
Examination Statement

Savills on behalf of Countryside

Dartford Borough Council Local Plan

Examination in Public

October 2022

1. Introduction

- 1.1. This Examination Statement is submitted by Savills on behalf of Countryside. Countryside Properties is a FTSE 250 top ten housebuilder, recognised as being at the forefront of the delivery of sustainable development and new communities. Countryside Properties has a strong local presence with offices in Sevenoaks and Brentwood and have a wealth of local experience.
- 1.2. Countryside Properties Representations to Dartford Borough Council (DBC) Regulation 19 Local Plan consultation has been given the following reference: **1484**.

2. Response to Inspectors Initial Matters, Issues and Questions

Matter 9 : The Supply and Delivery of Land

Issue: Overall Supply

Q137. 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?

Countryside Properties anticipate that further evidence will need to be presented by the Council as part of the upcoming hearing sessions. However, based on the Council's submitted evidence, the total supply of new housing over the plan period from 2017/18 to 2036/37 appears to be 15,646 homes. As noted within our Regulation 19 representation¹, Countryside Properties consider the Local Plan period to be unsound and therefore over a policy compliant plan period of 2020/21 to 2037/38 there is likely to be a shortfall of deliverable sites.

At this point in time, the Council have not submitted an indication of housing supply for the final year 2037/38, which would require additional homes to be identified. Countryside Properties therefore considers that the emerging plan does not have enough flexibility in order to justify the total projected supply of housing at this point in time.

Q138. 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? 5 year housing supply

No comment.

Q139. What is the requirement for the first five years following the anticipated adoption of the plan and what buffer should be applied?

Countryside Properties will await to hear Council feedback on this during the upcoming hearing sessions. It is understood however that the Council's current intentions is to apply a 10% buffer for the first 5 year requirement of 4,474 new homes.

Q140. What is the estimated total supply of specific deliverable sites for this period?

In accordance with the Council's submitted evidence, Countryside Properties understand the SHLAA 2021 findings to show a 5-year supply of 4,558 new homes from adoption of the Local Plan resulting in the likely following years of supply:

- Including 5% buffer
 - 5.07 year land supply (2021/21 start date)

¹ reference: 1484 paragraph 3.20

- 5.34 year land supply (2017/18 start date).
- Including 10% buffer
 - 4.84 year land supply (2020/21 start dated)
 - 5.09 year land supply (2017/18 start date).

Countryside Properties are however keen to understand further the Council's justification on this as part of the upcoming hearing sessions.

Q142. What is the evidence to support this and are the estimates justified? 6-10 and 11-15 year land supply

The Council should provide the Inspector with evidence to demonstrate deliverability of those schemes included within their supply estimates.

Countryside Properties considers the Council to have at best a marginal five-year land supply following adoption of the emerging Local Plan with an additional risk of having an undersupply as a result of market changes impacting delivery rates and the plan being considered immediately out of date. Further evidence should therefore be provided by the Council to support the current projected housing trajectory and housing supply.

Q143. What is the estimated total supply of specific developable sites or broad locations for growth for years 6-10 and 11-15? 144. What is the estimated supply from each source for this?

Countryside Properties will await further comments from the Council on this. However, if the plan period starts as we have suggested within our original representation being 2020/21, the Council would not have a sufficient housing supply in years 6 to 10 to meet demonstrated needs. Further sites should therefore be identified including through a sufficient review of the Green Belt to ensure a more flexible supply of housing over the emerging plan period.

On this basis, Countryside Properties consider the site Land East of Darent Valley Hospital a sustainable development option, which was submitted for consideration within the previous Call for sites process and Regulation 18 consultation.

Q147. Does the plan provide sufficient flexibility if any key sites do not come forward as anticipated?

No. As itemised within our original Regulation 19 representation², Countryside Properties do not consider the plan to have enough flexibility built-in to the Local Plan period.

Even based on the Council's assumptions, The Council will not have a five-year land supply from 2024/25. The Council should have provided more flexibility by identifying additional suitable sites that could deliver in the first 10 years following adoption. In the absence of the Council adopting this approach, the Council should commit within the Local Plan to undertake an immediate review, including a review of the Green Belt, in order to identify suitable and sustainable sites to meet the future needs of Dartford.

² reference: 1484, Section 3.2

Q149. Is the trigger for reviewing the plan if cumulative housing delivery on windfall sites reaches 50% justified?

Countryside Properties does not support the above trigger for a Local Plan review.

Countryside Properties consider triggers for a Local Plan review crucial for any Local Plan process. The 50% trigger as shown in Table 11 within the emerging Local Plan should therefore be amended to ensure the Council undertakes an immediate review following adoption of the Local Plan in order for the Council to demonstrate an update to Local Plan and sufficient supply of housing.

Andrew Watson
Director

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