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Date 3 February 2017
Our ref 05658/02/NG/ER/13280717v3
Your ref

Dear Sir/Madam

Dartford Development Policies Plan: Proposed Modifications Consultation

On behalf of our client, British Land, please find enclosed representations to the Proposed Modifications to the Dartford Borough Council Development Policies Plan. We previously submitted a statement in response to the Inspectors' Matters, Issues and Questions for Examination in September 2016. Prior to this, we submitted representations to the Pre-Submission Consultation Document in January 2016.

On this occasion, we seek to reiterate the comments previously made where they have not been addressed through the Proposed Modifications.

Background

British Land (BL) owns Prospect Place Shopping Park. The Shopping Park is located within the town centre boundary and is designated a secondary retail frontage on the Dartford Town Centre Policies Map.

Proposed Modifications

In light of our previous comments, we have reviewed the Proposed Modifications and note the following in regards to the amendments to retail policy and accompanying Figure 5.

Primary Shopping Area (Proposed Modifications ref. MM19, AM14 and AM34)

We agree with the insertion at paragraph 12.7 of Policy DP14, that a full review of the retail policies should be undertaken as part of the preparation of the new Plan in 2017 (Proposed Modifications ref. MM19). This is on the basis that the adopted Core Strategy (2011) and, of particular relevance, Policy CS12, pre-dates the National Planning Policy Framework (NPPF). Dartford's approach to retail development needs to be consistent with the national approach to retail and effective in



enabling future delivery. On behalf of a significant retail stakeholder within the Town Centre, we request that we are kept informed throughout the review process.

We also support the amendment to paragraph 12.16 which is proposed to read as follows:

“The Primary Shopping Area is shown on the Policies Map for Dartford Town Centre through the designated primary and secondary frontage, to help apply policy.”

The above addresses our previous comments that there should be a clearer definition of the Primary Shopping Area within Policy DP14 (Proposed Modifications ref. MM19) and we are, therefore, satisfied with this amendment. However, it is not clear from this or the modifications to Figure 5 (Proposed Modifications ref. AM14) and the Policies Map (Proposed Modifications ref. AM34) whether they have been updated in accordance with paragraph 12.16 to show the Primary Shopping Area. At present the proposed Town Centre (Figure 5) defines a town centre boundary, a primary retail frontage, and a secondary retail frontage.

Paragraph 23 of the NPPF states that *“in drawing up Local Plans, local planning authorities should... define the extent of town centres and primary shopping areas”*. The NPPF’s Glossary states that a town centre is an *“area defined on the local authority’s proposal map, including the Primary Shopping Area and areas predominantly occupied by the main town centre uses within or adjacent to the Primary Shopping Area”*. The Primary Shopping Area is then further defined in the NPPF’s glossary as *“where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage)”*.

The Primary Shopping Area is not currently defined on the policies map or Figure 5 and, therefore, is not consistent with the paragraph 23 of the NPPF. As previously noted the designation of a Primary Shopping Area in association with Policy DP14 is important with regards to the application of both the sequential and impact test (paragraphs 24 and 26 of the NPPF). Therefore, in the interest of soundness we recommend the relevant policy maps are updated to show the Primary Shopping Area (Proposed Modifications ref. AM14 and AM34).

Policy DP16 (Proposed Modifications ref. MM26)

We have similarly reviewed the proposed replacement wording of Policy DP16 in light of our previous representations (Proposed Modifications ref. MM26) and support the amendments. We consider that in accordance with paragraph 23 of the NPPF, the proposed wording positively promotes competitive town centre environments and permits development which will contribute to Dartford Town Centre’s viability and vitality.

Concluding Remarks

We trust that the enclosed comments are clear and will be taken into account where recommended. Please do not hesitate to contact my colleague Jenny Hill or me, should you require any clarification on the points made.



**Nathaniel Lichfield
& Partners**
Planning. Design. Economics.

We would be grateful if you could keep us informed of the forthcoming stages and Local Plan review.

Yours faithfully,

Enya MacLiam Roberts
Planner