

## **NON-TECHNICAL SUMMARY**

### **INTRODUCTION**

- 1 This document is the summary of the Sustainability Appraisal Report for Dartford's Local Development Framework (LDF) Site Specific Allocations (Preferred Policy Approaches). It describes how the Sustainability Appraisal (SA) process was used to assist in planning for the development and the use of land, as required by planning legislation and Government guidance. The SA assists sustainable development through an ongoing dialogue and assessment during the preparation of LDF Development Planning Documents (DPDs). Sustainable Development considers the implications of social, economic and environmental demands on land use planning.
- 2 Dartford and Gravesham Borough Councils are working together closely on the SA and consultants Enfusion were commissioned in January 2005 to progress the SA work jointly for the two Councils. The timescale for preparing development documents is now different and Sustainability Appraisals are being carried out separately for each Borough area. This summary report focuses on progress in Dartford, although much of the information will also be of relevance and strategic importance for Gravesham.

### **THE LOCAL DEVELOPMENT FRAMEWORK**

- 3 The LDF is the new system introduced by the Planning & Compulsory Purchase Act (2004) and it takes the form of a portfolio of documents including DPDs (Core Strategy, Site Specific Allocations and Area Action Plans), the Statement of Community Involvement, and an Annual Monitoring Report. The Site Specific Allocations DPD allocates land in order to achieve the spatial vision set out in the LDF Core Strategy Document. The Preferred Policy Approaches document sets out planning policy approaches aiming to achieve the spatial vision. The Council has also prepared a Preferred Policy Approaches document for the Core Strategy DPD and will prepare two Area Action Plans for Dartford Town Centre and the Northern Gateway.

### **SUSTAINABILITY APPRAISAL & STRATEGIC ENVIRONMENTAL ASSESSMENT**

- 4 Planning legislation requires that the LDF is subject to a SA, a systematic process that is designed to evaluate the predicted social, economic and environmental effects of development planning. European and UK legislation require that the LDF is also subject to a Strategic Environmental Assessment (SEA), a process that considers the effects of development planning on the environment. Where significant adverse effects are predicted, the SEA aims to identify means to avoid or mitigate such effects. Government guidance advises that these two processes should be carried out together and requires the LDF to be subject to a SA incorporating SEA. Dartford's Site Specific Allocations DPD has been prepared in accordance with these requirements for a SA/SEA.

## **THE STAGES OF SUSTAINABILITY APPRAISAL**

- 5 Government's guidance requires a number of stages of SA work that need to be carried out as the LDF is being prepared:

Stage A: Setting Context & Scope  
Stage B: Developing Options & Assessing Effects  
Stage C: Preparing the SA Report  
Stage D: Consulting on the Plan & the SA  
Stage E: Monitoring Implementation of the Plan

- 6 Stages A, B and C of the SA were carried out between January 2005 and June 2006.

## **THE CHARACTER OF DARTFORD BOROUGH**

- 7 Dartford Borough is located in the North West of Kent and occupies a unique strategic location. It is adjacent to London and is within the Thames Gateway area. With the opening of the Channel Tunnel Rail Link, Ebbsfleet will become a major new commercial centre. The main settlements are Dartford, Swanscombe, and Greenhithe, with Dartford being the main centre for employment, although approximately 50% of the working population works outside the Borough due to its proximity to London<sup>1</sup>.
- 8 The Borough is characterised by its historic environment and its location by the Thames and Darent Rivers. The area has other important environmental assets including riverside marshes which are characteristic of the highly valued habitats of the Greater Thames Estuary. To the south of the main urban areas, undulating countryside rises towards the South Kent Downs. This area, populated by villages and dormitory towns, features areas of high agricultural and landscape value. The Dartford area, therefore, includes a contrast of landscapes, from estuarine to semi-upland countryside, in addition to the townscapes.
- 9 Those areas of the Dartford and Gravesham Boroughs which are located to the north of the A2, constitute the 'Kent Thameside' regeneration area of the Thames Gateway. During the 1980s and 1990s, this area experienced economic repercussions from the decline of the traditional industries such as mineral extraction, manufacturing and port-based activities. The Thames Gateway Partnership is coordinating regeneration of the entire Thames Gateway, and Regional Planning Guidance (RPG 9a, 2001) identified Kent Thameside as one of the largest areas for development in the Thames Gateway. This has been confirmed in the recently-submitted South East Plan, (SEERA, 2006). Consequently, a challenging growth agenda has been set for Dartford (and Gravesham) with regard to housing allocations, job creation, and provision of supporting infrastructure and services.

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<sup>1</sup> Dartford Borough Local Plan Review 2003.

**SA SCOPING & ISSUES FOR SUSTAINABILITY**

- 10 During early 2005 a joint scoping process for Dartford and Gravesham was carried out to help ensure that the SA covered the key sustainability issues that are relevant to the development planning system in Dartford and Gravesham. Relevant plans and programmes were reviewed to develop a wider understanding of issues and priorities, together with a description of the current and predicted social, environmental and economic characteristics of the areas.
- 11 From these studies, the key sustainability problems, issues and opportunities identified are mostly associated with the high levels of growth in employment and housing proposed for the area as part of the regeneration planned for the Thames Gateway. Particular issues include affordable housing, local employment, environmental and design standards for development, protection of environmental quality, car usage, public transport and accessibility.

**CONSULTATION AND PREPARING THE SA FRAMEWORK**

- 12 An SA Framework was compiled and included a list of 19 SA Objectives that aim to resolve the issues and problems identified. These SA Objectives were used to test the draft DPDs as they were being prepared.

**SA Objectives:**

1. Balanced Communities	7. Sustainable Design & Construction	13. Cultural Heritage
2. Integrated Communities	8. Environmental Health	14. Minerals
3. Accessibility	9. Employment	15. Energy
4. Public Health	10. Landscape	16. Air Quality
5. Phasing of Supporting Infrastructure	11. Land and Soil Quality	17. Waste
6. Housing	12. Biodiversity	18. Water
		19. Flooding

- 13 This approach and the proposals for testing the development planning process developed into a SA Scoping Report that was sent to a wide range of organisations and also made available on the Council's website. Comments were invited and received from a number of these organisations, and these were incorporated into the SA Framework.
- 14 Each stage of the preparation of the Site Specific Allocations was appraised systematically using the SA Objectives. An appraisal of the Strategic Options was firstly undertaken, followed by detailed appraisal of the Preferred Policy Approaches. This recognised 6 categories of predicted effects, each represented by a different colour, as illustrated in the key below.

**Categories of Sustainability Effects**

<b>DG</b>	Development actively encouraged as it would resolve an existing sustainability problem
<b>LG</b>	No Sustainability constraints and development acceptable
<b>B</b>	Neutral or unknown effect
<b>Y</b>	Potential sustainability issues; mitigation and /or negotiation possible
<b>O</b>	Problematical and improbable because of known sustainability issues ; mitigation or negotiation difficult and /or expensive
<b>R</b>	Absolute sustainability constraints to development

15 Where it was considered that there were opportunities to enhance the sustainability of the proposals, recommendations were made. These were primarily with respect to minimising the negative sustainability impacts associated with the demands from new development on:

- The provision of balanced communities, including integration with existing communities, provision of housing and employment
- Transport and accessibility
- Phasing of supporting infrastructure
- Sustainable design and construction, including consumption and production
- Energy and Climate Change
- Protection and enhancement of the natural environment

**APPRAISAL OF THE LDF SITE SPECIFIC ALLOCATIONS  
 STRATEGIC OPTIONS**

16 Dartford Borough Council considered that there were few strategic options open to the Council in the consideration of Site Specific Allocations. The emerging South East Plan<sup>2</sup> set for Dartford a target of 15,700 dwellings in the period 2006 to 2026, and a minimum of 959,000 square metres of employment floor space by 2026; consequently a significant allocation of land would be required to meet this target.

17 Taking into account the strategic topics and preferred options progressed in the Core Strategy, it was considered that there were three strategic options open to Council in the consideration of how to meet the South East Plan allocations. Broadly, the options were:

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<sup>2</sup> Draft South East Plan SEERA, 2006

Option 1: In addition to commitments that have already been made, bring forward all sites that were previously identified in the Local Plan Review.

Option 2: Appraise all sites previously identified in the Local Plan Review and any new sites and bring forward only those sites required to meet the requirements of the emerging South East Plan

Option 3: Allow for further growth by permitting the development of Green Belt sites and new representation sites (in addition to the sites identified in Options 1 and 2), therefore exceeding the emerging South East Plan requirements.

- 18 The Sustainability Appraisal found that Option 2 was the most sustainable of the three options, performing better than or equal to Options 1 and 3 on all sustainability indicators. Through re-appraising sites taken from the Local Plan Review Process and any additional sites identified since that time, it allows for the latest Government Guidance, the South East Plan (including housing allocations set for Dartford Borough) and best planning practice to be considered and to contribute to the selection process. It also supports the regeneration of the Dartford Town Centre, through providing opportunities to introduce new sites identified as meeting the Council's Corporate Objectives for the centre.
- 19 The SA Assessment therefore supported the Council's approach to the preparation of the Site Specific Allocations document, with Option 2 being the Council's Preferred Option in the progression and preparation of the Site Specific Allocations DPD. Option 1 was rejected as it did not take account of changes to Government Policy, the emerging South East Plan and Council's Corporate Policy. Option 3 was also rejected, as it provides for development in the Green Belt, counter to Government Policy, and is also contrary to the emerging South East Plan.

## **APPRAISAL OF THE LDF SITE SPECIFIC ALLOCATIONS PREFERRED POLICY APPROACHES**

### **Introduction**

- 20 During early to mid 2006, the Council prepared Site Specific Allocations Preferred Policy Approaches (PPAs), which will be further developed into policies in the Site Specific Allocations Submission Document, due for publication and continued consultation later in 2006. These Preferred Policy Approaches were subject to a detailed SA in June 2006, with suggestions made for the mitigation of negative effects, where appropriate. Where available, evidence from the SA Scoping Stage and from other researched sources has been used to justify the prediction of effects. The key findings and recommendations arising from the SA of the Preferred Policy Approaches are listed below.

### **Chapter 1: The Context for Selecting Sites (PPA 8-12)**

- 21 The general principles underpinning the Council's Spatial Strategy and site allocation process are outlined in Council's Core Strategy Preferred Policy Approaches (PPA 8-12), and these have already been shown to be sustainable in the SA undertaken of the Core Strategy. The principles foresee a pattern of development which focuses on Dartford Town Centre, the Ebbsfleet Valley and the riverfront. They are in support of the LDF objectives, conform with the emerging South East Plan, and are linked to the Council's Corporate Plan 2006-07 and the Dartford and Gravesham Community Plan.

**Chapter 2: Housing Allocations and Chapter 3: Employment Allocations (PPA 101, 102 & 100)**

- 22 The Sustainability Appraisal for housing and employment allocations has been undertaken together, as many of the 'employment sites' are allocated for mixed-use development, including a significant residential component. The Council used a two-stage criteria-based assessment method (with 11 evolving criteria), to identify preferred site allocations for housing, employment and mixed uses. Potential major employment sites were also assessed against key aspirations of the Council's Core Strategy. This Site Allocations Assessment Method was appraised using the SA Framework.
- 23 For Chapter 2 and 3, the SA has focused on the assessment methodology used by the Council to accept/reject and prioritise the Site Allocations, considering whether the methodology used is compatible with the SA Framework, and whether it is a robust and defensible methodology from a sustainability perspective. It was not considered appropriate to assess individual Site Allocations at this level for the following reasons:
- Evidence for assessing effects was limited at this strategic stage of the decision-making process since uncertainties remain due to a lack of detailed information regarding the sites and specific development proposals.
  - Detailed environmental assessment will be undertaken at later planning stages for the sites, and for significant sites, this will involve formal Environmental Impact Assessment; good practice planning would also require a Sustainability Assessment (for example, in accordance with the SEEDA Checklist Method)
  - It was agreed by Enfusion and the Council that if the selection methodology were supported by SA, then the results of the process (i.e. the prioritised sites) would also be supported; therefore to appraise the sites individually would be an unnecessary duplication of work.
- 24 The appraisal of the Site Allocations Assessment Method demonstrated very positive progression through the key assessment criteria with the majority of SA Objectives progressed, particularly objectives 1 (Balanced Communities), 2 (Integrated Communities), 3(Accessibility), 5 (Infrastructure), 6 (Housing) and 9 (Employment). However, it is acknowledged that the scale of allocations will lead to pressure on existing infrastructure, cultural heritage resources and air quality/amenity in existing built up areas. This will have significant impacts on resources, in particular energy, water, construction materials, and natural resources, as well as production of waste.

- 25 The method has not specifically addressed opportunities for environmental and sustainable enhancement, nor a criterion that specifically addresses sustainable design and construction. However, it is considered that this will be covered by strong Development Control Policies and is most appropriately dealt with at the next stage of planning decision-making to inform Planning Briefs, Masterplans, Site Sustainability Strategies, and project level Environmental Impact Assessments.
- 26 In order to ensure that good practice is followed with regard to sustainable design and construction, and that potential adverse sustainability effects are mitigated, the SA recommended that for each site the Council requires a Sustainability Strategy that has used the SEEDA Sustainable Development Checklist and demonstrates compliance with the priority action areas outlined in the UK Sustainable Development Strategy.
- 27 The Council's Preferred Policy Approach to Gypsy and Traveller accommodation is to follow Government guidance in identifying need and providing for that need. Dartford is undertaking a Gypsy and Traveller Accommodation Assessment and will develop policy in accordance with this requirement, which would then be subject to SA.

#### **Chapter 4: Transport Schemes (PPA103-107)**

- 28 Chapters 4-6 represent a range of Preferred Policy Approaches relating to sites other than for housing and employment. The Preferred Policy Approach to each subject area was appraised using the SA Framework.
- 29 The Preferred Policy Approaches outlined in Chapter 4 ensure land is safeguarded for important transportation schemes that are vital to achieving sustainable development in Dartford Borough, in particular Fastrack, the Channel Tunnel Rail Link and Cycleways. They also safeguard land that is or may be required for limited road building proposals.
- 30 The SA found that the policy approaches support the development of a viable local public transport network that can compete with car-based travel, and aim to contribute to demand management of vehicular travel.

#### **Chapter 5: Major Development Sites in the Green Belt (PPA 108-110)**

- 31 The Chapter 5 Preferred Policy Approaches aim to ensure that the Green Belt is protected, whilst recognising that some existing major developed sites are already located there (Oakfield Lane Campus, Mabledon Hospital and Axton Chase School). In accordance with PPG 2: Green Belts, the approach allows for infilling and/or redevelopment of such sites, where appropriate.
- 32 The Preferred Policy Approaches perform well against the SA Objectives relating to balanced and integrated communities, accessibility, housing and employment. Through ensuring development is appropriate to its semi-rural setting and generally remains within the existing footprint, the approaches also progress the SA Objectives relating to landscape, and land and soil quality. Uncertainties generally relate to the implementation of development at each of

the three sites, for example, all three sites have potential to promote energy efficiency through construction and operation, but this would be dependent on detailed development control policies or design briefs.

**Chapter 6: Community Sites for Sport, Recreation, Leisure and Cultural Uses (PPA 111-113: Sport, Leisure and Recreation & PPA 110 Heritage Interpretation at Ebbsfleet/ Eastern Quarry)**

- 33 Preferred Policy Approaches 111-113 allocate 3 strategic sport/recreational sites to contribute to the strategic approach outlined in the LDF Core Strategy: Princes Park, Acacia Hall/Central Park and Stone Lodge. The SA illustrates that this will have a positive effect on health for a wide section of the community, progressing the SA objectives relating to balanced communities and public health.
- 34 The Policy Approaches ensure the location of new facilities close to and in Dartford Town Centre and Stone, which will assist in meeting regeneration objectives and minimising the number of journeys required by private car. However good public transport links should be provided to residents ensure access for residents located in the South of the Borough.
- 35 As highlighted in the SA of the LDF Core Strategy, the preservation and enhancement of local heritage (including maritime and industrial heritage) is an important issue facing Dartford Borough. Policy approach 114, which allocates land for a heritage interpretation site, addresses this concern and positively progresses a number of SA Objectives; it will assist in promoting social inclusion and community ownership and should provide opportunities for local employment and business development.

**Chapter 6: Community sites for Sport, Recreation, Leisure and Cultural Uses (PPA115-117 Riverfront recreation and leisure)**

- 36 The three Policy Approaches on riverfront recreation and leisure allocate land at the eastern end of Ingress Park for marine recreation (PPA 115); promote the redevelopment of Thames Europort / Johnson's Wharf (PPA 116) and allocate land to the north of Dartford Town Centre for a mix of uses taking advantage of the riverside setting (PPA 117).
- 37 The SA found that the Policy Approaches will have a generally positive sustainability effect in support of the SA objectives on balanced and integrated communities, accessibility, employment, environmental health; housing, sustainable design and land and soil quality. This will be achieved through:
- encouraging the enhancement and regeneration of the riverfront;
  - incorporating the Thames and Darent Rivers into community life;
  - providing spaces for active and passive recreation, socialising and new industry and business;
  - cleaning-up the riverfront, allowing the return of contaminated land to productive use, and reducing the presence of polluting industries;
  - allocating a mix of uses to the north of the Dartford Town Centre.
- 38 SA Recommendations were made regarding the need to ensure riverfront redevelopment takes into account concerns relating to the impacts of

development on biodiversity, water quality and flood risk. Redevelopment will also need to be managed sensitively to minimise the impact on heritage and townscapes.

**Chapter 6: Community sites for Sport, Recreation, Leisure and Cultural Uses (PPA 118-120: Proposed Local Nature Reserve)**

- 39 The Preferred Policy Approaches outlined in Chapter 6 allocate land at Dartford Marshes for a Local Nature Reserve (PPA118); require development at Ebbsfleet to include an ecological framework and support the designation of Ebbsfleet stream corridor as a nature reserve (PPA 119) and allocate the sites comprising the Ancient Woodlands Country Park for the provision of improved access.
- 40 The Preferred Policy Approaches perform particularly well against all relevant SA Objectives as they would have a long term positive effect through preserving and enhancing green space for recreation and enjoyment, promoting health and well-being. This would assist in promoting social inclusion and a sense of community ownership and responsibility for these areas as ecological assets. The Policy Approaches also support the need to protect flood plains in the Thames Gateway through the designation of the Dartford Marshes and Ebbsfleet Stream corridor as nature reserves thereby protecting them from development.

**CONCLUSIONS AND THE DIFFERENCE THE SA HAS MADE TO THE PLANNING PROCESS**

- 41 The SA of the emerging Core Strategy for Dartford's Local Development Framework found that the key challenge for the Borough in the preparation of its' LDF will be to minimise the sustainability impacts arising from increased population and employment growth, and to manage the social, cultural and environmental changes that are likely to accompany that growth.
- 42 The SA of the emerging Site Specific Allocations Document and Preferred Policy Approaches has supported this finding; it has also shown that the spatial approach Dartford is taking is sustainable and will assist in minimising the sustainability impacts arising from the growth required to meeting its regional housing and employment land allocations.
- 43 The SA findings from the Strategic Options for Allocations (Core Strategy) and the SA of the Site Allocations Assessment Method have contributed to the preparation of this Site Allocations DPD. However, due to timing constraints the recommendations from the SA of the Preferred Policy Approaches have not yet been considered by the Council, but they will be available to inform the preparation of policies in the Site Allocations Submission Document, further development of the Core Strategy policies and development control policies and the two Area Action Plans. There will be a further opportunity for consultation on the Submission Document.
- 44 The SA identified a number of uncertainties since the nature and significance of many of the sustainability effects are dependent upon the form, design,

layout, construction and occupation of the development sites. It is acknowledged that the scale of development proposed for the Dartford area will have adverse effects on sustainable consumption and production, and a variable effect on environmental resources. Mitigation and opportunities for environmental and sustainable enhancement tend to be more viable for the larger sites; the details for these will be managed through Development Control Policies and through Planning Briefs, Masterplans; the SA recommended that the Council should require Sustainability Strategies for all significant sites.

#### **MONITORING THE IMPLEMENTATION OF THE LDF**

45 Dartford's LDF is designed to be an on-going, iterative process, in which all sections are kept up to date through a rolling process of public involvement, monitoring and, where necessary, adjustment. The monitoring of the significant effects of any plan of this type is seen as essential by the European SEA Directive, and the Council believes that all stakeholders should have an early opportunity to be part of the process.

46 The Council intends to develop one set of indicators to meet the monitoring requirements for both the LDF and SA processes. The key sustainability issues identified in the SA Scoping Report, including consultation, and the SA of the Core Strategy and Site Specific Allocations have assisted in developing indicators and targets for monitoring, which will contribute to the overall Monitoring Strategy for the LDF. Indicators and Targets will be chosen that are relevant to sites from this overall Monitoring Strategy.

#### **NEXT STEPS**

47 In carrying out the SA of the Site Specific Allocations, Enfusion has identified a number of recommendations to contribute towards making development planning more sustainable. These will be used to inform the preparation of policies in the Site Specific Allocations and Core Strategy Submission Documents and the preparation of the Area Action Plan DPDs. Enfusion will then carry out a further SA, to determine whether the last stage of policy refinement has progressed the SA Objectives further and a Revised SA Report will be published alongside the Site Specific Allocations Submission Document.

**FURTHER INFORMATION AND HOW TO COMMENT ON THE SA REPORT AND THE LDF**

- 48 If you would like any further information or if you have any comments on the SA of the Site Specific Allocations Preferred Policy Approaches we would be grateful to receive them. Your views are important and the Council needs to receive them by 24 August, 2006. Comments should be sent to the Policy (Planning) Team by post or e-mail.

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