

Please contact: Prem Velayutham-Smith
Our ref: Dartford DMP Major Mods December 16
Your ref:
Date: 3rd February 2017



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BY E-MAIL ONLY

Dear Mr Aplin,

Dartford Development Policies Plan: Proposed major modifications

I write on behalf of Medway Council in response to the Dartford Borough Council Submission Development Policies Plan: Proposed Major Modifications consultation published on 23rd December 2016.

It is acknowledged that Medway Council has previously confirmed soundness of Dartford's Development Policies Plan and pre-submission stage. Previous comment and non-objection was on the basis of there being a retail hierarchy with Dartford Town Centre at the top and Bluewater being an out-of-centre shopping destination. The major modifications appear to be awarding Bluewater a 'town centre' status, which Medway Council consider a fundamental change and therefore does not support.

Medway Council has now received findings of the commissioned retail study and has most recently provided comment on the Bluewater planning application, which raises concern around the impact of Bluewater's expansion on neighbouring centres and the proposed status change to a town centre suggested in the major modifications consultation document. As such our comments in the accompanying table below relate to such matters but specifically tie into the proposed modifications as set out in your consultation document.

Major modifications	Medway Council's comment
MM19 - paragraph 12.2	The Authority is satisfied that this retains the retail hierarchy with only one 'town centre' (Dartford) as reflected on the Policies Map.
MM19 - paragraph 12.7	The Authority supports this view, i.e. to undertake a review of retail policies on adoption of the OPP. As such, seeking fundamental changes to retail policy and hierarchy (seeking to change the status of Bluewater to a 'town centre') in the OPP which would not be consistent with the adopted Core Strategy would render the OPP unsound, inconsistent and premature.
MM19 - Additional text after paragraph 12.7	<p>The changes proposed here, seek to change the retail hierarchy and award Bluewater a 'town centre' designation without justification or evidence. The Dartford Council Core Strategy identifies Bluewater as an out-of-centre location (paragraph 2.33) and confirms throughout the document that Dartford Town Centre is at the top of the hierarchy. The proposed change will fundamentally alter the retail hierarchy and consideration of proposals at Bluewater and has therefore deviated from what the Authority had previously considered acceptable.</p> <p>In addition, with due consideration of the NPPF and its <i>'town centre first approach'</i> the Authority does not consider that exempting Bluewater from the sequential test is compliant, in general, and because it is not a defined 'town centre'. Bluewater is a regional shopping centre as designated in the now revoked South East Plan, but was carried forward as such in the Core Strategy. It is not within the gift of Dartford Council to change the status of Bluewater prior to changing its status in the Core Strategy, i.e. the Core Strategy provides the strategic overview which sets the tone which the OPP must follow.</p> <p>Medway supports the inclusion of regional considerations where impact of proposals at Bluewater is concerned.</p>
MM20 - DP14: 1, Clause 1	Medway Council does not agree with the deletion of 'notably Dartford Town Centre' as this removes the emphasis of Dartford town centre being at the top of the hierarchy. This would be inconsistent with the Core Strategy and fundamentally seeks to change the retail hierarchy.
MM21 - DP14:2, clause 2	<p>The Authority objects to the deletion of clause 2. This clause ensured that national and local policy would be appropriately considered and does not exclude the need for a sequential test.</p> <p>The new text prepared as the replacement paragraph seeks again to establish Bluewater as a 'town centre' and remove the need to undertake a sequential test.</p>
MM23 - DP14:3, new clause	Medway Council supports the approach to review retail policies, but consider the proposed changes to the retail policies, particularly those seeking to change the status of Bluewater, are premature and not sound when considering the Local Plan as a whole, i.e. Core Strategy and OPP. The proposed changes are not consistent with the Core Strategy.

In summary, the major modifications to the Development Policies Plan seek to designate Bluewater as a 'town centre' without due process and reflection of that set out in the Core Strategy. The Core Strategy as stated above clearly identifies Bluewater as an out of centre location and confirms Dartford Town centre at the top of the hierarchy of centres (*CS1, CS2, CS4, table 1 page 49*). In addition, the major modifications refer to the proposals map which identifies the retail centres. It is recognised that Dartford Town Centre, Bluewater and Ebbsfleet have a retail focus, however there is only one 'town centre' identified, i.e. Dartford Town Centre.

Dartford Town Centre at the top of the hierarchy

Bluewater, although defined within a hierarchy of shopping centres in the Dartford Core Strategy, September 2011 (*CS12, page 61*), is not defined as a town centre. In fact, Bluewater is classified as an out-of-centre location in paragraph 2.33 of the Dartford Core Strategy, which quotes the South East Plan. Dartford town centre is defined as the 'town centre' at the top of Dartford's retail hierarchy, which is reaffirmed within many policies and parts of the Dartford Core Strategy and emerging Development Policies Plan:

- a) *Policy CS1 (Spatial pattern of development), pg 24*: Dartford Town Centre is at the top of the list of priority areas with the revitalisation of the centre as the main focus. The Ebbsfleet to Stone area is listed second in the hierarchy, which describes bringing quarries back into use with no explicit mention of Bluewater.
- b) *Policy CS2 (Dartford Town Centre), pg 28*: again the focus is on Dartford Town Centre. The policy aims to revitalise and improve the environment. Improving the quality of comparison retail is first on the agenda.
- c) *Policy CS4 (Ebbsfleet to Stone Priority Area), pg 38*: Bluewater is captured within bullet (f) - its future growth must be explored with neighbouring centres without adversely impacting upon them. Other considerations focus on the integration of the shopping centre with neighbouring residential developments. Again no mention is made of defining Bluewater as a 'town centre'
- d) *Table 1 (Summary Table of Development in Priority Areas 2006-2026), pg 49*: Summarises the priority development areas across the Authority between 2006 and 2026. Dartford Town Centre and the northern gateway are listed first with approximately 24,000sqm of shopping floorspace estimated in Dartford Town Centre. Mention is made of the Ebbsfleet to Stone area which identifies up to 23,800sqm of shopping floorspace. It is confirmed that any further floorspace (above 23,800sqm) would be allocated to Bluewater but is subject to regional considerations.

Impact

Medway has 6 centres, one of which is a primary centre (Chatham) with 5 district centres (Rochester, Rainham, Gillingham, Strood and Hempstead Valley). The hierarchy is therefore quite clear in terms of directing growth to the primary centre first.

Medway Council has commissioned a joint retail study with Gravesham Council (North Kent Retail Study), which provides an up to date evidence base to support the Local Plan preparation. The initial findings of the study confirm the Borough's retail hierarchy of centres, performance, requirement for growth and the impact of out of centre proposals, Bluewater in

particular draws 26% (£404.3m) of available comparison expenditure in the Gravesarn and Medway retail market area equating to a combination of spend captured by Chatham (£168.3m), Gravesend town centres (£134.6) and Hempstead Valley shopping centre (£134.6m). In contrast Dartford Town Centre retains 5% (£73.7m) comparison expenditure.

Much like Dartford Town Centre, Chatham's vibrancy and retail growth was slowed down by the recession. This was further compounded by out of centre retail proposals including Bluewater, drawing trade away and resulting in a vulnerable city centre unable to realise its retail ambitions. The economic climate is now showing signs of improvement and regeneration plans for Chatham city centre are being revisited and gaining momentum whilst the stability, vitality and viability of the Borough's centres continue to be challenged by out of centre development.

The lack of evening economy is a consistent theme across Medway's centres, Hempstead Valley is a District of significance in this case - It is a centre which is performing very well in the Authority and provides a comparison retail shopping experience. The Bluewater proposal would therefore have an impact on both Chatham and Hempstead Valley.

Having low value retailers in Chatham has not been an ambition. It is a sub-regional centre with bigger aspirations, which will not be realised or even pursued because of one location monopolising a specific retail market. In addition, it is questionable whether the current anchors in Chatham would relocate as a result of such monopolisation, leaving Chatham in an increasingly vulnerable position. The impact of directing further growth to Bluewater is therefore a concern for Medway Council.

Duty to cooperate

Furthermore, it is understood that Bluewater would share similar market area to the North Kent market area study. Future need identified should be discussed as a Duty to Co-operate issue of regional importance and agreement reached on a way forward between the appropriate authorities.

If you would like to discuss our response further, please do not hesitate to contact me.

Yours sincerely,

Prem Velayutham-Smith
Senior Planner (Policy)