

Inspector's Matters, Issues and Questions

Matter 9: The Supply and Delivery of Housing Land

Response by Dartford Borough Council

14 October 2022

Contents

Question 136 – Housing Completions Update	3
Question 137 – Estimated Total Supply of New Housing	4
Question 138 – Estimated Supply from Allocations, Permissions and Windfalls	4
Question 139 – Requirement for First Five Years and Buffer	5
Question 140 – Estimated Total Supply of Deliverable Sites	5
Question 141 – Estimated Supply from Each Source	5
Question 142 – Evidence to Support Estimates	7
Question 143 – Estimated Total Supply of Developable Sites	8
Question 144 – Estimated Supply from Each Source	9
Question 145 – Evidence to Support Estimates	12
Question 146 – Windfall Allowance	12
Question 147 – Flexibility	12
Question 148 – Small Sites Provision	13
Question 149 – Trigger for Review	13

Issue

Whether the approach towards the supply and delivery of housing land is positively prepared, justified, effective and consistent with national policy.

Overall Supply

Question 136 – Housing Completions Update

Has there been an update on housing completions from the most recent monitoring year and if so what is it?

1. The completions figure for the 2021/22 financial year was a net gain of 540 new homes. Relevant completions have been updated (removed) from the housing trajectory via a focussed SHLAA 2022 Update, provided here as Appendix 1. The list of SHLAA Sites that were completed in 2021/22, and thereby removed from the housing land supply were:
 - a. Site 30: Vineyard Church Centre, 14-18 Lowfield St & 24 Market St, Dartford
 - b. Site 42: R/o 150-160 Milton Rd, Swanscombe
 - c. Site 99: R/o 37-41 Brentfield Rd, Dartford
 - d. Site 106: R/o 71-81 Keary Rd, Swanscombe
 - e. Site 129: London Rd & Craylands Ln, Swanscombe
 - f. Site 130a: Castle Hill Neighbourhood Area
 - g. Site 144: Ebbsfleet Green Phase 2
 - h. Site 148: Adjacent the Lodges, Cotton Ln, Stone
 - i. Site 249: The Foresters, 235 High Rd, Wilmington
2. Additionally, partial completions on some housing land supply sites were recorded in 2021/22 monitoring year. These were:
 - a. Site 14: Lowfield St redevelopment, Dartford (2021/22 completions = 152 units, total complete prior to 1/4/2022 = 152 units)
 - b. Site 130a: Castle Hill B & C (2021/22 completions = 42 units, total complete prior to 1/4/2022 = 42 units)
 - c. Site 130a: Castle Hill GHJK (2021/22 completions = 38 units, total complete prior to 1/4/2022 = 38 units)
 - d. Site 130c: Ashmere Phase 1 (2021/22 completions = 19 units, total completions = 19 units)
 - e. Site 144: Ebbsfleet Green Phase 3 (2021/22 completions = 47 units, total complete prior to 1/4/2022 = 172 units)
 - f. Site 144: Ebbsfleet Green Phase 4 (2021/22 completions = 24 units, total complete prior to 1/4/2022 = 24 units)
3. Sites which have been granted planning consent in the 2021/22 monitoring year have been updated in regards to extant land supply, and windfall modelling, as set out in the 2022 SHLAA Update (included as Appendix 1). Additionally, 100% of the sites of 5+ units that delivered completions, or were granted planning permission in this monitoring year, were SHLAA sites. This demonstrates a successful approach to managing the local housing land supply.

4. No new sites have been identified in the 2022 SHLAA update. Changes are limited to updates to their delivery timeframes and planning status. This includes changes to capacities and timeframes where new planning permissions have been granted.

Question 137 – Estimated Total Supply of New Housing

What is the estimated total supply of new housing over the period 2017/18-2036/37? How has this been determined? Is the housing trajectory justified?

5. Appendix 1, the 2022 SHLAA Update, contains developable sites establishing a land supply for some 11,896 units between 2022/23-2036/37. This is expressed in Figure 1: Housing Trajectory graph below (a modification that would replace Appendix C of the Submitted Local Plan). Expected annual completions are justified and broken down by type of site and delivery timeframe in response to subsequent questions.

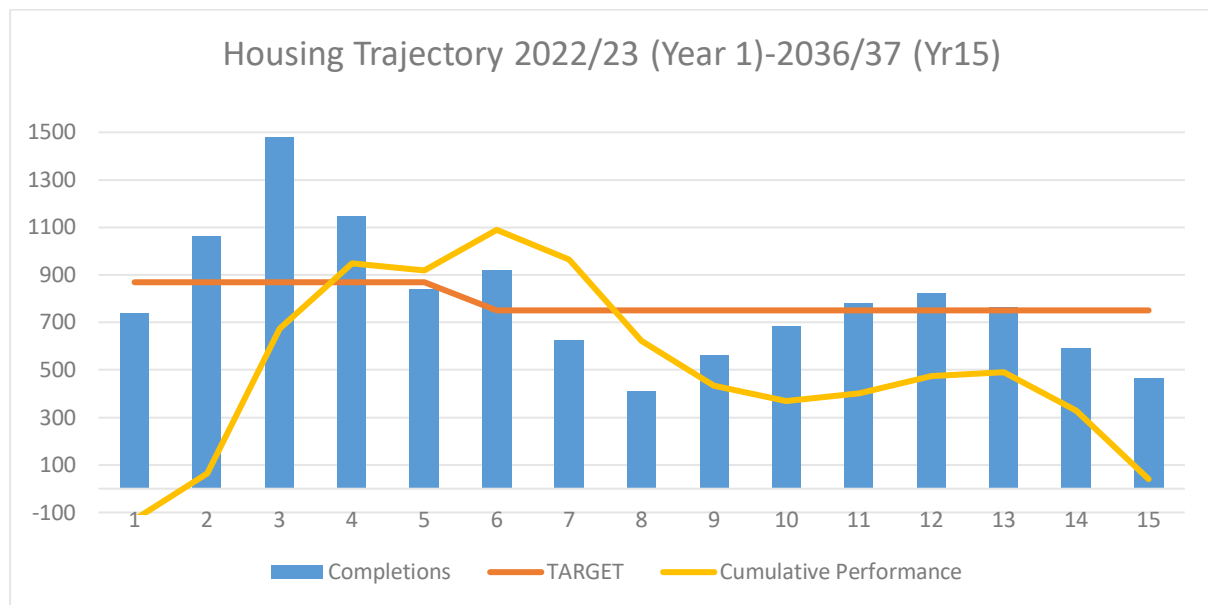


Figure 1: Housing Trajectory Graph

6. Between 2017/18-2021/22, 3,730 units were completed, as set out in Table 1 below. Adding the 2017/18-2021/22 (5 year historical) and 2022/23-2036/37 (15 year forward-looking) periods together arrives at 15,626 new homes.

Table 1: Completions 2017/18-2021/22

Period	2017/18	2018/19	2019/20	2020/21	2021/22
Net Completions	1,031	1,013	540	606	540

Question 138 – Estimated Supply from Allocations, Permissions and Windfalls

What is the estimated supply from site allocations, planning permissions, windfalls for the plan period? What is the evidence to support their delivery and are the estimates justified?

7. The Source of sites with regard to their planning status (permitted, allocated) is set out in Table 2 below.

Table 2: Sources of Housing Supply by planning status

Source of Local Plan Land Supply 2022-37	Units
Allocations (including permitted sites within Allocations)	7,554
Permissions (Detailed)	1,652
Permissions (Outline only)	918
Sites without Permission or Allocation	1,361
Windfalls (Extant + Modelled: sites of 1 to 4 dwellings)	405
Total	11,890

8. Delivery and justification of the above figures can be found in the responses to questions 47 and 48, as well as in response to the allocations covering the Plan's key growth areas in response to Matters 5 & 6. Further detail in relation to the housing land supply is included below.

5 year housing supply

Question 139 – Requirement for First Five Years and Buffer

What is the requirement for the first five years following the anticipated adoption of the plan and what buffer should be applied?

9. The annual requirement for the first five years of the Plan period is 790 units p.a, equating to 3,950 units in total. The first five year period is proposed to be for 2022/23-2026/27 (see Q6).
10. The Council is required in NPPF Para 74 to move 5% of housing land supply into the first 5 years of the Plan, but has chosen to increase this to 10% so that the Plan can be used as an effective demonstration of a deliverable 5 year land supply following adoption. The 10% buffer amount is 395 units, bringing the total requirement for the first 5 years of the Plan to 4,345 new homes. In the Housing Trajectory graph (Figure 1), this is shown by the downwards kink in the orange "Target" line.

Question 140 – Estimated Total Supply of Deliverable Sites

What is the estimated total supply of specific deliverable sites for this period?

11. The Council has identified specific deliverable sites totalling 5,211 units over the period 2022/23- 2026/27. It is also forecasted that 52 units of small site windfall supply will come forward in years 4 & 5 (see Q 146, 2022 SHLAA Update (Appendix 1)), bringing the total anticipated land supply over the 5-year period to 5,269.

Question 141 – Estimated Supply from Each Source

What is the estimated supply from each source for this?

12. Table 3 below sets out the Deliverable sites contributing to the 5 year land supply 2022/23-2036/37.

Table 3: Deliverable Housing Sites with capacities 2022/23-2036/37

Inspector's Matters, Issues and Questions: Matter 9 – Dartford Borough Council Response
October 2022

SHLA A Ref	Site	Total Site Capac ity	Compl eted Before 1/4/22	202 2/2 3 Yr1	2023/2 4 Yr 2	2024/ 25 Yr 3	2025/2 6 Yr 4	2026 /27 Yr 5	5 Yr Total
2	Greenwood	5		5					5
4	Two Brewers Public House	11			11				11
6	St Marys Church Hall, Church Hill	6		6					6
12	St James Lane Pit (Stone Pit 2)	764				150	150	150	450
14	Lowfield Street re-development site	556	152	124	60	143	77		404
15	Croxton Garry Site (E of Ingress Park)	232		60	75	60	37		232
16	Land At Highfield House 2 - 4 West Hill And 74-76	23					23		23
21	Stone Lodge	140			20	50	50	20	140
22	Vauxhall Farm, Land East of 110-114 Lowfield St	84			42	42			84
25	Car park west of Two Brewers Public House	14						14	14
32	52 Spital Street	14					14		14
35	SWCS Car Sales Craylands Lane Swanscombe Kent	5				5			5
44	Land South Of St Marys Road	76		30	40	6			76
53	Chastilian Road Workshop	9			9				9
56	Powdermill Lane	36					14	22	36
84	Former DA1 Club, 46-58 Lowfield St	71				71			71
114	Land West of Darenth Rd (Clubbs Pit) Phase 2	45			20	15	10		45
118	53 Watling Street	8		8					8
130a	Castle Hill B&C/ 2A PAP2	336	42	80	100	104	10		294
130a	Castle Hill GHJK	163	38	100	25				125
130b	Alkerden 5	182		10	87	85			182
130b	Alkerden 5b	160				80	80		160
130b	Alkerden 3	138		0	96	42			138
130b	Alkerden Market Centre	550				160	166	166	492
130b	Alkerden South Phase 1	227			65	90	72		227
130b	Alkerden South	347				50	100	100	250
130b	Alkerden Gateway Parcel 7	67		40	27				67
130c	Ashmere Phase 1	281	19	90	100	72			262
130c	Ashmere Phase 2	235			55	90	90		235
130c	Ashmere Phase 3	244						40	40
130c	Ashmere (Phase 4) Local Centre	118						59	59
130c	Ashmere Phase 9	271					90	90	180

SHLA A Ref	Site	Total Site Capacity	Completed Before 1/4/22	2022/23 Yr1	2023/24 Yr 2	2024/25 Yr 3	2025/26 Yr 4	2026/27 Yr 5	5 Yr Total
130c	Ashmere Phase 10	139					46	46	92
132	16A The Bridge (Care Home)	39			39				39
137	104 Lower Hythe Street Dartford, Reeves Garage	11		11					11
144	Ebbsfleet Green Phase 3	207	172	35					35
144	Ebbsfleet Green Phase 2C	126			42	41	43		126
144	Ebbsfleet Green Phase 4	133	24	80	29				109
170	Land north of St Mary's Road Stone	258			40	86	46	86	258
209	26 - 28 Westgate Rd	8			8				8
216	35 Myrtle Road Oakfield Lane	9			9				9
220	Block Of Lock-Up Garages And Land At Gilbert Close Swanscombe	16			16				16
236	Land Adjacent 33 St Marys Road Stone	12			12				12
248	1-6 Market Place, 1 Market St And 37 High St	14						14	14
254	Twistleton Court	6				6			6
269	Northern Gateway Block E Oldfield Mill Pond	14		14					14
272	72-80 East Hill	5			5				5
274	First, Second And Third Floors 28 Lowfield Street	5						5	5
252	North End Farm	6		6					6
278	Waterbridge Court, 50 Spital Street	9		9					9
Small Windfalls		93		31	31	31	26	26	145
Total		6,534		745	1,063	1,479	1,144	838	5,211

Question 142 – Evidence to Support Estimates

What is the evidence to support this and are the estimates justified?

13. All of the sites in the first 5 years (Table 3) have detailed planning permissions, with the exception of Sites 12 & 21, which are addressed below. Alignment with the NPPF definition of 'deliverable' and PPG 'housing supply and delivery Paragraph 007¹ is demonstrated through relevant clear evidence supporting completions on site beginning within five years.

¹ Reference ID: 68-007-20190722

Site 12 – St. James Lane Pit (Stone Pit 2)

14. This site holds an outline planning permission (05/00221/OUT) for up to 870 dwellings, alongside 1,200m² of business/ community/ supporting retail floorspace. The housebuilders have recently consulted the public as part of a revised scheme to be delivered under the outline permission, seeking planning permission for a total of 764 new homes, alongside a mix of other uses. A Planning Performance Agreement is in place.
15. As at 14 October 2022, all but one reserved matters have now been received and are being validated (the final submission is expected very shortly). Application 22/01151/REM was submitted for the spine road and the Watling Street access; determination is due in December. Determination for other reserved matters including for the housing is due in January 2023.
16. The applicant has submitted to the Council a phasing plan stating that development will commence following removal of the 132kva power line that crosses southern and western extent of the site, which is subject to UKPN's own programme. However, these works are underway, and it is anticipated that they will be completed by Q2/Q3 2023. Phasing has been stated by the applicant as: Phase 1: 300 dwellings, Phase 2: 301st to the 600th dwelling, Phase 3: 601st dwelling to the last dwelling.
17. The Council has taken a conservative view, capping the forecast delivery rate to 150dpa, starting in 2024/25. This is justified based on the design including flatted development, which generally aids build-out. Affordable housing and build to rent are also being considered for this scheme, either of which would expect to accelerate delivery relative to general purpose housing.

Site 21 – Stone Lodge

18. Stone Lodge currently carries an outline planning permission (DA/20/00746) for the erection of an 8 no. form entry secondary school, up to 140 residential dwellings in total across 2 sites and provision of 19 hectares of public open space. The Council is the landowner. The secondary school is complete and open.
19. A Planning Performance Agreement is in place. The Reserved Matters application 22/00605/REM is currently in the process of being determined, with permission expected in early 2023. Development towards the end of the first 5-year period is therefore considered likely.

6-10 and 11-15 year land supply

Question 143 – Estimated Total Supply of Developable Sites

What is the estimated total supply of specific developable sites or broad locations for growth for years 6-10 and 11-15?

20. After accounting for the reduced requirement, resulting from moving the buffer capacity forwards into the first 5-year period (Para 5), the total housing requirement per year for years 6-15 stands at 3,752.5 units per 5 year period, or 750.5 p.a. The total supply arising from specific, developable sites in years 6-10 is forecast to be 3,073 units, and in years 11-15 it is forecast to be 3,294 units.

21. Combining the three 5-year periods, the total supply on specific deliverable/developable sites is 11,485 new homes.

22. If small-site windfall is also included, then the total supply for the plan period can be expressed as:

- Years 1-5 (2022/23-2026/27) - 5,263 units
- Years 1-5 (2027/28-2031/32) – 3,203 units
- Years 1-5 (2032/33-2036/37) - 3,424 units
- Total Plan period (2022/23-2036/37) – 11,890 units

23. It should be noted that not all of policy D7's sites in Central Dartford are currently available. Where this is the case, the unavailable sites have not been included in the overall housing land supply. Similarly, no policy E6 land in Ebbsfleet Garden City is included.

Question 144 – Estimated Supply from Each Source

What is the estimated supply from each source for this?

24. Table 4 below sets out the sites which are expected to deliver in the 5 year period from 2027/28-2031/32.

Table 4: Developable sites in Years 6-10 (2027/28-2031/32)

SHL AA Ref	SITE	Total Site Capacity	2027/28 Yr 6	2028/29 Yr 7	2029/30 Yr 8	2030/31 Yr 9	2031/32 Yr 10	Total Yrs 6-10
1	Ebbsfleet Central B (EC2)	1,155	50	100	100	150	160	560
3	Knockhall Road	61	30	31				61
12	St James Lane Pit (Stone Pit 2)	764	150	150	14			314
20	Co-op Site	120	60	60				120
33	22 - 26 Spital St (Courts Furniture)	10	10					10
91	First & Second Floors, 8-10 High Street	8		8				8
102	Village Heights, Station Road, Greenhithe	47	47					47
117	Greenhithe Car Park, South of Steele Avenue	5	5					5
120	Upper Floors Iceland, 47-49 High Street	13	13					13
130	Alkerden Market Centre	550	58					58
130	Alkerden South	347	97					97
130	Ashmere Phase 3	244	84	80	40			204
130	Ashmere (Phase 4) Local Centre	118	59					59
130	Ashmere Phase 4	250	80	80	90			250
130	Ashmere Phase 5	250			40	40	90	170
130	Ashmere Phase 6	250				80	80	160

SHL AA Ref	SITE	Total Site Capacity	2027/28 Yr 6	2028/29 Yr 7	2029/30 Yr 8	2030/31 Yr 9	2031/32 Yr 10	Total Yrs 6-10
130	Ashmere Phase 7	222					74	74
130	Ashmere Phase 8	255				64	64	128
130	Ashmere Phase 9	271	91					91
130	Ashmere Phase 10	139	47					47
130	Ashmere Phase 11	364				91	91	182
212	The Priory Shopping Centre	390		90	100	100	100	390
268	36 - 40 Heath Street	6	6					6
277	43 High Street	5				5		5
288	24 Lowfield Street	5				5		5
291	Adams and Moore House	9	9					9
Small Sites Windfall Assumption		130	26	26	26	26	26	130
Total		5,988	922	625	410	561	685	3,203

25. Table 5 below sets out the sites which are expected to deliver in the 5 year period from 2032/33-2036/37.

Table 5: Years 11-15 (2027/28-2031/32)

SHL AA Ref	SITE	Total Site Capacity	2032 /33 Yr 11	2033 /34 Yr 12	2034 /35 Yr 13	2035 /36 Yr 14	2036 /37 Yr 15	5 Yr Capacity
1	Ebbfleet Central A (EC1)	418	80	100	140	98		418
1	Ebbfleet Central B (EC2)	1,155	200	220	175			595
1	Ebbfleet Central C (EC4)	638			50	100	150	300
10	Steam Crane Wharf	78		39	39			78
17	Station Approach, Home Gardens	253			53	100	100	253
19	Glentworth Club Site, 154 Lowfield Street	52		10	42			52
23	Builders Yard, 1 Spring Vale, Knockhall Road, Greenhithe	30					30	30
27	Questor Riverside	8				8		8
31	Land to the Rear of 67-97 Station Road, Longfield DA3 7QA	5			5			5
39	The Pits St Vincents Road	14				14		14
49	59-69 High Street	5		5				5
57	152-154 London Road, Stone	5			5			5
62	125 St Vincents Road	18				18		18
65	47-49 High Street, Swanscombe	5	5					5
77	British Gas Holder Site And Surrounding Land, Victoria Road	66		30	36			66
82	52 - 62 West Hill / C Pearson E Bates Storage Yard And Workshops, West Hill	34	34					34
85	127-129 Dartford Road,	14				14		14
89	Block of 35 Lock-Up Garages, Rear of 47-53 Farnol Road, Dartford	6					6	6

SHL AA Ref	SITE	Total Site Capa city	2032 /33 Yr 11	2033 /34 Yr 12	2034 /35 Yr 13	2035 /36 Yr 14	2036 /37 Yr 15	5 Yr Capa city
90	Block of 50 Lock-Up Garages, Rear of 36-46 Attlee Drive	13			13			13
97	Community Centre and 63-67 Alamein Gardens, Stone	6			6			6
108	West Hill House	33	15	18				33
111	Temple Hill Club, Temple Hill Square	14		14				14
119	Land to the rear of 62-66 Spital Street	28			28			28
124	Dartford Magistrates Court	25					25	25
130	Ashmere Phase 5	250	80					80
130	Ashmere Phase 6	250	90					90
130	Ashmere Phase 7	222	74	74				148
130	Ashmere Phase 8	255	64	63				127
130	Ashmere Phase 11	364	91	91				182
167	Orchards Shopping Centre	269		69	100	100		269
169	Northgate Van Hire, 301 Lowfield Street	6				6		6
177	Swanscombe Auto Centre, 38-48 Milton Road	6	6					6
190	J Clubb Ltd, Church Hill, Wilmington	30				10	20	30
197	Land at Lower Hythe Street, Dartford	86		22	37	27		86
214	County Estate Department Depot, Broad Lane, Wilmington	6		6				6
218	Block Of 29 Lock-Up Garages Rear Of 21 Albert Road	5				5		5
219	Block Of 23 Lock-Up Garages East Of Craylands Square	6			6			6
222	Block Of 26 Lock-Up Garages Rear Of 44 Keary Road	5					5	5
224	Angels Garage, 149 Church Road, Swanscombe	9				9		9
225	Land At Birch Place, Horns Cross	5		5				5
226	6-12 Lowfield Street and 11 Market Street. Argos	26		26				26
232	Block Of 25 Lock-Up Garages Northeast Of Collier Crescent	5					5	5
245	Bluewater Chestnut Avenue East (Site C)	114				54	60	114
261	Milestone Garage North of Victoria road	6		6				6
262	Milestone Garage South of Victoria Road	5	5					5
267	Ashirwad, Bean Road	5			5			5
270	114 - 130 Lower Hythe Street Dartford Kent	7	7					7
271	Eastern End of St Marys Road	5	5					5
276	Land rear of Rehoboth House, Brent Way	7					7	7
296	The Nucleus, Brunel Way	29					29	29
Small Sites Windfall Assumption		130	26	26	26	26	26	130
Total		5,036	782	824	766	589	463	3,424

Question 145 – Evidence to Support Estimates

What is the evidence to support this and are the estimates justified?

26. The 2022 SHLAA Update (Appendix 1 to this matter statement) has the planning status of each site listed in its Appendix D, which also contains information on the principles used regarding the phasing of sites within the housing land supply.
27. The concluding analysis of the suitability/ availability/ and achievability of land identified via the SHLAA is set out in the Strategic Housing Land Availability Assessment Sites Summary Compendium Sep 2021 [HOU-4](#). This shows the outcomes of the methodology detailed in [HOU-5](#).

Other

Question 146 – Windfall Allowance

Is the windfall allowance justified?

28. The complete methodology setting out how windfall is modelled is included as Appendix E of the 2022 SHLAA Update (Appendix 1). In regard to the 5-year supply, there are two constituent parts.
29. There were 78 sites of fewer than 5 net units in the borough with planning permission at 1st April 2022. These combined have a total capacity of 102 net units. The Council has applied a 10% reduction in this number to take into account the potential that not all of these sites are built out, leaving 93 units of permitted capacity. This has been evenly split over the first 3 years of the Plan period (31 units per annum)
30. To project future windfall rates, evidence has been taken from monitoring data. Over the period 2014/15-2021/22, 210 small windfall completions have come forward, at an average rate of 26 unit's p.a. This has duly been inputted into the 5 year land supply as the windfall assumption for years 4 and 5, and subsequent years for the developable supply.
31. No windfall has been applied for sites of 5 units or larger.

Question 147 – Flexibility

Does the plan provide sufficient flexibility if any key sites do not come forward as anticipated?

32. Yes. In considering contingency, it is important to note that there is no reliance on large site windfall in the Plan's housing land supply. While the Council considers the Plan, and SHLAA (as updated, Appendix 1) to be comprehensive, over a 15 year period, there is a reasonable chance that windfall site(s) of 5 dwellings or more will be delivered.
33. In terms of specific contingencies, in the plan's housing land supply for 2022/23-2036/37 the total supply of 11,890 dwellings is (40) above the requirement over the

fifteen year period for 11,850 dwellings. Additionally, there are three specific additional sources which may come forward:

- a. at Dartford Station Surrounds/ River Darent Area (Policy D7) there are land parcels beyond those included in the Housing Land Supply which while not currently available, have policy support and may become available before 2037 (See submitted Local Plan page 76 paragraph 3.59, also Question 75);
 - b. the area north of London Rd, Swanscombe (Policy E6) is also considered to include suitable land currently not available, albeit this might change in the future (see also Questions 97-98).
 - c. within the Ashmere area of Ebbsfleet, there is now a plot identified for older people's accommodation, but this was not included within the housing land supply;
34. There is also the potential that sites may come in above the capacity that they have been set out in the SHLAA/ housing trajectory. The capacity estimates are relatively conservative, and residential levels in allocations D4 to D6 and E5 are seen as minima. Note for allocation E4, Ebbsfleet Central, the current projection is for it to deliver its final homes just beyond the end of the plan period.
35. Also it is noted for overall contingency that the requirement is 40 units p.a. above Local Housing Need (or, over a 15 year period, 600 dwellings).

Question 148 – Small Sites Provision

Overall, would at least 10% of the housing requirement/target be met on sites no larger than one hectare?

36. Yes. There are 74 sites in the identified housing land supply 2022/23-2036/37 below 1 hectare in size, totalling 1,373 units of capacity. This equates to 11.5% of housing requirement over the period 202/23-2036/37.
37. The total contribution to land supply on small sites will also include small site windfall capacity (405 units), which when added increases the percentage to 15%.

Question 149 – Trigger for Review

Is the trigger for reviewing the plan if cumulative housing delivery on windfall sites reaches 50% justified?

38. Yes, the Council is committed to a Plan-led system of sustainable growth in Dartford. It is considered that this would not be occurring if the majority of housing was delivered via non-identified sites.

APPENDIX 1- SHLAA Updated September 2022

{Supplied as a separate document}