

The standard method for assessing housing numbers in strategic plans

Q1: Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is *whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?*

No. Dartford Council strongly objects to this first step in the methodology, which for many authorities, including Dartford, will be based on the household projections rather than the percentage of housing stock. An alternative method based on the housing stock alone is proposed and set out at Q2 below. It is not considered that the government's proposed formula is a fair, sustainable or future-looking methodology from which to derive a baseline.

1. It is unfair, since it penalises those authorities that have delivered on their housing needs and more. Where delivery has exceeded housing needs as in Dartford's case, this encourages further in-migration resulting in a spiral of ever-increasing housing projection figures, since the projections build in past levels of in-migration. By contrast, those authorities that have underprovided for their internal housing needs export the need elsewhere. This results in net outmigration and lower household projections. By using this methodology these under-providing authorities are rewarded for past under-delivery by low housing delivery targets in the future.

The table below shows how the 2018 household projections relate to the existing housing stock for Medway and the Kent districts. Whilst there is not an exact correlation and there are other factors at play, it is evident that those authorities which have delivered high rates of housing, generally have higher household projections as a percentage of their existing housing stock. By contrast, those authorities with a poor record of delivery, tend to have lower household projections.

Impact of Past Housing Delivery on Household Projections

	Housing Stock 2019	Average delivery over last 3 years	Delivery as a % of Housing Stock	2018-based household projection	2018 projection as a % of Housing Stock (in order)
DARTFORD	47,309	1,069	2.26	657	1.39
ASHFORD	54,390	722	1.33	674	1.24
SWALE	61,990	605	0.98	700	1.13
FOLKESTONE AND HYTHE	52,270	516	0.99	569	1.09
TONBRIDGE AND MALLING	55,180	806	1.46	579	1.05
MAIDSTONE	72,130	1,192	1.65	732	1.01
DOVER	54,510	435	0.80	667	0.98
THANET	67,490	308	0.46	544	0.81
CANTERBURY	68,160	662	0.97	503	0.74
TUNBRIDGE WELLS	51,340	486	0.95	347	0.68
SEVENOAKS	50,510	322	0.64	315	0.62
MEDWAY	115,150	660	0.57	415	0.36
GRAVESHAM	43,570	244	0.56	139	0.32

The comparison between Dartford and Gravesham, is particularly stark in demonstrating the huge distortions this formula results in. These are two adjoining authorities with similar population size (Dartford only recently having overtaken Gravesham because of its high growth rates) and similar constraints (Green Belt and flooding). Gravesham is a third larger in area than Dartford. Gravesend station has faster journey times to Central London than Dartford station. Yet Dartford has been increasing its housing stock at four times the rate of Gravesham. The outcome of this is that **the 2018 household projections show an increase of 657 households per annum for Dartford, as compared to 139 for Gravesham. As a percentage of the housing stock, the increase is more than four times higher for Dartford than it is for Gravesham.**

2. This formula is not sustainable because it puts pressure for delivery in those authorities that have already delivered much housing. In Dartford where the rate of growth has been running at about 2% annually of the existing housing stock, double the national rate, the area cannot absorb the level of housing proposed and there is no spare infrastructure capacity. At these rates of growth, infrastructure cannot be delivered fast enough to serve the growing population. This is contrary to the Planning White Paper support for infrastructure delivery to be in tandem with housing growth.

In order to meet ever-increasing targets, either unacceptable densification (not the 'gentle densification' proposed in the Planning White Paper) or development at unsustainable locations away from public transport and outside the urban areas, will need to be brought forward. In Dartford, that will result in the loss of Green Belt which the Planning White Paper seeks to protect.

3. It is not future-looking because it is based on historic trends which it is assumed will continue. The history of demographic trends in London and its suburbs shows that there have been times in history when a reversal of the prevailing demographic trend has occurred, resulting in alternating growth and decline of London's population.

The rapid societal changes now taking place as a result of Covid 19 will quite likely result in one of these demographic shifts as people re-evaluate their choices. If implemented, the formula will result in huge densification in London and the south east, resulting in dense high-rise housing with no private outdoor space and of the type that people no longer wish to live in.

It will be a missed opportunity for 'levelling-up' in the North and Midlands. A reduced housing requirement in areas which are in need of 'levelling up' will deprive them of the investment, regeneration and construction jobs that come from house-building. If the demand for housing in these areas is not met, it will also result in the continued outmigration of the educated and skilled workforce. Research by Stantec has demonstrated that for several authorities in the Midlands, North West and North East the revised local housing need figure is less than half of the number of homes built. These houses would not be being built if there was not a demand for them.

Whilst it is noted that the baseline figure under the proposed formula will form proportionately less of the overall need number than the current standard method does, it none the less sets the magnitude of the final figure. The distortions that arise from this baseline formula are magnified when the affordability factors are applied.

Q2: In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.

No. Dartford Council proposes that a percentage of the existing stock should be used as the primary determinant of the housing needs figure, rather than a fall-back position.

However, to adopt this alternative approach, 0.5% of the existing housing stock will not achieve the government's objective of over 300,000 homes a year. It is proposed that 1.25% of the existing housing stock is an appropriate figure to be applied, not as a baseline to which further affordability factors are added, but as a final figure. This will achieve the government's objective by resulting in a total figure of around 330,000 homes a year. As proposed in the White Paper (para 2.25), this standard method of distribution should then be locally adjusted taking into account the constraints and opportunities in an area.

Linking housing need figures to existing housing stock will allow areas to grow equitably and sustainably. Growth will be proportionate to the existing number of households in the area and cater for the growth of those households, allowing strong and stable communities to be maintained. It will be more responsive to the way people are now choosing to live, closer to their families and in less dense environments. It will also avoid the massive increases in requirements for housing delivery in London and the south east which are not in practice achievable or deliverable and which are based on historic rather than future trends.

Q3: Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.

No. Dartford Council objects to the use of any adjustment based on affordability ratios.

The consultation paper states 'The affordability of homes is the best evidence that supply is not keeping up with demand.' (para 31). On the contrary, the data for Kent districts and Medway shows that there is little correlation between housing delivery and affordability at the local authority level.

Impact of Housing Delivery on the Affordability Ratio

	Average delivery (last 3 years)	Delivery as a % of Housing stock	2009-2019 House Price % increase	Affordability Ratio 2019
SEVENOAKS	322	0.64	42%	13.12
TUNBRIDGE WELLS	486	0.95	57%	12.48
TONBRIDGE AND MALLING	806	1.46	53%	11.79
CANTERBURY	662	0.97	69%	10.65
MAIDSTONE	1,192	1.65	56%	10.4
THANET	308	0.46	61%	9.59
FOLKESTONE AND HYTHE	516	0.99	23%	9.52
ASHFORD	722	1.33	51%	9.39
DARTFORD	1,069	2.26	80%	9.23
SWALE	605	0.98	64%	9.03
GRAVESHAM	244	0.56	71%	8.62
MEDWAY	660	0.57	73%	8.41
DOVER	435	0.80	55%	8.22

The data above shows there is no discernible trend between past levels of delivery and the affordability ratio. Dartford, which has had proportionate rates of delivery has an affordability ratio which is higher (worse) than Swale, Gravesham, Medway and Dover, all of which have had significantly lower delivery rates. In Dartford, far from reducing house prices, high delivery levels have coincided with the highest growth in house price in the county over the last ten years.

Any adjustment based on the affordability ratio is, therefore, totally inappropriate since it is evidently not an indicator of unmet housing need at the local authority level. House prices and house price growth are complex and are the result of a number of factors including land values, employment factors, journey times to large employment centres etc.

In the context of London and its surroundings, waves of demand push outwards until an equilibrium is achieved between the travel time/costs and house prices. With a historic infinite demand arising from London (a trend which may now be reversed) an increase in delivery in a local authority area will not result in reduced house prices or an improvement in affordability. On the contrary, the creation of an enlarged new local housing offer provides the opportunity for developers to market these new homes at rates far higher than the existing housing stock. It is evident in Dartford that there is a very significant margin on the price of new homes as compared to the existing housing stock. It is this new stock which is driving the decreasing affordability in Dartford and putting housing out of the reach of local people.

Q4: Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.

No.

Dartford Council strongly objects to incorporating an adjustment for the change of affordability over 10 years. This is unlikely to have a positive effect on affordability. With both steps 2 and 3 in the proposed methodology relating to the affordability ratio, a double penalty is placed on those areas which experience high and increasing house prices, even where they are more than meeting their local housing needs.

It is irrelevant to consider if it is an appropriate way to measure whether affordability has improved. This is based on an assumption that increased delivery will improve affordability. The response to Q3 above demonstrates that this is not the case.

This indicator is too simplistic to be used in determining local housing need. The changes in an area's affordability ratio is influenced by many factors including rising house prices unconnected to levels of local need; increasing land values; and changes to local markets.

The table below demonstrates that far from resulting in improved affordability, high levels of housing delivery are just as likely to result in worsening affordability for local residents. There is no clear correlation between delivery rates and changing affordability. Dartford, which has had the highest delivery rates in the County as a percentage of its housing stock, has also experienced affordability worsening at a greater rate than every other authority in the County, with the exception of Sevenoaks and Tonbridge & Malling.

Impact of Housing Delivery on Changes in Affordability

	Average delivery (last 3 years)	Delivery as a % of Housing stock	Affordability Ratio 2009	Affordability Ratio 2019	Change in Affordability Ratio 2009-2019
SEVENOAKS	322	0.64	8.98	13.12	4.14
TONBRIDGE AND MALLING	806	1.46	7.79	11.79	4.00
DARTFORD	1,069	2.26	5.76	9.23	3.47
CANTERBURY	662	0.97	7.37	10.65	3.28
SWALE	605	0.98	5.81	9.03	3.22
MEDWAY	660	0.57	5.34	8.41	3.03
MAIDSTONE	1,192	1.65	7.43	10.4	2.97
GRAVESHAM	244	0.56	6.34	8.62	2.28
THANET	308	0.46	7.46	9.59	2.13
FOLKESTONE AND HYTHE	516	0.99	7.57	9.52	1.95
DOVER	435	0.80	6.34	8.22	1.88
ASHFORD	722	1.33	7.55	9.39	1.84
TUNBRIDGE WELLS	486	0.95	8.32	12.48	1.16

Q5: Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.

No. The use of affordability to adjust the housing need figure is totally inappropriate and no weighting at all should be afforded to it. It is based on an incorrect assumption that affordability is poor in those areas that have not delivered sufficient housing. The data demonstrates that this is not the case.

Furthermore, the two steps in the affordability calculation result in a double penalty for those areas that have delivered on housing need but not benefitted from improved affordability.

The responses to Qs 3 and 4 set out in more detail why these affordability adjustments are inappropriate.

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of:

Q6: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?

Yes. There would be long delays to adoption of Local Plans which are well progressed in the event that such transitional provisions are not introduced.

Q7: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance

to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate?

If not, please explain why. Are there particular circumstances which need to be catered for?

No. Dartford Council considers that authorities should be given 6 months rather than 3 months from the publication date of the revised guidance to publish their Regulation 19 plan. This would be more appropriate given the rapidly occurring changes to the planning system, the timings and lead in times for reporting to full Council meetings and the purdah periods associated with the various elections which are due to take place on 6 May 2021.

Delivering First Homes

Q8: The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):

- i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.**
- ii) Negotiation between a local authority and developer.**
- iii) Other (please specify)**

i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy. The existing Dartford Core Strategy includes an affordable housing policy requiring the provision of between 50-80% intermediate dwellings with the remainder to be provided as affordable rented housing; but more recent plans and evidence make clear that there is a need for more affordable rented homes (57%) than other types of affordable housing (43%). The requirement for 25% of affordable dwellings to be First Homes would be feasible within the context of Dartford's existing policies but would lead to a lower provision of other types of intermediate affordable dwellings such as shared ownership. There are circumstances where different amounts and types of affordable housing than required by Local Plan policy are provided due to site viability issues or where numbers of affordable rented products are too low for a registered provider to take on – this is subject to negotiation between the Council and the developer. The requirement for the provision of First Homes should not negate the Council's ability to negotiate for the provision of affordable rented homes in such circumstances. **Therefore, it should be made clear and explicit when policy is finalised that the requirement to provide 25% First Homes applies to affordable housing policy compliant development; in other circumstances there must be flexibility to negotiate.**

With regards to current exemptions from delivery of affordable home ownership products:

Q9: Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to apply to this First Homes requirement?

Yes.

Q10: Are any existing exemptions not required? If not, please set out which exemptions and why.

Existing exemptions should remain.

Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.

No. The presumption should be that affordable housing will be provided in as many circumstances as possible.

Q12: Do you agree with the proposed approach to transitional arrangements set out above?

Yes. The proposed approach will not affect the preparation of the new Dartford Local Plan.

Q13: Do you agree with the proposed approach to different levels of discount?

Paragraph 59 states that the different levels of discount would need to be evidenced in the local plan making process. It should be made clear when national policy is finalised whether or not a 30% discount is the default position, and **when and on what basis variation to a higher discount would be allowed** under national policy, e.g. justified locally through impacts on other forms of affordable housing provision, viability assessment etc.

Q14: Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?

There is no indication of whether the proposed First Homes exception sites policy would apply to Green Belts or not. It is noted that the current entry-level exception site policy (NPPF paragraph 71) does not allow homes suitable for first time buyers on land designated as Green Belt. If it is intended to apply the First Homes exception sites policy to Green Belt sites, then we object to allowing a proportion of market homes to be developed. The purpose of exception sites is that they are more viable for the provision of affordable dwellings as they should have agricultural land/lower value than sites identified as suitable for market housing. Therefore, it is unnecessary, plus it risks undermining exception sites.

Q15: Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?

No. We consider that the one hectare/ 5% of the size of the existing settlement threshold should be retained to provide clarity.

Q16: Do you agree that the First Homes exception sites policy should not apply in designated rural areas?

No comment as Dartford Borough does not have any designated rural areas.

Supporting small and medium-sized developers

For each of these questions, please provide reasons and / or evidence for your views (if possible):

Q17: Do you agree with the proposed approach to raise the small sites threshold for

a time-limited period?

No. We consider that this is unnecessary and would not help in the delivery of affordable housing in Dartford. In common with other areas, there is an urgent need for affordable rented housing in Dartford, as evidenced by our recent Housing Study. It would impact on our current threshold for the provision of affordable housing (15 dwellings or 0.5ha), with the type and amount of affordable housing provided being subject to a viability assessment.

Despite Covid-19, Dartford Borough continues at present to receive a healthy number of planning applications. It is not clear how the proposals will address the issue of economic recovery following COVID and supporting smaller sites delivery in the short term: due to the time it would take a developer to prepare a planning submission, the subsequent determination period and then the need to mobilise to begin on site, outputs of a policy change will be delayed. It is considered more likely that the main outcome could be a number of ill-prepared planning applications being submitted, so that planning permissions can be banked rather than quickly built out.

If it is, nonetheless decided to implement this policy and if it is to have any impact on economic recovery, it is suggested that there is **a time limit of one year for commencement** of the development.

Q18: What is the appropriate level of small sites threshold?

- i) Up to 40 homes
- ii) Up to 50 homes
- iii) Other (please specify)

Other. Retain current thresholds – see responses to Qs17 and 19.

Q19: Do you agree with the proposed approach to the site size threshold?

No. We do not consider that there should be any changes to the site size threshold for the reasons outlined in response to Q17.

Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?

No. Paragraph 79 states that this change would be for an **initial** period of 18 months subject to monitoring and review. The Council is concerned that there is a real risk that this would become a permanent change to policy with major impacts over time on the provision of affordable housing in Dartford Borough where there is an urgent need for affordable rented housing. If this is introduced, the Council considers that the final guidance should clearly specify a date on which the change will expire, as has been done for previous legislative changes to permitted development rights.

Q21: Do you agree with the proposed approach to minimising threshold effects?

Whilst the Council disagrees with the proposal to change the thresholds at which affordable housing should be provided, if it is decided to implement this then the Council agrees that there would be a need for planning guidance in relation to the phasing of larger sites and the provision of affordable housing.

Q22: Do you agree with the Government's proposed approach to setting thresholds in rural areas?

No comment as Dartford Borough does not have any designated rural areas.

Q23: Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?

We recognise the potential role of SME builders to delivering new homes on smaller sites in Dartford Borough. There are a number of ways that the Government can support SME builders as follows:

- Publish a national brownfield land register
- Remove areas of current national policy uncertainty by confirming and implementing now with clear guidance the various proposed new standards, e.g. Future Homes, electric vehicle charging points etc.
- Consider non-planning related financial incentives

Extension of the Permission in Principle consent regime**Q24: Do you agree that the new Permission in Principle should remove the restriction on major development?**

No, there will be insufficient information to make decisions on the number of dwellings that could be accommodated on the site, particularly in urban locations where there will be no ability to alter dwelling types to fit the number permitted. On town centre and urban brownfield sites, such developments will need to be knitted into the urban fabric in order to ensure good design. At the 'in principle' stage and without detailed drawings, it will not be possible to assess how many units can be accommodated on each floor of a block to provide good quality accommodation whilst also taking account other constraints on site, without having the technical detail to make this decision. Granting an upper limit of dwelling numbers on urban sites will therefore not provide the developer with any certainty that these numbers will be granted technical details consent, or alternatively will need to be very conservative, and so will not assist with financing.

The Council considers that the identification of sites through the Local Plan process, which usually provides a guide as to the housing capacity, provides certainty for developers as to whether the principle is acceptable. This should provide developers with sufficient certainty to proceed through a Full planning application, rather than a two staged approach of Outline application, followed by Reserved Matters. This is particularly since the governments focus is on the smaller 'major' schemes of between 10 and 150 units.

The Council also has concerns that this proposal will remove the rights of the community and elected Members to have such decisions considered by planning committee, due to the 5 week time period. In addition, the need for a section 106 legal agreement for some major developments, to be prepared at technical details consent stage, is likely to take longer than 5 weeks.

If this is brought forward **the Council considers that sites within Conservation Areas should be excluded and the time period should be increased to 13 weeks for major permissions in principle and technical details consent** with extensions of times allowed.

Q25: Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of

your views.

We agree that PiPs could appropriately be extended to cover commercial development, but also think that there is a case for further extending it to cover community facilities. There is some concern over the possibility of very high levels of commercial development occurring through PiP, this eventuality needs to be dealt with through introducing clear guidance on the applicable scope of PiPs.

Q26: Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?

See above – the Council do not consider that Permissions in Principle should be extended to major development but if they do the following should be provided as part of the submission:

- Indicative site plans including zones for landscaping and trees
- Indicative floor layouts should be provided for urban flatted developments
- Parameters with regard to height/number of storeys, to be varied across the site where appropriate
- A land use plan
- Notice should be served on the landowner, as required for planning applications

Q27: Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.

Agree, this would help to ensure that the impacts of the proposals are better understood and would ensure that if the maximum number of dwellings granted cannot be accommodated within this height parameter there is not pressure to increase the height of the development which would result in harm to neighbours or the appearance of the surrounding area.

Q28: Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be:

- i) required to publish a notice in a local newspaper?**
- ii) subject to a general requirement to publicise the application or**
- iii) both?**
- iv) disagree**

If you disagree, please state your reasons.

The Council disagrees with the requirement to publish a notice in the newspaper, as the required lead in time by the press for such adverts will delay the start of the consultation period, such that the Council will have little time to consider any responses.

The Council considers that as the requirement for a site notice and the current requirement to publicise on the Council's website is considered sufficient for the existing permission in principle regime it should be acceptable for major developments although the Council is also likely to send letters to neighbouring occupiers.

The Council does have concern that some sites may receive a significant amount of objection and that such proposals should then be considered by the Council's elected Members. The 5 week time period does not allow for this and also therefore removes the right of the public to speak at committee or for their application to be decided by elected Members. The Council considers therefore that the proposals affect the democratic process of considering the principal of major new developments, as applications for PiPs will most probably not have been considered through the Local Plan process.

Q29: Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?

No, many sites for redevelopment in urban area will have a low hectare but are likely to raise more issues and require far more detailed consideration than greenfield or low density cleared brownfield sites. A fee based on hectare on such sites would not then reflect the complexity of the consideration.

The Council is seeking to encourage redevelopment of existing town centre sites and it is likely that many applications for new development will relate to small complex urban sites.

The Council suggest that the fee should be based on the median or the upper 20% of maximum number of dwellings proposed.

Q30: What level of flat fee do you consider appropriate, and why?

The Council considers that the flat fee should be based on the current fees for outline planning permission, as the Council will need to divert resources of experienced planning officers to consider these applications and the timescales involved will require almost full-time attention to such cases. In addition, in order to consider the proposal without detail it is likely that the Council will have to procure expertise from an architect or urban designer. This is difficult to manage when the Council have no warning of when an application will be submitted and is therefore likely to impact on the consideration of other planning applications under consideration and will need an-going commitment with regard to the procurement of architect skills. An adequate fee is therefore required to ensure that the Council can adequately fund additional resources in such a short time span.

Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.

Yes. This would ensure consistency between the application process and the Brownfield Land Register.

Q32: What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.

Clearer guidance for applicants on the process and what they will need to submit at technical details consent stage

Guidance for the local planning authority on what can be considered at technical details consent stage and how LPAs should deal with developments where the technical details demonstrate that the maximum number of dwellings cannot be provided.

Q33: What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?

The benefit is that the developer will understand whether the principle of residential development of a site is acceptable and the Council supports this. Dartford Borough Council

seeks to do this through the Local Plan and is looking at ways to give this confidence to developers in the new Local Plan. The Council considers that this is 'in principle' reassurance for major developments is better provided through the Local Plan process which has had full consultation in the Local area and has been considered by elected Members.

The costs of the scheme are that without adequate detail and fully understanding the constraints of the site it is not possible to determine the upper level of residential units that could be acceptable. This could lead to pressure at technical details stage for the Council to accept developments that are out of character with the local area; have no open space, or opportunity for tree planting; have no room for adequate private gardens or amenity space; in urban and town centres result in higher buildings that have an impact on the visual amenity of the area; have inadequate car parking, waste storage and cycle provision due to lack of room left on the site.

An additional cost is that the community will feel alienated by this process, with decisions being made within a very short timescale, particularly on sites which are not identified in the Local Plan. They are likely to feel aggrieved at the lack of opportunity to have their say.

Q34: To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.

Unknown. Only one application has been made for a permission in principle in Dartford Borough. This was for one dwelling in the garden of an existing house and was invalid initially as the applicant had not understood the process and not submitted the required detail.

Q35: In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty?

If so, please specify the proposal and explain the impact. If there is an impact – are there any actions which the department could take to mitigate that impact?