

Sent by email to: localplan@dartford.gov.uk

20/20/2020

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Dartford Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the preferred options for the Dartford Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Housing needs and the requirement

Housing needs

2. Question 9 of the consultation document asks whether an alternative figure be used when planning for housing delivery within Dartford. We would agree with the Council's calculation as to the minimum number of homes that it is required to deliver using the standard method. However, the Council state that they expect to maintain the current levels of housing growth of 865 dwellings per annum from the current Core Strategy. We support Councils who are seeking to deliver higher housing targets and given the growth aspirations of the Council it is appropriate for the Council, as set out in paragraphs 2a-010 and 2a-024 of Planning Practice Guidance (PPG) to plan for more homes than the minimum required under Government policy.
3. However, in addition the Council need to consider whether it can meet any of the unmet needs of neighbouring areas as required by Paragraph 60 of the National Planning Policy Framework (NPPF) which states that:

"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."

There are currently two areas neighbouring Dartford where we are aware that



there are shortfalls in housing delivery. The first, and most pressing area with unmet housing needs is London where, following the examination of the London Plan, it was concluded by the inspectors that the delivery expectations for each London Borough was overestimated by the GLA and that housing needs would not be met “*by some margin*”¹. As a result of this it is now expected that there will be shortfall in delivery of some 140,000 homes over the next 10 years across London against stated needs. We recognise that a collective approach across the south east in meeting the capital’s needs would be the most effective way forward but given the lack of willing partners coming forward to support London it is necessary to push this matter through the preparation and examination of individual local plans. The Council must therefore engage with the GLA and neighbouring London Borough’s to discuss the level of unmet needs in this part of the capital.

4. In addition to London’s unmet needs Dartford will need to discuss with Sevenoaks whether they intend to meet their housing needs in full. We recognise that there may be some uncertainty over their position at present but it will be important to ensure that the appropriate discussions take place with Sevenoaks on this matter.

Housing requirement

5. The Council state that their approach to housing is to plan for the provision of 797 to 865 homes. It is not clear whether or not the Council intend set their housing requirement as a range. If this is the Council’s intended approach, we do not consider it be a sound basis on which to plan for more homes. It is clear from the evidence presented by the Council and that there is considerable unmet need in neighbouring areas that the Council’s housing requirements should be greater than the 797 dpa minimum calculated using the standard method. The final requirement will need to take into account both the economic and regeneration aspirations of Dartford and the need to meet some of the unmet needs arising in neighbouring areas.
6. The housing requirement in the new local plan should also be expressed as a minimum to indicate that this is not a ceiling on the amount of development within an area. Whilst the Council have not stated its position with regard to the final housing requirement, we note that its preferred option is to remain within current development target. However, if the Council ensure to ensure that its housing requirement is achieved it must plan beyond this level. It is rare for any development to progress as predicted. The start date is likely to be delayed as a result of a range of factors such as approval of pre-commencement conditions and delivery rates being far less consistent than is set out in the Council’s, often ambitious, housing trajectory.

¹ Paragraph 175 <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/inspectors-report>

Housing supply

7. The main focus of any overarching strategy should be to ensure that the development needs of their area are met. If the Council's preferred option for the development of Dartford, as set out on page 21 and page 22 of the consultation document, achieves this fundamental aim of Government policy then we would consider it to be a sound approach. However, the strategy should not be so constrained as to offer no flexibility in its housing supply. The development strategy needs to offer sufficient flexibility to allow it to adapt to rapid change, as set out in paragraph 11 of the NPPF. The strategy therefore needs ensure, as outlined above, that more housing is being planned for than minimum requirements to take account of the uncertainties in bringing forward residential development. The HBF recommends that a buffer of at least 20% above minimum requirements provide the necessary flexibility required by national policy.

Renewable energy and water management

8. The HBF prefers a national and standardised approach to improving the energy efficiency of buildings, the provision of renewable energy and the delivery electric vehicle charging points. The housebuilding industry, through the HBF, has resolved to implement stronger measures to improve the environmental performance of new residential developments. This is in terms of reducing carbon emissions in new homes, providing gains in biodiversity on all developments, green infrastructure and improving the environment around new developments.
9. As part of this work, the industry will need to take into account the Government's measures on the Future Homes Standard (see the MHCLG consultation in October 2019) and Bio-Diversity Gain – both of which will be mandatory for new residential developments in 2020. In terms of these new regulatory targets applying to new development from 2025 onwards – to deliver the objectives of the Future Homes Standard – the industry, with the leadership of the HBF, will be commissioning work to consider what the industry can do, taking into account developments in research and product development within that time-frame, and what new standards can feasibly be adopted and implemented by the industry.
10. To assist with this, it is the industry's preference for a national approach to improving the environmental performance of residential developments, rather than local authorities setting their own standards. We consider this is necessary to allow research and development and supply chains to focus upon responding to agreed national targets, and for training course providers to plan their training programmes to equip the labour force. It is inefficient to create a plurality of standards. This will militate against effective action.

Electric vehicle charging

11. We note that the consultation states that the Council will consider going beyond building regulations with regard electric vehicle charging points. The HBF prefers

a national and standardised approach to the provision of electrical charging points in new residential developments. We would like this to be implemented through the Building Regulations rather than through local planning policy. However, if the Council does choose to make policy in this area there are several issues that it will need to consider carefully.

12. Firstly, any policy, including a requirement for charging points, should be clearly written and unambiguous. The policy will need to specify the quantum and type of provision sought either AC Level 1 (a slow or trickle plug connected to a standard outlet) or AC Level 2 (delivering more power to charge the vehicle faster in only a few hours) or other alternatives.
13. Secondly, the Council's work should be supported by evidence demonstrating the technical feasibility and financial viability of its requirements. The Council must justify any requirement by including confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all, or a proportion of dwellings, have charging points. We argue this because if re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables. This might mean that new sub-station infrastructure is necessary increasing the cost of provision. There may also be practical difficulties associated with provision to apartment developments or housing developments with communal shared parking rather than houses with individual on plot parking.

Affordable housing

14. We note that the consultation document states at paragraph I6 that the Council is looking to "... *increase the overall affordable housing target aspired to in planning policy*". Whilst the Council acknowledge that any future requirement will need to be subject to viability testing, we are concerned that the Council are looking at a level of affordable housing to aspire to rather than a the more pragmatic approach that is signalled in paragraph 57 of the 2019 NPPF.
15. The approach to viability in the 2019 NPPF is one of the key differences with the previous iteration. The earlier framework required a plan to be deliverable but enabled local planning authorities and developers to negotiate with regard to developer contributions to reflect site specific circumstances. However, this position has been altered by the 2019 Framework which places the primary emphasis for viability testing on the local plan. There is now the assumption, as outlined in paragraph 57 of the Framework that the decision makers can assume that all development that is fully policy compliant is viable. Furthermore, the paragraph goes on to state that it is for the decision maker to decide how much weight it gives to evidence provided by the applicant challenging these assumptions. Therefore, to suggest that the Council might set an aspirational target is worrying given that national policy provides much less scope for negotiation.

16. In fact, the Council must look to do the opposite and set a policy that is more pragmatic and one that will allow for the majority of development to come forward without negotiation. The Council are still to undertake their viability evidence and as such it is impossible to conclude whether the suggested increase in affordable housing contributions will be viable, especially alongside the impact of new local requirements such as electric vehicle charging points and new national policies such as Biodiversity Gain. We would like to draw the Council's attention to paragraph 10-001 of PPG which states that "*policy requirements should be informed by ... a proportionate assessment of viability that takes into account all relevant policies, and local and national standards*". Therefore, whilst we recognise that the statements on affordable housing provision are caveated, a more policy compliant approach would have been to consider the potential for development to deliver suggested policy requirements first.

Housing type and Size

Accessible and adaptable dwellings

17. As set out above the HBF considers a standardised and national approach to technical regulations to be the most appropriate way forward. As the Council progresses this plan it will need to have regard to the Future Homes Standards and obviously amend its position accordingly. However, on the basis of current policy we do not consider the evidence is sufficient to support the requirement for all homes to be built to part M4(2). National policy requires Councils to justify on the basis of needs and viability the adoption of the optional technical standards for housing. As the Council have stated they are yet to test the cumulative impact of their policies on new development. In relation to the need for such homes the Council's housing needs assessment – the Dartford and Ebbsfleet, Housing Needs Assessment (DEHNA) published in October 2019, has considered the need for such homes. At paragraph 6.30 of this study it is stated that there is likely to be a need for 4,480 accessible homes and adaptable homes in 2036, an additional 2,339 such homes over the plan period.
18. The study goes on to state that it is not possible to move those people into specific properties designed to meet their needs and as such the only approach is for all homes to be built to the M4(2) standard. We would disagree with this statement. The NPPF states in footnote 46 that Councils should make use of the optional technical standards where they would "*address an identified need for such properties*". Had the Government intended all homes to be built to this standard then it would have taken the decision to require all new homes to be built to this standard. However, this is not the approach that has been taken and the Council's policy should reflect their identified needs. The Council's evidence also fails to consider the number of properties that have been adapted to date and will be adapted to meet their owner's needs during the plan period. The Council must be aware that the majority of those in need of a more adaptable home will already reside in the Borough and in a significant number of cases those residents will be able to secure the necessary adaptations to their current homes. This will both increase the stock of adapted homes and reduce the overall need for such

accommodation. Given that PPG requires the accessibility and adaptability of the existing housing stock to form part of the Council's assessment of needs it will be important for these considerations to be taken in to account.

Housing Mix

19. We would agree with maintaining the current threshold with regard to mix requirements. However, the mix on sites should not be strictly defined by the Council to allow for flexibility to take account of the location of the site and changing demand for homes within an area.

Self-Build

20. We are supportive of self-build and custom house building and the important contribution such development can make to housing supply. However, we are concerned that the need for such homes can be often be overstated by self-build registers. In particular we find that many registers are rarely updated to remove those no longer in need of a self-build plot or to assess whether there is double counting across registers. It will be important for the Council to ensure that its evidence on the need for self-build homes has been effectively reviewed if it is to offer a robust position on the demand for this type of development.
21. It will also be necessary for the Councils to consider how they support the self-build market in Dartford. Paragraph 57-025 of PPG sets out a range of different approaches to support the self-build market all of which need to be thoroughly considered by the Council. Too often local plans seek to require demand for self-build plots to be met through their provision on allocated sites without proper consideration of the other approaches set out in PPG. Rather than set requirements in the local plan for the provision of such plots we would suggest the Council seek to find suitable sites where the landowner is willing to provide self-build plots. Such an approach would also be consistent with PPG which states that Councils should work with landowners and encourage them to consider self-build plots but does not state that it should compel them do to so.

Older people's housing

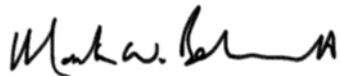
22. It will be important for the Council to identify and allocate sites to meet the specific needs of older people. Too often such development is expected to come through windfall or on strategic allocations with no specific target set in the local plan as to how many specialist homes for older people should be provided. This approach does not offer the necessary certainty that needs will be met. As such we would suggest the local plan undertakes to, firstly, establish a housing requirement specifically for the needs of older people. This will ensure that the supply of such homes can be effectively monitored and any under supply be taken into account when making decision on applications for older peoples' accommodation. Secondly, we would suggest that the Council's work with specialist providers to identify suitable sites that will meet the specific needs of older people. Such

accommodation needs to be in sustainable locations close to services and as such it is important to work closely with this sector of the housebuilding industry to understand the needs of their customers.

Conclusion

23. We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

Mark Behrendt MRTPI
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 020 7960 1616