
EXAMINATION STATEMENT

Matter 9 – The supply and delivery of housing land

Dartford Local Plan

Representations on behalf of
Storefield Group Ltd

October 2022

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MATTER 9 – THE SUPPLY AND DELIVERY OF HOUSING LAND

DARTFORD LOCAL PLAN

**REPRESENTATIONS ON BEHALF OF:
STOREFIELD GROUP LTD**

OCTOBER 2022

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Barton Willmore, now Stantec



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CONTENTS

	PAGE NO
1.0 INTRODUCTION	01
2.0 RESPONSE TO QUESTIONS	02

1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Barton Willmore, now Stantec on behalf of Storefield Group Ltd. We are acting on behalf of Storefield Group regarding its land interest at "Stone Pit 9" – presently an omission site as part of the emerging Local Plan.
- 1.2 This Statement is prepared in response to the Matters, Issues and Questions raised by the Inspector in respect of Matter 9 relating to the supply and delivery of housing land.
- 1.3 Notwithstanding our client's specific land interests, this Matter Statement has been prepared in objective terms in line with the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).
- 1.4 These representations have been considered in the context of the tests of 'Soundness' as set out at Para 35 of the NPPF. These required that a Plan is:
- Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;
 - Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.0 RESPONSE TO MATTER 9: THE SUPPLY AND DELIVERY OF HOUSING LAND

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

Overall Supply

Q.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?

- 2.1 The Local Plan itself is silent on anticipated delivery rates for each source of supply, with only a high-level breakdown of supply sources provided in Table 1 and a housing trajectory graph at Appendix C.
- 2.2 The SHLAA (Sept 2021) (HOU-2) provides a 'Phased Housing Land Supply' (Appendix D) which indicates expected delivery rates over the period 2021/22 – 2036/37. The Phased Housing Land Supply trajectory identifies the following elements of supply:
 - No planning permission and no application submitted – 5,760 dwellings;
 - No planning permission and no application submitted, but with pre-application engagement – 1,425 dwellings;
 - No planning permission but with an application submitted – 749 dwellings;
 - Outline consent – 831 dwellings;
 - Resolution to grant Full consent – 328 dwellings;
 - Full consent – 2,960 dwellings;
 - Small sites (approved) – 77 dwellings; and
 - Small sites (windfall) – 325 dwellings.
- 2.3 Appendix D of the SHLAA identifies the site trajectories are based on site assessments, good practice principles and local evidence, however this is lacking in site-specific detail.
- 2.4 In the light of the relatively limited number of sites, we would expect the Local Plan evidence base to include signed delivery statements from landowners / promoters / developers to provide the necessary level of detail to justify delivery rates identified. As it currently stands, **the identified supply has not been justified, nor can it be considered to provide an effective strategy for addressing housing needs.**

5 year housing supply*Q.139. What is the requirement for the first five years following the anticipated adoption of the plan and what buffer should be applied?*

- 2.5 On the basis of a standard method housing requirement of 750 dwellings per annum, the 5-year requirement would be 3,750 dwellings.
- 2.6 However, as previously detailed in our Regulation 19 response and through our Matter 2 statement, we believe the Council has pursued an approach to addressing unmet need from neighbouring authorities which is insufficient, inflexible and too narrow in scope.
- 2.7 We recommend the buffer should be increased to circa. 20% (i.e. and additional 150dpa or 3,000 dwellings over the Plan period) to provide flexibility and allow for choice and competition in the market. The increased buffer could be met through a flexible policy approach to housing and/or provisioning additional allocations in the Local Plan, including in the urban area such as at our Client's Site at Stone Pit 9.
- 2.8 On the basis of our recommendation, the housing land supply requirement for the next 5-years would be **4,500 dwellings** (900dpa x 5) in order to deliver a positively prepared plan which provides an effective strategy for addressing housing needs, including unmet needs of neighbouring authorities.

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

- 2.9 The SHLAA Phased Housing Land Supply identifies 4,767 dwellings to be delivered across the period 2022/23 – 2026/27.
- 2.10 For the period 2023/24 – 2027/28 (reflecting the Plan is unlikely to be adopted in the current monitoring year) the supply is identified as 4,558 dwellings.

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

- 2.11 The Phased Housing Land Supply trajectory identifies the following elements of supply in the period 2022/23 – 2026/27:
- No planning permission and no application submitted – 388 dwellings;
 - No planning permission and no application submitted, but with pre-application engagement – 651 dwellings;

- No planning permission but with an application submitted – 744 dwellings;
- Outline consent – 199 dwellings;
- Resolution to grant Full consent – 322 dwellings;
- Full consent – 2,337 dwellings;
- Small sites (approved) – 51 dwellings; and
- Small sites (windfall) – 75 dwellings.

2.12 Similarly for the period 2023/24 – 2027/28:

- No planning permission and no application submitted – 628 dwellings;
- No planning permission and no application submitted, but with pre-application engagement – 886 dwellings;
- No planning permission but with an application submitted – 734 dwellings;
- Outline consent – 258 dwellings;
- Resolution to grant Full consent – 247 dwellings;
- Full consent – 1,680 dwellings;
- Small sites (approved) – 25 dwellings; and
- Small sites (windfall) – 100 dwellings.

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

- 2.13 No evidence has been provided by landowners / promoters / developers to justify the delivery rates identified. This is important for all sites which are not yet delivering, which is the majority of the identified supply.
- 2.14 1,039 or 1,514 dwellings in the immediate 5 year supply (depending on a 2022/23 or 2023/24 start) are from sites where no planning application has been submitted, with a substantial number of these on sites without even the benefit of pre-application engagement. A further 1,066 or 981 dwellings are on sites without the benefit of any planning consent, albeit a number of these may have resolution to grant (or may have subsequently been granted planning permission), and 199 or 259 dwellings only with Outline consent.
- 2.15 This further emphasises the need for a flexible policy approach to housing and/or provisioning additional allocations in the Local Plan to ensure a positively prepared, effective and justified strategy is achieved.

6-10 and 11-15 year land supply***Q.142. What is the estimated total supply of specific developable sites or broad locations for growth for years 6-10 and 11-15??*****6-10 Years**

- 2.16 The SHLAA Phased Housing Land Supply identifies for 2027/28 – 2031/32 (years 6 – 10) a supply of 3,247 dwellings.
- 2.17 For the period 2028/29 – 2032/33 (years 6 – 10, reflecting the Plan is unlikely to be adopted in the current monitoring year) the supply is identified as 3,504 dwellings.

11-15 Years

- 2.18 The SHLAA Phased Housing Land Supply identifies for 2032/33 – 2036/37 (years 11 – 15) a supply of 3,786 dwellings.
- 2.19 Supply data for year 3037/38 is not provided. In the absence of this, the 4-year period 2033/34 – 2036/37, reflecting the Plan is unlikely to be adopted in the current monitoring year, supply is 2,961 dwellings.

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

- 2.20 Beyond the next 5-year, with the exception of a single site of 700 dwellings with Outline planning permission (St James Lane Pit), all supply will be derived from sites without the benefit of planning consent:
- 2027/28 – 2036/37 supply:
 - No planning permission and no application submitted – 5,372 dwellings;
 - No planning permission and no application submitted, but with pre-application engagement – 774 dwellings;
 - No planning permission but with an application submitted – 5 dwellings;
 - Outline consent – 632 dwellings; and
 - Small sites (windfall) – 250 dwellings.
 - 2028/29 – 2036/37 supply
 - No planning permission and no application submitted – 5,132 dwellings;

- No planning permission and no application submitted, but with pre-application engagement – 539 dwellings;
- No planning permission but with an application submitted – 5 dwellings;
- Outline consent – 564 dwellings; and
- Small sites (windfall) – 225 dwellings.

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

- 2.21 No evidence has been provided by landowners / promoters / developers to justify the delivery rates identified. This is important for all sites which are not yet delivering, which is the majority of the identified supply
- 2.22 In respect of the biggest sources of supply from the Plan, i.e. Ebbsfleet South and Alkeren and Ashmere, together identified to deliver 6,628 dwellings across the Plan period (including in years 1 – 5), we have made detailed representations as part of our Matter 6 statement which recognises the uncertainty over delivery arising from the Plan's dependency on a broadly single location.

Other

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

- 2.23 As recognised throughout this matter statement, alongside those prepared previously, there should be flexible policy approach to housing within the Plan in order to ensure housing needs are fully addressed across the Plan period.
- 2.24 Policy M9 (Sustainable Housing Locations) provides an inflexible approach to identifying which locations would be supported by the Council, limiting this only to allocation sites or those in the identified housing land supply (i.e. SHLAA suitable sites) or on brownfield land, unless there is a five-year supply deficit (in which case the "presumption" would apply in any event).
- 2.25 There are other sustainable locations within the urban area and/or outside of the Green Belt which will inevitable become available (if they are not already) which would not be supported by this policy.
- 2.26 As detailed in our Matter 4 statement, it is likely the SLAA may have discounted too many sites presently deemed "unsuitable", due to oversights or insufficient technical

understanding at the time of the original assessment (which could have been overcome following the submission of further detailed information).

- 2.27 This is the case for our Client's site (@ Stone Pit 9), which the SHLAA did confirm was sustainably located and well served by public transport. However, the SHLAA went on to consider the site as "unsuitable" for two principal reasons (at that time). These were addressed as part of our Regulation 19 representations, confirming there to be no insurmountable matters which could not be suitably addressed via established mitigation.
- 2.28 As it stands, Policy M9 is not positively prepared, is unjustified and is not consistent with national policy, in that it unreasonably and unnecessarily restricts windfall development.
- 2.29 As set out in the NPPF, 5-year housing land supply is a 'minimum' requirement, not a cap to development, and suitable and sustainable opportunities for delivering housing growth should be supported. We recommend Policy M9 be amended to provide a suitably flexible approach which supports housing development, in addition to those identified in the Plan, as below:

Policy M9: Sustainable Housing Locations

1. Sites located in accordance with the Central Dartford or Ebbsfleet and Swanscombe policies, or in the identified housing land supply (where the proposed number of dwellings is broadly in line with the projected site capacity), will be permitted for residential development.

2. At other locations, residential development will be supported where the benefits of the proposal outweigh the disbenefits, including the sustainability of the site's location, including its proximity to community facilities and employment opportunities. In the case of major development, it is also shown to be sufficiently served by infrastructure, after allowing for the infrastructure requirements of the sites identified in the housing land supply

~~Unplanned windfall development within use class C3 involving a net gain of five or more dwellings should also show that:~~

~~a) It is located on brownfield land, unless it has been demonstrated that the site is necessary to rectify a lack of five year supply of deliverable housing land;~~

~~b) It is within easy walking distance of a range of community facilities including schools, shops, leisure and recreation services, and is well located with respect to walking/ cycling and good public transport to a choice of employment opportunities; and~~
~~c).~~