

Appendix A

Strategic Issues Consultation – Main Issues Arising

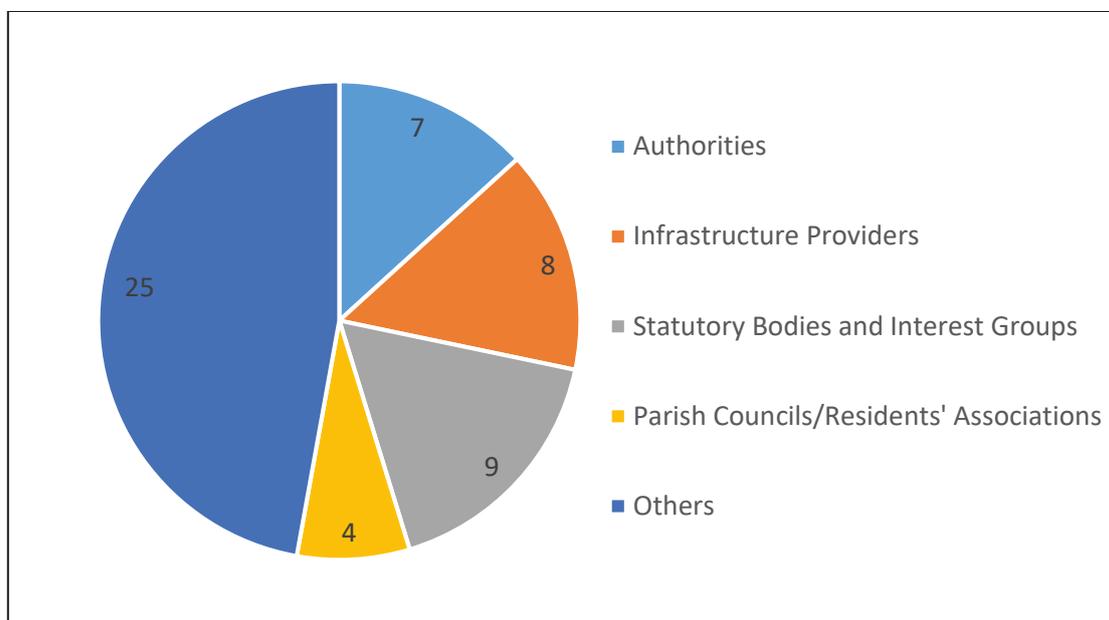
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Introduction

In total, responses were received from 53 different organisations. The diagram below shows the type of organisations who responded.



The Strategic Issues consultation occurred shortly after the SHLAA 'call for sites' period. There is a clear link between developer/interested party land interests and the nature of responses made to the Local Plan consultation. There are a number of tables in the Annex outlining some of the land interests that make up part of the 'other' respondents.

Consultation Document Section B:

Dartford's Strategic Development Objectives and Issues

Strategy and Scope of the Plan (Questions 1-2c and 4a)

Strategy

A number of respondents consider that **the current strategy is appropriate** and that the emphasis should continue to be on the current approach of focussing development on existing brownfield/ underutilised land within settlement confines by making more efficient use of land and optimising the density of development to support regeneration whilst protecting the Green Belt. However, some comment that the strategy needs to take account of **changes to the mix of uses coming forward** on some strategic sites and consider the future role of Bluewater (see relevant sections below).

Some developers comment that the current strategy is appropriate but that it should promote a higher level of housing provision on suitable sites, including non-strategic previously developed sites, and a higher density of development in Dartford Town Centre.

Other developers state that the strategy should be reviewed to allow for more housing in rural villages/Green Belt (including a Green Belt review and the allocation of sites) and that

there should be a more even spatial distribution across the Borough rather than relying on key delivery sites in the urban area.

There have been a number of general comments including the need for the Local Plan to:

- reflect **updated policy and legislation**; and
- clarify the **plan period** which should be at least 15/20 years from the date of adoption.

Scope of the Local Plan

A number of statutory and local bodies support the Local Plan being **focussed on strategic policies** but there are some references to the need to update development management policies to:

- comply with the strategic approach, current legislation and national planning policy;
- strengthen planning controls; and
- reflect the Dartford Town Centre Masterplan.

A number of developers consider that there should be a single new Local Plan which includes strategic policies and development management policies. Some refer to the need to include site allocations.

The EDC suggests that, for proposals on sites that span both Boroughs, and as far as possible, the policies and proposals in DBC should be consistent with those being reviewed in Gravesham to avoid obvious conflicts. The Marine Management Organisation considers that the Local Plan needs to take into account marine planning.

Important Long-term Topics for Future Strategic Policies

Respondents list a wide variety of important topics for future strategic policies. Statutory and local bodies in particular cite **transport/highways**, including the provision of sustainable transport options and lorry parking, and infrastructure provision, including superfast broadband, water supply and energy supply. There are also references to green belt protection, biodiversity, green infrastructure, environmental net gain, flood mitigation, air quality, design and the historic environment.

A number of developers list **the delivery of new dwellings** as being important, particularly to address needs in the rural area. Reference is also made to facilitating a mix of housing types, including **older persons' accommodation**, and the need for development which creates communities to enable families to stay close.

A statutory body considers that economic development is important. One landowner refers to the importance of repurposing/regenerating Dartford Town Centre in considering future strategic policies for the Borough.

New Policy Guidance

A large number of policy areas have been listed as needing new or updated local policy/guidance. These relate to strategic sites, other site issues, house types, infrastructure, environmental issues, the built environment, the green belt, and recreation and tourism. These are listed in the table overpage.

Policy Areas needing New or Updated Local Policy/Guidance

Strategic Sites	<ul style="list-style-type: none"> • Ebbsfleet Garden City • Swanscombe Peninsula
Other Site Issues	<ul style="list-style-type: none"> • Windfall sites including former quarries/landfill sites and Borough Open Spaces • Viability assessments • Reinvigorating employment locations
House Types	<ul style="list-style-type: none"> • Affordable housing for local people • Older persons' accommodation (new and retention of existing housing suitable for older people) • Lifetime homes • Build to rent • Co-living • Student accommodation • HMOs
Transport Infrastructure	<ul style="list-style-type: none"> • Highways/transport • Traffic management • Use of River Thames for transport • Public rights of way
Other Infrastructure	<ul style="list-style-type: none"> • Energy generation • Water utilities • Wastewater • Waste management • Education provision including allocating land for schools • Emergency planning and resilience • SUDS • Technology • Green infrastructure
Environmental issues	<ul style="list-style-type: none"> • Climate change • Energy efficiency, renewable energy and local energy generation • Water efficiency and supply • Environmental net gain • Biodiversity • Electric vehicle connections • Air quality • Dark skies protection • Protecting the best quality agricultural land
Built environment	<ul style="list-style-type: none"> • Heritage and conservation (including local list of assets) • Design tools to support place-making • Building on sloping sites
Green Belt	<ul style="list-style-type: none"> • Traveller sites • Housing • Boundaries
Recreation and Tourism	

Cross Boundary Issues and Duty to Co-operate (Questions 3a-b)

Main Cross Boundary Planning/Infrastructure Issues

The following key cross boundary issues have been identified, particularly by statutory bodies:

- Housing
- Employment
- Retail/role of Bluewater
- Key development sites including Ebbsfleet Garden City, Swanscombe Peninsula and the Thames Waterfront area
- Green Belt
- Infrastructure including education, health, TE2100, water supply, wastewater management
- Transport infrastructure including Crossrail extension, Fastrack (and possible link to the north Bexley proposed transit scheme), public transport, walking, cycling, traffic management, A2 junction improvements/M25/Dartford Crossing, Lower Thames Crossing, use of and access to the River Thames, modelling
- Green infrastructure

There are also some references to environmental sustainability and resilience, decentralised energy and electric vehicle charging infrastructure, heritage, and air quality in a cross boundary context.

Gravesham BC, Thurrock Council, the GLA and the EDC refer to the potential of producing **joint plans**. Some make reference to the Thames Estuary 2050 Growth Commission report in this respect. A number of statutory bodies also refer to the duty to co-operate, including the preparation of other strategic and local plans in neighbouring areas and the implications and opportunities to engage with these.

Protocol for Action and Communication

Respondents generally offered clear **support for the protocol** and its aims. One comments that this should be reviewed in light of the revised NPPF and PPG guidance on duty to co-operate and the need for statements of common ground. The EDC has already committed to work with DBC through a recent Memorandum of Understanding.

Section C: Features of the Development Strategy for the Borough

Homes (Questions 5 part, 6a-c, 7a-b and 25a-c)

Policy Approach/Housing Numbers (see also Strategy section above)

A significant number of respondents comment that the policy approach should be informed by **updated evidence/assessments including consideration of other housing/employment** scenarios – SHMA, SHLAA, SA/SEA. The GLA refer to their demographic modelling which provides alternative population and household projections which could be taken into account when applying the government’s standard approach to calculating housing need.

Sevenoaks DC and Gravesham BC refer to the potential difficulties of meeting their housing needs in their areas and the potential of neighbouring areas to meet some of these needs. A number of developers consider that DBC should accommodate some of the housing shortfalls arising from surrounding areas, deliver its Core Strategy housing target and/or provide an oversupply of housing. However, some local bodies express concerns about increasing housing provision in the borough.

Housing Types

As already referred to above, some respondents consider that the size, type and tenure of housing needed in the borough should be informed by an updated Strategic Housing Market Assessment. One developer considers that this should take account of local demand factors, site opportunities and constraints.

The EDC states that consideration needs to be given to alternative models of housing, including the private rented sector, self-build and custom build, as well as specialist housing to support specific needs and assist in downsizing. Other respondents also recognise the importance of providing **homes suitable for older and disabled** people, including KCC who refer to the need for extra care housing and residential care homes.

Swanscombe and Greenhithe TC considers that consideration needs to be given to starter homes and live-work units. In addition to private sale and affordable housing, developers suggest that the Local Plan needs to have regard to build to rent, co-living, and rent to buy housing.

There is also reference to the need for a range of house types and locations. One respondent considers that there should be more flexibility in the houses/flats ratio based on site characteristics and market demand. The EDC states that there needs to be clarification of the housing mix ratios in the Thames Waterfront area.

Affordable Housing

A number of developers consider that Dartford should apply **the national policy approach**, i.e. not seek affordable housing contributions on developments of ten units or less and update the definition of affordable housing in accordance with the NPPF.

Conversely, some local bodies and developers support the current policy approach of seeking affordable housing contributions on smaller sites in the rural area. KCC consider that it may be appropriate to seek an affordable housing contribution from smaller sites if an appropriate level cannot be achieved through larger sites, taking viability into account.

Some local bodies refer to the need to provide affordable homes which genuinely meet the needs of local people.

Accessible /Adaptable Dwellings

There is a mixed response to the question of whether all dwellings should be accessible/adaptable for all users and ages through national design standards with local bodies in favour and developers generally against such a requirement. One developer suggests a 10% allowance. The EDC considered that there should be an explicit policy setting out this requirement for all new dwellings unless it is not possible due to physical constraints. KCC consider that the requirement for accessible/adaptable homes should apply to all affordable units and to at least 75% of market units (excluding 1-bed units) and that at least 2% of units on sites of more than 50 dwellings should be made wheelchair accessible.

Windfall Development

Large/Small Sites

Local bodies consider that windfall development is problematic, particularly on small sites, due to the loss of amenity space and parking issues. One developer refers to the limited availability of small windfall sites in the urban area which are not easily deliverable. Conversely, a local resident considers that windfall development is only an issue in the case of **larger sites**.

A number of developers submit that windfall development is not problematic, contributes to meeting housing needs and should be supported subject to good standard of design, causing no harm and meeting sustainable development objectives.

KCC refer to the fact that infrastructure can be more easily planned for sites identified through the Local Plan process. Whilst both small and large windfall sites lead to a need for additional infrastructure, this is more difficult in the case of larger sites due to the cost of providing land and delivering the facilities.

Policy DP6: Sustainable Residential Locations

There is **support** for the current policy from local bodies, a local resident and KCC. Some developers state that it needs to comply with national policy while others consider that it should allow for the development of open spaces which do not fulfil that purpose and the redevelopment of previously developed sites.

Efficiency of Land Use/Brownfield Land

Local and statutory bodies consider that Dartford can best make efficient use of land by **focussing development on brownfield sites but it is recognised that this is a finite resource**. There are references to taking a more flexible approach to housing densities, with KCC suggesting that **higher densities** should be allowed in appropriate locations (e.g. around railway stations).

Developers put forward a range of ways in which Dartford can make efficient use of land, including: bringing forward development on previously developed sites in the urban area and the Green Belt; setting differential CIL rates/not requiring excessive planning obligations for development of brownfield sites; factoring in the cost and timescales for developing brownfield land; allowing a wider range of housing types; and locating development where this supports services within settlements.

Some local bodies and a developer consider that the Local Plan should contain a target of 80% of housing to be on brownfield land. Conversely, developers with an interest in greenfield sites consider that there should not be such a target as the availability of brownfield land will reduce and it is subject to constraints, both of which may affect the delivery of growth in the long term. Natural England consider that the target should be driven by the available area of low environmental value, possibly using a brownfield audit. KCC supports the focus on brownfield land subject to the provision of infrastructure.

In relation to whether the focus should be on delivering sites in part 1 of Dartford's Brownfield Land Register, some developers point out that: it fails to include all brownfield land (e.g. former quarry and landfill sites, brownfield sites in the Green Belt); it will not support rural communities; and there should be more emphasis on the delivery of greenfield sites. The issue of the diminishing supply of brownfield sites is also raised.

Employment

A number of statutory bodies comment that the employment policy approach should be informed by **updated evidence/assessments** and consideration of whether the existing strategy is still appropriate – employment needs, employment land assessment. Stone PC consider that there should be some flexibility to allow workplaces to change use. A landowner wants the plan to maintain the approach of protecting successfully operating employment uses at Victoria Industrial Park.

Statutory bodies consider that DBC should consider **land for industry and logistics** and quality commercial space to provide for future economic development in Dartford. Local bodies refer to the need for live-work units, provision for home working and provision for businesses perceived as under threat from the possibility of a London Resort. The owner of the former Littlebrook Power Station suggests that the focus should be on advanced logistics and the storage and distribution employment sector. One landowner considers that the Plan should seek to regenerate land in or with potential for employment use in order to maximise job creation whilst another states that job targets are not transferable to retail need and should not be used to support out of town retail development.

There is support for new economic growth focussed on **locations that are well served by public transport and walking/ cycling**. Some respondents also consider that new economic growth should reflect the local skills and experience of the resident or future workforce. The EDC would like to see the creation of a vibrant commercial destination at Ebbsfleet which maximises access to the public transport, walking and cycling network. KCC seeks policies which encourage development to commit to Local Employment Initiatives.

Retail and Leisure (Questions 9a and 9b)

Policy Approach

A number of respondents consider that the retail and leisure policy approach should be informed by **updated evidence/assessments** – retail capacity/need/impact studies, leisure study. A couple of local bodies state that the plan should reflect changes in retail habits, e.g. online shopping.

Dartford Town Centre

In terms of Dartford Town Centre, KCC considers that the major opportunities have already been identified and that the redevelopment of the Station Mound could have the greatest impact. Some respondents consider that there could be opportunities to increase residential development, e.g. through taller buildings, though a local resident is concerned about the impact of this on infrastructure and open spaces. One landowner considers that there is potential to maintain/expand civic and community uses. The GLA notes that any significant retail/leisure development would need to consider impacts on London's centres.

Bluewater

A number of neighbouring authorities consider that any policy for Bluewater needs to consider its **future role/status** and impacts on other centres, taking into account updated evidence.

The owners of the site state that the current policy strikes the right balance between protecting existing centres and allowing changes to retail provision at Bluewater but that it should include updated guideline figures. Both the owners and EDC consider that the policy should allow for flexibility of uses to respond to changing needs/demands in the retail sector. The owners refer to the potential for dining, leisure, hotel and residential development.

KCC comment that the Local Plan should support the further expansion of Bluewater so that it can compete with rival shopping locations subject to it complimenting the offer at Dartford and Gravesend, not making any further parking provision, improving sustainable forms of transport and the completion of the A2 Bean junction improvement.

A major landowner within Dartford Town Centre considers that future development/expansion of Bluewater should be resisted to allow town centres to benefit from increased expenditure capacity in the leisure/retail sectors. Local bodies state that the parking and opening time conditions need to be clarified and its setting should provide the context for any future change.

Transport, Infrastructure and Developer Contributions (Questions 3c and 10-14b)

Transport General Comments

A number of respondents consider that there is a need for an updated, robust transport evidence base, including what impact the Lower Thames Crossing will have at Dartford.

Interestingly, Network Rail refer to the issue of narrow platforms on curves at **Dartford station** and the fact that there may be the opportunity to move the station westwards for improved rail operation. [This is a new proposal and is being discussed with them. The relationship with the potential Crossrail extension is uncertain]. They also mention the potential to lengthen trains through Dartford to 12-car.

The GLA/TfL state that DBC could consider extending some of the Mayor's strategic transport policy objectives.

Highways/Parking

Highways England state that the strategy, policies and allocations should support the operation of a **safe and reliable transport network and alternatives to the car**. KCC recognise that severe traffic congestion on the local road network is often a result of incidents at the Dartford crossing. They support improvements at the Dartford Crossing and the new Lower Thames Crossing. There is a need for further investment beyond the planned STIPS schemes and DBC should continue to engage with KCC/Highways England to identify measures to improve the performance of the local road network. Other respondents also raise issues of traffic congestion and support projects/improvements to ease this. Local bodies have suggested the need for: road and parking enforcement; smart traffic lights; separation of local and through traffic; and action on lorry parking. EDC suggest that there should be bespoke parking standards for sites in their area.

Buses/Fastrack

There is general support for improving the Fastrack/ bus network and services and ensuring that destinations are well served by them. Swanscombe and Greenhithe TC considers that they should be made more reliable and affordable and that more efficient use should be made of bus lanes. EDC make the suggestion that developer contributions should be used to fund Fastrack infrastructure and that this should be included on the CIL 123 list. Bexley Council consider that there is the opportunity to link an expanded Fastrack scheme with the proposed transit scheme in north Bexley. A local resident has expressed concerns about the relocation of buses from Market Street to Home Gardens.

Cycling/Walking

Respondents consider that better provision should be made for cyclists/pedestrians, i.e. a network of high quality routes and facilities. EDC suggest that reference should be made to the Ebbsfleet Implementation Framework whilst KCC think that DBC should develop a cycle strategy with the development of traffic free cycle routes set out as a priority.

KCC wish to see policies which: encourage walking and cycling; ensure development provides high quality access infrastructure; address public rights of way issues; improve equestrian access; ensure developments do not adversely impact on non-motorised users of rural lanes; and protect and enhance promoted routes, e.g. England Coast Path National Trail.

A developer suggests that developer contributions could be used to fund cycle paths and cycle parking at railway stations.

Railway Services/Stations

Respondents identify **overcrowding (peak capacity)** as the most important issue facing future rail services in the Borough. Maintaining access to existing **London termini stations and the quality of local stations** are identified as the next most important issues. Reliability and cost of travel and are identified as the other key issues.

In terms of relocating/rebuilding stations on the North Kent line, the issue of funding is raised, i.e. capital funding would need to be met by the private sector. Opportunities should be investigated but any relocation would need to consider the impacts on local facilities.

There is support from EDC and Swanscombe and Greenhithe TC for the relocation/improvement of Swanscombe Station and Network Rail consider that there may be the opportunity to improve it if London Resort goes ahead.

Partners support the **Crossrail extension** to Ebbsfleet, with some making reference to the development opportunities that this would facilitate. One respondent states that the route should continue to be safeguarded.

There are some issues raised over the possibility of linking the London Victoria railway line to the existing underused railway line south of Ebbsfleet International. Statutory bodies question what impact it would have on development at Ebbsfleet Central and the capacity of Ebbsfleet station, how it would be funded, how services would operate, and how the A2 would be crossed. Local bodies and residents are concerned about impacts on residents, businesses, existing train services through Longfield/Farningham Road stations and the road network/parking provision.

River Transport

A number of statutory bodies comment that policies should support river transport, including between North Kent and Essex/London. The PLA specifically refers to the use of the river to transport construction materials, freight and passengers, and the role of operational wharves. Dartford and Crayford Creek Restoration Trust states that Dartford Creek should remain navigable.

Other Infrastructure

Infrastructure providers and statutory and local bodies consider that policies and schemes should take account of the need for:

- wastewater treatment, efficient/sustainable use of wastewater assets and the need to protect sensitive development from odour pollution
- water supply including the protection of groundwater and surface water sources from pollution and the efficient/sustainable use of water resources
- SuDS
- education provision through robust planning and safeguarding land/identifying sites
- health facilities including the potential for the future expansion of Darent Valley Hospital
- sports and leisure facilities – indoor and outdoor
- more facilities for children in villages
- wider service provision which does not just include facilities
- the provision of more community and social uses
- care home provision for older people
- high speed broadband to be provided in new housing

There is a need to provide these at the necessary time to meet the needs arising from new development and ensure that they are accessible by a variety of transport modes.

KCC consider that policies on housing delivery (CS11), community services (CS21) and delivery and implementation (CS26) are important for the delivery of infrastructure and that the Local Plan should allocate land for community facilities.

Infrastructure Delivery Plan

Respondents refer to the need for the IDP to include sufficient provision for infrastructure and provisions for review. Comments have been received from infrastructure providers, statutory and local bodies stating that the IDP should include reference to:

- Community service needs arising from all development including changes to the delivery of services
- Sufficient GP facilities to meet needs arising from new development, to be funded through CIL
- Green infrastructure, including public rights of way, green space and enhancing habitats
- The need for riparian lifesaving equipment and suicide prevention measures to be provided by development on the riverside
- Crossrail
- Use of the River Thames
- Possible support for the Kenex Thames Transit was raised by Bean RA (although no response was received from the organisation directly on this).

Infrastructure Funding

A number of comments have been made on the proposed changes to the system of development contributions. KCC consider that both CIL and S106 obligations could apply, particularly for larger sites, and they support the ability for authorities to recover the cost of monitoring obligations. EDC consider that the current dual CIL/S106 agreement process adds uncertainty and complication. They support **CIL review**, and particularly the proposals for viability assessment to be carried out at the plan making stage and for CIL to be based on existing land value with links to the residential/commercial index. However, EDC are concerned about the implications of nationally set contributions and the proposed strategic infrastructure tariff which could have a negative impact on securing the infrastructure needed to support development in Dartford and the provision and funding of major infrastructure (notably the proposed Crossrail extension). The CCG consider that the proposals will lead to the need to review Dartford's CIL rates and developers state that viability needs to be taken into account.

KCC are keen to work with DBC if new funding approaches are explored and reference the need to work collaboratively to plan for strategic transport infrastructure beyond the current STIPS programme. A number of statutory bodies refer to the need for developer contributions/CIL to provide sufficient school places, green infrastructure and improvements to railway facilities.

Natural Environment (Questions 15 and 16)

Local and statutory bodies consider that planning policies should achieve **environmental net gain** and plan positively for networks of biodiversity and green infrastructure including: protecting SSSIs and ancient woodland; enhancing biodiversity on new developments; considering the role of trees as part of a wider integrated landscape approach; and creating opportunities for greater public understanding and engagement with the local natural environment (e.g. River Darent, Dartford Marshes).

In terms of the approach to mitigating the impacts of large developments on the international habitats and species on the North Kent coast, a number of statutory bodies support the existing approach which should continue. It is considered that DBC will need to consider the implications of the recent judgement on this issue.

Open Space (Questions 26a-c)

The question on where the focus of greenspace and outdoor recreation improvements should be elicited a variety of responses. Statutory bodies make reference to the need to focus improvements in deprived areas and where there is a deficiency in provision, as well as increasing requirements for open space provision.

Stone PC and Bean RA have made a number of suggestions for increased/improved open space provision as follows:

- former landfill sites that offer low development potential;
- Bean Triangle, funded by the EDC;
- Beacon Wood Country Park, funded by Tarmac; and
- The Thrift ancient woodland, funded by Highways England.

The Dartford and Crayford Creek Restoration Trust would like the Local Plan to support improvements at Dartford Creek and surrounding areas as a destination and catalyst for outdoor activity, health and wellbeing, as well as making the Darent Valley Path a more visible and inviting green route. A couple of developers state that open space should be provided as part of developments whilst another considers that open space improvements should take place throughout the Borough.

Some statutory bodies refer to the need to: create a green space/ecological network; protect existing sites; and carry out an assessment of needs for open space sport and recreation facilities. Sport England make particular reference to the protection of playing fields and sports facilities and the need for a Playing Pitch Strategy.

A number of suggestions are made on how open space enhancement should be funded including developer contributions and CIL. One developer suggests that capital receipts generated through the development process should be used.

The EDC are currently investigating options for the long-term stewardship of open spaces in its area. Swanscombe and Greenhithe TC consider that parish councils should fund enhancements through agreements with developers and they also raise the issue of residents of new developments currently being double charged due to development service charges.

Local bodies recognise the need for new open space as part of new development to provide a healthy and safe environment for all ages. Statutory bodies consider that such spaces should be accessible to all users and by sustainable modes of transport, as well as multifunctional. A number of respondents refer to the importance of making adequate provision for long term maintenance. KCC makes reference to the need to integrate with the drainage system whilst the EDC consider that provision should be made for soft landscaping and, in the case of larger spaces, public toilets and refreshment facilities. NE consider that provision should be made for publicly accessible semi-natural habitats.

Climate Change, Energy and Air Quality (Questions 17a-c)

Flood Risk

KCC consider that policies should reflect the government's recent Climate Change Risk Assessment and the forthcoming National Adaptation Plan.

The EA states that Dartford's SFRA should be updated to include their modelling updates. They also consider that there is a need to give greater resilience and protection to existing drainage infrastructure and flood defences, including setting development back from them, and to take account of measures in the TE2100 Plan.

Some statutory bodies recognise that that flood risk can be reduced by working with natural processes, using green infrastructure (including trees) and SUDS. KCC consider that policies should reflect changes that have occurred in respect of the way SUDS are delivered in line with their policy statement. Thames Water also consider that reference should be made to the Dartford Surface Water Management Plan.

Water Resources

Water companies want policies which promote the efficient and sustainable use of water resources and prevent development which would lead to a deterioration in the quality and yield of ground and surface water. They are also keen to ensure that new development does not result in sensitive receptors being introduced to areas where they may be affected by existing land uses (policy DP5). EDC comment that policies should support water sensitive design and sustainable water management.

Emissions/Air Quality

Respondents comment that policies should support modal shift by ensuring convenient access to public transport and safe/accessible pedestrian and cycle routes/facilities as well as supporting the use of the River Thames for transport. Natural England suggest that a green infrastructure strategy should be produced. A number of statutory and local bodies consider that there should also be a requirement for new development to make provision for electric vehicles and charging points,

Some respondents recognise that air pollution is an issue in the Borough and this should be considered when planning for future development in the Borough. KCC specifically refers to the government's Clean Growth Strategy and 'Road to Zero' consultation

The land use strategy can reduce emissions by locating residential close to employment areas and/or public transport.

Energy/Technology

Statutory and local bodies respond that planning policies should support broadband/high speed internet provision and encourage the use of green, brown and blue roofs, solar panels and rain water collection. EDC consider that the references to the Code for Sustainable Homes should be updated to allow the application of future nearest equivalent standards.

Design and Conservation (Questions 18a-b)

In terms of heritage, Historic England suggest that the Local Plan needs to consider how the historic environment can assist in the delivery of wider objectives as well as how new development can contribute to local distinctiveness and the conservation/enhancement of heritage assets. There is also the suggestion that masterplans or design briefs should be produced and that all documents should refer to the Borough's heritage/character. Local bodies recognise the need for development to reflect local heritage, including the application of existing policies DP12 and DP13. Historic England/KCC and the EDC go further by respectively suggesting that a heritage strategy or SPD should be developed and the Ebbsfleet Character Study should be expanded to cover the Borough. NE refer to the need to address connections between people and places and to integrate new development into the natural, built and historic environment. KCC refer to a project involving volunteers from the Kent Gardens Trust reviewing the heritage significance of gardens.

Statutory bodies have put forward a significant list of suggestions which need to be considered to ensure good design, largely reflecting their areas of focus. These include: green infrastructure; heritage; sustainable drainage systems; and the riverside environment. KCC consider that further design guidance should be produced which uses examples and covers a number of topic areas. The EDC considers that the Plan should consider:

- tall buildings;
- public realm;
- public open space;
- private amenity space; and
- Building for Life 12

Section D: Main Areas and Types of Future Development

Pattern of Development (Question 19)

There is significant support for **the locations identified in the Core Strategy** from statutory and local bodies as well as the developers of sites identified within the current plan. Natural England considers that sites with the least environmental impact should be progressed to deliver sustainable development.

Developers with an interest in other sites consider that the plan should: recognise the role of non-strategic previously developed sites; allow for the development of suitable windfall sites that are well related to the priority areas; and/or provide a more even distribution of housing across the Borough including sites at villages south of the A2.

Stone, Greenhithe, Swanscombe and Thames Riverside (Questions 20-23)

Ebbsfleet to Stone Priority Area

See also the comments set out in the relevant sub-sections below.

Local bodies have made a number of comments. They consider that policies need to recognise that this may no longer be a single area, there should be prioritisation of health services rather than residential development and the early provision of public transport should be required.

Stone and Greenhithe Former Landfill Sites

In relation to former landfill sites, statutory bodies state that consideration should be given to comprehensive restoration, ecological and landscape value, and opportunities for green infrastructure. Similarly, a number of local bodies refer to their potential for recreational use but safety issues are also raised. A developer submits that they are suitable for residential led redevelopment which can provide housing and bring community benefits.

There is general support from local bodies for these sites to provide public benefits/access though Natural England consider that this should be part of a wider green infrastructure strategy.

There are concerns from local bodies that redevelopment of landfill sites could increase pressures on infrastructure, lead to the loss of green space/gaps, adversely impact on the character of the area and exacerbate poor air quality.

Swanscombe Regeneration

The EDC considers that the regeneration in Swanscombe could be supported by reinforcing connections between **Swanscombe and Ebbsfleet Central**, whilst Natural England recognises the importance of securing the long term management of the Swanscombe Skull Site NNR. The Town Council recognises that there are parking issues and raises the issue of funding availability.

Thames Waterfront Priority Area

Stone Parish Council considers that any development should be **mixed use**, include facilities and maximise access to public transport. In addition, the appearance of the industrial area should be improved and there should be new links north/south of the railway line.

Some developers state that the policy and diagrams should be **updated** to reflect development undertaken since 2011. One supports existing policies which promote redevelopment on the proviso that they remain flexible given the presence of complex brownfield sites.

A number of respondents consider that the policy should support river transport and the use of the River Thames though Natural England point out that there is a need to ensure that there are no impacts on coastal designated sites. The relationship between the waterfront and Dartford Creek with regard to river use, leisure provision, public realm and amenity needs to be taken into account.

The PLA wants the references to wharves, the need for a study on cargo handling viability where sites are proposed for redevelopment and the encouragement of proposals which incorporate sustainable river transport uses using the wharves in policy CS6 to be retained. The policy should be updated to refer to the Kent Minerals and Waste Local Plan 2016.

In relation to the former Littlebrook Power Station, the future role of the site needs to be clarified. The landowner suggests that the whole of the site should be shown as a key development site suitable for new employment floorspace.

There are references to London Resort/Swanscombe Peninsula which are addressed in the section below.

Ebbsfleet Garden City (Questions 24a-c)

The EDC consider that the Ebbsfleet policy approach should support the principles and aspirations set out in the **Ebbsfleet Implementation Framework** and require development to reflect the site's character as set out in the Character Study. GBC consider that the Garden City principles should extend beyond the EDC's area to ensure that existing adjoining communities benefit from the public investment being made.

Thurrock Council comment that Ebbsfleet should contribute as much as possible to meeting development needs. Comments are also made in relation to the importance of a high quality public realm, environmental issues, technology and the potential for a heritage/cultural centre.

Swanscombe Peninsula

Local bodies have concerns about the impacts of the potential London Resort theme park on the local area, businesses and development of Ebbsfleet Central whilst the GLA require any significant retail/leisure development to consider impacts on London's centres.

A number of statutory bodies recognise the **uncertainties** regarding the potential London Resort theme park and KCC suggest a specific policy for Swanscombe Peninsula which

reflects the emerging proposal for London Resort and prospective alternative development if this does not come forward. The EDC consider that a policy could support a mixed use development subject to overcoming constraints (including ecological value), integrating with the surrounding area and maximising the use of river based transport.

The potential developer asserts that London Resort is a fundamental part of growth at Swanscombe Peninsula and the plan should emphasise its importance to the regeneration of the area, its benefits to the local economy/jobs, improvements to roads/infrastructure, and an enhanced green network.

Ebbsfleet Central

There is **uncertainty over what will be delivered**. The EDC recognise that the extant permission has not fully come forward due to viability issues but state that the landowner is exploring options within the parameters of the consent. Policy CS5 provides a strong starting point though reference should be made to the Implementation Framework including the aspiration for a mixed and vibrant community supporting Ebbsfleet as an economic destination and enhancing connectivity including a pedestrian connection between Ebbsfleet and Northfleet stations

KCC consider that policy should allow for **higher density development** and an intensification of uses on the site including a Centre of Excellence for Healthcare, further education provision and/or a major leisure/cultural attraction. The EDC also refer to the potential to provide a medical campus at Ebbsfleet. The CCG make reference to the delivery of high order community/ cultural facilities, residential and major economic development on the site.

The landowner states that the Ebbsfleet permission is still live, could be brought forward and should not be considered for alternative infrastructure use. Whilst they support sustainable, high quality development of the site, they would like a flexible policy position which allows for a residential led development with 4,000 homes anticipated as part of the Garden City.

Other Sites

KCC recognise that other sites are limited by environmental/ecological **constraints** and issues of contaminated land though a number of statutory bodies consider that there may be opportunities for these to be developed for green infrastructure, e.g. former landfill site north west of Ebbsfleet Station, Craylands Gorge, Swanscombe Heritage Park.

KCC consider that there is possible potential for the redevelopment of Manor Way Business Park in conjunction with redevelopment of Northfleet Industrial Estate in Gravesham if an alternative route to relieve the A226 over HS1 were to be delivered

The plan should include a vision for Bean Triangle, which is subject to an environmental improvement scheme commissioned by the EDC. This should recognise the need to protect the ancient woodland. Bean Residents' Association consider that if Ightham Cottages are demolished, these should be rebuilt close to their current location and considered as a rural exception site.

Green Belt (Questions 27a-b)

There is support for the **protection** of the Green Belt and the current strategy from a number of statutory and local bodies. This is in accordance with national planning policy.

Bean RA want to see the Green Belt protected, with specific reference to Bean Triangle and Beacon Wood Country Park. They also consider that only replacement dwellings should be allowed and that no new traveller sites should be allowed adjacent to villages.

A number of developers state that a Green Belt **review** should be carried out.

Local Priorities (Questions 28a-c)

Area Needs

Some respondents have referred to the need to protect/improve community facilities and infrastructure e.g. **cycling** links. Stone PC and Bean RA make specific reference to safe walking/cycling routes for children and others in their areas whilst the Dartford and Crayford Creek Restoration Trust refer to improved mooring provision, navigability and environmental improvements at Dartford Creek.

Some developers refer to the support that housing/employment development in the rural area can give to rural communities and meeting local housing needs. One claims that the employment generating uses in Sutton at Hone, Hawley and South Darenth are greater than shown in the area profiles.

Bean RA comment on the need for the Bean and Darenth Area Profile to separate the statistics for Bean and investigate the reason for lower life expectancy.

Small or Brownfield Sites

Some developers have put forward small or brownfield sites for potential development. The tables in the Annex contain lists of sites in which developers have expressed an interest.

The Dartford and Crayford Creek Restoration Trust has suggested that the Bus Garage or Steam Crane Wharf could be used for employment and community use related to its riverside location.

KCC consider that the level of new housing that could be sustained should be informed by information on schools.

Specialist and Alternative Sources of Housing

KCC consider that developments for vulnerable adults should be located in areas with good transport links and close to community facilities. Swanscombe and Greenhithe TC would like to see specialist and alternative sources of housing located in all locations to create vibrant, mixed communities. Developers put forward options which support the potential development of their sites including: provision on brownfield or other suitable land in sustainable locations with low environmental value; adjacent to transport hubs and within 800/400m of local services; and where the needs arise rather than relying on strategic allocation sites.

Stone PC raise the issue of affordability for aspiring owners in their parish and the fact that housing stock does not often provide effective downsizing opportunities. A degree of parish housing priority would help address this issue.

A few sites have been put forward as suitable for specialist residential needs and alternative sources of housing. These are included in the tables in the Annex. Bean RA suggests that

Branton's Brickfield Bean could be treated as a rural exception site suitable for the rebuilding of Ightham Cottages.

Annex: Land submitted through Local Plan consultations and subsequently

Land promoted by developers/ interested parties through the Local Plan consultation (not requested for Strategic Housing Land Availability Assessment 'SHLAA' consideration):

Name of site	Nature of submission
Blackshole Farm, Watling Street	Mixed use proposal.
Swanscombe Peninsula, London Resort	Tourism/ leisure led proposal.
Croxtan & Garry site, Tiltman Avenue	Existing residential permission- subject S106.
Top Dartford Road	Residential proposal.

Local Plan representations potentially relating to land submitted to the SHLAA:

Name of site	SHLAA ref.
Highfield Farm, Betsham Road	186
Birchwood Park Golf Centre, Wilmington	196
Bluewater*	-
West of Darenth Road*	-
Land surrounding Ebbsfleet Station	1
Edwin Road, Wilmington	201
1-11 Ightham Cottages/Branton's Brickfield, Bean	176
North of Elizabeth Street, Stone	189
Clock House, West of Green Street Green Road	191
Malt House Farm, Green Street Green Road	61
West of Green Street Green Road and North of Gill's Road	192
Lords, Lane End and Manor Farm, North of Green Street Green Road	194
West of Hawley Road and North of Arnolds Lane, Hawley	163
Bybow Farm, south of Highfield Road, Wilmington	72
Former Heathside Nursery, Leyton Cross Road, Wilmington	47
Former Littlebrook Power Station, Dartford	180
Biffa Site, London Road, Greenhithe	34
East of Main Road, South of Keith Avenue, Sutton at Hone	66
West of Main Road, North of Chaplin Court, Sutton at Hone	67
Priory Shopping Centre, Dartford	212
North Kent College, Oakfield Lane, Wilmington	46
Park Corner Road, Betsham	115
Warrigal Farm, Sandbanks Hill, Green Street Green	188
School Lane, Bean	181
Ship Lane, Sutton at Hone	174
Rear of South Darenth Primary School, North of St Margaret's Road	193
St Margaret's Farm, St Margaret's Road, Darenth	59
North of Shellbank House, Shellbank Lane, Bean	187
North of Steele Avenue, Greenhithe*	-
The Whitings, Longfield	179
Westwood Farm, West of Westwood Road, East of Highcross Road	195

** Late sites may be resubmitted at the next Local Plan consultation and may necessitate further SHLAA work after that stage.*

Other land submitted late to the SHLAA (post Local Plan consultation):

Name of site
Barton Road, Sutton at Hone*
North of Main Road, Longfield*

** Late sites may be resubmitted at the next Local Plan consultation and may necessitate further SHLAA work after that stage.*