

DARTFORD LOCAL  
PLAN

# **Residential Requirement Report**

**September 2021**

**DARTFORD**  
BOROUGH COUNCIL

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## 1. INTRODUCTION AND CONTEXT

- 1.1 This report draws from the Dartford Local Plan housing evidence base, national policy/guidance and further assessment, to explain how residential development levels have been established and expressed in the Dartford Local Plan. It has been updated to accompany the second (revised) Publication Plan document September 2021.
- 1.2 This section sets out the purpose and structure, and the defining existing national and local policy context, in producing the report and setting the residential requirement in the Dartford Local Plan.

### Purpose and Structure of Report

- 1.3 National policy sets clear expectations for Local Plans to deliver a sufficient amount of new sustainable development, particularly housing. The national standard method now forms a starting point for Local Plans considering local housing need. However evaluation of a range of further relevant factors is required to confirm the local residential requirement level (number of new homes).
- 1.4 Future housing levels and national policy can usefully also be set in the context of Dartford and its past requirement levels and delivery, and resulting local growth rates relative to other areas.
- 1.5 The report considers data on Borough development needs and other studies that consider how the level of required development should be accommodated, most notably the Strategic Housing Land Availability Assessment (SHLAA). The report also considers Local Plan progress in neighbouring authorities in Kent and elsewhere.
- 1.6 Section 2 reviews housing delivery and population change data. Section 3 considers standard method outputs in the wider context, and implications of national requirements for Dartford, taking account of other Local Plans. Section 4 draws together findings, with final key conclusions and the new Local Plan approach set out in Section 5.
- 1.7 Appendices include the five year deliverable supply calculations for the Local Plan.

### Existing Policy – Headline Review

- 1.8 Chapter 3 of the National Planning Policy Framework (NPPF) is on ‘Plan Making’. It opens (paragraphs 15-16b, emphasis added):

*“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings....”*

*Plans should:*

- a) be prepared with the objective of **contributing to the achievement of sustainable development;***
- b) be prepared **positively, in a way that is aspirational but deliverable;**...*

- 1.9 NPPF Chapter 2 ('Achieving Sustainable Development') requires a presumption in favour of sustainable development to be applied. For plan-making this means (paragraph 11a emphasis added) that:

*“all plans should promote a **sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;**”*

- 1.10 NPPF Chapter 5 ('Delivering a sufficient supply of home') starts (paragraphs 60-61, emphasis added):

*“To support the Government’s objective of **significantly boosting the supply of homes**, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.... To determine the minimum number of homes needed, **strategic policies should be informed by a local housing need assessment, conducted using the standard method** in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be **taken into account** in establishing the amount of housing to be planned for.”*

- 1.11 The Dartford Core Strategy, adopted 2011, sets the housing requirement by focusing on the capacity of residential sites. It states (policy CS10:1):

**Policy CS10: Housing Provision**

1. In order to meet housing needs and to provide an impetus for regeneration of the Borough, land is allocated for housing in accordance with the spatial strategy set out in Policy CS 1. The capacity between 2006 and 2026 is as follows<sup>107</sup>:

Dartford Town Centre inc Northern Gateway	up to 3,070
Ebbsfleet to Stone	up to 7,850
Thames Waterfront	up to 3,750
Other sites north of A2	up to 2,400
Sites south of A2, normally provided within village boundaries	200

- 1.12 These capacity figures are aggregated to produce the headline Borough housing level (maximum). The regeneration areas which comprise the planned housing supply for the 20 years from 2006 to 2026 total 'up to' 17,270. The capacity/ regeneration potential-based housing requirement can be expressed as up to 865 dwellings per annum, when averaged over the 20 year plan period.

- 1.13 The capacity figure set out in policy CS10 of the Core Strategy was complemented by a 11,700 local housing need figure (equating to 585 dwellings per annum over the 2006-2026 plan period), which works as an effective minimum, i.e. when intervention would be taken to change approach and push levels up towards 17,270. This is set out in Table 5 'Triggers and Management Action' (Core Strategy Chapter 6):

Housing delivery does not meet local needs	Forecasts indicate plan delivery falling below local housing need level of 11,700 homes <sup>195</sup>	Review of SHLAA/SHMA Full or partial review of the plan to be undertaken
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- 1.14 The three columns above in the Core Strategy present risks, responses<sup>1</sup> and actions, respectively.
- 1.15 The Dartford Town Centre (including Northern Gateway), Ebbsfleet to Stone and Thames Waterfront locations set out in policy CS10 reflect policy CS1 (Spatial Pattern of Development) of the Core Strategy. This sets out that these are the plan’s three priority areas for development which provide the focus for development. As shown in Diagrams 3, 4 and 5 of the Core Strategy, these areas include two strategic allocations and other brownfield land regeneration opportunities.
- 1.16 These three defined urban areas for regeneration have ‘up to’ development figures in CS1 aggregating to 14,670 dwellings (equating to an average of 734 per annum). These focal areas account for 85% of the total level required.
- 1.17 The extent to which residential development has been implemented in accordance with the Core Strategy is outlined in section 2.
- 1.18 Both national and existing local strategy, in short, need to support delivery of ambitious housing/ and regeneration outcomes.

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<sup>1</sup> The footnote 195 in the Core Strategy refers to the 2011 Housing Implementation Strategy.

## 2. RESIDENTIAL DELIVERY TRENDS AND BACKGROUND

- 2.1 Residential delivery levels and rates for a local authority should be seen in context, with trends shifting over time and at wider than local scales. Past levels and national changes provide further understanding for the future.
- 2.2 This section explores housing trends in Dartford and elsewhere, related targets and brownfield land use. Dartford's recent population levels are outlined at the end of this section, along with national comparators.

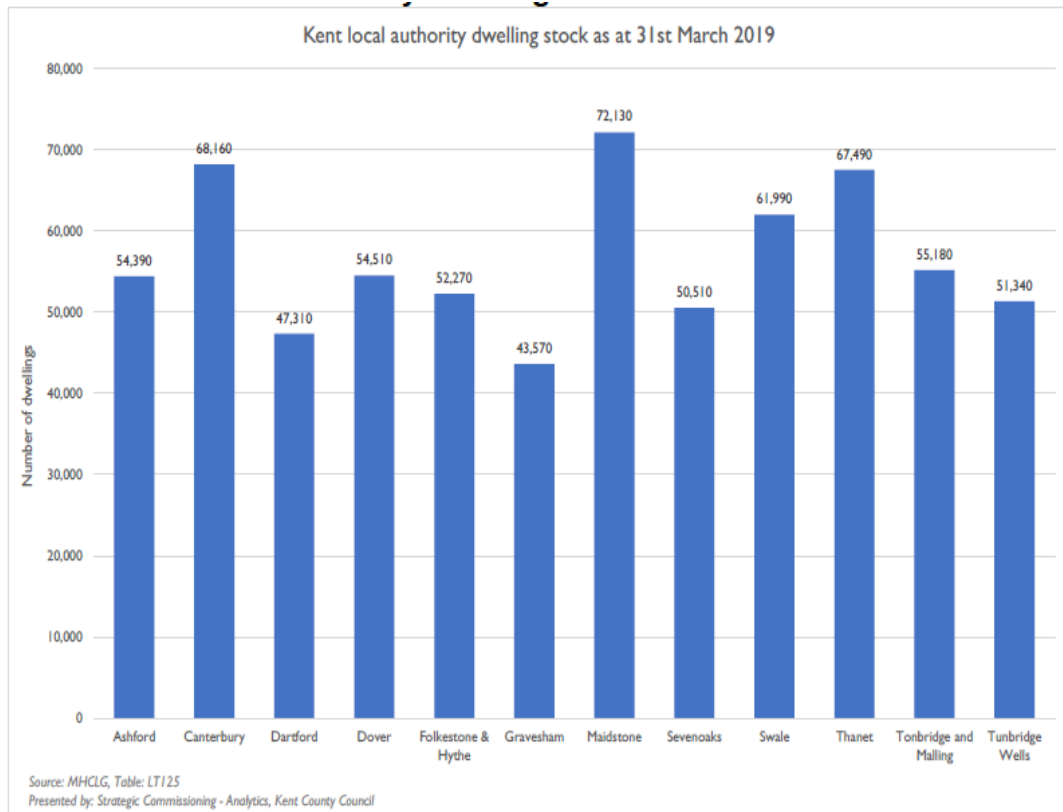
### Housing Change in Dartford and Kent

- 2.3 Alongside all other factors and opportunities, the scale of total possible housing land availability must be constrained by size. Therefore it should firstly be noted that in simple land terms, Dartford is not a large Borough in area, whether seen in a county or more metropolitan context. In land area terms, at 7,600 hectares, Dartford is the smallest out of the 13 Kent Districts.
- 2.4 Similarly, whether considering home building levels, or the number of Borough residents, proportionate growth calculations clearly relate to existing scale. Kent County Council (KCC)<sup>2</sup> analysis of central government data provides a snapshot of Dartford's overall aggregate housing stock levels in the county context. This is shown in Figure 1.

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<sup>2</sup> [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0005/81662/Housing-stock.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0005/81662/Housing-stock.pdf)

**Figure 1: Dwelling Stock of Local Authorities in Kent County**

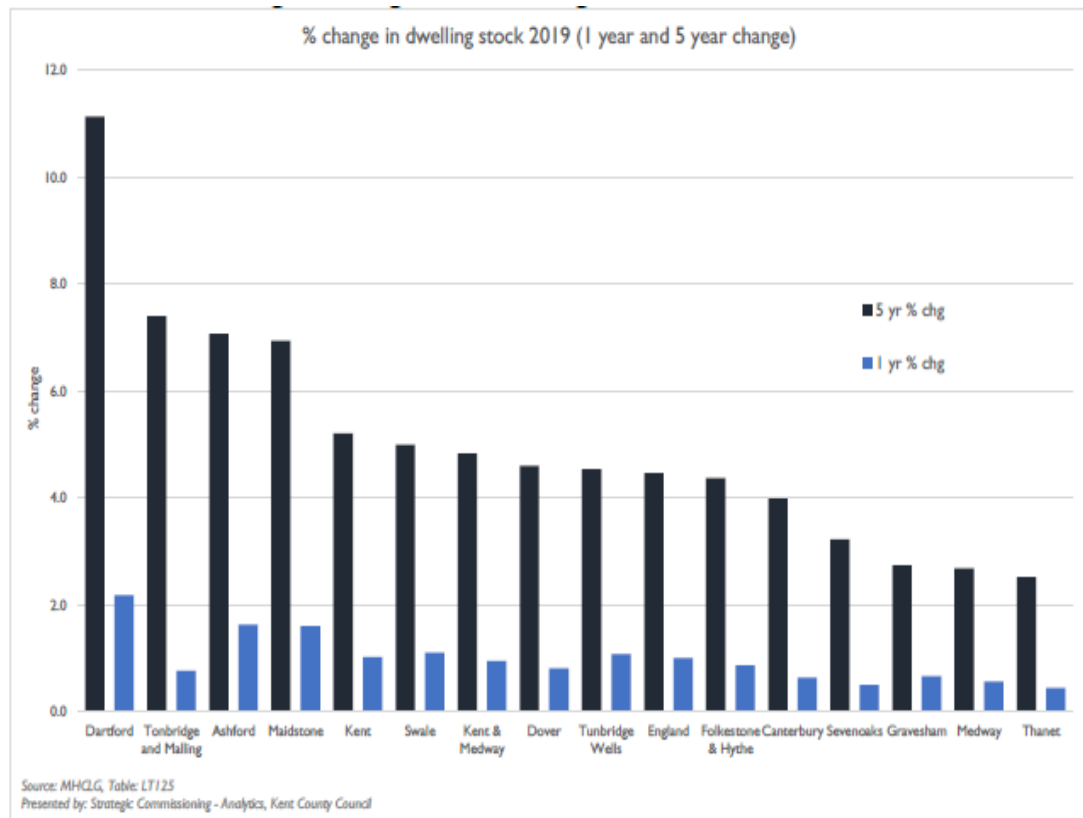


2.5 The County Council comment:

*“As at 2019 Maidstone district has the largest dwelling stock in the county (72,130). Over recent years Dartford (+4,740, +11.1%), Maidstone (+4,680, +6.9%) and Tonbridge & Malling (+3,800, +7.4%) districts have seen the biggest growth in dwelling stock over the last five years. Thanet saw the smallest 5 year percentage growth (+2.5%) while Gravesham saw the smallest number increase (+1,160) in dwellings.”*

2.6 Data from the County Council shows that Dartford has had proportionately very high rates of growth in the housing stock, both over the year to 2019 and the 5 year period prior to 2019 – the highest in Kent for both. This is shown in Figure 2. The figure also includes the average figures for England and for Kent as a whole. Gravesham, Sevenoaks, Medway and some authorities in east Kent are below the national average in terms of recent percentage growth in housing stock.

**Figure 2: Percentage Change in Housing Stock for Local Authorities in Kent**



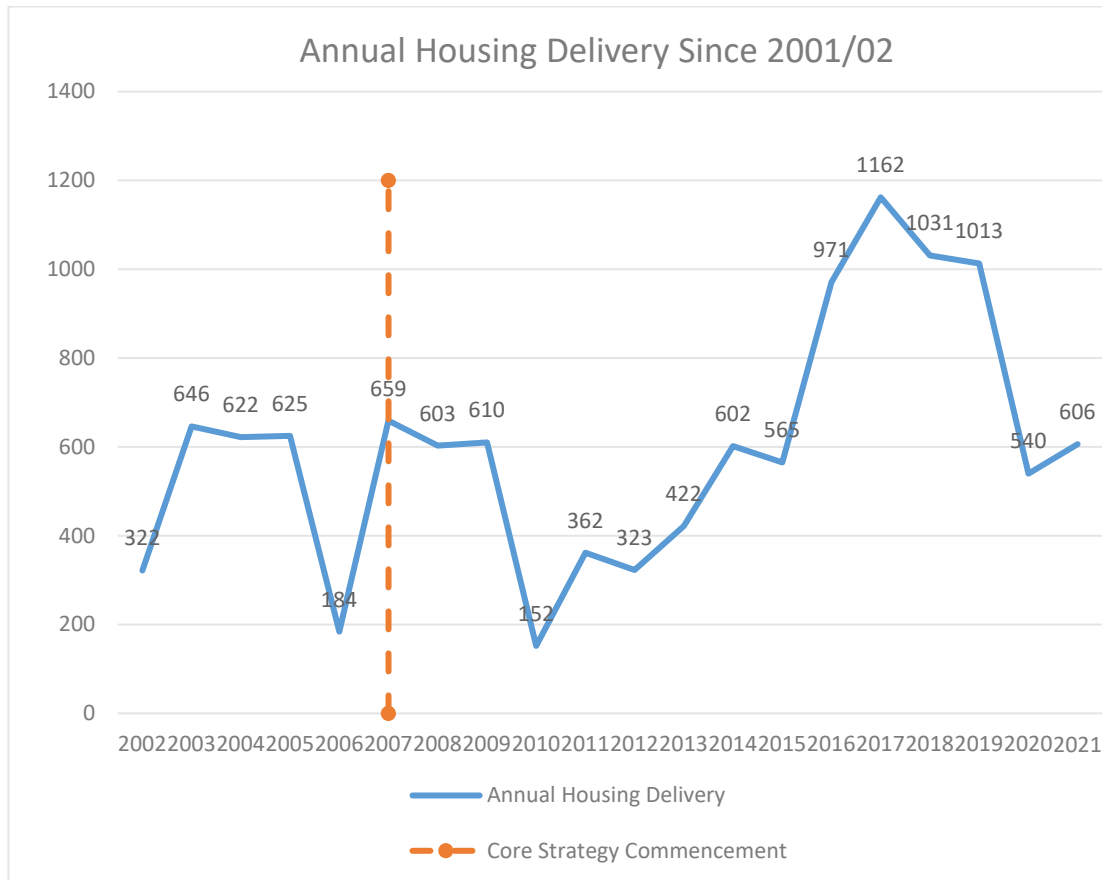
2.7 The KCC data additionally shows Dartford has the lowest number of long-term vacant dwellings in the county in 2019.

### Housing Delivery Trends in Dartford

2.8 The context of previous housing delivery rates and target levels in the Borough is also highly relevant. These are shown in Figure 3.



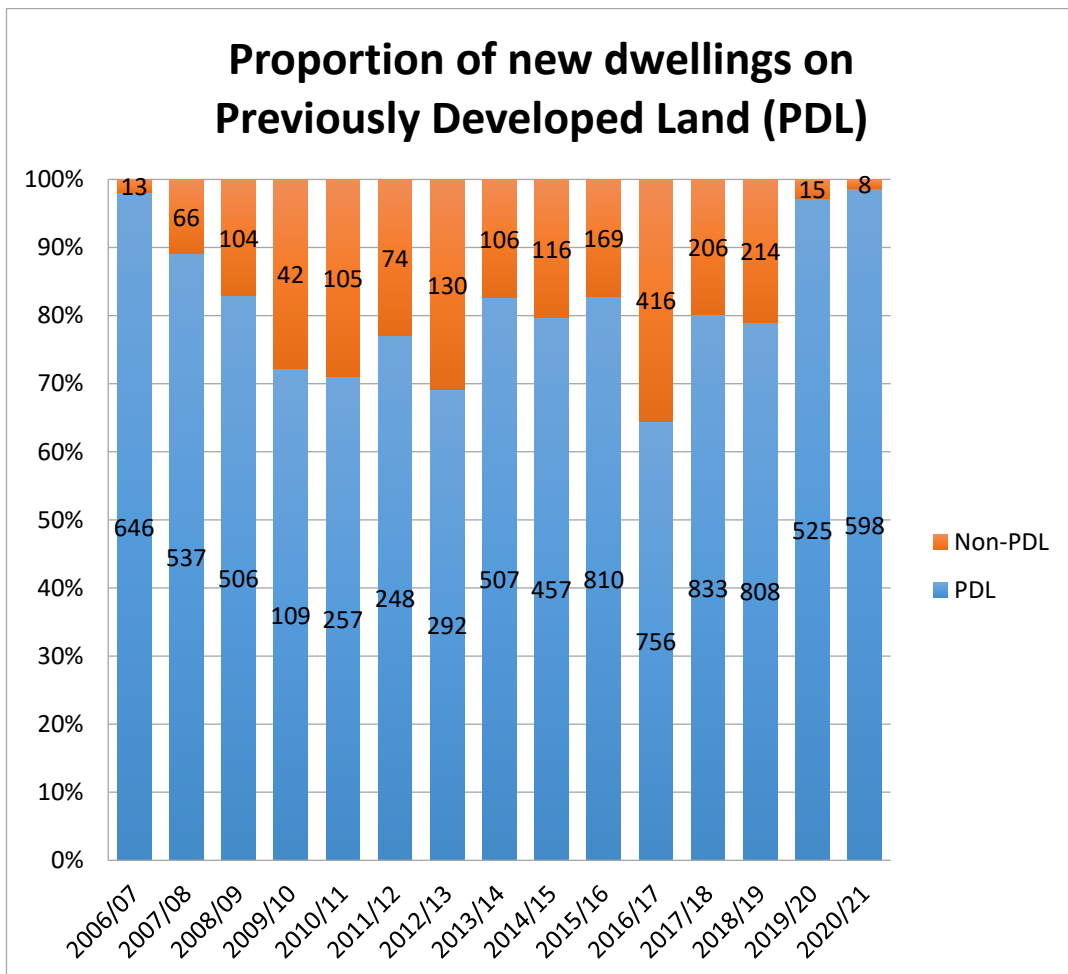
**Figure 3: Housing Rates in Dartford Borough since 2001/2002**



- 2.9 In the 20 years to 2020/2021 inclusive, the Borough’s annual delivery has 11 times been within a narrow (+/- 10%) variance of 600 homes. The overall mean average new dwellings to 2020/21 has been 601 per annum. Delivery has fluctuated with the extremes being:
- Lowest annual delivery of dwellings was 152 in 2009/10
  - Highest annual delivery of dwellings was 1,162 in 2006/17
- 2.10 Average rates of delivery are generally slightly higher in more recent periods:
- From 2006/07 (Core Strategy period) = 641 dwellings per annum mean, 603 dwellings per annum median
  - From 2011/12 (Last 10 years) = 724 dwellings per annum mean, 604 dwellings per annum median.
- 2.11 In terms of policy requirements, the delivery figures set out above compare with a headline Core Strategy target of up to 865 dwellings per annum on average, and a minimum need trigger of an average of 585 dwellings per annum.
- 2.12 For information, it can be noted that prior to the 2011 Core Strategy, the 1995 Dartford Local Plan included a much lower requirement equating to 287pa dwellings.
- 2.13 Data above supports the proposition that following the adoption of the Core Strategy, actual average delivery rates increased, albeit there have been some reduced rates due to economic fluctuations, e.g. the impact of recession in the early 2010s, and more recently.

2.14 The Core Strategy sites have a strong brownfield land focus and sets a target for 80% of housing completions to be delivered on previously developed land. The total proportion of new dwellings delivered on brownfield land in the period 2006-2021 is 81.6%. The yearly proportion is set out in Figure 4. This shows that the percentage of new dwellings on brownfield land has fluctuated.

**Figure 4: Proportion of New Dwellings built on Previously Developed and Non-Previously Development Land**



2.15 The 80% aim has typically been relevant, and can be seen to be set at a level that is applicable, having generally been achieved but not always. There have been some notable sources of brownfield sites in Dartford, typically land recycled from specific past land uses such as quarrying or historic hospital sites. However these particular sources are not continuing to produce surplus land indefinitely, which underscores the importance of supporting sustainable regeneration for the future through:

- Appropriate intensification at urban locations well served by public transport
- Introducing new neighbourhoods where regeneration opportunities now clearly exist and land can be used very efficiently e.g. to transform town centres.

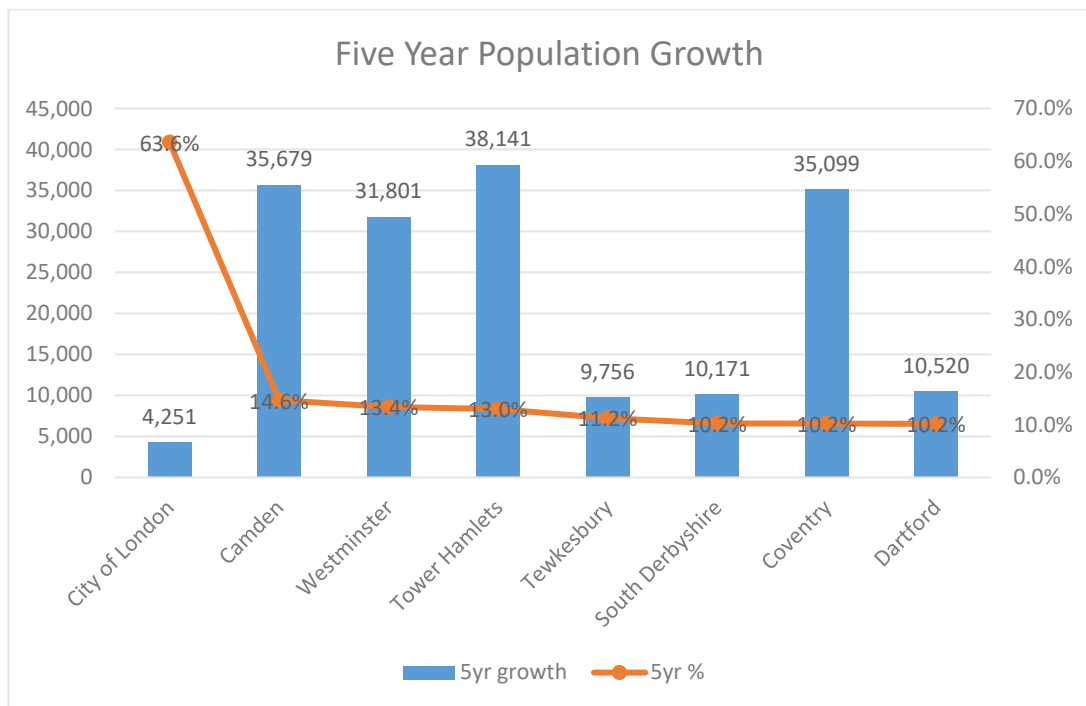
2.16 These locations are fully consistent with national policy, especially NPPF Chapter 11, Making Effective Use of Land. This report later considers the extent to which available

housing land is sufficient to meet housing needs at sustainable development locations identified in the evidence base.

## Dartford Population Growth

2.17 As well as experiencing growth of housing stock within the Borough, Dartford has seen significant increases in population. ONS mid-year population estimates show that over the last five years, the borough has experienced very high population growth rates (2<sup>nd</sup> highest in England if excluding London Boroughs, equal with South Derbyshire and Coventry). This is indicated in Figure 5 which shows all the authorities which have experienced a population growth of 10% or more.

**Figure 5: Five Year Population Growth Compared to Other Fast Growing Boroughs 2015-2020**

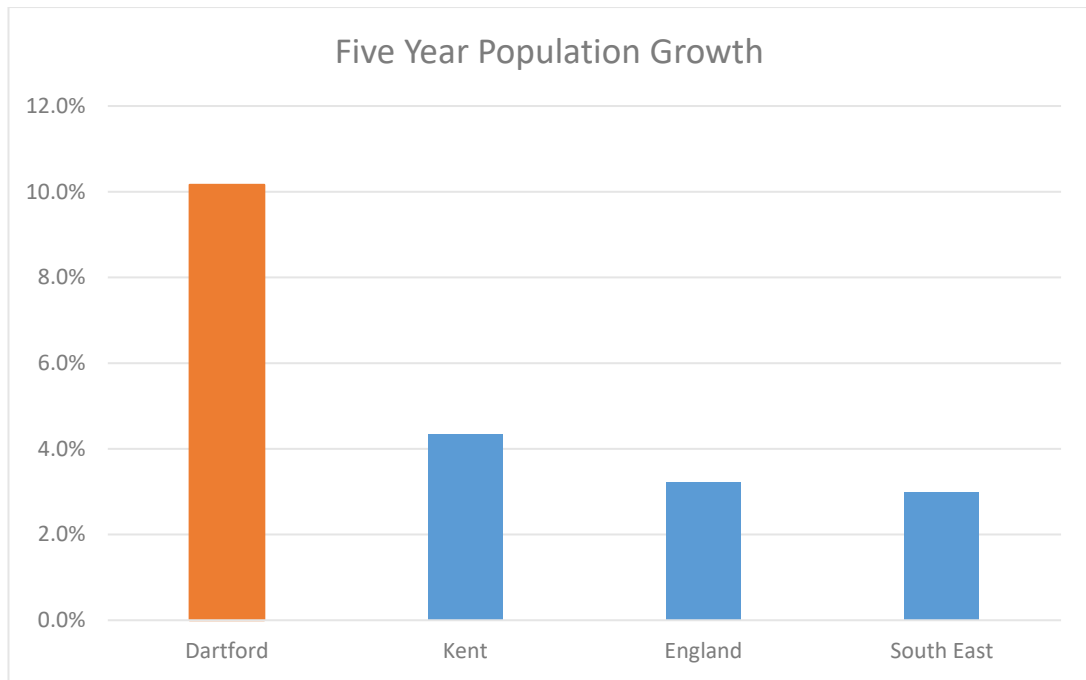


Source: ONS

2.18 Figure 5 shows that Dartford's population grew by more than 10,000 persons, equating to a 10.2% increase in the years mid-2015 to mid-2020.

2.19 Figure 6 confirms that in summary, Dartford's population growth at over 10% was a significantly higher rate than county, regional and national growth levels.

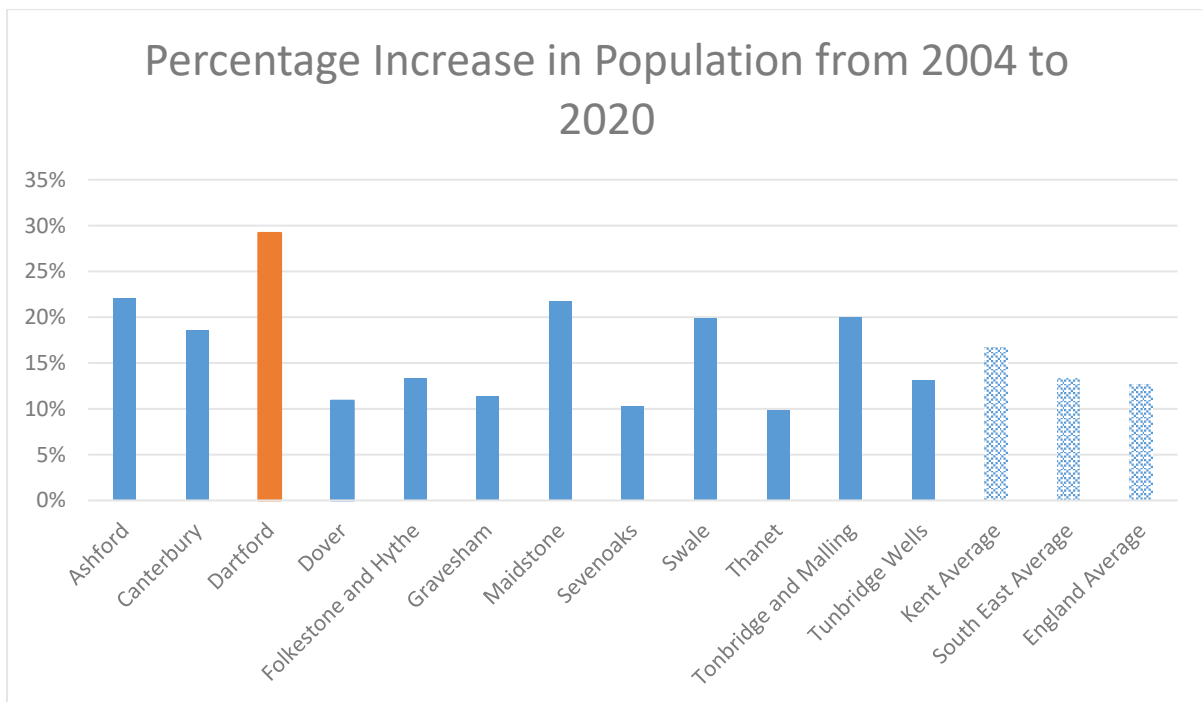
**Figure 6: Dartford's Population Growth Compared with County, Regional and National Population Growth 2015-2020**



Source: ONS

2.20 This also applies when looking long-term. Dartford’s population growth remains significantly higher than both other districts within Kent as well as averages for Kent, the South East and England. As shown in figure 7, between 2004 and 2020, Dartford’s population increased by 29%, in comparison with average increases of 17% for Kent, 13% for the South East and 13% for England.

**Figure 7: Population Growth within Kent and averages for Kent, South East and England 2004 – 2020**



Source: ONS

### 3. POLICY EVALUATION

- 3.1 This section is a central part of the report, as national guidance requires close consideration, particularly of Dartford’s housing need baseline and how a local policy requirement can be formed and implemented and take on board wider requirements.

#### Standard Method Outputs

- 3.2 The NPPF paragraph 61 on delivering a sufficient supply of homes states that policies should be informed by the standard method in national planning guidance, unless an appropriate alternative approach is justified.
- 3.3 The Dartford and Ebbsfleet housing needs assessment studies<sup>3</sup> reviewed the Dartford standard method output in the context of evidence on local affordable housing needs. The research considered that development levels in and around the standard method provided a suitable general basis for meeting housing needs in Dartford (see for example, paragraph 7.6 of the original assessment).
- 3.4 Dartford has therefore not applied its own methodology for local housing need. It is implementing the current national standard method to provide a key baseline for consideration against the full requirements of national policy.
- 3.5 The current local housing need level from the standard method has been calculated, as set out in Guidance, in the 2021 (HdH) Dartford and Ebbsfleet Residential Needs Assessment Update. In short, this uses household growth projections, adjusted for ‘affordability’ (house prices and earnings), with adjustment as detailed in this formula (plus potentially further refinements under some circumstances):

$$\text{Adjustment factor} = \left( \frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

- 3.6 The cap and the new cities/ urban centres uplift adjustment stages are not triggered in Dartford Borough.
- 3.7 This results in a current standard method Local Housing Need figure for Dartford of 750 dwellings per annum. This method reflects core demographic trends occurring in Dartford, and also takes account of key economic factors for home purchase.

#### National Principles Informing Residential Requirements

- 3.8 The overall thrust of government policy aims in the NPPF are clear. In summary, these include:
- Significantly boosting housing supply
  - A plan-led system that is positive and aspirational (but deliverable) through the presumption in favour of sustainable development. This means that plans need to:

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<sup>3</sup> HdH (2019) Dartford & Ebbsfleet Residential Needs Assessment, HdH (2021) Dartford & Ebbsfleet Residential Needs Assessment Update

meet the development needs of their area; align growth and infrastructure; improve the environment; and take account of unmet needs in neighbouring plans.

- Planning policies identifying a sufficient amount and variety of developable land that will be delivered for housing where it is needed, with specific housing requirements addressed.

3.9 These principles imply that close consideration need to be given to exceeding the standard method figure, wherever possible and sustainable. This cannot be fully achieved without identifying and quantifying the actual higher level of homes. However, specific national policy on finalising a precise housing requirement in excess of standard method housing needs is limited in the NPPF. This likely recognises the range of local factors and evidence that will influence housing delivery levels that are sustainable and achievable in a locality beyond supply and needs data, i.e. important other qualitative considerations. Similarly, key assessments such as Sustainability Appraisal have a vital role in plan making but do not generate or directly determine housing figures. Therefore the current national planning practice guidance and applicable wider local determinants have been reviewed to inform the challenges of quantifying Dartford’s residential requirement.

3.10 For practical advice, national guidance on Housing and Economic Needs Assessment<sup>4</sup> offers some points for consideration. This advises on the circumstances suggesting when an acceleration in delivery beyond local trends, and going higher than standard method level, is appropriate. Local trends are set out in section 2. The relevant national guidance is reproduced at Appendix A, and its key requirements form the basis of the factors considered (shown in the left hand column in Table 1):

**Table 1: Applying National Guidance on Increased Housing Needs**

<b>Situations where increases in housing need are likely to exceed past trends</b>	<b>Evaluation of relevance to Dartford’s new Local Plan residential requirement</b>
<p>PAST DELIVERY: “previous levels of housing delivery in an area... are significantly greater than the outcome from the standard method”</p>	<ul style="list-style-type: none"> <li>• As set out at paragraph 2.9 Dartford’s past housing delivery has fluctuated but most typically has been in the order of 600 dwellings per annum since 2001/2, as a broad indication.</li> <li>• Dartford’s history of housing delivery has generally been under the level of the standard method (750 dwellings per annum on average), not significantly greater.</li> </ul>
<p>LOCAL NEED EVIDENCE: “previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method”</p>	<ul style="list-style-type: none"> <li>• The assessment of local housing need in the Core Strategy was 585 dwellings per annum (paragraph 1.13above).</li> <li>• The Dartford and Ebbsfleet Housing Needs Assessment for the new Local Plan found that Borough residential needs assessed using the government methodology did not necessitate aiming for a requirement beyond the standard method in order to meet affordable housing requirements.</li> <li>• Across relevant information, the indications are that the Borough’s housing needs are not significantly greater than the standard method.</li> </ul>

<sup>4</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

Situations where increases in housing need are likely to exceed past trends	Evaluation of relevance to Dartford’s new Local Plan residential requirement
<p><b>STRATEGIC INFRASTRUCTURE:</b>                      “strategic infrastructure improvements that are likely to drive an increase in the homes needed locally”</p>	<ul style="list-style-type: none"> <li>• No infrastructure projects have been confirmed that will increase housing need in the Borough.</li> <li>• Infrastructure deficiencies can limit the level of demand for homes locally and constrain development, with actual circumstances such as reliance on temporary school accommodation and very high GP to patient ratios likely to deter prospective occupants and some developers. The Sustainability Appraisal confirms education/ doctors capacity issues in the Borough. Similarly, if left unchecked, Dartford’s high profile congestion problems may drive away more economic and investment stimuli of residential growth.</li> <li>• Recent experience has clearly indicated a lack of responsiveness of infrastructure provision to high population growth. For example, healthcare, education and public transport improvements have had an extended lag in provision relative to the provision of new development, impacting on wellbeing and generating significant additional journeys and further loading transport infrastructure as people require essential services further afield.</li> <li>• There are two major transport schemes planned and with good certainty of delivery:                             <ul style="list-style-type: none"> <li>○ The Fastrack route extension linking Ebbsfleet International station eastwards and westwards via Alkerden and other developments to Bluewater</li> <li>○ The A2 junction improvements at Bean and Ebbsfleet.</li> </ul> <p>These both are conceived in relation to, and will be focused on serving, planned development at Ebbsfleet that is supported and accounted for in the Local Plan</p> </li> <li>• No other strategic infrastructure projects creating new capacity are confirmed in the Borough. However, the implications of any commitment to significant new rail infrastructure and services, or the economic growth and facilities from the London Resort, would be reviewed should they be agreed and likely to have an impact during the plan period.</li> <li>• Therefore, there are no strategic infrastructure improvements that are likely to drive an increase in the homes needed locally, beyond the new homes planned for.</li> </ul>
<p><b>GROWTH FUNDING STRATEGIES:</b>                      “growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate</p>	<ul style="list-style-type: none"> <li>• No growth deal or infrastructure funding has been agreed with government on the basis of planning for further increased growth rates in the Borough.</li> <li>• No deliverable growth strategy has been agreed for Kent.</li> </ul>

Situations where increases in housing need are likely to exceed past trends	Evaluation of relevance to Dartford’s new Local Plan residential requirement
additional growth (e.g. Housing Deals)”	
<p>STATEMENTS OF COMMON GROUND:  “agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground”</p>	<ul style="list-style-type: none"> <li>• Statements of Common Ground have mostly been at an emerging stage, reflecting the situation with other Local Plan making. The rate of Local Plan progress in the wider area has meant Statements relevant to Dartford have not generally been driven forward under other plans.</li> <li>• The agreed existing Statements of Common Ground and Local Plans have not been adopted quantifying unmet need in the area, or on the basis of additional growth occurring at Dartford.</li> <li>• There is advanced progress for the Dartford Local Plan on agreeing Statements of Common Ground with neighbouring authorities. Bexley’s housing supply position under consideration reflects the recently adopted London Plan. Other Statements of Common Ground are being updated/ prepared reflecting progress on the Dartford Local Plan.</li> <li>• In summary, the position on Statements of Common Ground is informed by respective Local Plan updates and evidence release. Reflecting an interface between the rate of plan progress in Dartford, Bexley, Greater London, Sevenoaks, Gravesham and Thurrock, the situation is dynamic and requires ongoing cooperation to be maintained, statements to be finalised/ kept up to date.</li> </ul>

3.11 Out of all the considerations in the government guidance, it is apparent that the only likely rationale for Local Plan housing development levels above the standard method is if agreed through Statements of Common Ground. This has not specifically occurred at the time of writing, but the overall current Duty to Cooperate obligation on Local Planning Authorities confirms that it warrants continued work and consideration. This is consistent with key NPPF policy to take into account unmet needs of neighbouring authorities, and as part of planning positively and effectively.

3.12 Dartford’s strategic context is that Borough and Kent’s boundaries form several local, county and regional frontiers (with Bexley in Greater London and Thurrock in the East of England areas) with some freely traversed in economic and housing movements. One implication of this complexity is in a variety of cross-boundary and spatial arrangements, and contrasting situations in having usable, up to date information from plans . The Borough’s situation is consistent with the fact that after review of functional connections, the housing needs assessment<sup>5</sup> has consistently concluded that Dartford can be seen as its own housing market area.

<sup>5</sup> HdH (2021) Dartford & Ebbsfleet Residential Needs Assessment Update, paragraph 6.3.



- 3.13 Extensive cooperation between Dartford and its neighbouring Authorities has occurred<sup>6</sup> and continues, and drafting of Statements of Common Ground is progressing further<sup>7</sup>.
- 3.14 The presence of unmet housing need in the wider area has been noted and considered. In relation to setting the residential requirement, to directly quantify implications for Dartford's final housing policy which fully takes account of neighbouring authorities' requirements, the magnitude of aggregate need would need to be known and confirmed. This is not the case, partly as some adjoining authorities have not successfully progressed plans:
- The Bexley Core Strategy was adopted in 2012. Bexley has recently taken its Local Plan to Regulation 19 stage, following the adoption of the new London Plan. This progress has brought greater certainty and enabled productive discussions on housing need and delivery in Dartford and Bexley/ London, informing a Statement of Common Ground.
  - Thurrock Council, on the other side the River Thames, adopted its Core Strategy in 2011. Now, like Dartford Borough, it is aiming to meet or surpass its housing need.
  - The Sevenoaks Core Strategy was adopted in 2011. Following a request for Dartford and others to take some of its housing need in 2019, no new Plan has been adopted, and the current approach to taking it forward is still being confirmed. Nevertheless, Statement of Common Ground discussions are progressing positively.
  - The Gravesham Core Strategy was adopted in 2014. In 2015, Gravesham Borough wrote to Dartford Borough to request it takes on some of Gravesham's need. Dartford Borough requested that Local Plan evidence should be produced – further information and discussion is required. Gravesham has yet to take a Local Plan to Regulation 19 stage since the Core Strategy, and whilst emerging evidence and a Statement of Common Ground is under discussion, firm data including confirming the unmet need figure for Dartford to address is not yet available.
- 3.15 Alternatively, in the situation of no fully quantified pre-identified level of unmet needs in neighbouring Boroughs, Dartford can proactively devise the achievable level of a contribution towards unmet needs that may exist, informed as best possible by duty to cooperate discussions. This can be taken forward via negotiations on signing Statements of Common Ground. This takes account of unmet need considerations, but this does not directly help quantify Dartford's residential requirement.
- 3.16 In any event, there is no set expectation by government that an authority should vary from sustainable development and national policy key principles, including Green Belt national policy, to accommodate all unmet needs in the wider area. The national guidance considered above/ set out in Appendix A is clear that the priority for growth beyond the local housing need level relates closely to urban development.
- 3.17 To facilitate further progress, it is apparent from the above state of play of Local Plans that there is significant uncertainty still, and Dartford Borough confirming its proposed housing development levels will be directly beneficial to taking forward further co-operation and positive strategic planning. Although there is no current total of full unmet

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<sup>6</sup> DBC (2021) Duty to Cooperate Statement of Activities

<sup>7</sup> DBC (2021) Duty to Cooperate Addendum and Update

need, scope for a locally-derived contribution towards housing needs can be part of overall aims to provide flexibility of delivery and appropriately high and sustainable levels of housing in Dartford and the wider area. This will inform the update and completion of Statements of Common Ground and assist with housing needs in the area.

## Quantifying the Local Residential Requirement

- 3.18 National policy seeks to significantly boost the supply of homes. It is considered that Dartford's existing strategy has boosted housing supply substantially, as set out in section 2.
- 3.19 Looking forward, the Dartford SHLAA (DBC, 2021) demonstrates relatively good overall expected levels of housing delivery in the Borough, i.e. aggregate totals exceed the standard method level projected forward. Promisingly for delivery, existing planning permissions form a significant part of the supply, and reliance on windfall sites is very low. This supply is therefore sufficient and robust and can form a potential quantitative basis for determining the residential requirement in the Local Plan.
- 3.20 NPPF paragraph 68a sets the obligation to provide at least a five year deliverable supply, and paragraph 68b seeks "specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan". The SHLAA shows that the identification of developable sites is possible for 15+ years of the plan.
- 3.21 The base year of the Local Plan is 2017/18, aligning with:
- the adoption of the Dartford Development Policies Plan, and
  - the proposed introduction by government of the standard method.
- 3.22 On the basis of the above, drawing from national policy, and considering the continuing long-term nature of regeneration in the Borough, it is concluded that if planned residential levels in Dartford are to be based directly on available supply – regeneration potential – in the housing trajectory, this should be calculated on a period of 15 years into the plan (2031/32). This is clearly only appropriate if the amount of housing planned is above the standard method level.
- 3.23 In terms of how the residential requirement level is expressed and operates it should:
- Adhere to NPPF requirements for a sufficient provision of developable and, in particular, deliverable housing sites over the appropriate time period required to significantly boost supply;
  - Be flexible enough to not preclude additional development occurring where it is in highlighted sustainable locations, i.e. in the identified urban regeneration areas at Central Dartford and Ebbsfleet Garden City; and
  - Provide sufficient certainty to inform infrastructure planning and to manage proposals for development in unsustainable locations. This is particularly important in the context of Dartford being one of the fastest growing Boroughs in the country, operating in a two-tier system of government, which adds to the fragmentation of infrastructure service delivery.
- 3.24 There are many variations in how housing levels are expressed in Local Plans. A range - expressing upper and lower figures - is sometimes found, and could be locally

feasible (and is how the current Dartford Core Strategy works). Alternatively, a simple, single figure could be implemented. This could be explicitly applied to operate as a minimum or maximum. However justification would be needed on how this works with the requirements of national policy and with local objectives.

- 3.25 Local Plans sometimes include staggered figures that vary over time. There is allowance for this in national guidance<sup>8</sup>, and some factors such as strategic sites may relate to Dartford. However, the guidance only supports this in certain circumstances. Dartford is cautious over the ability to control both upwards and downwards deviations in rates of development and infrastructure delivery may be limited. Nevertheless, phased delivery on major sites is desirable, including for infrastructure reasons or to ensure build out in line with agreed masterplans.
- 3.26 The government's preference for regular plan updating is likely to mean that long-term specific provisions in plans for phasing many years ahead are unnecessary or inappropriate. Key local triggers for review should be identified in the Plan from the outset.
- 3.27 The housing requirement will operate alongside Plan performance monitoring and provisions that will trigger actions, including potential formal review of housing policy. This is allied with extensive government housing supply management measures, such as the Housing Delivery Test.
- 3.28 All these considerations are synthesised in Section 4.

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<sup>8</sup> Housing Supply and Delivery <https://www.gov.uk/guidance/housing-supply-and-delivery>

## 4. KEY FINDINGS REVIEW

- 4.1 This section summarises the evaluation in this report, to inform final policy outputs. The preceding important local context/ data and national policy requirements are brought together to outline findings on the potential Local Plan approach to total Borough housing levels. Deliverable housing land implications are also set out.

### Summary Context

- 4.2 Dartford is a compact small Borough, and 57% Green Belt land, but has hosted large scale population growth with significantly boosted home building levels.
- 4.3 Underlying this, residential delivery rates in particular have fluctuated but there is evidence of an upward trajectory over time following the Core Strategy. New homes have principally been from brownfield land sources.
- 4.4 Dartford's housing policy in the Core Strategy 2011 set out the maximum (up to) residential capacity in the twenty years to 2026. If account is also taken of the lower level included in the Plan for triggering actions to intervene to boost supply, the existing overall approach could be considered to be a range.
- 4.5 Planning forward, despite Core Strategy success in focusing regeneration and increasing housing supply, it is not considered appropriate under the NPPF to continue to set out headline policy as a maximum/ or up to level. However, it is recognised that if residential development occurs at a level substantially higher than expected, this can result in major adverse infrastructure and environmental outcomes.
- 4.6 The simplest and clearest approach is for the housing requirement to be expressed as a single figure. To reflect Dartford's regeneration agenda focussed on the redevelopment of urban brownfield land, area policies can provide support to bring forward further sustainable opportunities at identified urban locations, when land is available.
- 4.7 Under the government's current standard method, Dartford's local housing need level is 750 dwellings per annum. Dartford Borough is not proposing an alternative methodology for quantifying the residential need level as its starting point for setting the Borough residential requirement.
- 4.8 To put this in context, a sustained level of new home construction of 750 dwellings per annum in Dartford can be seen as a significant increase, which may equate to a 25% uplift from prevailing levels of the last two decades.
- 4.9 A housing requirement level somewhat in excess of 750 new homes a year would increase certainty of delivery, achieving an average in excess of 750 dwelling completions a year over time. However in any event, national policy has requirements that introduce a buffer to manage delivery.
- 4.10 In terms of when and why to set a requirement at a level above the standard method, government guidance on circumstances to accelerating housing delivery/ trends has been studied:

- There is no evidence of current or future housing need data, or agreements in relation to infrastructure secured on the basis of future additional growth, to indicate that a very substantial uplift on the standard method is appropriate in the Borough.
- It has been shown the principal consideration from national guidance that applies in Dartford is in relation to the issue of Statements of Common Ground (reflecting ongoing Local Plan progress in the area).
- An increase in the residential requirement also uplifts affordable housing delivery to some extent, unless extra development is concentrated on small sites that do not meet national affordable housing development thresholds. In terms of identified affordable housing needs and local delivery, the proposal to increase the target proportion of affordable housing on private developments through development management policy is significant. In addition, it should be noted that the national standard method output factors in affordability of home buying.

4.11 Appropriate allowance beyond the standard method level if possible and appropriate in Dartford, would assist with the delivery of overall housing needs, and is consistent with NPPF aims and requirements.

### Setting Dartford's Residential Requirement

4.12 These external and internal considerations for the Borough do not define a specific residential requirement number for Dartford, above the standard method level.

4.13 However rather than defaulting down to the standard method level, a positive approach is proposed in Dartford that can meet and exceed residential and regeneration needs in sustainable locations in order to provide flexibility and inform the final residential requirement level. This is aspirational but must also be realistic. From a general perspective, a lower requirement (e.g. at the standard method level) maximises certainty for Dartford's housing supply to meet the target. However, for Dartford, the identified housing land supply is complemented by additional possible sources of sustainable residential development. For instance, additional sites or faster rates of delivery in Central Dartford or Ebbsfleet could come forward depending on market conditions.

4.14 Dartford's identified housing supply has been finalised with the SHLAA showing suitable, available and achievable sites in excess of the current standard method need level. Dartford's SHLAA criteria allow for sustainable but sufficient residential development, and enable broad continuity from the Core Strategy approach that has been successful in accelerating housing supply at identified urban locations. As outlined in section 2 this provides a specific, quantified basis for setting a sufficiently high level of residential requirement in the Borough that is reliable, achievable and sustainable.

4.15 Full phasing of new housing site (SHLAA) capacity over the Plan period has been undertaken in line with guidance. Applying a 15 year horizon, drawing from national policy from the start of the Plan as identified in paragraph 3.22 above and focusing on the identified sustainable regeneration potential i.e. cumulative delivery total in the SHLAA at 2031/32, results in a total housing potential of 11,900. The Borough's housing land supply provides good certainty, partly because much of this residential pipeline already benefits from planning permission.

- 4.16 Annualised, this sets the Dartford housing requirement at 790 dwellings per annum on average (rounded).
- 4.17 The latest empirical research<sup>9</sup> confirms that impacts of the recent pandemic, and new demographic data, has not fundamentally changed Dartford's strategic needs, and that this is an up to date and suitable level to deliver.
- 4.18 Dartford's housing requirement based on the Borough's identified sustainable regeneration potential reflects the established local and national policy principles of brownfield land development near good public transport and a choice of local services and facilities. This accords with government policy to boost housing supply whilst maintaining a focus for development in Dartford's most sustainable urban locations, contributing to wider needs and protecting the Metropolitan green belt.

### Deliverable Supply

- 4.19 Close regard has been had to the NPPF, including specific housing requirements such as paragraph 67 on deliverable sites (and specific developable sites for years 6-10 and where possible years 11-15 of the plan). The achievement of housing delivery over time is featured in the Local Plan housing trajectory. The essential prerequisite for a five year supply, with an appropriate buffer on a requirement of 790 new homes per annum, is tested at Appendix B.
- 4.20 When applying the 790 dwellings per annum requirement, there is shown in Appendix B a 5.5 years deliverable housing land supply from the appropriate sites in the SHLAA.
- 4.21 Dartford is seeking to confirm this presence of a five year deliverable supply of housing land through the progression of the Local Plan (revised second Publication document) to adoption.

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<sup>9</sup> HdH (2021) Dartford & Ebbsfleet Residential Needs Assessment Update

## 5. CONCLUSIONS AND LOCAL PLAN APPROACH

- 5.1 This final section summarises key conclusions from the report, particularly section 4, and outlines the approach being taken forward in the Dartford Local Plan (revised/ second Publication plan document) to the residential requirement policy delivering housing needs.
- 5.2 A residential development level policy can now be set out in the Local Plan which meets national policy and aids local regeneration and infrastructure planning. This can maintain the principle of a regeneration potential/ urban brownfield based approach, as consistent with ensuring local housing need is fully addressed.
- 5.3 After analysis of the level of development which needs to be met, how national policy to boost housing will be satisfied, and the specific findings on available and sustainable Dartford housing potential (SHLAA), it is concluded that a Local Plan strategic policy based on an average residential requirement of 790 per annum is positive (ambitious and realistic), justified and effective.
- 5.4 This level is deliverable (see Appendix B), consistent with spatial strategy and meets the strategic objectives set out in the second Publication Local Plan aims. It will significantly increase housing supply in the Borough and maintain it over the long term. It exceeds the current standard method requirement of 750 dwellings per annum.
- 5.5 In consideration of how it is expressed and operates with other policies, the level is not specified as an “up to” level or “minimum”. This recognises how national policy and guidance works, and environmental implications. A clear single figure provides clarity and confidence, for example for infrastructure service providers.
- 5.6 The Dartford Local Plan strategic policy should also:
- Recognise a target of 80% of new homes to be brownfield land.
  - Encourage phased large site delivery/ alignment with infrastructure.
  - Include supporting residential delivery level monitoring arrangements and review triggers.

## APPENDICES

### **Appendix A: National Planning Practice Guidance: Housing and economic needs assessment**

When might it be appropriate to plan for a higher housing need figure than the standard method indicates?

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.

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## **Appendix B: Deliverable Housing Land Supply**

The process and calculations for determining Dartford’s projected five year delivery, against the five year requirement, is set out here.

A sufficient deliverable supply with the 10% buffer for a Local Plan is derived with the following steps:

- Row A in the table below confirms the 790pa requirement
- Row B in the table shows 3,191 homes have already been delivered between 2017/18<sup>10</sup> and 2020/21.
- Row C shows this is very slightly (31 dwellings) above a 790 pa rate.
- Row D shows after fully accounting for this marginal surplus within the five year period, the total five year requirement is 3,919
- Row E applies the 10% buffer to produce a total requirement.

A	Annual Housing Requirement	<b>790</b>
B	Homes already delivered to 2020/21 inclusive	<b>3,191</b>
C	Surplus (Four years of requirement – B)	<b>31= (790x4) – 3,191</b>
D	Five years of requirement, minus surplus ((Ax5) – C)	<b>3,919= (790x5) – 31</b>
E	Requirement with 10% Buffer (D + 10%)	<b>4,311= 3,919 x 1.1</b>

The PPG requires that a 10% buffer be ordinarily added to the five year housing requirement for Local Plans to account for potential fluctuations in the market over the year and ensure that the five year land supply is sufficiently flexible and robust.

After applying the 10% buffer, **the five year requirement is 4,311 (row E)**

Against this, the annual projected delivery in the housing trajectory is shown in the following table and is made up of all sites assessed as ‘deliverable’. In total, there are 4,721 homes projected within this five year period. **Dartford’s deliverable year supply meets, and exceeds, the new Local Plan requirement of 4,311 homes over the five year period and equates to a 5.475 year supply.**

	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>
<b>Projected Housing Delivery</b>	655	777	1,039	1,162	1,088

The above five year supply calculations apply the Sedgefield approach, however should the Liverpool approach be preferred the results remain similar. Dartford’s strategy is based on a strongly brownfield land, long term urban regeneration approach, often associated with the Liverpool method.

<sup>10</sup> Rationale in paragraph 3.21

With a housing requirement for Dartford at 790 homes per annum, over the Plan period (20 years), equates to a total need for 15,800 homes. From this perspective of long-term growth, the alternative Liverpool method is to for account of the surplus (or shortfall) to be spread over the whole plan period.

In applying the Liverpool approach, where the 31 surplus units are spread across the whole trajectory rather than just the first five years in row D, the buffered five year requirement in row E would be 4,334, slightly higher than the Sedgefield requirement of 4,311. This would then result in a 5.446 year supply, compared with the 5.475 under the Sedgefield approach.