

Examination of the Dartford Borough Local Plan

Statement on behalf of Taylor Wimpey UK Ltd

Matter 9 – The Supply and Delivery of Housing Land

October 2022

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Introduction

- 1.1 This statement is submitted on behalf of Taylor Wimpey UK Ltd for purposes of the Examination of the Dartford Borough Local Plan.
- 1.2 The statement responds to the Inspectors' Issues and Questions for Matter 9 – The Supply and Delivery of Housing Land.
- 1.3 The concerns outlined by our client at the Regulation 19 stage, on issues pertaining to the plan's legal compliance and soundness, have not in our view been overcome thus far. If anything, the documents published by the Council for examination purposes serve to highlight the deficiencies evident in the production of the plan now submitted.
- 1.4 Accordingly, we have examined the Inspector's questions for Matter 9 and provide responses to those we wish to contribute to debate on. We have also respectfully requested the opportunity to participate in the forthcoming hearing sessions to assist the Inspector further on such matters.

Response to Issues and Questions for Matter 9 – The Supply and Delivery of Housing Land

Issue 1: Whether the approach towards the supply and delivery of housing land is positively prepared, justified, effective and consistent with national policy.

Overall Supply

Question 137. What is the estimated total supply of new housing over the period 2017/18-2036/37?

- 2.1 The latest SHLAA update in September 2021 indicates a supply of 15,646 to 2037, which is short of the that required by some 154 homes. However, as the plans adoption has been delayed to 2023, the relevant 15-year period should now run to 2038¹. This would leave a shortfall of 944 homes.
- 2.2 In addition, insufficient contingency has been built into the proposed land supply to assure the delivery of the stated requirement within the plan period. We would normally anticipate an LPA to build in at least a 10% contingency, particularly in this case, where such reliance is placed on large, complex brown field sites delivering the bulk of the housing land supply. Taken together, the shortfall and lack of contingency does not in our view constitute a ‘positively prepared’ Local Plan under paragraph 35 of NPPF. Additional sources of supply should accordingly be identified, assessed, consulted upon, and allocated through the modification stages of this Examination.

5 Year Housing Supply

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

- 2.3 The Council are yet to publish their completions data for 2021/22, which will need to be accounted for in the relevant requirement calculation for the period 2023 (Q2) – 2028 (Q2)². However, assuming the Council achieve the 655 and 777 completions anticipated for 2021/22 and 2022/23 in Appendix B of the ‘Residential Requirement Report’ (DBC, Sept 2021), the Council’s five-year housing requirement for 2023/24-2027/28 would be 3,950 (790x5), plus 117 shortfall (against requirement of 790pa for six-year period 2017/18 to 2022/23)³, plus a 10% buffer as required under PPG⁴. Totalling 4,474 dwellings (2023/24 – 2027/28).

¹ Paragraph 22 NPPF

² The anticipated adoption of the Local Plan in the latest published LDS (July 2021) is stated as 2023 (Q2).

³ Utilising the same Sedgfield approach adopted by the Council in Appendix B of the ‘Residential Requirement Report’ (DBC, Sept 2021)

⁴ Paragraph: 010 Reference ID: 68-010-20190722

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

- 2.4 Appendix D of the SHLAA (DBC, Sept 2021) provides the total annual estimated supply figures the Council rely upon for five-year comparisons in Appendix B of the *'Residential Requirement Report'* (DBC, Sept 2021). The supply assumptions for the period 2023/24 – 2027/28 total 4,558 dwellings. This would equate to an exceptionally marginal 5.09 Years supply against requirement. However, if the Local Plan is rebased to a start year of 2020/21, as we contend in our Matter 2 Statement (PINS Matter 2 - Question 2), then only 4.88 years supply can be demonstrated.
- 2.5 Appendix D of the SHLAA (2021) suggests this position will then deteriorate further in the following year, and for several years thereafter before it recovers. Therefore, the Council has insufficient land identified in our view to maintain a 5-year rolling housing land supply from anticipated adoption of the Local Plan in 2023 (Q2). This is a further symptom we suggest of a Local Plan that has not provided sufficient homes to meet its needs over the plan period (contrary to Paragraph 35 of NPPF), including sufficient contingency to assure the level of growth proposed is delivered within the plan period. This would suggest there is a strong need to allocate additional readily deliverable sites, to bolster supply over the plan period. This further supports the need to build in sufficient contingency and flexibility into the land supply assumptions for the plan period.
- 2.6 The Council have not in our view identified sufficient land supply to meet objectively assessed needs for the 15-year period post anticipated adoption of the Local Plan to 2038. The housing land supply is heavily reliant on large complex brownfield sites, with little or no contingency or slippage allowance built in to assure a sufficient supply over the plan period. The supply of land identified for housing is accordingly insufficient to meet objectively assessed needs for the relevant 15-year period.
- 2.7 Given the evident shortfall in the plans land supply provisions, the lack of contingency built in to ensure evidenced needs are met within the plan period, the mounting levels of unmet needs in adjoining authorities, and the unmet needs for affordable homes in the Borough, we would suggest that there are exceptional and compelling grounds to explore the contribution that modest, suitable, and deliverable Green Belt sites could make in addressing the shortcomings of this plan. We respectfully suggest additional sites (inc. Green Belt) should be assessed, identified, consulted upon, and allocated through the Modification Stages of the Local Plan.
- 2.8 In this respect, we respectfully recommend lands abutting the south eastern edge of Dartford, west of Hawley Road, north of the A2, are included in such assessments (SHLAA Ref: 237 & 178). The site is well located on a main public transport corridor into Dartford, abutting a main employment area with access to a range of local services and facilities. The site is highly sustainable and well suited to residential development, and our initial site assessments and master planning indicates there are no known overriding constraints to its delivery early within the plan period.
- 2.9 The site is contained by the existing urban area, Hawley Road and the A2, which act as strong, logical, and defensible boundaries to realign Green Belt boundaries toward. We therefore commend this site for reassessment as part of a suggested modification

stage to the plan. This should be accompanied and informed by a revised SA process that is objective in setting reasonable alternative strategies to test. The current SHLAA assessment of these sites (Ref: 273 & 178) concludes there to be no overriding constraints to its delivery for housing, but classifies them as unsuitable owing to a 'policy-on' presumption against the release of Green Belt. As outlined above, we contend there are strong grounds to support the need to release these sites. They are well located and suited for release, and are importantly of a scale capable of being delivered in the first five years of the plan period.

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

- 2.10 No. See response to Question 137 and 140 above for avoidance of repetition.

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

- 2.11 No. This requirement is a symptom of a Local Plan that has not been positively prepared or likely to be effective in enduring the plan period envisaged. See responses to questions above for avoidance of repetition.

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