

A guide to understand Dartford's Strategic Housing Land Availability Assessment in the form of FAQs (Frequently Asked Questions).

Strategic Housing Land Availability Assessment (SHLAA)

**FAQs 2018/19 (Update to
original Q&A document)**

January 2019

DARTFORD
BOROUGH COUNCIL

Dartford SHLAA FAQs

Contents Page

1. What is a SHLAA?	3
2. Is the SHLAA a Local Plan, does it make Planning Policy or allocate land?	3
3. Can a SHLAA grant planning permission?	3
4. Is this the first Dartford SHLAA?	3
5. Why does Dartford need a new SHLAA when it has large housing planning permissions?	4
6. Which sites go into a SHLAA for consideration?	4
7. What submissions were received from landowner/developers from the “call for sites”?	4
8. What public input is there?	5
9. What are the main stages in the Assessment?	5
10. What is happening now in the assessment, and what about the end of the SHLAA?	6
11. How does a SHLAA help Local Plan production?	7
12. How will sustainable locations for development be ensured?	7
13. Does existing planning policy apply?	9
14. What about Green Belt land?	9
15. What feedback was there on the proposed SHLAA methodology?	10
16. What other updates have been necessary to the methodology?	10
17. What is a Broad Location in the Dartford SHLAA?	11
18. Isn't under-used industrial land a potential source of 'brownfield' land, how is this being looked at currently?	11
19. How are proposals for non-residential development, such as employment, retail and community uses, going to be considered?	12

Dartford SHLAA FAQs

This is an update of the original spring 2018 Q&A document.

It reports back on some of the refinements necessary to the draft methodology published at the same time. Answers to questions 1, 4 and 5 are unchanged. Questions 7, and 15 to 19 are new.

Dartford SHLAA FAQs

1. What is a SHLAA?

A 'Strategic Housing Land Availability Assessment' (SHLAA) is research required by government to inform a Council's Local Plans.

2. Is the SHLAA a Local Plan, does it make planning policy or allocate land?

No. A SHLAA is technical evidence that will inform, alongside a host of other information, future Local Plan public consultation and decisions by the Council. Land needs to have met the criteria across all SHLAA stages for it to be explored further as a potential residential land allocation in the Local Plan.

Government guidance explains: *"The [SHLAA] assessment is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development.... It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs."* Paragraph: 003 Reference ID: 3-003-20140306

The Council is beginning a process of technical studies and public consultation to ensure its Local Plan policies remain up to date and respond to Dartford's needs and national policy. The SHLAA is one part of this, alongside other important studies that will look at economy, transport, wider environmental issues and a range of other topics. Once complete, a refreshed pool of potential housing land via a new SHLAA should be considered alongside other evidence and consultation, to inform long-term planning policy.

3. Can a SHLAA grant planning permission?

No. A planning application is a separate process. The SHLAA when finalised, may provide information of relevance. For example, it may indicate land that may be unsuitable for residential development in SHLAA terms, suggest constraints that apply to land, or set out what is considered to be an appropriate general capacity (number of homes) land could support if brought forward.

4. Is this the first Dartford SHLAA?

No. A SHLAA was produced for the Dartford Core Strategy. This identification of land helped justify and deliver a Core Strategy Local Plan that is focussing development in the most sustainable locations and protecting the Green Belt. The overall approach and method to the Dartford's SHLAA will be similar to that undertaken last time.

A new SHLAA is needed as the previous one is ageing. SHLAAs are expected by government to be updated, not least as they are introducing requirements to bring forward land for particular types of housing and accommodation, some of them not within the previous SHLAA. Moreover, a SHLAA process will also allow developer's proposals to be assessed in a robust way – avoiding speculative planning applications.

Dartford SHLAA FAQs

5. Why does Dartford need a new SHLAA when it has large housing planning permissions?

The SHLAA is about updating the range of possible sources of new housing, keeping supply options broad enough to give real alternative options to choose from when the Local Plan is prepared.

Dartford's current Local Plans plan to 2026; however national policy seeks housing locations/ sites in Plans to be identified for at least 10 years in advance. It is nevertheless highlighted at the outset that planning permission exists at April 2018 c. 12,300 dwellings in the Borough, and it is readily apparent some of these large sites that are now underway will continue to deliver housing for several years beyond 2026.

Dartford has a Five Year Supply of Deliverable housing sites ([see here for further details](#)), a critical government requirement when planning applications are received.

6. Which sites go into a SHLAA for consideration?

Identification of land for assessment pulls together many sources of information over time. These sources can be described as either 'desktop' sources identified by the council from existing records eg planning permissions, brownfield land lists, or 'submitted' land put forward to the council specifically for consideration in the SHLAA in response to a "call for sites". On occasion, complementary land may also be identified collectively in response to sustainable areas and desktop sources, known as a "broad location" (see Question 17). For the approach to current employment land see Question 18.

National guidance states that certain locations, for instance if incompatible with development for five dwellings or by virtue of national designations, will not be taken forward in the SHLAA. The 'qualification' requirements preclude any consideration of land such as Ancient Woodland, SSSI, designated village greens etc. TPOs are accounted for with reference to the prevalence of trees on site. Sites may be disqualified on this basis, or on a combination basis with other factors. This includes due to the overall impact of disqualified areas on gaining access to land or forming a sufficient, cohesive, developable site for 5+ dwellings.

The Council will look at sites for the Dartford SHLAA in line with our methodology based on national guidance.

7. What submissions were received from landowner/ developers from the "call for sites"?

In the Borough as a whole, including within the Ebbsfleet Development Corporation area, over 60 parcels of land were submitted in the 'call for sites' period, which are [available to see](#).

This includes land with planning permission or in housing use, in Dartford Town Centre, brownfield land, and sites owned by the public sector but expected to be surplus to needs.

Dartford SHLAA FAQs

8. What public input is there?

The methodology has been produced to build on national guidance, and is being refined in light of feedback. (The government do not require us to consult on the SHLAA, as it is a technical exercise with outcomes subject to public consultation). It is also considered prudent to set out in advance further details of anticipated specific SHLAA procedures in Dartford. Identified land maps provided for assessment will be made available for public inspection early in the process.

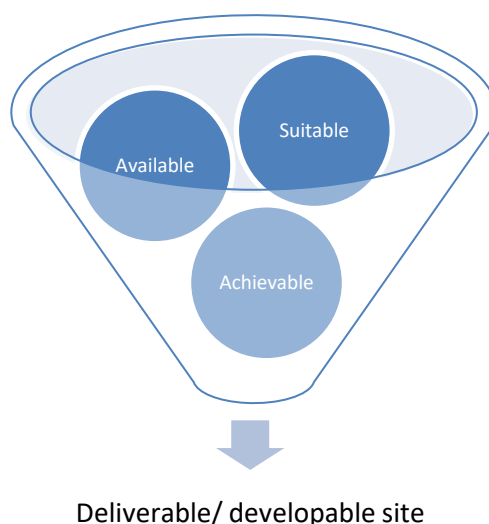
We consider it is beneficial and transparent that a draft methodology be made publicly available for comments and response, and for information to be openly placed on the website, for example this updated document.

The SHLAA will be fed into major public consultations on the Local Plan. It is expected that the SHLAA process and its outputs will be reviewed as part of the Examination in Public conducted by the independent Planning Inspector, where member of the public can observe (or participate if they make written representations in response to the consultation preceeding the Examination).

9. What are the main stages in the Assessment?

Once identified, if land is located and sufficient in size to satisfy qualifying criteria (see Question 6), its suitability is considered. If suitable, its availability will be checked. If available, its achievability will be confirmed. The diagram below illustrates filtering out over a series of stages, each of which has detailed considerations.

A successful site (labelled '[deliverable](#)' or '[developable](#)' at the end, depending on when it may happen) will need to satisfy all of these requirements:



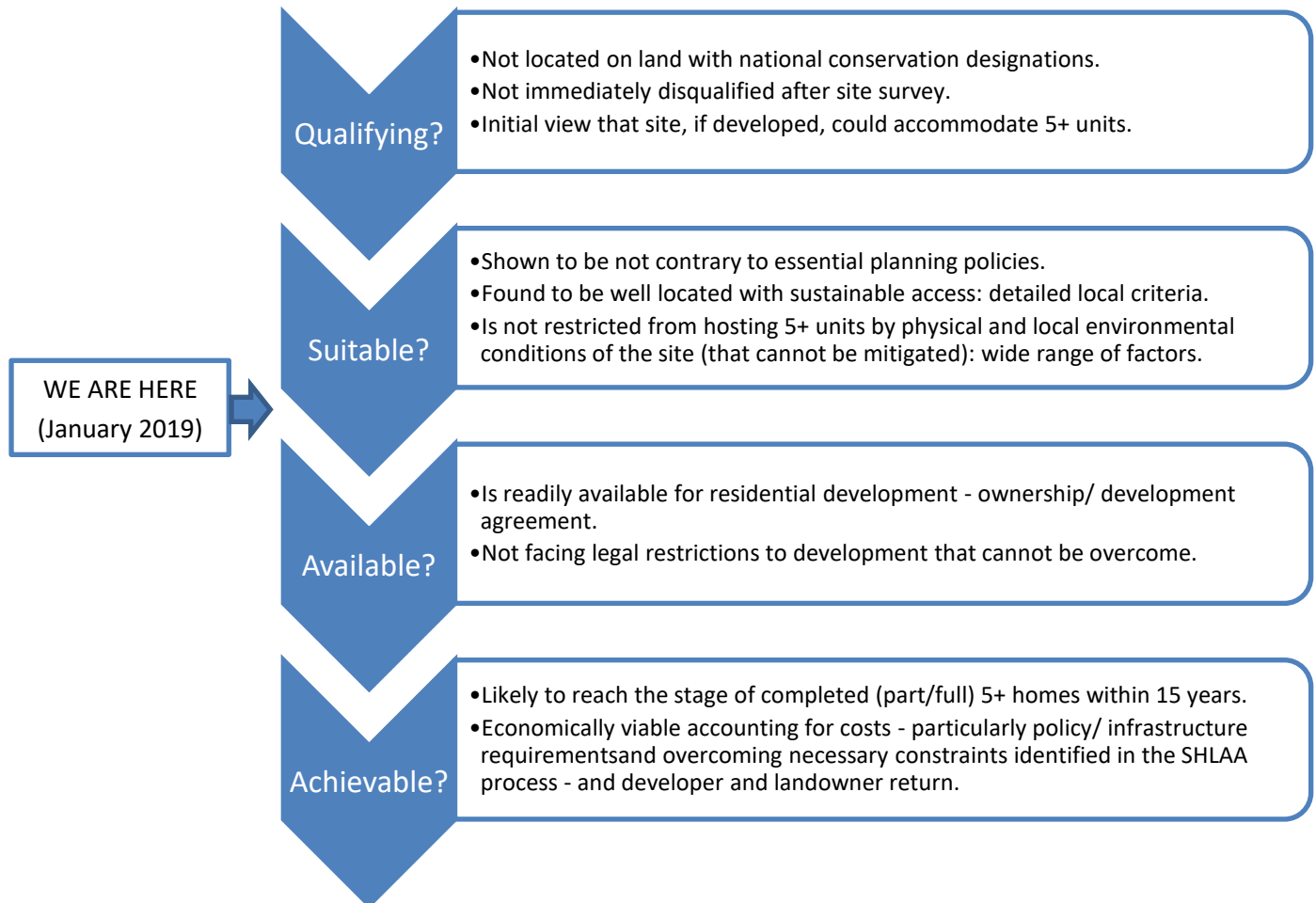
Further information is provided in the next question, where some of the key criteria at each stage of this filtering process are outlined.

Sites should be acceptable in each respect, in terms of the land, infrastructure and management of local impacts that can be provided to allow dwellings to be satisfactorily completed within 15 years.

Dartford SHLAA FAQs

10. What is happening now in the assessment, and what about the end of the SHLAA?

Works continues on the SHLAA. A simplified outline of the assessment phases is set out below. As can be seen, the process is at a mid-point, with ongoing examination of land and suitability, and evaluation due to commence of applicable sites for availability and achievability.



→ FIRST OUTPUTS DUE MID-2019

To proceed successfully all the way through the SHLAA, land must be suitable, available and achievable.

In this way, sites fall by the wayside at the various stages of assessment. Whilst land is identified from a volume of sources at the outset for consideration through the SHLAA, the output of 'successful' sites for options assessment in the Local Plan is more limited.

Even for successful (deliverable/developable) sites, key constraints will be noted. Appropriate development potential in terms of number of dwellings would be estimated, and the broad rate of construction in future would be phased. This will result in the identification of a pool of deliverable or developable site (as defined in national policy) options to inform Local Plan decisions.

Dartford SHLAA FAQs

Land not deliverable or developable for whatever reason would be considered a 'windfall' site if a planning application is submitted, and would be scrutinised and determined in accordance with policies DP6, CS10 and the Windfall Supplementary Planning Document.

The draft methodology provided further details on later stages. The following question outlines how a SHLAA may be used.

11. How does a SHLAA help Local Plan production?

It is emphasised that the SHLAA only has the status of technical evidence to inform future decisions. Land found deliverable (or developable) after successful SHLAA assessment does not indicate it should be granted planning permission or will be selected as Local Plan site allocation.

The SHLAA is produced to establish the range of possible land options available. In Dartford, where there is generally ample existing housing land supply, some available land may not need to be developed, such as greenfield sites that do not fully meet local regeneration and sustainable development objectives.

Local Plans have to look at different options for the distribution of development. The SHLAA identifies potential sites for housing development which enables the most suitable distribution of housing sites to be tested: for example, the extent to which Dartford Town Centre can meet housing needs, versus the potential alternative of a more even distribution throughout the urban area.

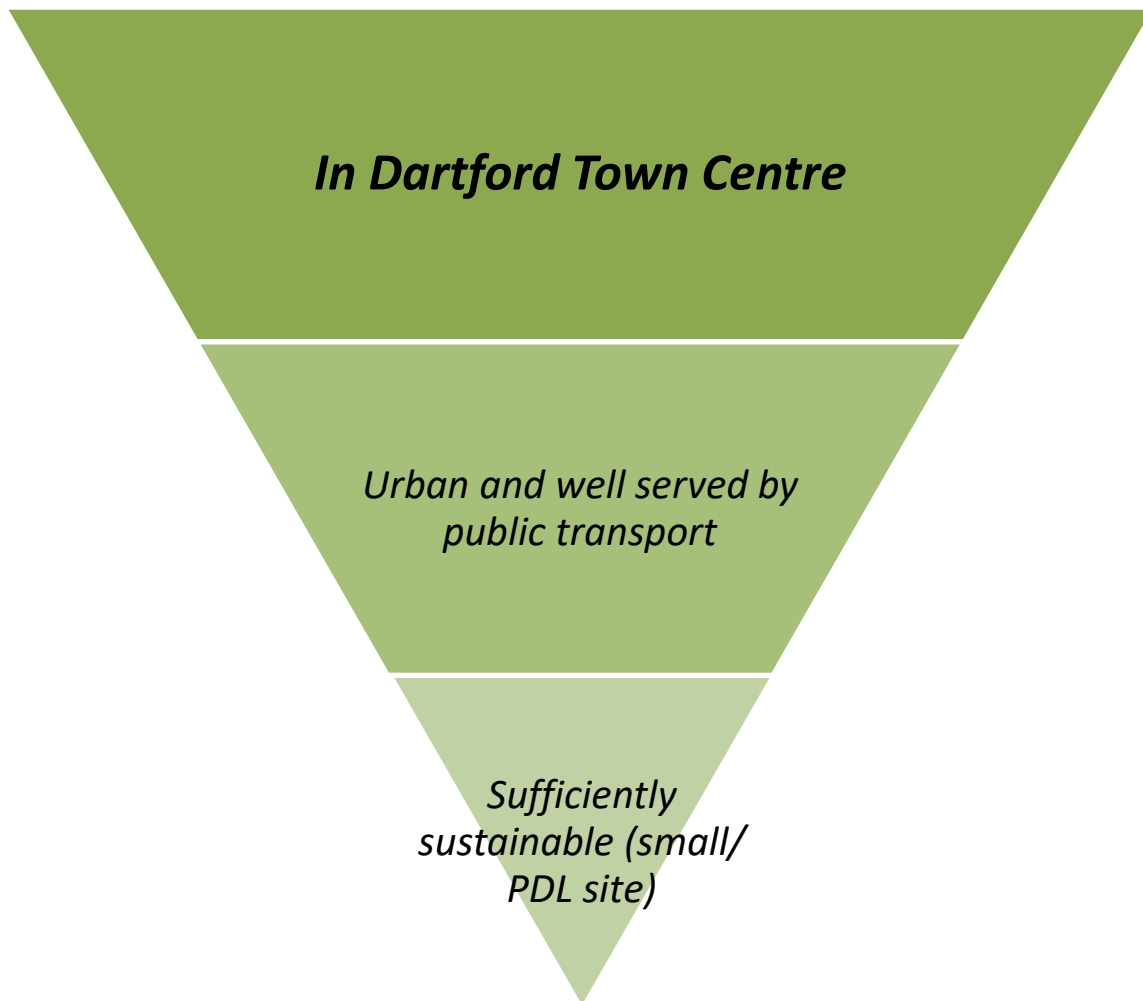
Having a SHLAA in place will mean the most sustainable residential development sites can be chosen. A pattern of development can be set in the Local Plan that minimises demand on infrastructure e.g. less need for vehicular travel.

12. How will sustainable locations for development be ensured?

Drawing from national guidance, which allows regard to recently adopted Local Plans, such as Dartford's Development Policies Plan, new land should be one of the following as a minimum:

- Within Dartford Town Centre.
- In the urban area (north of the A2) and well served by public transport.
- Sufficiently sustainably located small or brownfield site.

Dartford SHLAA FAQs



The preference towards sites in the Town Centre (or Urban, i.e. north of A2, and well served by public transport) has been confirmed following the [‘Strategic Issues’ Local Plan consultation in mid-2018](#). This reiterated the ‘tried and tested’ appropriateness of the Core Strategy’s focus on development at Dartford Town Centre and elsewhere north of the A2. The requirement to be well served by public transport reflects the Borough’s transport requirements and that the spatial strategy is based on achieving a major shift in transport modes away from private vehicles.

This is taken as locations within:

- i) 800m of Ebbsfleet International railway station or the four stations on the North Kent Line in the Borough (or 400m beyond that along dedicated cycle routes),
- ii) or 400m from routes with a peak service level of at least 6 buses per hour in the day time (including Fastrack) in both directions

The required criteria for those sites that are not located in Dartford Town Centre, or not urban and very well served by public transport is as follows:

Land will have to be under 1 hectare or brownfield land (or both), and

i) Within 400m walk from a bus stop with an average of approximately 2 buses per hour (in the day time) in both directions, OR

ii) Meeting the majority i.e. three or more, of the following accessibility to services criteria:

- *Within 400m walk from a bus stop with an average of at level of at least hourly buses (in the day time) in both directions*

Dartford SHLAA FAQs

- *Primary school within 400m or secondary school within 800m walk,*
- *GP/ hospital within 800m walk.*
- *Convenience A1 store within 400m or designated Town Centre/ District or Neighbourhood Centre within 800m walk (policy DP17&18).*
- *Designated employment area (policy DP20) within 800m walk.*

The under 1 hectare criterion reflects the final (July 2018) new NPPF.

Further tests of 'physical' suitability apply such as access, land conditions, pollution, living conditions and so on.

13. Does existing planning policy apply?

Yes it can apply. The government have confirmed SHLAAs need to identify sufficient potential housing land but should not be wholly 'policy off' exercises. The assessment will not test land against the full Development Plan in the same way as planning applications, only essential policies are critical. However it informs the criteria in the SHLAA e.g. policies DP4 on Transport Access and Design and DP6 on housing (see criteria in above question) in the [Dartford Development Policies Plan](#).

It is highlighted that the draft methodology proposes to apply two specific policies adopted in 2017, identifying Borough Open Space and Community Services land, where (unless policy-based criteria in methodology are met) land will be regarded as unsuitable and will not proceed successfully through the SHLAA.

However the process is not intended to mirror a planning application: no development rights result from the SHLAA.

The approach in policy DP5:3 will also be important in considering some landfill sites.

14. What about Green Belt land?

Dartford's first public consultation document for a new Local Plan confirmed: "*Dartford Borough Council attaches the very highest importance to the permanence and openness of the Green Belt. The Metropolitan Green Belt in Dartford can be regarded as an essential characteristic of the Borough.*" (Strategic Issues consultation document June 2018, paragraph 80).

Dartford has a very healthy land supply, and aims for any additional housing sites to be highly sustainable e.g. in the town centre or very well served by public transport. No presumption should be made that any Green Belt land will be necessary to meet housing needs in Dartford.

We are NOT identifying greenfield Green Belt land as part of our desktop land sources. However landowners have a right to submit such land for consideration; there is no basis in the national guidance to automatically exclude it from the outset from assessment in Dartford's SHLAA. Some sites in the Green Belt have been previously developed and are, therefore, classified as brownfield sites. These could be more sustainable than greenfield site development and we may give them greater

Dartford SHLAA FAQs

consideration consistent with our methodology for assessment (see Question 12). They are, however, required to meet further tests to be considered as suitable for development.

The factual criteria of greenfield/brownfield status, size and access to services and public transport will be applied in each case. Green Belt sites will be examined by the SHLAA in the same way as all other sites (see question 12). Dartford's rural (often Green Belt) land is generally poorly served by local services and public transport compared to urban locations in the Borough. Consequently, it is likely that few rural sites will proceed to later stages of assessment.

For all land there will be the full technical analysis, public consultation and independent examination procedures that apply for producing and finalising a Local Plan.

15. What feedback was there on the proposed SHLAA methodology?

There was no objection to the overall approach, structure, or proposed key sustainability criteria in the Borough's SHLAA.

Kent County Council asked for aspects of minerals/waste planning to be captured in the methodology and the Port of London Authority asked that existing wharves be excluded at an early stage in the methodology. No Identified safeguarded wharves are identified for consideration. SHLAA stages include assessment of the suitability and achievability of sites for residential development (and their appropriate capacity). This will take into account the potential impacts of residential development on the operation of all minerals and waste facilities/infrastructure (including wharves) and mineral safeguarding areas.

Comments were considered from other organisations, but no changes were directly necessary. Advice and potential future actions were provided in these comments and will be a basis for further action, in particular as part of the parallel process of taking the Dartford Local Plan forward.

Dartford Borough Council is in ongoing contact with all these organisations as part of its Local Plan preparation and further discussion is expected with applicable organisations on specific sites or the SHLAA assessment/ outcomes.

16. What other updates have been necessary to the methodology?

The methodology is being updated in line with the new NPPF 2018. This did not change the approach to SHLAAs, but has implications for the volume and range of housing required in the Local Plan. It also reinforced the commitment to Green Belt, and includes a series of minor or new aspects of housing policy; for example it includes the new government policy that at least 10% of the housing requirement should, if possible, be accommodated on sites no larger than one hectare (NPPF paragraph 68a). Other aspects will also be addressed, for example, in considering achievability and phasing regard will be had to the updated definition of a deliverable site.

Dartford SHLAA FAQs

Continuing consideration will be given to the implications of the new NPPF. Although this document provides an interim update, details of the final methodology will be confirmed in due course.

Since the draft SHLAA methodology was compiled, the council has also adopted the Dartford Town Centre Framework SPD and held the first consultation on a new Local Plan. Amendments to the draft methodology have been referenced in updating this document.

Attention is drawn to the updates within the criteria for sustainable development, set out in Question 12.

17. What is a Broad Location in the Dartford SHLAA?

Government has established that 'broad locations' for housing may be identified. These are not necessarily individual mapped sites or a single potential development with a simple boundary.

Dartford residential broad locations are a form of SHLAA desktop source. They will be assessed in terms of their ability to assist with sustainable development in the Borough, in accordance with national SHLAA guidance, and potentially in supporting delivery of other beneficial uses. As potential long-term land supply (part of complex sites or in multiple ownership) a proportionate view is necessary of the balance of availability and achievability considerations over fifteen years.

In Dartford they can help brownfield delivery. They are taken as a general area where there are residential development prospects that may be developable, particularly in the context of pre-existing mixed uses e.g. town centres.

18. Isn't under-used industrial land a potential source of 'brownfield' land, how is this being looked at currently?

Yes, full examination of potential brownfield land sources is occurring, to test their sustainability.

In some regions, former employment land may be a central part of this. In Dartford, a new policy confirming designated employment (industrial and warehousing based) land was adopted last year after bespoke evidence of these sites was produced and independently examined. This remains relevant: no evidence has come to light that there has been a notable reduction in demand for this land source as whole, and the 2018 NPPF emphasises the need to plan for economic growth sectors. This may support the local case for not releasing major employment areas.

Nevertheless, to maximise brownfield potential consistent with economic objectives, the SHLAA is informed by an exercise on employment land. This gives initial consideration as to whether small parts of designated land that may be under-used or could potentially be compatible with employment locations being maintained and floorspace/ jobs levels retained e.g. where mixed use redevelopment is likely to deliver new employment premises and residential accommodation.

Dartford SHLAA FAQs

19. How are proposals for non-residential development, such as employment, retail and community uses, going to be considered?

There have been some submissions for sites which put forward proposals for non-residential uses. These will not be considered in the SHLAA. As part of the new Dartford Local Plan, there will be evidence gathered to assess what needs there are for other types of development, e.g. retail and employment. There will also be an updated Infrastructure Delivery Plan which will set out what infrastructure will be required to support new development (e.g. schools and open spaces), including how and when this will be brought forward. Once this evidence is available, we will consider options for accommodating these needs and this will be subject to consultation on the next stage of our Local Plan.