Policy M11(1) and (2) require all development to maintain sufficient garden land, amongst other things (page 151 of [COR-1](#)). Policy M10(2) sets out a number of

requirements relating to the provision of private and communal amenity space which would apply to all developments, including subdivisions (page 147 of [COR-1](#)).

77. The requirements in policy M10(3) are more prescriptive and intended to capitalise on the opportunities in new build developments to design in quality from their conception. Such requirements may not be as feasible in subdivisions and the imposition of such requirements may reduce the flexibility for such development to be brought forward. This may reduce the amount of windfall development coming forward and deter the sustainable re-use of property.

Question 22 – Policy M11 Living Conditions

Policy M11 – Extensions, New Dwellings and Garden Land

Would the policy be effective in ensuring that the living conditions of future occupiers of a development would not be harmed?

78. Yes. Policy M11 (1) requires development to maintain sufficient garden land, retain the character, local environment and amenity of residential areas and achieve a satisfactory quality of development. Furthermore, policy M11 (3) sets out a series of principles to be met which would ensure that the living conditions of future occupiers are acceptable. However, it is considered that policy M11 (3)(d) could be strengthened by a modification which ensures that it applies to the residential amenity of both existing and future occupiers (page 151 of [COR-1](#)). Paragraph 5.99 recognises that converted terraced dwellings are not normally capable of providing an adequate standard of accommodation and can have significant impacts on residential amenity (page 148 of [COR-1](#)). This is another policy principle which is taken forward into policy M11(4) which will help to ensure satisfactory living conditions for future occupiers (page 151 of [COR-1](#)).

Question 23 – Policy M11 Conversions

Is the restriction on the conversion of single dwellinghouses of 120 sqm or less original net internal floorspace justified and supported by evidence?

79. Yes. The relevant evidence to justify the restriction on conversions of single dwellinghouses of 120 sqm or less original net internal floorspace is contained in the Housing Density Paper ([HOU-10](#)) and the Dartford and Ebbsfleet Residential Needs Assessment ([HOU-7](#)). Furthermore, it should be noted that this is a continuation of the approach in existing policy DP7(4) of the adopted Development Policies Plan 2017 (page 40 of [POL-2](#)).
80. The Housing Density Paper provides information on the average sizes of dwellings across existing neighbourhoods in the Borough (page 43 of [HOU-10](#)) which is repeated in Figure 1 below.

Figure 1: Average Sizes of Dwellings in Neighbourhoods in Dartford Borough

Area	m ²	Area	m ²
Burnham Road Area		Knockhall Area	
<u>Mayfair Road</u>		<u>Ingress Gardens</u>	
3 Bed Terrace	75	3 Bed Terrace	86
<u>Burnham Road</u>		<u>Pilgrims Way</u>	

Area	m ²	Area	m ²
3 Bed Terrace	72	4 Bed Detached	93
2 Bed Maisonette	46	Swanscombe Area	
Princes Area		<u>Lewis Road</u>	
<u>Maple Road</u>		3 Bed Terrace	83
2/3 Bed Terraces	76	<u>Leonard Way</u>	
<u>Willow Road</u>		3 Bed Terraces	84
3 Bed Terrace	74	<u>Church Road</u>	
<u>Meadowside</u>		2 Bed Terrace	57
1/2 Bed Flat	49	Wilmington Area	
Newtown Area		<u>Whitehead Close</u>	
<u>St Albans Road</u>		3/4 Bed Semi-Detached	97
2 Bed Terrace	60	<u>Warren Road</u>	
<u>Howard Road</u>		3 Bed Semi-Detached	87
2 Bed Terraces	63		

81. The Housing Density Paper also uses information from a CABE research report in 2010 on the average sizes (in sqm) of different types and sizes of dwellings (page 44 of [HOU-10](#)) as shown in figure 2 below.

Figure 2: Average Sizes of Dwellings from CABE Research

Typology	Mean	Median
Studio	32.1	31.9
1 Bedroom flat	46.6	46.3
2 Bedroom flat	60.7	59.1
3 Bedroom flat	86.5	89.6
1 Bedroom house	64.3	69.1
2 Bedroom house	71.2	69.2
3 Bedroom house	95.6	92.1
4 Bedroom house	120.6	117.0
5 Bedroom house	163.5	158.7

82. Figure 7.2 in the Dartford and Ebbsfleet Residential Needs Assessment shows the sizes and tenures of new housing required in the Borough over the plan period and this is repeated in as Figure 10 in the Submission Plan (page 95 of [HOU-7](#) and page 136 of [COR-1](#)). In terms of the sizes of dwellings, this shows that the greatest need is for 3 bedroom homes, followed by 2 and 4+ bedroom homes. There is less need for 1 bedroom dwellings.
83. It is clear from the CABE data in figure 2 above that the average size of 2 bedroom homes ranges from around 60sqm for a two bedroom flat to around 70sqm for a 2 bedroom house. The DBC data in figure 1 indicates that 2 bedroom terraced dwellings in the neighbourhoods of the Borough which were analysed range from 57sqm to 63sqm. There is less local data on the sizes of 2 bedroom flats. The 120sqm figure is justified on the basis that the conversion of smaller dwellinghouses is likely to result in the loss of family sized dwellings to 1 bedroom dwellings when the evidence shows that the greatest need is for 2, 3 and 4 bedroom dwellings.

Question 24 – Policy M11 General

Is the policy otherwise justified, effective and consistent with section 12 of the Framework?

84. DBC considers that policy M11 is justified, effective and consistent with the relevant part of the NPPF. The key evidence to justify policy M11 is contained in paragraph 5.4 and table 5 (which set out its relationship with existing adopted Local Plan policies) and paragraphs 5.12-5.13 of the Housing Policies Topic Paper (pages 18-19 and 20-21 of [HOU-1](#)). Furthermore, the Sustainability Appraisal (SA) found policy M11 to have positive effects in relation to relevant SA objectives (pages 175-176 of [COR-8](#)). The Local Plan NPPF Compliance document sets out how policy M11 complies with paragraph 71 of the NPPF which states that plans should consider the case for setting out policies to resist the inappropriate development of residential gardens (page 3 of [COR-18](#)).

Issue 4: Gypsies, Travellers and Travelling Showpeople

Whether the plan will meet the needs of Gypsies, Travellers and Travelling Showpeople.

Policy M12 - Gypsies, Travellers and Travelling Showpeople Accommodation

Question 25 – Additional Work Timeframes, Progress and Plan Impact

What is the timeframe for the completion of the additional work being undertaken in relation to site capacity of existing authorised and tolerated sites? Is there any update on the progress of this work? How will the outcomes from this affect the plan (being undertaken post submission)?

85. The work has recently been completed and is attached as Appendices 2-4 to this statement. Appendix 1 comprises the site deliverability assessments and Appendices 3-4 are plans showing how additional pitches could be accommodated on two Salinas sites. Full details of the current 5 year gypsy and traveller pitch supply position is set out in Appendix 5. Tables 2 and 3 below show the key findings on whether the sites can meet any of the needs arising for the period 2019-24.

Table 2: Findings from the Further Work – Gypsies and Travellers

Site	Total pitch needs 2019-24 ¹	Outputs from recent work
Castle Farm	7	There are an additional 8 caravans on the site compared to when the GTAA was carried out. These meet the needs arising from the site in the period 2019-24. This also reduces overall needs for pitches in the Borough ³ . There is no space remaining on the site to meet any other needs.
Claywood Lane ²	4	The existing site is not suitable for further consideration for additional pitches due to the constraint on intensification or expansion caused by the presence of ancient woodland.
Eebs Stables ³	5	The 2019-24 needs could be met by allowing the temporary pitches to be made permanent and extending the site to the east. A plan has been produced to show how the site could accommodate 5 pitches. This is included as Appendix 3.
Knoxfield Plot 3	1	There are no longer any needs arising from this site in either the 2019-24 or 2024-35 periods as the occupant will soon vacate the site to move to a site outside Dartford Borough. This also reduces overall needs for pitches in the Borough ³ .
Salinas	3	The need for 1 of these pitches will be met by the proposed allocation already set out in the Policies Map Changes document (page 10 of COR-2). The remaining need for 2 pitches in the 2019-24 period could be met by extending the site to the south east. A plan has been produced to show how the site could accommodate 2 additional pitches to meet needs. This is included as Appendix 4.
Tennis Courts	2	There is no space remaining on the site to meet any of the needs arising either in the 2019-24 or 2024-35 periods.

¹ Information from the original survey carried out for the GTAA in 2019 for those who meet the national definition except for Claywood Lane – see separate note

² The needs arise from those who do not meet the national definition

³ Figure includes the 3 pitches granted temporary planning permission until 25 February 2025

Table 3: Findings from the Further Work – Travelling Showpeople

Site	Total plot needs 2019-24 ¹	Outputs from recent work
Forest Amusements	1	There is plenty of room on the site to meet the need for an additional plot in the 2019-24 period.

86. Policy M12(1) of the Submission Plan identifies the needs for 34 gypsy and traveller pitches and 1 travelling showpeople plot to 2026. It identifies a range of actions to meet needs, including the allocation of land at Tennis Courts Sutton at Hone and Salinas Darenth Wood Road (page 154 of [COR-1](#)).

87. The key Local Plan implications from the updated 5 year gypsy and traveller pitch supply position and further site work are:

- Appendix 5 indicates that: the pitch needs in the period to 2024 have now reduced from 48 to 47; there has been a supply of 25 pitches in the period 2019-2022; and there is a need for 27 pitches in the 5 year period from 2022-2027. The text in paragraphs 5.106, 5.107 and policy M12(1) should be modified to reflect this updated information (pages 152 and 154 of [COR-1](#));
- The Tennis Courts Sutton at Hone site should be removed as an allocation in the policy and on the Policies Map Changes as it is not capable of providing any further pitches to meet needs (page 154 of [COR-1](#) and page 11 of [COR-2](#));
- The policy could now include a criterion which allows temporary sites to be made permanent – this would enable the 3 temporary pitches at Eebs Stables to become permanent;
- The policy and the Policies Map Changes would show the existing Eebs Stables site plus the area to the east as a site allocation to ensure that provision is made for the total needs for the 5 pitches on the site (including the 3 temporary pitches);
- The current proposed allocation for the Salinas site shown in the Policies Map Changes document should be retained to enable provision for 1 pitch to meet needs arising from the current unauthorised site (page 10 of [COR-2](#));
- The Policies Map Changes could show an extended site allocation area for the Salinas site to enable provision for an additional 2 pitches. It should be noted that the existing red line boundary on the Policies Map Changes document includes provision for the current unauthorised pitch and
- Including the additional allocation at Eebs Stables, retaining the current allocation at Salinas and extending the Salinas site would result in land being available for the provision of 8 pitches towards the requirement for 27 pitches in the 2022-2027 period.

88. As set out in Appendix 5, the need is now for 27 pitches over the 5 year period 2022-2027. Assuming that modifications relating to the sites at Eebs Stables and Salinas are taken forward, there is an outstanding need for 19 pitches in the 2022-2027 period. It should be noted that paragraph 1.13 of the Gypsy and Traveller Accommodation Assessment (GTAA) found that “

“In Dartford, a number of sites are occupied by extended family groups and are not sub-divided into individual pitches. As such, in the short to medium term, it is likely that the accommodation needs of concealed or doubled-up adults and

teenagers who will be in need of a pitch of their own in the next 5 years could be through additional touring caravans or shared static caravans, tourers and dayrooms on existing sites. These would generally be equivalent to providing pitches, even if they are not formally set out as such.”

As families change, it may be that some need is met within existing sites, either by the elders moving into bricks and mortar or young adults moving into tourers,

Question 26 – Ebbsfleet Sites Potential to Contribute to Pitch Supply

Policy M12 seeks to identify deliverable non-Green Belt sites at Ebbsfleet as a possible source of Gypsy and Traveller pitches. However paragraph 5.7 of EXAM3 states that no assessment has been undertaken. Having regard to the description of development for the outline planning permissions at Ebbsfleet, is there a reasonable prospect that any of these sites would be capable of making any contribution to Gypsy and Traveller pitches in the Borough over the plan period?

89. Paragraph 5.7 of EXAM-6 outlines that there have not been any more detailed assessments of sites within Ebbsfleet Garden City which have outline planning permission, detailed planning permission or reserved matters approvals, including areas which are subject to masterplanning. DBC and the EDC would expect these to come forward for the uses for which they already have planning permission, i.e. residential and supporting community facilities and infrastructure (page 8 of [EXAM-6](#)). There is no reference to provision for gypsy and traveller pitches within the descriptions of the developments with planning permission nor any planning conditions or section 106 agreements requiring them to be provided. Therefore, there is no reasonable prospect that any of these sites would be capable of making any contribution to Gypsy and Traveller pitches in the Borough over the plan period. The relevant sites, reference numbers, descriptions and status of development are set out in table 4 below.

Table 4: Information on Key Planning Permissions within Ebbsfleet Garden City

Site and SHLAA Ref	Planning Ref	Description	Status as at Sep 22
Ebbsfleet Central #1	None	None	Application expected to be submitted soon.
Croxton and Garry #15	EDC/17/0110, EDC/19/0161, EDC/21/0012 EDC/21/0064 EDC/22/0019	Current permission is for 232 dwellings, the outline permission for which was originally approved on 12/12/2018.	Development has started on site. Completions are expected to come forward in the period upto 2025/2026.
Craylands Lane #129	14/01689/OUT, EDC/18/0033	Permission was for 100 dwellings, the outline permission for which was originally approved on 16/02/2015	Development complete.
Alkerden and Ashmere (part of the larger Eastern Quarry site) #130	03/01134/OUT	Outline application for a mixed development comprising up to 6,250 dwellings and up to 231,000 sq	Various phases now have detailed permission and development is underway, with some dwellings having

Site and SHLAA Ref	Planning Ref	Description	Status as at Sep 22
		metres of built floorspace for: business premises; education; community & social facilities; hotels; theatre; & supporting retail & leisure facilities approved on 13/11/2007	already been completed. Completions totalling 4,550 dwellings among other uses are forecast to be completed by 2033/34.
Alkerden and Ashmere (part of the larger Eastern Quarry site) #130	12/01451/EQVAR	Changes to some aspects of the masterplan, and consequently, the Development Parameters and Land Use Disposition Plan approved on 18/01/2013	
Alkerden and Ashmere (part of the larger Eastern Quarry site) #130	EDC/17/0048	Variation of conditions 3 & 4 of ref 12/01451/EQVAR to substitute approved parameter plans and documents under condition 3 and revised strategies under condition 4 approved on 28/03/2018	
Ebbsfleet Green #144	05/00308/OUT, EDC/16/0045	Permission for upto 950 dwellings & non-residential floorspace for: shopping, food & drink, hotel use; community, health, education & cultural uses; assembly & leisure facilities, the outline permission for which was originally approved on 31/03/2014	A number of phases are already complete and development is underway on a number of other phases. It is expected that the remaining phases will be completed by 2025/26.

Question 27 – Other Land Considered for Pitches

What other land has been considered to meet the identified need for Gypsy and Traveller pitches?

90. Following receipt of the Gypsy and Traveller Accommodation Assessment in October 2019, the Council set out its principles for considering the potential of land to provide a supply of deliverable sites in paragraphs K3-K9 of the Local Plan Preferred Options (pages 80-81 of [CON-4](#)). In particular, paragraph K3 referred to the potential for additional accommodation within, or as small scale extensions to, a number of existing authorised gypsy and traveller sites, allowing existing temporary sites to become permanent, and considering potential sites within Ebbsfleet Garden City, the sites and areas for which are shown on the figure in paragraph K7. Paragraph K4 further stated that in the event that these sources do not provide sufficient accommodation to meet the 5 year needs, the Council will carry out a Borough-wide search for new sites. This would include other areas that are not within the Green Belt and sites that may be put forward in response to the Preferred Options consultation or as a result of a consultation with landowners prior to the publication of the Local Plan.
91. As set out in paragraph 4.2 of the Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report, the Council wrote to the owners of the authorised and lawful sites in the Borough in cases where it was considered that additional caravans could be provided and/or where there were outstanding planning permission for the provision of additional caravans (page 12 of [GAT-2](#)). Paragraph 4.3 of the Meeting Needs Report indicated interest from the owners of sites at Hillside Farm, Cob Tree Farm and Salinas in providing additional pitches for gypsies and travellers.
92. Further consultant work was then commissioned to consider the potential capacity of a number of existing gypsy and traveller sites to accommodate more pitches. Table 2 in response to the Inspector's Initial Question 21 (page 5 of [EXAM-6](#)) set out the list of authorised and tolerated sites that were subject to further work. It should be noted that these sites were where there were known needs arising from those who meet the definition as explained in paragraph 3.3 of the response to initial question 21 (page 5 of [EXAM-6](#)). Claywood Lane was also included in the site delivery work as it was initially considered that there may be capacity on this site to meet some needs arising from those who do not meet the definition. The results of the site deliverability assessment work have only recently been received following unavoidable delays as explained in paragraph 3.3 of the Meeting Needs Report (page 5 of [EXAM-6](#)). The results are contained in Appendix 2 of this response.
93. The Council has also considered a number of potential new sites for the provision of pitches to meet these outstanding needs but has been unable to identify any which are suitable and available (see paragraphs 4.9-4.19 on pages 13-16 of [GAT-2](#)). Following the work which has only recently been completed, there remains a shortfall in provision of 19 pitches. DBC considers that it is important that the plan is not delayed as the proposed policy approach will provide certainty for the provision of pitches that can be implemented to meet part of the current 5 year needs. There is the option to carry out an early focussed review of this policy, including a call for sites, or other such action as may be necessary to consider if any other sites might be available to meet the shortfall in pitch provision.
94. The Council subsequently carried out a search for potential new suitable and available (i.e. deliverable and developable) sites for gypsies and travellers. This involved an assessment of whether any traveller pitches could be accommodated:

- within any of the Submission Local Plan strategic site allocations and identified areas with potential for future development;
- on other land within Ebbsfleet Garden City; and
- on council owned land (Dartford Borough Council and Kent County Council).

The information on this can be found in paragraphs 4.9-4.19 of the Meeting Needs Report (pages 13-16 of [GAT-2](#)). These options were considered as being the most likely to have any prospect of coming forward. No sites were identified using this approach, and the SSSI designation has now further restricted opportunities at Ebbsfleet Garden City. Even if DBC had been able to identify sites, there is no guarantee that they would be suitable to meet the specific needs of gypsies and travellers living in the Borough.

Question 28 – Justification for Sites in the Green Belt

Is the release of Gypsy and Traveller sites in the Green Belt justified? What is the evidence for any exceptional circumstances that support the release?

95. Paragraph 3.12 of the Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report Sept 2021 (page 9 of [GAT-2](#)) sets out that that all traveller and travelling showpeople's sites within the Borough are located in the Green Belt. Paragraph 4.1 of the Meeting Needs Report (page 12 of [GAT-2](#)) explains that many of the sites from which traveller and travelling showpeople's needs arise are unauthorised, occupied by extended family groups which contain concealed or doubled-up adults, and/or occupied by teenagers.
96. Work has demonstrated that 8 pitches could be provided within or by extending existing sites. It outlines that these are exceptional circumstances which justify a limited alteration to the Green Belt boundary in accordance with the PPTS.
97. As set out in paragraph 94 above, the Council considered whether any suitable and available (i.e. deliverable or developable) new sites outside the Green Belt could be identified to meet the needs for gypsy and traveller pitches. In the event, it was not possible to identify any such sites and it is considered that this means that there are exceptional circumstances which justify the alteration of parts of the Green Belt to allow the provision of additional pitches for gypsies and travellers

Question 29 – Impact on Green Belt

How would the release of land maintain the openness and permanence of the Green Belt?

98. As set out in paragraph 87 above, the additional work suggests that part of the Eebs Stables site could be proposed for release to meet needs, the Salinas site proposed for release could be extended and it may well no longer be necessary and justified to release the Tennis Courts site from the Green Belt.

Eebs Stables

99. Paragraphs 14 and 15 of the appeal decision for the Eebs Stables site dated 25 February 2022 included consideration of the impact of the proposals to change the use of the land for residential purposes with the siting of 3 no. mobile homes, partial conversion of existing stables as a utility room and provision of ancillary hardstanding⁵. In this respect, it found the following:

⁵ Planning appeal reference APP/T2215/W/19/3228522 –
<https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=46435543>

14. The NPPF states that one of the essential characteristics of the Green Belt is its openness, and its purposes include checking the unrestricted sprawl of large built-up areas and safeguarding the countryside from encroachment. Prior to the development taking place, the site contained development limited to that associated with the keeping of horses on the land, namely a stable building with a yard.
 15. In spatial terms, the introduction of the mobile homes and other paraphernalia associated with the residential use has resulted in a loss of openness. Visually, the loss of openness is apparent in close views from the access road to the north and in some long distance views. The mobile homes are clustered together on a relatively small area of land and I therefore find the development to be moderately harmful. As the site is at the edge of Dartford it adds to urban sprawl and represents an encroachment into the countryside and therefore conflicts with the related Green Belt purposes.
100. Extending this to the east to provide an additional 2 pitches would cause further loss of openness of the Green Belt, urban sprawl and encroachment into the countryside. Both the existing area occupied by temporary development plus the extension to this would result in these impacts on the Green Belt being permanent. As set out in the Site Assessment on pages 41-43 of Appendix 2, development could be accommodated on the part of the site to the north of the hedgeline and there would be no need to encroach onto the paddock/field to the south of this. It is considered that the hedgeline is a defined landscape feature which provides a defensible boundary to the proposed amendment to the Green Belt in this location.

Salinas

101. Figures 7 and Appendix D of the Gypsy and Traveller Accommodation Assessment (GTAA) indicate that part of the Salinas site is lawful (i.e. long term within planning permission) and the rear of the site is unauthorised (pages 34-35 and 57 of [GAT-1](#)). Both of these areas are included in the area proposed for release from the Green Belt in the Policies Map Changes document (page 10 of [COR-2](#)). In order to accommodate the 2 additional pitches required to meet the needs to 2024, it is considered that for this to happen there would need to be a modification to extend the area proposed for release from the Green Belt further to the south east.
102. The existing lawful part of the site is already developed and therefore already has an impact on the openness of the Green Belt. This is within an area of existing built ribbon development on the east side of Darenth Wood Road which encroaches into the countryside. The extension to this, both for the existing unauthorised pitch and for the extended area for 2 further pitches, would further impact on the openness of the Green Belt by increasing encroachment into the countryside. There could be a requirement, as part of any planning application, for the provision of a hard or soft landscape feature (such as a fence or hedge) to ensure that there is a defined, defensible boundary around the pitches in order to avoid any further impacts on the openness of the Green Belt.

Question 30 – Existing Sites

Are the existing authorised and tolerated sites identified in the policy and/or on the policies map?

103. No, it is not considered necessary to identify the existing authorised and tolerated sites in the policy or on the policies map as these fluctuate over time. Appendix D of the

GTAA lists the authorised and tolerated sites as existed in June 2019 (page 57 of [GAT-1](#)) but this has changed with planning permissions which have been granted since then and the amended list is set out in table 5 below. This reflects the information contained in paragraph 3.7 of the Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report (page 8 of [GAT-2](#)) and paragraph 3.2 of (page 5 of [EXAM-6](#)). If there is a need to identify these sites in the Local Plan, there could be a modification to the plan which includes the information below, for example as an Appendix.

Table 5: Site and Yard List Updated

Site/Yard	Authorised Pitches or Plots	Unauthorised Pitches or Plots
Public Sites		
Claywood Lane	11	-
Private Sites with Permanent Permission		
48 Brakefield Road ¹	4	-
Castle Farm	3	-
Cob Tree Farm ²	4	-
Fairview	1	-
Hillside Farm ³	17	-
Knoxfield, Plot 1	3	-
Knoxfield, Plot 2	3	-
Knoxfield, Plot 3	3	-
Knoxfield, Plots 4 & 5	3	-
Knoxfield, Plot 6	6	-
Knoxfield, Plot 7	1	-
Nurstead Stables	3	-
Rear of Woodside Cottages	3	-
Sauleskalns	6	-
Shirehill Farm	1	-
Tennis Courts	1	-
The Green Bungalow	1	-
The Stables ⁴	1	-
Private Sites with Temporary Permission		
Eebs Stables ⁵	3	-
Lawful Sites – Long-term without planning permission		
Salinas	-	4
Unauthorised Developments		
Salinas (rear of)	-	1
TOTAL PITCHES	78	5
Travelling Showpeople Yards		
Forest Amusements	7	-
TOTAL PLOTS	7	0

¹ Previously 1 pitch on a private site with temporary permission, 1 pitch on a lawful site – long term without planning permission and 1 pitch was unauthorised development. 1 additional pitch has been granted permission

² Previously 1 authorised pitch

³ Site previously shown as having 6 authorised pitches and 7 unauthorised pitches. The amendments for the site in the table above reflect the planning permissions which have since been granted for the site, resulting in a net gain of 11 pitches

⁴ Previously unauthorised development

⁵ Previously unauthorised development

Question 31 – Assessment of Needs for Travelling Showpeople

Is the assessment of need for plots to meet Travelling Showpeople's needs robust?

104. Yes, the assessment of needs for plots to meet Travelling Showpeople's needs is robust as it meets the requirements set out in the Planning Policy for Traveller Sites ([NAT-2](#)).
105. Policy A in paragraph 7 of the Planning Policy for Traveller Sites sets out the actions that local planning authorities should take in assembling the evidence base necessary to support their planning approach (page 2 of [NAT-2](#)). This includes:
- a) Early and effective community engagement with both settled and traveller communities (including discussing accommodation needs with travellers themselves, their representative bodies and local support groups)
 - b) Cooperation with travellers, their representative bodies; local support groups and relevant interest groups to prepare and maintain an up-to-date understanding of accommodation needs
 - c) Use a robust evidence base to establish accommodation needs to inform the preparation of local plans.
106. Chapter 3 of the Gypsy and Traveller Accommodation Assessment (GTAA) outlines the methodology used to carry out the assessment (pages 17-25 of [GAT-1](#)). This outlines the various stages of the assessment. The desk-based review of secondary data, included records of unauthorised sites/ encampments, information on planning applications/ appeals and information on enforcement actions whilst the stakeholder engagement included an interview with a representative of the Showmen's Guild. Furthermore, there was a survey of travelling communities. This information was used as a basis for determining needs for those who meet the planning definition, undetermined households and households that do not meet the planning definition.

Question 32 – Deliverability of Sites

Are the sites identified for Gypsies and Travellers and Travelling showpeople deliverable?

107. DBC has taken a practical approach towards identifying sites for Gypsies, Travellers and Travelling Showpeople, which focusses on sites which are deliverable to meet actual known needs rather than simply identifying land to meet an overall pitch/plot target which may not come to fruition. This was outlined in paragraph 1.7 in DBC's response to the Inspector's Initial Question 19 (page 3 of [EXAM-6](#)). DBC considers that needs are most likely to be delivered, and met directly at source, by providing additional caravans within (intensification) or extending existing authorised and tolerated sites.
108. Policy M12(1)(b) of the Submission Plan and the Policies Map Changes document currently identify sites for additional pitches at Tennis Courts Sutton at Hone and Salinas Darenth Wood Road (page 154 of [COR-1](#) and pages 10-11 of [COR-2](#)). The policy was informed by paragraphs 4.5 and 4.8 of the Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report which indicated a number of authorised or tolerated traveller sites that were considered to be able to accommodate additional caravans in a satisfactory way at that time. The situation has now changed following the further work that has taken place (see Appendix 2) and updated versions of the tables from the Meeting Needs Report are set out below. This includes information on the deliverability of pitches and plots on the various sites.

Table 6: Gypsy and Traveller Pitch Deliverability

Site	Needs to 2024	Notes	Update Sept 2022
Eebs Stables, Trollingdown Hill*	5	N/A as not previously included as a potential site in the Meeting Needs Report	Part of the site has temporary permission for 3 pitches until 25 February 2025. It is possible to accommodate the overall permanent need for 5 pitches. It would be necessary to identify this site in policy M12(1)(b) and include it in the Policies Map Changes document. This is a family site and the owners would be able to deliver the pitches.
Knoxfield Plot 3, Darenth Wood Road	1	Within existing authorised site, site history means that planning permission is not needed, no need for a Local Plan allocation	There are no longer any needs arising from the site as the occupant will be moving to a site outside Dartford Borough. Therefore, deliverability is not applicable.
Salinas, Darenth Wood Road	3	Within and as an extension to existing tolerated site, planning permission needed for extension, site proposed for Local Plan allocation	The needs to 2024 for those who meet the definition is 2 pitches. The site shown on page 10 of the Policies Map Changes document (COR-2) would meet the existing needs generated by the unauthorised pitch occupied by those who do not meet the definition. There would be a need to extend the allocation to the south east to meet the additional need for 2 pitches. This is a family site and the owners would be able to deliver the pitches subject to overcoming any contamination issues.
Tennis Courts, Main Road, Sutton at Hone	2	Within existing authorised site, planning permission needed, site proposed for Local Plan allocation	There is no space remaining on the site to meet these needs. It is not deliverable and the reference to the allocation in policy M12(1)(b) and the Policies Map Changes

Site	Needs to 2024	Notes	Update Sept 2022
			document should be removed.

* This site was not previously identified in either policy M12(1)(b) or paragraph 4.5 of the Meeting Needs Report but the circumstances have changed as a result of the appeal decision (see para 3.2 on page 5 of [EXAM-6](#)) and the outcomes of the recent work which has been carried out (see pages 41-43 of Appendix 2).

Table 7: Travelling Showpeople Plot Deliverability

Site	Needs to 2024	Notes	Notes Updated
Forest Amusements, Darenth Wood Road	1	Within existing authorised site, site history means that planning permission is not needed for further plots, no need for a Local Plan allocation	This is a family site and they are currently in the process of re-organising the layout to the accommodation to deliver the additional plot within the next 5 years.

Appendix 1 – Potential Modification to Section 6 of the Submitted Local Plan


Potential modifications to the submitted Local Plan (Section 6) could include a new paragraph on page 204, before current paragraph 6.13:

“Strategic planning actions may include addressing the prospective requirement as a statutory requirement under the Duty to Cooperate to assist neighbouring local authorities to meet any established unmet housing need, where the neighbouring authority has clearly demonstrated both the extent of the shortfall and at what stage in their plan period that shortfall needs to be addressed. Neighbouring authorities will need to demonstrate that they have maximised urban capacity, considered the option of repurposing for residential use land currently used for or allocated for different uses and, in the event that a shortfall remains, the authority has properly assessed the capacity of green belt in their area to accommodate part or all of the housing shortfall. In the event that neighbouring authorities have demonstrated that they are unable to meet their housing needs, the expectation will be that DBC and the authority(s) collaborate on delivering necessary joint studies. These may include, but may not be limited to: a reassessment of the housing market area dynamics within and beyond the authorities to establish the necessary functional links between the Dartford Borough and the area in question; green belt assessment to establish the extent to which the green belt meets the purposes set out in the NPPF, its potential capacity to accommodate development and the implications of any potential release on the purposes and wider function of the green belt; any other evidence necessary to satisfy the Green Belt exceptional circumstances test; viability and infrastructure delivery implications (including the timing and funding of such infrastructure).”

Appendix 2 – Dartford Gypsy & Traveller Site Deliverability Assessment

- 1.1 A detailed site appraisal was undertaken of sites considered to have potential to accommodate additional pitches/plots to meet needs arising from those sites, identified at the time that the GTAA was published in 2019. 6 gypsy and traveller sites and 1 travelling showpersons' site were subject to appraisal. The sites appraised were:
- Castle Farm (gypsy and traveller site – meet definition)
 - Claywood Lane (gypsy and traveller site – do not meet definition)
 - Eebs Stables (gypsy and traveller site – meet definition)
 - Knoxfield Plot 3 (gypsy and traveller site – meet definition)
 - Salinas (gypsy and traveller site – meet definition)
 - Tennis Courts (gypsy and traveller site – meet definition)
 - Forest Amusements (travelling showpeople site – meet definition)
- The appraisals are set out in the matrices below.
- 1.2 For the sites included in the detailed site appraisal, the GTAA 2019 identified the following needs:
- 8 pitches to meet current needs for gypsies and travellers who met the definition;
 - 10 pitches to meet the 5 year needs for gypsies and travellers who met the definition;
 - 6 pitches to meet the 5 year needs for those who did not meet the definition;
 - 1 plot to meet the 5 year needs for travelling showpeople who met the definition.
- Please note that the current, 5 year and 6+ year needs outlined in the matrices below set out the position at the time that the GTAA was published in 2019.


Castle Farm

SITE BACKGROUND	
Site reference	DART001
Site name and address	Castle Farm, Green Street Green Road
Site plan	
Site planning status	Private Authorised/Lawful
Planning history	84/0062 - on appeal. Continued use of land as a residential gypsy site. Condition no more than 3 touring caravans. 18/01167/LDC - Certificate granted on 06/02/19 allowing non-compliance with the condition that limits the number of touring caravans to three. Therefore allows unrestricted numbers of caravans.
GTAA 2019 pitch number	3 pitches providing 14 accommodation units
GTAA 2019 planning definition status	
Meet definition	9
Do not meet definition	5
Undetermined	0
Current and future needs – position as at 2019 when the GTAA was published	
Current need	1 – 1 meet definition
5-year need	7 – 6 meet definition, 1 does not meet definition
NHF year 6+	5 – 4 meet definition, 1 does not meet definition
Total pitch needs 2019-24	8
Total pitch needs 2024-35	5
Site area	0.2ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Within Settlement Boundary	No
Green Belt	Yes
SSSI	No
Local Wildlife Site	No
Ancient Woodland, other Priority Habitat or TPO	No
Affecting the setting of Listed Building(s)	Rats Castle, immediately south of the site is a grade II listed building
Scheduled Monuments	No
Potential Archaeological site	No
Agricultural Land Grade	N/A – Existing gypsy and traveller site

Protected Local Green Space or Borough Open Space	No
Within or affecting the setting of a Conservation Area	No
Flood Zone – 1, 2 or 3	Flood Zone 1
Groundwater Source Protection Zone – 1, 2, 3, 3a, none	Groundwater Source Protection Zone 2
Potential Contaminated land (including within 250m of landfill site)	Southern part of site is within a hazardous site consultation zone – national grid transmission network, within proximity of an overhead powerline. Most of the site is within 50m of a former landfill site.
Gas pipelines, oil pipelines and/or overhead power lines	See above
Mains water and electricity available or accessible	Existing site – assumed to be available.
Provision for surface water and storm water drainage	Existing site – assumed to be available.
Sanitation available or capable of being provided	Existing site – assumed to be available.
Appropriate vehicular access	Existing site – assumed to be appropriate
Proximity to primary schools	1.9km to Darenth Primary
Proximity to GP surgery	1.7km to Jubilee Medical Group Longfield
Proximity to shops	1.9km to Longfield
Proximity to public transport	0.5km to Gills Road, 423 Dartford to New Ash Green
Footway/Cycling Links	There is a public footway along Green Street Green Road to Longfield and Darenth.
Minerals Safeguarding Area and/or within 250m of a safeguarded Minerals/ Waste Site	Within a Minerals Safeguarding Area
FINAL APPRAISAL	
Impact of site on local character and landscape	Intensification would not have an adverse impact on local character and landscape.
Impact of site on amenity of existing residents close to the site	Existing site is in close proximity to existing residential properties.
Site can achieve acoustic privacy/ is not adversely affected by sources of noise	Yes
Site can achieve an adequate level of air quality	Yes
Site can achieve visual privacy	Yes
Constraints on design and layout of the site including topography and/or size	The site cannot be re-arranged to meet any future need.
Could the site meet current and future need in accordance with licensing requirements?	The current and 5 year needs for the family have been met since the GTAA was carried out. There are now 22 accommodation units on the site compared to 14 at the time of the GTAA.
Could the site only meet current need in accordance with licensing requirements?	There is no space for any further units of accommodation.

Can the configuration of the site be altered to meet future need in accordance with licensing requirements?	No
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	No. There is no space to accommodate any further accommodation units.
CONCLUSION	The current and 5 year needs for the family have been met on the site since the GTAA was carried out. There is no space to accommodate any further accommodation units.

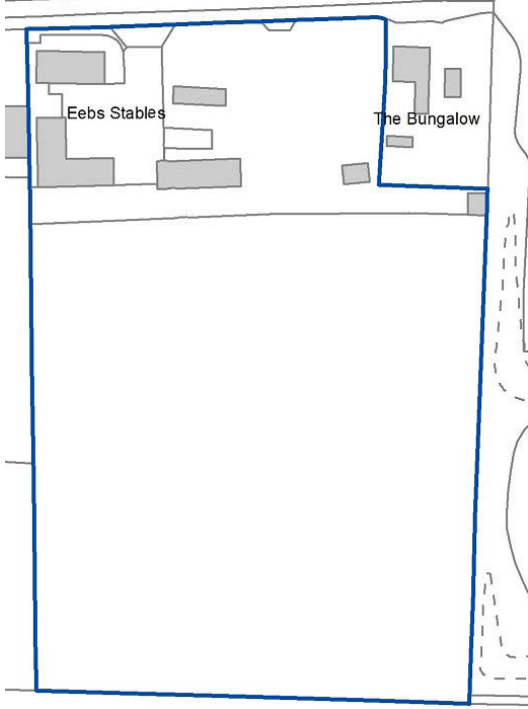
Claywood Lane

SITE BACKGROUND	
Site reference	DART002
Site name and address	Claywood Lane
Site plan	
Site planning status	Public Authorised
Planning history	64/00040/FULA13 - Use of Old Clay Pit for Camp for Gipsies & Other Travellers.
GTAA 2019 pitch number	11 (1 x double pitch 2 & 3)
GTAA 2019 planning definition status	
Meet definition	0
Do not meet definition	10
Undetermined	1
Current and future needs – position as at 2019 when the GTAA was published	
Current need	0
5-year need	4 – not meet definition
NHF year 6+	4 – not meet definition and 1 undetermined
Total pitch needs 2019-24	4
Total pitch needs 2024-35	5
Site area	0.8ha
Site ownership	Public
DEVELOPMENT CONSTRAINTS	
Within Settlement Boundary	No
Green Belt	Yes
SSSI	No
Local Wildlife Site	No
Ancient Woodland, other Priority Habitat or TPO	Yes, much of the site is within an area of ancient woodland or the consultation zone
Affecting the setting of Listed Building(s)	No
Scheduled Monuments	No
Potential Archaeological site	Not directly affecting site but in close proximity
Agricultural Land Grade	N/A – Existing gypsy and traveller site
Protected Local Green Space or Borough Open Space	Site is surrounding by Borough Open Space
Within or affecting the setting of a Conservation Area	No
Flood Zone – 1, 2 or 3	Flood Zone 1

Groundwater Source Protection Zone – 1, 2, 3, 3a, none	Groundwater Source Protection Zone 2 and aquifer
Potential Contaminated land (including within 250m of landfill site)	None
Gas pipelines, oil pipelines and/or overhead power lines	Overhead power line bisects the site.
Mains water and electricity available or accessible	Existing site – assumed to be available.
Provision for surface water and storm water drainage	Existing site – assumed to be available.
Sanitation available or capable of being provided	Existing site – assumed to be available.
Appropriate vehicular access	Existing site – assumed to be appropriate
Proximity to primary schools	1.1km to Bean Primary
Proximity to GP surgery	1.6km to Bean Village Surgery
Proximity to shops	4.4km to Longfield
Proximity to public transport	1.1km to School Lane, 475 or 474 Greenhithe Station to Longfield
Footway/Cycling Links	Located on a country lane with no public footways.
Minerals Safeguarding Area and/or within 250m of a safeguarded Minerals/ Waste Site	No
FINAL APPRAISAL	
Impact of site on local character and landscape	Site is contained within the existing landscape.
Impact of site on amenity of existing residents close to the site	No adverse impacts as no other residents live close to the site.
Site can achieve acoustic privacy/ is not adversely affected by sources of noise	A2 is in close proximity and it a source of noise.
Site can achieve an adequate level of air quality	Yes
Site can achieve visual privacy	Yes
Constraints on design and layout of the site including topography and/or size	Presence of ancient woodland in close proximity.
Could the site meet current and future need in accordance with licensing requirements?	There is no current need arising from this site. It is unlikely that it can meet any future need as it would require the removal of ancient woodland in order to intensify or expand the site to facilitate the 4 new pitches needed within the next 5 years.
Could the site only meet current need in accordance with licensing requirements?	There is no current need arising from this site.
Can the configuration of the site be altered to meet future need in accordance with licensing requirements?	This is unlikely as it would require significant removal of ancient woodland to facilitate any intensification or expansion.

Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	The site is owned and run by Dartford Borough Council. There is no limit in planning terms on the number of caravans which could be located on this site.
CONCLUSION	This existing site is not suitable for further consideration for additional pitches due to the constraint on intensification or expansion for new pitches caused by the presence of ancient woodland.

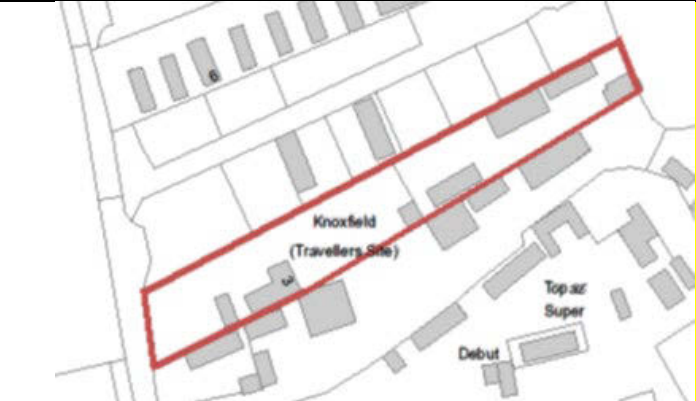
Eebs Stables

SITE BACKGROUND	
Site reference	DART003
Site name and address	Eebs Stables, Trollingdown Hill
Site plan	
Site planning status	Private authorised until 25/02/2025 (north western part of site only)
Planning history	<p>22/00619/CDNA – application for site layout details pursuant to permission 19/00102/FUL approved on 10/08/2022.</p> <p>21/00648/FUL - application for 3 mobile homes refused on 22/06/2021.</p> <p>19/00102/FUL - application for 3 mobile homes allowed on appeal on 25/02/2022 for a temporary period until 25/02/2025</p> <p>18/00982/FUL - application for 3 mobile homes refused on 16/10/2018.</p>
GTAA 2019 pitch number	3
GTAA 2019 planning definition status	
Meet definition	5
Do not meet definition	0
Undetermined	0
Current and future needs – position as at 2019 when the GTAA was published	
Current need	5 (including the 3 temporary pitches) – meet planning definition
5-year need	0
NHF year 6+	2 – meet definition
Total pitch needs 2019-24	5 (including the 3 temporary pitches)
Total pitch needs 2024-35	2
Site area	0.09ha
Site ownership	Private

DEVELOPMENT CONSTRAINTS	
Within Settlement Boundary	No, but adjacent to the existing urban area.
Green Belt	Yes
SSSI	No
Local Wildlife Site	No
Ancient Woodland, other Priority Habitat or TPO	No
Affecting the setting of Listed Building(s)	No
Scheduled Monuments	No
Potential Archaeological site	No
Agricultural Land Grade	Possibly grade 3 but unknown
Protected Local Green Space or Borough Open Space	No
Within or affecting the setting of a Conservation Area	No
Flood Zone – 1, 2 or 3	Flood Zone 1
Groundwater Source Protection Zone – 1, 2, 3, 3a, none	Groundwater Source Protection Zone 2 and aquifer
Potential Contaminated land (including within 250m of landfill site)	Within 250m of a former landfill site
Gas pipelines, oil pipelines and/or overhead power lines	None
Mains water and electricity available or accessible	Existing site – assumed to be available.
Provision for surface water and storm water drainage	Existing site – assumed to be available.
Sanitation available or capable of being provided	Existing site – assumed to be available.
Appropriate vehicular access	Existing site – assumed to be available.
Proximity to primary schools	1.8km York Road
Proximity to GP surgery	1.5km to Dartford East Health Centre
Proximity to shops	1.7km to Dartford East District Centre and 2km to Fleetdale Parade Neighbourhood Centre
Proximity to public transport	1km Leigh Academy, 423 and 433 Bluewater/ Dartford to New Ash Green
Footway/Cycling Links	Footways along Green Street Green Road/Trollingdown Hill into Dartford but there is a long private driveway shared by a number of properties to access it.
Minerals Safeguarding Area and/or within 250m of a safeguarded Minerals/ Waste Site	No
FINAL APPRAISAL	
Impact of site on local character and landscape	The site is in a visually prominent position and any development would need to be to the north of the hedge line which bisects the site in order to minimise any impact on landscape character.
Impact of site on amenity of existing residents close to the site	Site is in proximity to existing residential properties and there would be a need for a buffer to be retained between the site and The Bungalow to the east.

Site can achieve acoustic privacy/ is not adversely affected by sources of noise	Yes
Site can achieve an adequate level of air quality	Yes
Site can achieve visual privacy	Yes
Constraints on design and layout of the site including topography and/or size	Large site with potentially wide-reaching landscape impacts. Any development should be restricted to the part of the site to the north of the hedge line.
Could the site meet current and future need in accordance with licensing requirements?	The existing accommodation units could meet the current needs arising from the 3 temporary pitches if they are allowed to remain there permanently. The current need for an additional 2 pitches could be met in the north-eastern part of the site adjacent to the existing pitches. There would be no need to encroach onto the paddock/field to the south of the hedge line.
Could the site only meet current need in accordance with licensing requirements?	See above.
Can the configuration of the site be altered to meet future need in accordance with licensing requirements?	There are no future needs within the next 5 years.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	The site is owned by gypsies/travellers. The site has 3 temporary pitches with permission until 2025. The owners of the site are in a position to take forward an application to meet current need and to deliver the accommodation on site.
CONCLUSION	The existing accommodation units could meet the current needs arising from the 3 temporary pitches if they are allowed to remain there permanently. The current need for an additional 2 pitches could be met in the north-eastern part of the site adjacent to the existing pitches. The owners are in a position to deliver this accommodation on site. There would be no need to encroach onto the paddock/field to the south of the hedge line. There would be a need to ensure that a buffer is retained between the site and The Bungalow to the east. There are no future needs within the next 5 years.


Knoxfield Plot 3

SITE BACKGROUND	
Site reference	DART004
Site name and address	Knoxfield Plot 3, Darenth Wood Road, Dartford
Site plan	
Site planning status	Private Authorised
Planning history	No recent planning history
GTAA 2019 pitch number	3
GTAA 2019 planning definition status	
Meet definition	4
Do not meet definition	0
Undetermined	0
Current and future needs – position as at 2019 when the GTAA was published	
Current need	0
5-year need	1 – meet definition
NHF year 6+	1 – meet definition
Total pitch needs 2019-24	1
Total pitch needs 2024-35	1
Site area	0.17ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Within Settlement Boundary	No
Green Belt	Yes
SSSI	No
Local Wildlife Site	No
Ancient Woodland, other Priority Habitat or TPO	Within ancient woodland consultation zone
Affecting the setting of Listed Building(s)	No
Scheduled Monuments	No
Potential Archaeological site	No
Agricultural Land Grade	N/A – Existing gypsy and traveller site
Protected Local Green Space or Borough Open Space	No
Within or affecting the setting of a Conservation Area	No
Flood Zone – 1, 2 or 3	Flood Zone 1
Groundwater Source Protection Zone – 1, 2, 3, 3a, none	Groundwater Source Protection Zone 3 and aquifer

Potential Contaminated land (including within 250m of landfill site)	Within 250m/50m of a former landfill site
Gas pipelines, oil pipelines and/or overhead power lines	None
Mains water and electricity available or accessible	Existing site – assumed to be available.
Provision for surface water and storm water drainage	Existing site – assumed to be available.
Sanitation available or capable of being provided	Existing site – assumed to be available.
Appropriate vehicular access	Existing site – assumed to be appropriate
Proximity to primary schools	1.98km Fleetdown Primary
Proximity to GP surgery	1.13km Bennett Way Surgery
Proximity to shops	1.98km Fleetdale Parade neighbourhood centre
Proximity to public transport	0.97km to Darent Valley Hospital. Various services including Fastrack
Footway/Cycling Links	No footway on this part of Darenth Wood Road
Minerals Safeguarding Area and/or within 250m of a safeguarded Minerals/ Waste Site	Within a Minerals Safeguarding Area
FINAL APPRAISAL	
Impact of site on local character and landscape	It is not considered that additional caravans would have a materially adverse impact.
Impact of site on amenity of existing residents close to the site	The site is bounded by other plots occupied by caravans. There are no other residential properties in close proximity.
Site can achieve acoustic privacy/ is not adversely affected by sources of noise	Yes
Site can achieve an adequate level of air quality	Yes
Site can achieve visual privacy	Yes
Constraints on design and layout of the site including topography and/or size	Potential constraints relate to the existing numbers/ layout of the site and its ability to accommodate additional caravans whilst meeting licensing requirements.
Could the site meet current and future need in accordance with licensing requirements?	There are no current needs and there is no need for further accommodation to meet future needs as the occupant intends to move away from the site to a piece of land in West Kingsdown (outside Dartford Borough). The site is jointly owned by 11 people so getting consensus for intensification is difficult. The site is very tight for space and any intensification would necessitate the removal of dayroom/stables.
Could the site only meet current need in accordance with licensing requirements?	There are no current needs.
Can the configuration of the site be altered to meet future need in accordance with licensing requirements?	See above.

Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	No, as the site is jointly owned by 11 people, getting consensus for expansion is difficult.
CONCLUSION	There are no current needs arising from the site and there is no need to consider further accommodation to meet future needs. This is because the occupant will soon vacate the site to move to a site outside Dartford Borough.


Salinas

SITE BACKGROUND	
Site reference	DART005/DART006
Site name and address	Salinas, Darenth Wood Road, Dartford
Site plan	
Site planning status	Tolerated/Lawful (4 pitches) – Unauthorised (1 pitch)
Planning history	No restrictions on numbers as lawful use with no LDC
GTAA 2019 pitch number	4 tolerated and 1 unauthorised
GTAA 2019 planning definition status	
Meet definition	2 (1 tolerated and 1 unauthorised)
Do not meet definition	3
Undetermined	0
Current and future needs – position as at 2019 when the GTAA was published	
Current need	2 meet definition
5-year need	1 meet definition 1 do not meet definition
NHF year 6+	4 meet definition 1 do not meet definition
Total pitch needs 2019-24	3
Total pitch needs 2024-35	5
Site area	0.26ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Within Settlement Boundary	No
Green Belt	Yes
SSSI	No
Local Wildlife Site	No
Ancient Woodland, other Priority Habitat or TPO	Within ancient woodland consultation zone
Affecting the setting of Listed Building(s)	No
Scheduled Monuments	No
Potential Archaeological site	No, though there is an area of archaeological potential to the east
Agricultural Land Grade	N/A – Existing gypsy and traveller site
Protected Local Green Space or Borough Open Space	No
Within or affecting the setting of a Conservation Area	No
Flood Zone – 1, 2 or 3	Flood Zone 1

Groundwater Source Protection Zone – 1, 2, 3, 3a, none	Groundwater Source Protection Zone 3 and aquifer
Potential Contaminated land (including within 250m of landfill site)	Within 50m/250m of a former landfill site but there is also evidence that large amounts of materials were brought onto the site in 2019, the exact composition of which is not known.
Gas pipelines, oil pipelines and/or overhead power lines	None
Mains water and electricity available or accessible	Existing site (partly unauthorised) – assumed to be available.
Provision for surface water and storm water drainage	Existing site (partly unauthorised) – assumed to be available.
Sanitation available or capable of being provided	Existing site (partly unauthorised) – assumed to be available.
Appropriate vehicular access	Existing site (partly unauthorised) – assumed to be appropriate
Proximity to primary schools	1.98km Fleetdown Primary
Proximity to GP surgery	1.13km Bennett Way Surgery
Proximity to shops	1.98km Fleetdale Road neighbourhood centre
Proximity to public transport	0.97km to Darent Valley Hospital. Various services including Fastrack
Footway/Cycling Links	There is a footway along Darenth Wood Road which ends just north of this site.
Minerals Safeguarding Area and/or within 250m of a safeguarded Minerals/ Waste Site	Shown as a Minerals Safeguarding Area but within the urban boundary
FINAL APPRAISAL	
Impact of site on local character and landscape	Minimal impact on local character and landscape if the land take is kept to a minimum.
Impact of site on amenity of existing residents close to the site	Site is in close proximity to existing residential properties.
Site can achieve acoustic privacy/ is not adversely affected by sources of noise	Yes
Site can achieve an adequate level of air quality	Yes
Site can achieve visual privacy	Yes
Constraints on design and layout of the site including topography and/or size	The authorised part of the site is not able to meet future need. It is understood that parts of blue line area may be contaminated (depending on the composition of materials which were previously brought onto the site) but this would be subject to a land contamination assessment.
Could the site meet current and future need in accordance with licensing requirements?	The red line site could meet the current need for the existing unauthorised pitch if this is allowed to remain. It could not meet any other current or future needs as the owner does not wish to position any units or demolish any buildings in that area. The remaining current and 5 year needs for 2 pitches could be met in part of the blue line area to the south-east. However, it is understood

	that this land may be contaminated so there would be a need for a land contamination assessment and the potential need to cap the site before development could take place which would add significantly to the cost of development.
Could the site only meet current need in accordance with licensing requirements?	See above.
Can the configuration of the site be altered to meet future need in accordance with licensing requirements?	See above.
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes. The site is owned by gypsies/travellers who wish to develop and deliver accommodation in the blue line area.
CONCLUSION	The red line site could meet the current need for the existing unauthorised pitch if this is allowed to remain. It could not meet any other current or future needs as the owner does not wish to position any units or demolish any buildings in that area. The remaining current and 5 year needs for 2 pitches could be met in part of the blue line area to the south-east. However, it is understood that this land may be contaminated so there would be a need for a land contamination assessment and the potential need to cap the site before development could take place which would add significantly to the cost of development. The site is owned by gypsies/travellers who wish to develop and deliver accommodation in the blue line area.


Tennis Courts

SITE BACKGROUND	
Site reference	DART007
Site name and address	Tennis Courts, Main Road, Sutton at Hone, DA4 9HQ
Site plan	
Site planning status	Private Authorised
Planning history	10/00701/VCON (A) - Standing of caravans for residential purposes. Conditions: Restrict to Gypsies; No more than 5 caravans.
GTAA 2019 pitch number	1
GTAA 2019 planning definition status	
Meet definition	3
Do not meet definition	0
Undetermined	0
Current and future needs – position as at 2019 when the GTAA was published	
Current need	0
5-year need	2 – meet definition
NHF year 6+	2
Total pitch needs 2019-24	2
Total pitch needs 2024-35	2
Site area	0.17ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Within Settlement Boundary	No but adjacent to it
Green Belt	Yes
SSSI	No
Local Wildlife Site	No but it is within a Biodiversity Opportunity Area
Ancient Woodland, other Priority Habitat or TPO	The trees are protected by a group Tree Preservation Order and would need to be retained
Affecting the setting of Listed Building(s)	No
Scheduled Monuments	No
Potential Archaeological site	No, though there is an area of archaeological potential to the east and south
Agricultural Land Grade	N/A – Existing gypsy and traveller site
Protected Local Green Space or Borough Open Space	No
Within or affecting the setting of a Conservation Area	No
Flood Zone – 1, 2 or 3	Flood Zone 1
Groundwater Source Protection Zone – 1, 2, 3, 3a, none	Groundwater Source Protection Zone 1 and aquifer

Potential Contaminated land (including within 250m of landfill site)	None
Gas pipelines, oil pipelines and/or overhead power lines	None
Mains water and electricity available or accessible	Existing site – assumed to be available.
Provision for surface water and storm water drainage	Existing site – assumed to be available.
Sanitation available or capable of being provided	Existing site – assumed to be available.
Appropriate vehicular access	Existing site – assumed to be appropriate
Proximity to primary schools	0.34km Sutton at Hone Primary
Proximity to GP surgery	0.64km Devon Road Surgery
Proximity to shops	0.16km Main Road Sutton at Hone
Proximity to public transport	0.02km Balmoral Road, 414 South Darenth to Dartford
Footway/Cycling Links	Footways along Main Road to access local facilities
Minerals Safeguarding Area and/or within 250m of a safeguarded Minerals/ Waste Site	Within a Minerals Safeguarding Area
FINAL APPRAISAL	
Impact of site on local character and landscape	Intensification of caravans will not have an adverse impact on local character and landscape if the existing trees and vegetated boundaries are retained.
Impact of site on amenity of existing residents close to the site	Existing site is in close proximity to existing residential properties.
Site can achieve acoustic privacy/ is not adversely affected by sources of noise	Yes
Site can achieve an adequate level of air quality	Yes
Site can achieve visual privacy	Yes
Constraints on design and layout of the site including topography and/or size	The trees are protected by a group Tree Preservation Order and would need to be retained.
Could the site meet current and future need in accordance with licensing requirements?	The current configuration does not 6 metre fire safety distances. It is unlikely that the site could be reconfigured to meet any current and future pitch need whilst meeting licensing requirements.
Could the site only meet current need in accordance with licensing requirements?	No, as it would not meet 6 metre fire safety distances (see above).
Can the configuration of the site be altered to meet future need in accordance with licensing requirements?	No, as it would not meet 6 metre fire safety distances (see above).
Are the residents in a position to take forward the planning application/deliver the site and intensification to meet planning conditions?	Yes, it is an authorised site which is owned by gypsies/travellers. Planning permission would be needed for additional caravans on the site.

CONCLUSION	This existing authorised site is not suitable for further consideration for additional pitches as its current configuration does not meet licensing requirements in respect of 6 metre fire safety distances and it cannot be reconfigured to meet current and future pitch need whilst meeting licensing requirements. The Tree Preservation Order also restricts the extent to which the site could be intensified.
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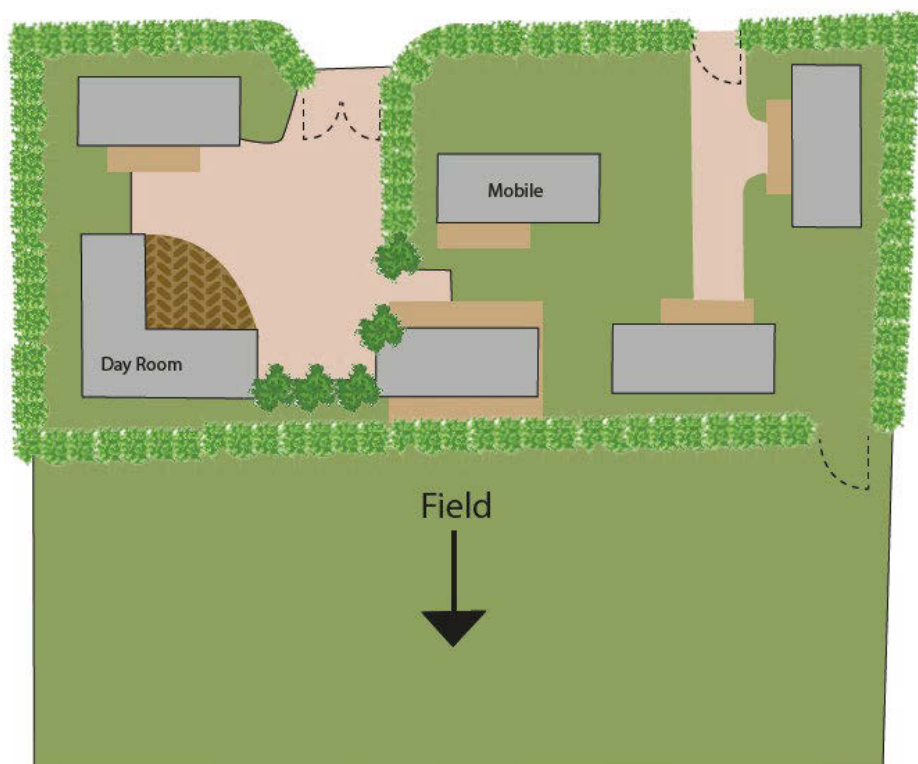
Forest Amusements

SITE BACKGROUND	
Site reference	DART008
Site name and address	Forest Amusements, Darenth Wood Road, DA2 8AA
Site plan	
Site planning status	Private Lawful (Travelling Showpeople)
Planning history	Does not need planning permission for further caravans within the site
GTAA 2019 plot number	7
GTAA 2019 planning definition status	
Meet definition	5
Do not meet definition	2
Undetermined	0
Current and future needs – position as at 2019 when the GTAA was published	
Current need	0
5-year need	1 – meet definition
NHF year 6+	0
Total plot needs 2019-24	1
Total plot needs 2024-35	0
Site area	2ha
Site ownership	Private
DEVELOPMENT CONSTRAINTS	
Within Settlement Boundary	No
Green Belt	Yes
SSSI	Very close to Darenth Woods SSSI
Local Wildlife Site	No
Ancient Woodland, other Priority Habitat or TPO	Within ancient woodland consultation zone and adjoins ancient woodland
Affecting the setting of Listed Building(s)	No
Scheduled Monuments	No
Potential Archaeological site	No, though there is an area of archaeological potential to the east
Agricultural Land Grade	N/A – Existing Travelling Showpeople site
Protected Local Green Space or Borough Open Space	No
Within or affecting the setting of a Conservation Area	No
Flood Zone – 1, 2 or 3	Flood Zone 1

Groundwater Source Protection Zone – 1, 2, 3, 3a, none	Groundwater Source Protection Zone 3 and aquifer
Potential Contaminated land (including within 250m of landfill site)	Located on a former landfill site
Gas pipelines, oil pipelines and/or overhead power lines	None
Mains water and electricity available or accessible	Existing site – assumed to be available.
Provision for surface water and storm water drainage	Existing site – assumed to be available.
Sanitation available or capable of being provided	Existing site – assumed to be available.
Appropriate vehicular access	Existing site – assumed to be appropriate
Proximity to primary schools	1.98km Fleetdown Primary
Proximity to GP surgery	1.13km Bennett Way Surgery
Proximity to shops	1.98km Fleetdale Road neighbourhood centre
Proximity to public transport	0.97km to Darent Valley Hospital. Various services including Fastrack
Footway/Cycling Links	No footway on this part of Darenth Wood Road
Minerals Safeguarding Area and/or within 250m of a safeguarded Minerals/ Waste Site	No
FINAL APPRAISAL	
Impact of site on local character and landscape	It is not considered that additional caravans would have a materially adverse impact.
Impact of site on amenity of existing residents close to the site	This is an existing large, authorised site and it is considered that it could accommodate additional caravans without an adverse impact on residential amenity.
Site can achieve acoustic privacy/ is not adversely affected by sources of noise	Yes
Site can achieve an adequate level of air quality	Yes
Site can achieve visual privacy	Yes
Constraints on design and layout of the site including topography and/or size	None
Could the site meet current and future need in accordance with licensing requirements?	There is no current need arising from this site but there is plenty of room on the site to meet the future need for an additional plot within the next 5 years.
Could the site only meet current need in accordance with licensing requirements?	There is no current need arising from this site.
Can the configuration of the site be altered to meet future need in accordance with licensing requirements?	Yes, the family are currently in the process of re-organising the layout of the accommodation to provide for the future need for an additional plot within the next 5 years.
Are the residents in a position to take forward the planning application/deliver the site and	Yes. The site is owned by travelling showpeople. There is no limit in planning terms on the number of caravans which could be located on this site.

intensification to meet planning conditions?	
CONCLUSION	This existing authorised site is suitable for further consideration for an additional plot and the family are currently in the process of re-organising the layout of the accommodation to provide for the future need for an additional plot within the next 5 years.

Appendix 3 – Eebs Stables Plan



Appendix 4 – Salinas Plan



Appendix 5 – Dartford 5-Year Supply Position – September 2022

A new GTAA was completed for Dartford that was published in October 2019. This covered the period 2019-35 and is included in the Submission Plan evidence base as document [GAT-1](#).

The current period to be assessed in terms of 5-year supply is between 2022-23 and 2026-27. This is illustrated below (highlighted in green). The requirement in the Planning Policy for Traveller Sites (PPTS) 2015 is for the Council to be able to demonstrate a deliverable 5-year supply of pitches against locally assessed need from the GTAA or other robust local evidence. This should be based on need identified from households that met the PPTS planning definition of a Traveller. There is also a requirement for the Council to consider a proportion of need identified from undetermined households but this should be addressed through Criteria-Based Local Plan Policies and not through specific allocations. This approach was set out by the Inspector for the Maldon Local Plan in his Examination Report that was issued in June 2017.

Figure 2 of the 2019 Dartford GTAA identified the following levels of need from households that met the PPTS planning definition of a Traveller over the period 2019-35 (see page 8 of [GAT-1](#)). This is made up from a combination of unauthorised pitches; concealed or doubled-up households and single adults; teenagers who will be in need of a pitch of their own in the next 5-years; temporary pitches; and new household formation:

G&T	2019-24	2024-29	2029-34	2035	Total
Meet Planning Definition	48	9	11	2	70

Since the baseline date of the GTAA in June 2019 planning permission has been granted for a total of 21 pitches across 5 Traveller sites⁶. However, 3 of these pitches have only been granted temporary permission for 3-years at appeal and therefore cannot be considered as contributing towards 5-year supply. It is understood that all of the remaining 18 pitches have either been implemented and occupied or are in the process of being implemented and developed. Therefore it can be assumed that they will all be deliverable within 5-years as required by the PPTS.

A total of 8 new pitches have also been developed at Castle Farm to meet all current and future need, including 7 pitches required for those who meet the planning definition. These additional accommodation units did not require planning permission.

In addition, it is understood that there are no longer any needs arising from the site at Plot 3 Knoxfield as the occupant will soon vacate the site to move to a site outside Dartford Borough. Therefore, the need for 1 pitch has been taken off the overall need figure, reducing it from 48 to 47.

⁶ See the table in paragraph 3.7 of the Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report (page 8 of [GAT-2](#)) and paragraph 3.2 in response to the Inspector's Initial Question 21 (page 5 of [EXAM-6](#)).

By taking into consideration new permissions that have been granted since June 2019 and the dates that these permissions were granted, this shows that there is a **5-year need for 27 pitches** for the current period from 2022-2027. This is made up of the residual current need that was identified for the period 2019-24 and a proportion of need from new household formation that was identified for the period 2024-29. There remains a further need for 17 pitches for the remainder of the GTAA period to 2035.

	2019-22			2022-27					2027-32					2032-35		
Year	19-20	20-21	21-22	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	30-31	31-32	32-33	33-34	34-35
GTAA Requirement	25			22 ⁷		5 ⁸			4		11				2	
Supply	11 ⁹	7 ¹⁰	7 ¹¹	8 ¹²												

Potential Additional Supply for 2022-27

Following the completion of the GTAA the Council worked with ORS to complete a Site Deliverability Assessment (SDA). This looked at the potential for a selected number of sites to meet need that was identified in the GTAA that has not subsequently been granted planning permission or lawfully accommodated additional pitches (see footnotes below).

The SDA considered a total of 7 Gypsy and Traveller sites and 1 Travelling Showpeople yard. The SDA concluded that these sites can accommodate a total of 8 additional pitches for households that met the PPTS planning definition of a Traveller for the period 2022-27.

Current 5-Year Supply

Following the granting of planning permissions, provision of additional lawful pitches without the need for planning permission, and the completion of the SDA, there is an outstanding 5-year need in Dartford Borough for 19 pitches for the period 2022-27.

⁷ Residual need from 2019-24 taking into account the reduction of 1 pitch from Plot 3 Knoxfield.

⁸ Proportion of need from new household formation 2024-27.

⁹ Hillside Farm, Darenth Hill – 18/01652/FUL – 5 pitches – 08/08/2019. Cob Tree Farm, Darenth Hill – 18/01658/COU – 3 pitches – 07/11/19. 48 Brakefield Road, Southfleet – 19/00605/COU – 3 pitches – 13/02/20.

¹⁰ 8 additional pitches have been provided at Castle Farm, 7 of which meet the needs of those who meet the planning definition. This is in line with the authorised use of the site.

¹¹ Hillside Farm, Darenth Hill – 20/01290/COU – 6 pitches – 16/04/2021. The Stables, Sutton at Hone – 20/00768/RCON – 1 pitch – 12/05/2021.

¹² Eebs Stables – 5 pitches. Salinas – 3 pitches.