

Home Builders Federation

Matter 9

DARTFORD LOCAL PLAN EXAMINATION

Matter 9 – The supply and delivery of housing land

Issue

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

Overall Supply

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

For council

137. 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?

Based on the Council submitted evidence the total supply of new housing over the period 2017/18 to 2036/37 is 15,646 homes. 154 homes short of meeting needs in full. However, over a policy compliant plan period of 2020/21 to 2037/38 there is likely to be a larger shortfall. The housing requirement over this period is 14,220. There are no submitted figures for delivery in the final year but in order for needs to be met in full would require over 1,000 homes to be built in 2037/38. This shows a lack of flexibility in supply across the plan period and a significant reliance on delivery prior to this plan being submitted in order to meet future needs.

138. 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?

For council.



5-year housing supply

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

This will depend slightly on the starting year for the local plan and whether there is a surplus or deficit in supply on adoption and as such have provided in appendix A to this statement a rolling assessment of the five-year housing land supply in Dartford based on a plan period starting 2020/21. The five-year requirement from 2023/24 will be 3,950 homes. If the plan period starts in 2020/21 then by the end of 2022/23 there is a deficit of 332 homes.

As required by PPG this will need to be addressed within five years and leads to a five-year requirement of 4,282 homes. A 5% buffer should be applied on the basis of the Housing Delivery Test score of 105%, though the Council can seek to demonstrate it has sufficient supply for the year following the local plan by adopting a 10% buffer as set out in paragraph 73 of the NPPF. A 5% buffer results in a five-year requirement on adoption of 4,496 homes and a 10% buffer of 4,710 homes.

If the plan period commences in 2017/18 there will be a deficit of 117 homes in 2022/23 and, when the 5% buffer is included, the five-year requirement post adoption is 4,270 homes. A 10% buffer results in a requirement of 4,474 homes. In Appendix B of the Residential Requirement Report (HOU6) the Council uses a 10% buffer, and it will be important for the Council to confirm its intentions with regard to the buffer.

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

It will be for the Council to confirm this position in its hearing statements. However, on the basis of the evidence in HOU2 supply over the 5 years following its likely adoption is 4,558 homes. This would mean that on adoption the Council would have a 5.07-year land supply with a 2020/21 start date and a 5.34-year land supply with a 2017/18 start date using the 5% buffer. Using the 10% buffer the Council would have a 4.84-year land supply using a 2020/21 base date and a 5.09-year land supply using a 2017/18 start date.

141. What is the estimated supply from each source for this?

This is for the Council to answer.

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

Evidence will need to be provided indicating the deliverability of those schemes included in supply estimates especially those indicated as not having a full planning permission in place. The Council has a marginal five-year land supply on adoption and small changes in supply could lead the council to not having a five-year land supply on adoption and the plan being immediately out of date. The identification of smaller sites on the edge of villages would have provided the council with more of a buffer in these

early years of the plan and ensured a healthy five-year housing land supply during his period.

6-10- and 11-15-year land supply

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

If the plan period starts, as we suggest it should, in 2020/21 the Council would not have sufficient supply in years 6 to 10 to meet needs. There would be a shortfall in by 2030/31 of 148 homes against needs for the first ten years of the plan period. The impact of this lack of supply in the middle years of the plan can be seen in the projected five-year land supply in appendix 1 to this statement. This shows that from 2024/25 onwards where the Council will not have a five-year land supply aside from one year. It suggests that the Council should have reviewed the Green Belt to ensure a more flexible supply of housing over the plan period and suggests that as a minimum an immediate review of the plan is required.

144. What is the estimated supply from each source for this?

This is for the Council to answer.

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

For Council

Other

146. Is the windfall allowance justified?

No comment

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

No. As outlined above there is no buffer between the total requirement and total supply. This lack of buffer means that regardless of the plan period the five-year land supply across the plan period is perilous. Even if all sites come forward as the Council expect there will not be a five-year land supply from 24/25. As mentioned earlier the Council should have looked to create some headroom through a review of the Green Belt in order to identify suitable sites that could have delivered more homes in the first 10 years following adoption. As such the HBF suggests that the need for an immediate review is set out in the local plan and that this will include a review of the Green Belt in order to identify suitable and sustainable sites to meet the future needs of Dartford.

148. Overall, would at least 10% of the housing requirement/target be met on

sites no larger than one hectare?

This needs to be answered by the Council. It is also important to show that these come forward on allocated sites or on sites identified in the brownfield register. Therefore projected windfall on smaller sites cannot be considered as part of any assessment as these have not been identified by the Council and do not have any of the benefits arising from allocation or inclusion on the brownfield register – the key reason for the policy and the Government's drive to support SME house builders.

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

Triggers for the review of any local plan are important however if this plan is considered to be sound on the basis of its current level of supply the Council should be required to undertake an immediate review of the plan in order to identify additional supply and ensure that it is not out of date soon after its adoption.

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Appendix A: Rolling Five-year land supply 2020/21 to 2036/37

	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	35/36	36/37
Requirement	790	790	790	790	790	790	790	790	790	790	790	790	790	790	790	790	790
Cumulative	790	1,580	2,370	3,160	3,950	4,740	5,530	6,320	7,110	7,900	8,690	9,480	10,270	11,060	11,850	12,640	13,430
Delivery	606	655	777	1,039	1,162	1,088	701	568	595	633	718	733	825	997	1,033	578	353
Cumulative	606	1,261	2,038	3,077	4,239	5,327	6,028	6,596	7,191	7,824	8,542	9,275	10,100	11,097	12,130	12,708	13,061
Surplus/ deficit	-184	- 319	- 332	-83	289	587	498	276	81	-76	-148	-205	-170	37	280	68	-369
Five-year requirement	3,950	3,950	3,950	3,950	3,950	3,950	3,950	3,950	3,950	3,950	3,950	3,950	3,950				
add deficit/ surplus	3,950	3,962	3,971	3,974	3,956	3,926	3,897	3,900	3,919	3,940	3,961	3,975	3,991				
Buffer	198	198	199	199	198	196	195	195	196	197	198	199	200				
Total req	4,148	4,160	4,170	4,172	4,154	4,122	4,091	4,095	4,115	4,137	4,159	4,173	4,191				
Five-year supply	4,239	4,721	4,767	4,558	4,114	3,585	3,215	3,247	3,504	3,906	4,306	4,166	3,786				
Surplus/ deficit	92	561	597	386	-40	-537	-876	-848	-611	-231	147	-7	-405				
5YHLS	5.11	5.67	5.72	5.46	4.95	4.35	3.93	3.96	4.26	4.72	5.18	4.99	4.52				

