

## Home Builders Federation

### Matter 1

#### DARTFORD LOCAL PLAN EXAMINATION – STAGE 1

#### Matter 1 – Procedural and legal requirements including the Duty to Co-operate

**Issue - Whether the Council has complied with the Duty to Co-operate in the preparation of the Dartford Local Plan.**

#### Questions

#### Housing needs, the housing requirement and housing provision

1.1 Other than Gravesham Borough Council, were any other requests made to Dartford Borough Council from other authorities to accommodate any unmet housing need? If so, from who and when were any such requests made?

As is noted in our representations there are significant unmet needs in London as well as in the adjoining London borough of Bexley. Whilst it is for Council to provide detail as to any requests it is important to note it is clear in the London Plan that the Mayor of London is seeking support from the rest of the south east to help meet identified unmet need for housing. This is clearly set out in paragraph 2.3.4 which states “... *the Mayor is interested in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital*”. So, whilst there may have not been a direct plea for assistance there was a clear general request for support that the Council will have been aware of. As such London’s unmet housing needs should have been a key part of its duty to co-operate considerations and any subsequent decision making by the Council on housing needs and supply.

It is also not appropriate to argue that it is for the Mayor, or indeed any other authority, to make the running on this matter. As was stated in in paragraph 24 of the final report of the Tonbridge and Malling Local Plan with regard to the fact the Sevenoaks did not formally ask Tonbridge and Malling for help with their unmet needs “... *this is a circular argument with a risk that both parties defer the issue to the other without meaningful attempt to resolve it*”. Whilst we are in no way suggesting that the issue of London’s unmet needs could be resolved by DBC it could have considered the issue earlier and formally made provision to meet some of London’s unmet needs which alongside



others across the south east and east of England could lead to the shortfall in London being addressed. However, this requires the issue to be taken seriously and at least considered as part of the preparation of local plans.

1.2 From which authorities' is the proposed 40 dwellings per annum (dpa) 'contribution to unmet housing need in the wider area' intended to meet? What proportion of this unmet housing need is proposed to be accommodated from each?

It is important to note that the ability of DBC to support other areas would appear to be as a result of a reduction in the local housing needs assessment rather than evidence of the active and on-going co-operation between Dartford and neighbouring Boroughs. As such the HBF considers it necessary that the Council clearly identify within the local plan those unmet needs the Council are seeking to address. As we noted in our representations the most significant level of unmet needs is in London and we would suggest that the Council clearly states that the 40 additional homes are being delivered in response to this issue. However, we note that there are likely to be unmet needs from elsewhere, such as Gravesham, and as such the Council should have examined whether it could have done more from the start of the plan making process to address the needs of other areas.

1.3 Was engagement with Gravesham Borough Council on the quantum of unmet housing need to be accommodated in the Dartford Local Plan constructive, active, and ongoing during the plans' preparation?

No comment.

1.4 What evidence is there of the attempts made to reach agreement between Dartford Borough and Gravesham Borough Council in respect of unmet housing need?

For Council.

1.5 What evidence is there of any attempts to reach agreement with any other authorities in respect of unmet housing need?

As outlined above the Council's position with regard to unmet needs is a result of the local housing needs assessment for DBC reducing as the plan has progressed rather than from a proactive attempt to meet the needs of neighbouring areas. This would appear to be the reason why the Council state in the submitted local plan that it could potentially support delivery of some unmet needs in the wider area and have not reached a specific agreement with any authority as to unmet needs. It is also evident from the SoCG with the London Borough of Bexley that unmet housing needs were discussed and concludes on page 7 should there be any unmet needs in Bexley that it would be:

*"...appropriate for any available future housing delivery contribution from Dartford to be drawn down in the first instance if required by Bexley as the logical priority authority of those adjoining Dartford."*

And that

*“... if there is a need then both parties consider that there could be scope to call upon Dartford’s allowance.”*

However, what is lacking is the recognition that there are unmet needs in Bexley at present. Whilst it is noted in the SoCG that housing needs as calculated using the standard method is significantly higher than the London Plan Target for Bexley it does not appear to acknowledge that the housing target in the London Plan of 685 dpa is a capacity constrained figure. The level of delivery required in Bexley to meet needs over the next ten years that was identified by the GLA, and included in the submitted London Plan, was 1,245 dpa. As such there is evidently a significant shortfall in supply to meet identified housing needs in Bexley that have not been properly discussed with Bexley or considered by DBC. Without such considerations the effectiveness of the co-operation must be questionable as it would not have adequately informed the decisions made by DBC as to the level of unmet needs in Bexley and any considerations as to amending Green Belt boundaries.

Mark Behrendt MRTPI  
Planning Manager – Local Plans SE and E