

**HOUSING
DELIVERY TEST
ACTION PLAN**

**FEBRUARY 2025
PLANNING SERVICES**

DARTFORD
BOROUGH COUNCIL

CONTENTS

1. Introduction.....	2
2. Housing Delivery	4
3. Challenges and Constraints.....	7
4. Key Actions to Increase and Monitor Housing Delivery.....	8

1. INTRODUCTION

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), published annually by central government, is a percentage calculation of the number of net homes delivered against the number of homes required over a rolling three year period in each local borough. Full details of the method used for the HDT are specified in the Housing Delivery Test measurement rule book¹.

The requirements of the HDT are set out in the National Planning Policy Framework (NPPF). When a Local Planning Authority has failed to meet the requirements of the HDT as prescribed in the NPPF, the authority is required to take actions. These requirements 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.

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%.

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 (Ebbsfleet Garden City). From 2016 to 2019 (inclusive), residential completions were sustained at an average of over 1,000 dwellings per annum, mostly in or near Central Dartford. The Residential Requirement Report³ (September 2021) prepared by Dartford Borough Council addresses the past delivery context and current needs discussion in more detail.

Employment growth, proximity and connections to London, and good connections to other key national and international locations, provide Dartford Borough with 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 in the country. Continued residential and economic growth is expected in Dartford Borough under the newly adopted Dartford Plan to 2037 (superseding the 2011 Dartford Core Strategy) through existing permissions, planned supply, and new proposals (for example in Ebbsfleet Garden City and Central Dartford).

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

¹ Housing Delivery Test measurement rule book (2018)

² National Planning Policy Framework (2024)

³ Dartford Borough Council Residential Requirement Report (2021)

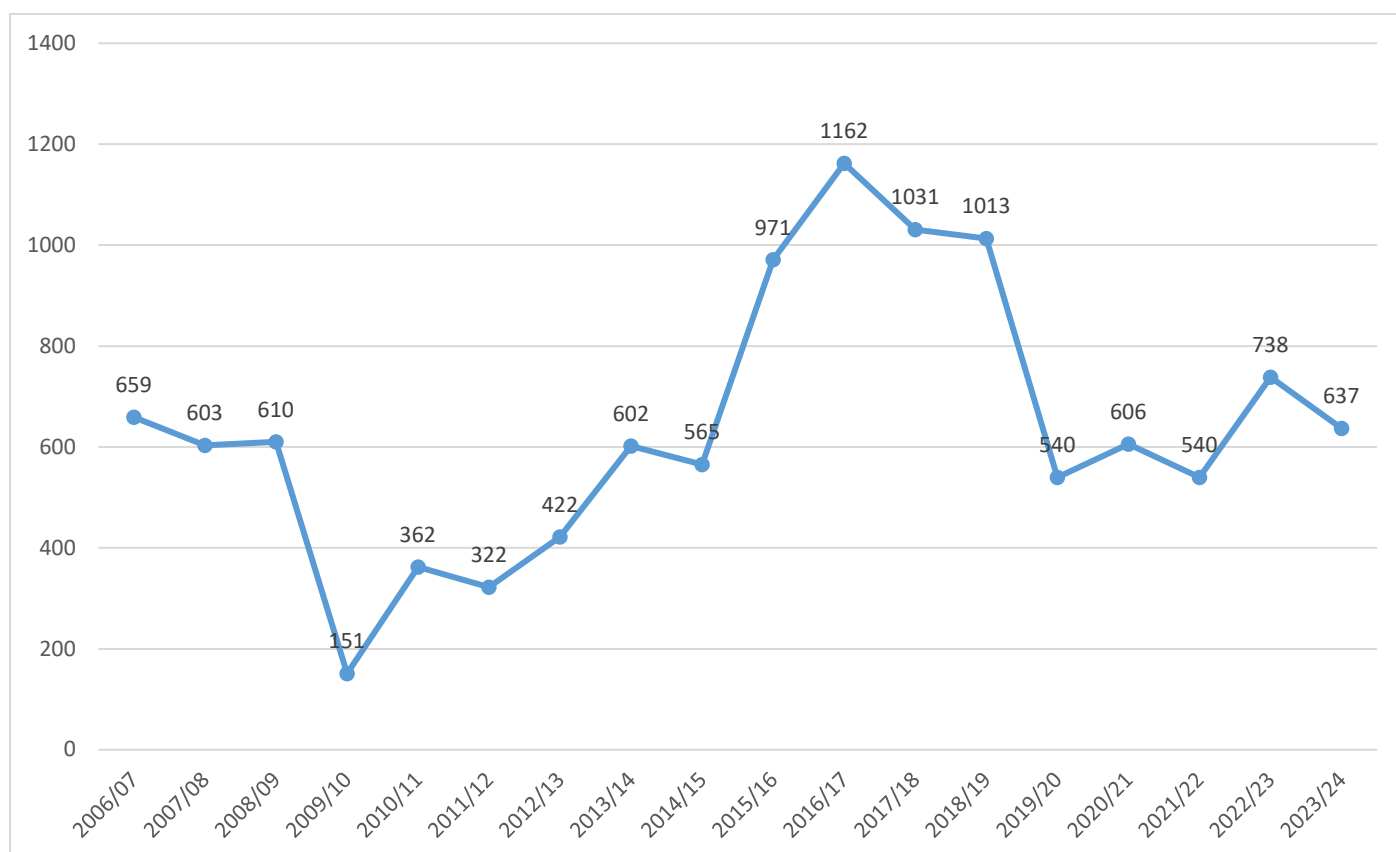


Figure 1: Dartford Borough Annual Housing Delivery from 2014 to 2024.

Source: Dartford Borough Council Monitoring Dataset.

2. HOUSING DELIVERY

The planning system in the UK is plan-led, and this influences how new housing development is delivered. In April 2024 Dartford Borough Council adopted the new Dartford Plan to 2037, which addresses a number of matters related to housing, site delivery, and growth. To continue to deliver the strategy of brownfield land recycling and sustainable regeneration in Dartford, infrastructure delivery should be aligned with planned growth. 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 is intended to enhance market absorption and delivery rates, particularly when the national economic growth levels uplift. These matters are addressed as part of Policy S1, criterion 1 and 3; Policy S2, criteria 1; Policy S4, criteria 1; and Policy M8 of the Dartford Plan.

The Strategic Housing Land Availability Assessment (SHLAA) notes that there are almost 12,000 dwellings projected to be available in the next 15 years, which is sufficient to meet the local housing needs over the Dartford Plan period of 2022-2037⁴. Figure 2, below, shows the expected 15-year housing trajectory to 2037 including delivery, requirement and cumulative performance. A specific overview justifying the full delivery context of all key housing sites (50 dwellings or more) was presented during the examination of the Dartford Plan⁵. 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.

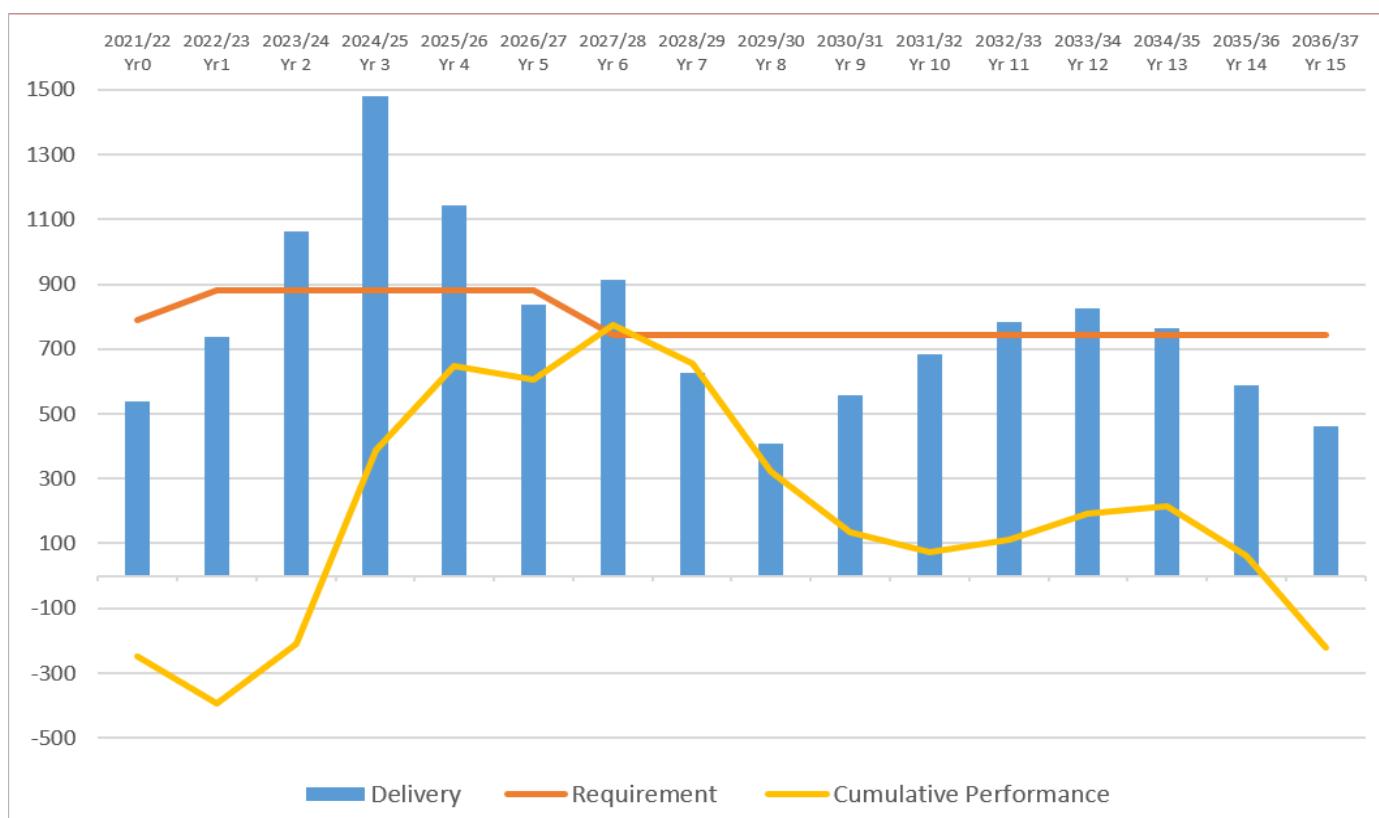


Figure 2: Dartford Borough 15-Year Housing Trajectory 2021/22 to 2036/37.

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

⁴ Strategic Housing Land Availability Assessment (2022), Paragraph 4.13

⁵ Strategic Housing Land Availability Assessment (2022), Additional Appendix: Dartford Borough Council Commentary on Trajectory rates of sites 50+ Units

Positive actions in Dartford have resulted in progress on substantial regeneration sites that will continue to deliver new housing into the next decade, and potentially longer. This means there is a very low reliance of delivery from more uncertain sources, such as land from unidentified (windfall) sites (see Policy S5, criteria 2 of the Dartford Plan). This aligns with the delivery of sustainable development supported by infrastructure, through clear forward planning co-ordinated by the Local Plan and infrastructure planning (see Policy S2).

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 predicted supply has a plan allocation (including some sites with planning permission).

Table 1: Source of Projected Housing Supply

Source of housing supply	Dwellings (15 years to 2037) <i>Rounded to the nearest 100</i>
Allocated (including those with permission)	9,400
Other new dwellings with planning permission	1,700
Sites with no allocation or permission	400
Small sites (including windfall allowance)	400
Total housing supply 2022/23 to 2036/37 (inclusive)	11,900

Source: Table 2 of the Dartford Plan to 2037.

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 Plan⁶.

The allocations have inherent advantages in their current and future infrastructure provision due to location and characteristics. In particular, both Central Dartford and Ebbsfleet Garden City 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 Garden City 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.

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

⁶ Dartford Infrastructure Delivery Plan (2024)

The Local Plan Viability Assessment⁷ for the Dartford Plan notes that Local Plan proposals are considered to have reasonable prospects of viability, meet NPPF criteria, and be consistent with 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 costs⁸.

⁷ Local Plan Viability Assessment Final Report (2021)

⁸ The Dartford Plan to 2037 (2024), Policy M7, criteria 2a.

3. CHALLENGES AND CONSTRAINTS

The 2023 HDT resulted in Dartford Borough Council having an HDT measurement of 90% was influenced by national and international economic matters including Brexit and Covid-19, which have impacted rising costs of construction materials, labour shortages, and inflation.

As these are not local barriers they are difficult to address at the Local Authority level. Nevertheless, the preparation of the Dartford Plan and the SHLAA has taken into account extensive research into future housing supply in Dartford Borough. Delivery is projected to surpass minimum requirements over the next three years (see Figure 2).

Challenges on a more local level include increasing pressure on infrastructure including transport links, healthcare services, and education facilities. This has been caused by increased demand due to population growth and economic activity, and lagging infrastructure delivery from service providers. Infrastructure delivery responsibilities are fragmented and Council's role limited. Responsibilities lie predominately with Kent County Council (highways and education) and other national organisations and private companies. The Dartford Plan has a number of policies related to infrastructure planning and delivery (including Policies S2, M15, M16, and M17). The Future Infrastructure Statement⁹ was produced to support the delivery of the Dartford Plan and provides a strategic longer term context to direct infrastructure investment decisions.

⁹ Dartford Borough Council, (2021), Future Infrastructure Statement.

4. KEY ACTIONS TO INCREASE AND MONITOR HOUSING DELIVERY

The key action to increase housing delivery continues to be the Dartford Plan. The Dartford Plan has a number of dedicated policies and site allocations that have been developed to meet housing and infrastructure delivery targets until 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 Inspector's Report finding it 'sound'¹⁰. This plan will be reviewed every five years by the planning policy team.

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 continuous engagement with providers such as KCC and the NHS.

The identified housing land supply in Dartford Borough is almost exclusively made up of existing developable permissions and sites found deliverable or developable in the most recent SHLAA and 5-year housing land supply analysis¹¹. 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.

An additional action that will be undertaken in support of this Action Plan is monitoring. The data gathered and examined as part of the preparation for the Dartford Plan 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.

¹⁰ Report on the Examination of the Dartford Local Plan 2017 to 2037 (2024)

¹¹ 5-Year Housing Land Supply (2025)