

Housing Delivery Test Action Plan 2024

DARTFORD
BOROUGH COUNCIL

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1. Introduction

- 1.1. Local Planning Authorities have an important role in planning for, and demonstrating a sufficient supply of housing in their area. The Housing Delivery Test (HDT) is published by central government. The HDT is a percentage calculation of the number of net homes delivered against the number of homes required over a rolling three year period. Full details of the method used for the HDT are specified within the Housing Delivery Test Rule Book¹.
- 1.2. Where a HDT indicates that the delivery has fallen below the requirement over the previous three years there are consequences for the authority, these are:
 - Where the HDT result is less than 95%, the authority should prepare an action plan to address the causes of under delivery and identify actions to increase the delivery in future years.
 - Where the HDT result is less than 85%, the authority should include a buffer of 20% to their identified supply of specific deliverable sites in addition to producing an action plan.
 - Where the HDT result is less than 75%, the presumption in favour of sustainable development applies in addition to the requirement for a buffer of 20% and an action plan².
- 1.3. This Housing Delivery Test Action Plan (Action Plan) has been prepared by Dartford Borough Council in response to the requirement of the National Planning Policy Framework (NPPF) for the preparation of an action plan where the authority has a result less than 95%.
- 1.4. The Thames Estuary has been a longstanding national priority for regeneration and Dartford is part of this priority area. Therefore, ambitious growth plans were set out in the 2011 Dartford Core Strategy, particularly reflecting brownfield land availability. Very large scale long-term residential-led developments gained planning permission, particularly north and east of Dartford town and in the east of the Borough (the area now known as Ebbsfleet). From 2016 to 2019 (inclusive), residential completions were sustained at an average of over 1,000 dwellings per annum, mostly in or near Dartford town. The Residential Requirement Report³ addresses the past delivery context and current needs discussion in more detail.
- 1.5. Employment growth, as well as the proximity and connections to London, other national locations, and international locations, mean that Dartford has the fundamental components for enduring demand as a place to live. At the 2021 census, population growth totalled 20% in the preceding 10 years, the second highest nationally. Continued residential and economic growth is expected in Dartford

¹ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government, (2018), Housing Delivery Test measurement rule book.

² Department for Levelling Up, Housing and Communities, (2023), National Planning Policy Framework.

³ Dartford Borough Council, (2021), Residential Requirement Report.

Borough under the newly adopted Dartford Plan through existing permissions, planned supply, and new proposals, for example in Ebbsfleet and Central Dartford.

- 1.6. While there has been recent nationwide and international economic pressures (e.g. Brexit and Covid-19), there is long term confidence in Dartford Borough that sufficient housing supply will come forward at pace with The Dartford Plan adopted in April 2024 (superseding the 2011 Dartford Core Strategy). Figure 1 shows the Annual Housing Delivery from 2014 to 2023 which shows a downwards trend after 2019 to a noticeable increase in 2023. To note, as the HDT result is the 2022 result 2023 is not included in the last published HDT result.

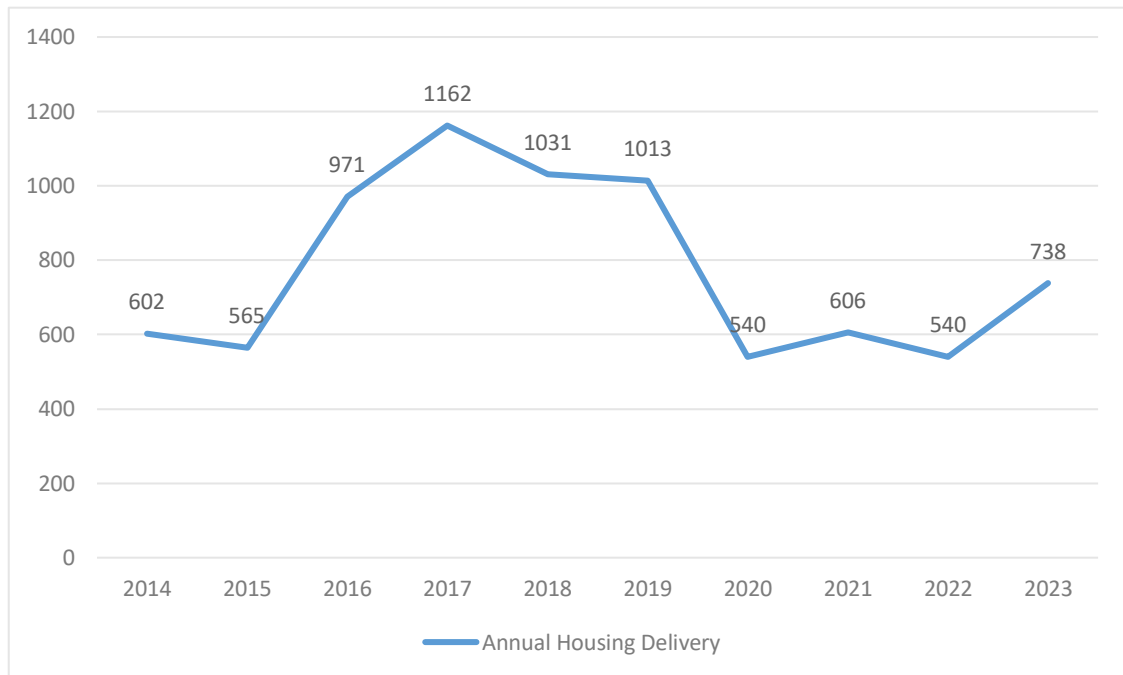


Figure 1: Dartford Borough Annual Housing Delivery from 2014 to 2023.

Source: Dartford Borough Council Monitoring Dataset.

2. Housing Delivery

- 2.1. The Planning System in the UK, and therefore new housing development, is plan-led. Dartford Borough Council have a recently adopted Local Plan (The Dartford Plan, adopted on the 22 April 2024). The Dartford Plan addresses a number of matters related to housing, site delivery, and growth. To continue to deliver the strategy of brownfield land recycling and sustainably regenerating Dartford, the rate and types of infrastructure delivery should be aligned. New homes in Dartford are planned to be delivered alongside jobs and services, and large sites should include a variety of homes. Maximising the mix of housing products, types, and tenures will increase the number of housing outlets in the Borough's large sites, enhancing market absorption and delivery rates, particularly when the national economic growth levels uplift. These matters are addressed as part of Policy S1 parts 1 and 3, Policy S2 part 1, Policy S4 part 1, and Policy M8 of the Dartford Plan.

2.2. The Strategic Housing Land Availability Assessment (SHLAA) (updated September 2022) notes that there is nearly 12,000 dwellings which are projected to be available which is sufficient to meet the local housing needs over The Dartford Plan period of 2022-2037⁴. The Housing Trajectory to 2037 including delivery, requirement and cumulative performance is shown in Figure 2. A specific overview justifying the full delivery context of all key housing sites (50 dwellings or more) was presented to the Examination in Public of the new Dartford Plan in the 'DBC Commentary on Trajectory rates of sites 50+ Units'. The commentary addresses the planning, housing, environmental, and market factors which support the assessed delivery rates and site capacity rates on which the Dartford Plan was based on, and found sound.

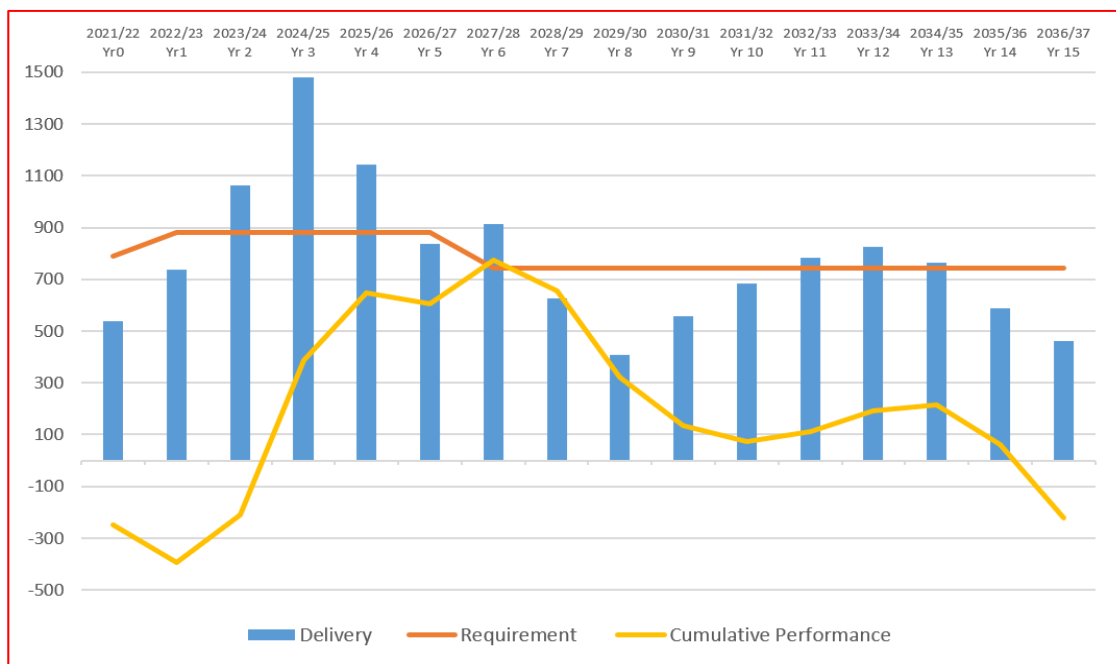


Figure 2: The Housing Trajectory.

Source: Dartford Borough Council. (2022). Dartford Strategic Housing Land Availability Assessment (SHLAA) Findings Update September 2022.

2.3. Positive actions in Dartford have resulted in progress on substantial regeneration sites that will continue to deliver new housing in the mid/ late 2020s, and potentially longer. This means there is a very low reliance of delivery from more uncertain sources, e.g. land from unidentified (windfall) sites, which can come forward through clear criteria in the Dartford Plan, Policy S5 part 2. This aligns with the delivery of sustainable development supported by infrastructure, through clear forward planning co-ordinated by the Local Plan and infrastructure planning (Policy S2).

⁴ Dartford Borough Council, (2022), Strategic Housing Land Availability Assessment (SHLAA), Paragraph 4.13.

2.4. The sources of projected housing supply are shown below in Table 1. The predominance of Dartford Borough’s housing supply is identified and well advanced; providing a choice of sites for the market to draw down and deliver. Over three quarters of the supply has a plan allocation (including some sites with planning permission)⁵.

Table 1: Source of Projected Housing Supply.

Source: Table 2 of The Dartford Plan to 2037.

Source of housing supply:	Dwellings (15 years to 2037)
Allocated (including those with permission)	9,400
Other new dwellings with planning permission ²²	1,700
Sites with no allocation or permission ²²	400
Small sites (including windfall allowance)	400
TOTAL housing supply 2022/23 to 2036/37 (inclusive)	11,900

To the nearest hundred

2.5. The allocations within the Dartford Plan are specifically directed towards the major urban areas of Central Dartford and Ebbsfleet Garden City. In these areas there is either infrastructure already in place or additional provision has been identified and in the process of being delivered. The specific delivery projects are outlined in Dartford’s Infrastructure Delivery Plan.

2.6. The allocations have inherent advantages in their current and future infrastructure provision due to location and characteristics. In particular, both Central Dartford and Ebbsfleet offer/will offer excellent railway and Fastrack connections. Central Dartford allocations also benefit from the existing urban fabric and social infrastructure. The layout and intensity of development in Ebbsfleet has been designed around public transport linking the new homes with local services. The Ebbsfleet Development Corporation brings additional resource for infrastructure and unlocking sites, and its Implementation Framework gives close consideration to infrastructure delivery including connections, community facilities, and utilities.

2.7. The Dartford Plan and the policies within it is flexible in nature. The growth areas have additional sources of potential housing land identified. This includes areas that are not allocated or counted in the current supply, however, may become available in the future. These developments will benefit from a range of policies in The Dartford Plan including D7 (other potential sites A to E) and Policy E6.

⁵ Dartford Borough Council, (2024), The Dartford Plan.

2.8. The Local Plan Viability Assessment⁶ for The Dartford Plan notes that the Local Plan proposals are considered to have reasonable prospects of viability, meeting the National Planning Policy Framework (NPPF) criteria, and being consistent with the Planning Practice Guidance (PPG) in viability terms. The assessment further notes that Dartford Borough Council has a strong track record on development, delivering [housing] at a high level. The assessment draws the conclusion that the Dartford Plan policies which affect housing development should support suitable prospects of delivery. Specifically, its recommendations led to bespoke approach to affordable housing in Central Dartford to ensure development remains viable despite higher construction costs⁷.

3. Challenges and Constraints

3.1. The 2022 HDT which resulted in Dartford Borough Council having an HDT measurement of 85% was influenced by national and international economic matters including rising construction costs, Brexit, labour shortages, Covid- 19, and inflation. Due to the period and method of calculation using periods from 2019 to 2022 the measurement for Dartford fell short of the 95%. As these are not local barriers they are difficult to address at the Local Authority level, however, through the Local Plan and SHLAA process there has been extensive research into future supply. For the next three years, from 2023 to 2026 the delivery is projected to be well above the requirement (Figure 2).

3.2. Challenges which are more local in nature include infrastructure pressures arising from lags in delivery by service providers, as well as the high levels of demand from population growth and economic activity that the Borough has hosted. This includes aligning the timing of housing development with local infrastructure such as transport links, healthcare services, and education. Infrastructure delivery responsibilities are fragmented, with Dartford Borough Council's role limited. Kent County Council is the highway and education authority, with other responsibilities resting with national organisations and private companies. The Dartford Plan, however, has a number of policies related to infrastructure planning and delivery (including policies S2, M15, M16, and M17). The Future Infrastructure Statement⁸ was produced to support the delivery of the Dartford Plan and provides a strategic longer term context to direct infrastructure investment decisions.

⁶ Dixon Searle Partnership (for Dartford Borough Council), (2021), Local Plan Viability Assessment Final Report.

⁷ Dartford Borough Council, (2024), The Dartford Plan to 2037. Policy M7, part 2a.

⁸ Dartford Borough Council, (2021), Future Infrastructure Statement.

4. Key Actions to Increase and Monitor Housing Delivery

- 4.1. The key action which has been ongoing since 2018 is the new Local Plan. The Dartford Plan was adopted on the 22 April 2024 and has dedicated policies and site allocations in order to meet both housing and infrastructure delivery targets to 2037. The quantity, location and makeup of housing supply, and provision of a deliverable five year supply, has been recently and thoroughly tested -with the February 2024 Inspector's Report finding it 'sound'. This plan will be reviewed every five years by the planning policy team.
- 4.2. Dartford Borough Council is further expanding infrastructure planning activities to support continued sustainable growth. There is a significant uptake in the amount of Community Infrastructure Levy (CIL) funding allocated toward new infrastructure as well as liaison with providers such as Kent County Council (KCC) and the NHS is expanding, post Dartford Plan adoption.
- 4.3. The identified Dartford Borough housing land supply is almost exclusively made up of existing developable permissions and sites found deliverable or developable in the Strategic Housing Land Availability Assessment (SHLAA). The Dartford Plan provides flexibility for housing delivery including provision for additional sites to be noted for residential development through formal secondary documents such as the Brownfield Land Register. The housing requirement will continue to be satisfied and will be kept up to date and flexibly managed and reflected in regular five year deliverable housing land supply statements and/or monitoring.
- 4.4. An additional action that will be undertaken in support of this Action Plan is monitoring. The data gathered and examined as part of the Local Plan preparation concluded there is sufficient delivery of housing to meet the requirement. The planning policy team will annually monitor the delivery of housing in relation to the expected delivery for the plan period to 2037. Should delivery be materially and consistently lower than anticipated and intervention be required, the Dartford Plan will be reviewed or this Action Plan will be updated to reflect any additional causes and challenges which result in the under delivery of housing.