

Dartford Local Plan Pre- Submission (Publication) September 2021 Town and Country Planning (Local Planning) England Regulations 2012 – Regulation 19 Representation Form

Representations on the Dartford Local Plan should be submitted by **5pm on Wednesday 27th October 2021**. **Late representations will not be accepted.**

Representations should be made using this form and submitted to Dartford Borough Council by email to localplan@dartford.gov.uk or sent to: Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR.

Additional copies of the form can be obtained from the Council's website at: <https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/new-local-plan>. Photocopies of blank forms can also be made.

Advice on how to make representations is provided in the guidance notes which accompany this form. You are strongly advised to read the guidance notes before completing this form. ***Please note that if you responded to the previous version of the Pre-Submission Local Plan February 2021, your previous representation will not be automatically carried forward and you will need to respond again.***

This form comprises 3 parts:

- Part 1: Your details
- Part 2: Your representation(s). Please fill out a separate sheet for each representation you wish to make. However, only fill in Part A once and send all representations in together.
- Part 3: Declaration

If you have any queries about this consultation, please contact the Planning Policy Team by emailing localplan@dartford.gov.uk or by phoning 01322 343213.

You only need to fill this section out once.

Part 1: Your details

You only need to fill this section out once

	1. Personal details	2. Agent details (if applicable)
Title		Miss
Name		Hardeep Hunjan
Organisation / group		Barton Willmore
Address 1		
Address 2		
Address 3		
Postcode		
Telephone number		
Email address		

If you are replying on behalf of a group, how many people does it represent?

Part 2: Representation

For office use only

Consultee ID:

Agent ID:

Date Received: :

Please use a separate sheet for each representation

Name or Organisation:

Goodman Logistics Development (UK) Ltd

1. To which part of the Local Plan does this representation relate (please specify paragraph or policy number)?

Paragraph

Policy

Policies Map

2. Do you consider the Local Plan is:

Please mark with a cross in the boxes as appropriate

(1) Legally compliant

Yes

x

No

(2) Sound

Yes

No

x

(3) Complies with the
duty to co-operate

Yes

x

No

3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to accompanying Representations report.

(Continue on a separate sheet / expand box if necessary)

4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 3 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying Representations report.

(Continue on a separate sheet / expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

x

Yes, I wish to participate in hearing sessions(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they may wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part 3: Declaration

Data Protection

The personal information you provide on this form will be processed in accordance with the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004, and may be used by the Council to contact you, if necessary, regarding your submission. Under Regulation 22, we have a duty to send all representations to the appointed Planning Inspector. Your name, organisation name (if relevant), comments and town/parish of residence will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

Please sign and date this form. Forms signed electronically will be accepted.

Declaration:

By completing and signing this form, I agree to my name, organisation, town/parish of residence and representations being made available for public inspection.

Signature:

Date:

26/10/21

Dartford New Local Plan Regulation 19 Stage 2 Consultation Representations

Prepared by Barton Willmore LLP
on behalf of Goodman Logistics Development (UK) Ltd

October 2021

**DARTFORD NEW LOCAL PLAN
REGULATION 19 STAGE 2 CONSULTATION**

REPRESENTATIONS

**PREPARED BY BARTON WILLMORE LLP
ON BEHALF OF GOODMAN LOGISTICS DEVELOPMENT (UK) LTD**

Project Ref:	29816/A5/HH/sjo
Status:	Final
Issue/Rev:	01
Date:	26 October 2021
Prepared by:	Hardeep Hunjan
Checked by:	James Finn
Authorised by:	James Finn

Barton Willmore LLP

COPYRIGHT

Ref: 30737/A5/HH/sjo
Date: 26 October 2021

The contents of this document must not be copied or reproduced in whole or in part without the written consent of the Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil-based inks.

CONTENTS

	PAGE NO.
1.0 INTRODUCTION	01
i) Content of Representations	02
2.0 REPRESENTATIONS TO REGULATION 19 CONSULTATION	03
i) Spatial Strategy	03
ii) Employment Land Supply	06
iii) Duty to Co-Operate	07
3.0 DEVELOPMENT MANAGEMENT POLICIES	08
i) Sustainability	08
ii) Flood Risk	09
iii) Biodiversity	09
iv) Travel Management	09
v) Economic Growth	10
4.0 CONCLUSIONS	12

1.0 INTRODUCTION

- 1.1 These representations are submitted on behalf of Goodman Logistics Development (UK) Ltd in response to Dartford Borough Council's Local Pre-Submission (Publication) document second stage Regulation 19 Consultation (DBPD) published in September 2021. Goodman submitted representations to the first stage Regulation 19 Local Plan consultation that was published in February 2021.
- 1.2 Goodman Logistics Development (UK) Ltd own land at the former Dartford International Ferry Terminal, Clipper Boulevard, Dartford (hereafter referred to as the 'Site'). As such it has a direct interest in the Local Plan and the long-term development strategy for Dartford. Phase 1 of the Site has Full planning permission for three Class B8 (storage and distribution) buildings (comprising 43,735 sq. m total floorspace) with associated access, servicing, parking and landscaping (ref. DA/19/00991/FUL as amended by DA/19/01701/VCON and further amended by DA/21/00274/VCON). The original planning permission was approved on 29 November 2019, DA/19/01701/VCON was approved on 31 March 2020 and DA/21/00274/VCON was approved on 28 May 2021. Phase 1 is currently under construction.
- 1.3 A Full planning application for Phase 2 including the demolition of the existing buildings and redevelopment of the Site to provide three Class B8 (storage and distribution) buildings (29,343 sq. m floorspace) with associated access, servicing, parking and landscaping was submitted on 23rd August 2021. The planning application is currently under consideration by Dartford Borough Council (DBC).
- 1.4 These representations focus on providing support for the proposed Strategic Site Allocation of the former Dartford International Ferry Terminal within an extension to the 'Crossways' Identified Employment Area.
- 1.5 The principle of employment development at the Site is well established within the adopted Core Strategy through Policies CS6 and CS8 of the existing Core Strategy, which supports logistics development as a key growth sector.
- 1.6 The Site is considered to be available, suitable and achievable (and therefore deliverable) within the first five years of the current plan period to 2036.
- 1.7 Notwithstanding our client's specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government

guidance as set out in the National Planning Policy Framework [NPPF] (July 2021) and National Planning Practice Guidance [NPPG] (March 2014).

1.8 This current consultation represents the final opportunity to comment ahead of submission for Examination. In testing the soundness of a local plan, paragraph 35 of the National Planning Policy Framework ('NPPF') provides the following tests:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet, as a minimum, objectively assessed development and infrastructure requirements. The strategy should be informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be an appropriate strategy, taking into account the reasonable and based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

i) Content of Representations

1.9 The DBPD and the strategy for the preparation of a new Local Plan, has been assessed on the basis of National policies as referred to in Section 2.0. These representations are structured as follows and provide a response to the following matters/questions:

- Section 2.0 – Representations to Regulation 19 Consultation
- Section 3.0 - Development Management Policies; and
- Section 4.0 – Conclusions.

2.0 REPRESENTATIONS TO REGULATION 19 CONSULTATION

2.1 This section sets out our representations on the main matters for the Regulation 19 Consultation as follows:

- i. Spatial Strategy
- ii. Employment Land Supply
- iii. Infrastructure Delivery
- iv. Duty to Co-operate

i) Spatial Strategy

2.2 We support the Council's spatial strategy for economic development, which focuses on existing centres and employment clusters, maintaining their competitiveness, particularly through enhanced public transport accessibility and enhancing their local environment.

2.3 It is noted that Policy S4 'Borough Development Levels' identifies that in terms of economic development, planning decisions will have regard to the desirability of providing approximately an average rate of 25,000sqm per annum of new industrial/distribution premises. It is not clear whether this is across the Plan period (2037) or across the 15 year time period (by 2032) set out for the delivery of jobs within supporting table 2. This should be clarified. We note that the Dartford Economic Land Report (DELR) September 2021 assumes that the future pipeline will be delivered across the Plan period by 2032. Notwithstanding this, we have concerns regarding the level of employment land identified, which are raised later on within this Report.

2.4 Supporting table 2 sets the objective to achieve a range of approximately 8,000 – 16,000 jobs across the office and industry/logistics sectors by 2032 at locations across the Borough, particularly identified employment areas. This will be delivered through strategic expansions to areas at Littlebrook/ The Bridge; Riverside/ Northern Gateway; Burnham Road and Crossways, completing sites under construction or with planning permission and sustainable intensification of identified employment areas.

2.5 The new Local Plan includes proposals to amend the Policies Map to extend the existing Crossways Identified Employment area to include the Site. This includes both Phases 1 and 2 of the development and we wholly support the addition of the Site within the Identified Employment Area.

2.6 We consider that the spatial and strategic approach to economic development and the allocation of this Site for employment purposes in the new Local Plan is justified, and is supported by the evidence contained within the DELR, which:

- Focuses on planning new development for the main economic clusters identified in the Local Plan and has a particular focus on industrial and warehousing/logistics uses; and
- Assesses the Site in terms of its Suitability, Availability and Achievability with eight individual criteria tested. Each criterion is scored for performance from 1 to 5, providing a framework to consider the relative performance of land in terms of planning for economic development; and to inform evaluation of overall sustainable development merits; and whether suitable to include as an allocation. This assessment is combined with the planning status of the sites which underpins the assessment findings and provides a total score of 30 out of 40 points for the Site. The DELR finds that based on this high scoring against the criteria, the Site should be put forward for employment land and designated as such within the Local Plan.

2.7 We support these findings and maintain that the Site provides a deliverable location for employment uses and is wholly Suitable, Available and Achievable as evidenced by the extant planning permission at the Site within Phase 1 which is presently under construction and proposals for development at Phase 2.

2.8 To this extent, we consider that the approach taken to economic development and the allocation of this Site for employment purposes is consistent with National Policy, which seeks the following objectives within the NPPF (2021):

- To achieve the economic role of sustainable development - to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation (para. 8).
- For planning policies to:
 - Set out a clear economic vision and strategy, encouraging sustainable economic growth;
 - Identify strategic sites to align with the strategy and meet anticipated needs over the plan period;

- Address potential barriers to investment including inadequate infrastructure;
- Allow sufficient flexibility to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and enable a rapid response to changes in economic circumstances (para. 81).

- 2.9 Moreover, the spatial strategy seeks to direct economic development to brownfield land. We support this strategy which aligns with the NPPF para. 119 which identifies that “Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.” Paragraph 120(c) requires Local Planning Authorities to give ‘substantial weight’ to the value of utilising valuable brownfield land and “support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”.
- 2.10 The Site is one such example of brownfield, previously developed land. The redevelopment of the Site will provide high-quality modern warehouse accommodation for storage and distribution purposes.
- 2.11 Furthermore, the NPPF directs that planning policies and decisions should recognise and address the specific locational requirements of different sectors and supports varying scales of development at suitably accessible locations for storage and distribution operations. (Para. 83). The Site’s strategic connectivity is positively recognised by its proposed inclusion within the Crossways Identified Employment Area.
- 2.12 Moreover, the spatial strategy for economic development aligns with the Thames Estuary 2050 Growth Commission’s Vision (dated June 2018), which identified key opportunities within the report include strengthening of existing sectors, comprising growth in freight, logistics and construction, capitalising on the five major ports and the growing logistics and associated manufacturing sectors. The Report identified that Dartford is located within the Vision’s ‘Inner Estuary’ sub-area, the core strength of which is recognised to be connectivity, which supports a growing higher value logistics and freight sector. The government’s response to the Thames Estuary 2050 Growth Commission was published in March 2019, which supported within the Inner Estuary a ‘Transport Innovation Zone’, and welcomed the innovative thinking regarding clean technology in transportation, logistics and data systems. The Response also underlined Government support for the Lower Thames Crossing in unlocking growth and Government commitment to £125 million to improve the A2 junctions at Bean and Ebbsfleet and £10 million to the existing Dartford Crossing.

ii) Employment Land Supply

- 2.13 The NPPF requires Local Plans to be 'positively prepared' based on a strategy which, as a minimum seeks to meet the area's objectively assessed needs. We note that the pipeline of employment land identified within the Local Plan and DELR has been amended since the first stage Regulation 19 Local Plan consultation from a 10 year period to a 15 year period included within this second stage Regulation 19 Local plan consultation.
- 2.14 We note that the DELR provides justification as to the selection of the 2031/32 timeframe for the pipeline of employment land, namely to align with the Local Plan residential requirement timeframe; considered to be justified against the anticipated delivery profile of industrial and distribution development; appropriate timescale for predominance of other job generating developments (including mixed use development proposals); avoids stretching (lowering delivery rates to 2037, which is considered to be a very long term period over which to fix economic development planning in a fluctuating market.
- 2.15 Whilst we acknowledge the justification provided for selection of the 2031/32 timeframe, we consider that this does not align with para. 22 of the NPPF which notes that "strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements or significant infrastructure". Therefore, if the Local Plan were to be adopted in 2022, the 15 year timeframe would align with the Plan period end year of 2037, rather than the 2031/32 timeframe that has been considered for the supply of employment land.
- 2.16 The total quantum of industrial and distribution floorspaces between 2017 – 2032 is 380,104 sq. m which provides an annual average future delivery of 25,340 sq. m and includes a 10% buffer. The supply includes sites with permissions, pending applications and allocated sites.
- 2.17 Whilst we recognise that build out rates are underpinned by market demand, we consider that the Council should provide for a contingency within the supply to ensure that sufficient employment floorspace can be delivered to cover the entirety of the Plan period and to ensure that the Plan is Sound and positively prepared, in a way that is aspirational but deliverable. (NPPF, para's 16 and 35). To ensure that the Plan is consistent with the tests of soundness set out within the NPPF, we consider that further flexibility should be built into the pipeline of employment land for the Plan.

iii) Duty to Co-Operate

- 2.18 It is noted that the NPPF requires Plans to demonstrate effective joint working on cross-boundary strategic matters including employment and infrastructure. To this extent, it is acknowledged that Dartford's Duty to Cooperate Statement of Activities identifies the key stakeholder meetings that have taken place on a range of strategic matters including accommodating development growth and infrastructure with the South East Local Enterprise Partnership and Thames Gateway Kent Partnership as well as neighbouring Local Planning Authorities.
- 2.19 In addition, whilst Local Enterprise Partnerships (LEPs) are not subject to the requirements of the duty to cooperate, it is also noted that the NPPG confirms that LPAs must cooperate with them and have regard to their activities when they are preparing Local Plans. To this extent, we note that the SELEP Economic Strategy Statement (2018) provides an analysis of SELEP's industrial mix indicates that it has considerable diversity – both at the level of the LEP overall, and within its four economic areas. At the level of the LEP overall, two sectors – construction and transport and logistics – stand out as having particularly high relative concentrations of employment (reflecting the scale of the South East's growth agenda and its 'gateway location'. To this extent, the spatial strategy of the new Local Plan, including the allocation of the Site as an Identified Employment is therefore considered to be aligned with the activities of the LEP.
- 2.20 We consider that Dartford has satisfied the Duty to Co-Operate and has "engaged constructively, actively and on an ongoing basis" in respect of meeting employment needs with neighbouring authorities.

3.0 DEVELOPMENT MANAGEMENT POLICIES

- 3.1 Once adopted the Local Plan will supersede the Council's Local Development Framework development plan documents including the Core Strategy and Development Management Plan. The Plan therefore sets out proposed development management policies against which development proposals are to be assessed. Where necessary and relevant we comment on the soundness of the proposed development management policies below.

i) Sustainability

- 3.2 Draft Policy M3 'Sustainable Technology, Construction and Performance' provides that all non-residential development over 1,000 sq.m **must** achieve BREEAM Excellent standard, showing that available water credits have been met.
- 3.3 Whilst we support the Council's aspirations within this regard, we consider that there should be flexibility in such an approach subject to viability / feasibility considerations. We therefore suggest this policy is reworded to "seek" to achieve.
- 3.4 The supporting text to the Policy clarifies that developments are required to meet the maximum available water credits in the excellent category but the composition of the remaining necessary credits to achieve BREEAM excellence remains flexible. Overall, it is noted that the Policy places a requirement of BREEAM Excellent standard although it is ambiguous within the Policy wording which appears to relate to an Excellent standard just in terms of the water credits. We propose alternate wording to address this as follows:-

Original wording

2. All residential development must demonstrate delivery of the water efficiency level of no more than 110 litres per person per day for all dwellings created. In order to demonstrate high levels of energy performance and water efficiency, non-residential development over 1,000sqm must achieve the BREEAM excellent standard, showing that available water credits have been met.

Revised wording

2. All residential development must demonstrate delivery of the water efficiency level of no more than 110 litres per person per day for all dwellings created. In order to demonstrate high levels of energy performance and water efficiency, non-residential

development over 1,000sqm ~~must~~ **should seek to** achieve the BREEAM excellent standard **and** showing that available water credits have been met.

ii) Flood Risk

- 3.5 Draft Policy M4 'Flood Risk and Riverside Design' notes that development with a frontage along the River Thames will be expected to fully explore the potential for improving the riparian landscape; biodiversity; access and appeal for pedestrians and cyclists; and opportunities for river-based recreation.
- 3.6 We broadly support the objective of this part of Policy M4, and endorse the way in which it requires development proposals to "fully explore" rather than place an outright obligation on the delivery of the listed improvements to the riparian landscape. This is because in some instances it may not be appropriate for development proposals with a river frontage to provide river-based recreational uses, which would not be feasible within, for example, industrial locations such as this Site.

iii) Biodiversity

- 3.7 Policy M15 'Biodiversity and Landscape' notes that development will be expected to protect and enhance biodiversity and requires biodiversity net gain to be applied to all applicable developments.
- 3.8 We support the provision of biodiversity net gain in line with National policy and changes proposed to the Environment Bill. The current National proposals indicate that proposed development will be required to demonstrate a 10% increase in biodiversity on or near development sites. The proposals include a two-year transition period for this to be implemented after the updated Environment Bill receives royal assent.

iv) Travel Management

- 3.9 Policy M16 'Travel Management, amongst other matters, notes that *"proposals should capitalise on all feasible opportunities to promote enhanced movement on and alongside rivers, including travel for passengers, products and the transportation of construction materials and waste. Development must not unacceptably adversely affect the operation of safeguarded wharves. Proposals for alternative development at existing non-safeguarded wharves will not be supported unless that facility is no longer viable or capable of being made viable for waterborne transport."*

- 3.10 We recognise that the policy approach continues to support the transportation of goods and services by river which is consistent with the protection afforded to wharves within the Core Strategy Core Strategy para. 2.49 and policy CS6.
- 3.11 It is considered that the Site can be developed for employment related uses which can satisfy the requirements of this draft policy given the potential for additional development to come forward in a way that preserves the jetties and remaining operational port land for use as a ferry terminal or other port-related uses retained.

v) Economic Growth

- 3.12 Draft Policy M19 'Sustainable Economic Locations' supports B and E Class Uses which are well designed and located with major developments having good transport connectivity within a number of locations including Central Dartford and Ebbsfleet Garden City; Identified Employment Areas; and the network of Retail Centres. We support this policy approach and consider that it has been positively prepared.
- 3.13 Draft Policy M20 'Provision for Local Business and Skills' requires large proposals including for industrial/distribution uses exceeding 20,000 sqm gross floorspace to contribute to the accommodation needs of local businesses and training needs of the Borough's workforce. Developments are required to include a mix of premises/commercial land proportionate to total site size which deliver:
- A proportionately significant number of small units or premises designed to provide for local start up/ 'move on' business accommodation; or
 - Premises/ land that is shown to be constructed for, or targeted to, the needs of the Borough's small/ medium sized enterprises, including through premises available to rent or buy at a discount, or employment land premises delivered in a form to secure local businesses (potentially including land predominantly for open storage).
- 3.14 We recognise the Council's aspirations to provide suitable employment accommodation for smaller businesses and their different requirements.
- 3.15 Whilst we support the principle of this draft Policy, we consider that provision of smaller units for start-up/ 'move on' business accommodation or affordable premises/ land for local businesses should only be provided within the right locations in Identified Employment Areas, based on evidence related to the level of interest and demand from such businesses. Care must also be taken to ensure that varying sizes and scales of employment accommodation is

provided for within the Borough, and that this draft Policy does not render unviable those sites that are more capable of accommodating the larger footprint buildings required by some occupiers.

- 3.16 Therefore, we consider that the policy wording should be amended to enable flexibility for the size of units depending on site specific characteristics. The policy wording should also be adaptable to changing circumstances over the Plan period to be consistent with the NPPF. Para. 11 of the NPPF requires LPAs to plan for sustainable development, positively seeking opportunities to meet development needs of their area and be sufficiently flexible to adapt to rapid change.
- 3.17 We support the safeguarding and intensification of Identified Employment Areas together with improved transport provision and environmental benefits within policy M21: Identified Employment Areas. The DELR has confirmed that the Site is a deliverable location for employment uses and is Suitable, Available and Achievable and as such it is included as a proposed extension to the Crossways Identified Employment Area. We support the conclusions drawn from the supporting evidence base in this respect and consider that the proposed allocation is Sound.
- 3.18 The draft policy notes that "Identified Employment Areas will be maintained and developed for additional high quality, accessible and affordable commercial premises, and a more diverse range of new jobs in line with the Plan's economic strategy." (our emphasis added). While we support the principle of this draft policy, we consider that the reference to 'affordable' commercial premises should be deleted as it is ambiguous as it is not clear if it is seeking some form of discounted market rate 'affordable' commercial premises offer. This is presumably not the case as no viability evidence has been produced to support such an approach. Moreover, to suggest that commercial values should be determined by anything other than the market risks placing an unevidenced onerous restriction on the value of employment land that could deter future economic investment into the Borough. Such an approach would therefore be contrary to the objective to set out a clear economic vision and strategy encouraging sustainable economic growth achieving (NPPF para 8). For the avoidance of doubt, we therefore suggest that reference to 'affordable' commercial premises is deleted.

4.0 CONCLUSIONS

- 4.1 The Pre-Submission second stage Regulation 19 Local Plan (September 2021) has been produced by Dartford Borough Council seeking to address its growth needs until 2036/37.
- 4.2 We support the inclusion of the former Dartford International Ferry Terminal within the 'Crossways' Identified Employment Area and consider that the Site is deliverable within the early part of the Plan period. This is evidenced by Phase 1 which is already under construction and development proposals for Phase 2 which are emerging.
- 4.3 In terms of the Economic Growth Strategy and the quantum of employment floorspace identified to be delivered across the Plan period, we do not consider that sufficient employment land has been incorporated into the supply and consider that the Council should provide for a contingency within the supply to ensure that sufficient employment floorspace can be delivered to cover the entirety of the Plan period in order for the Plan to be made Sound.
- 4.4 In addition, we have commented on the wording of specific development management policies which should be reviewed by DBC before the Local Plan is submitted for Examination to ensure that the policies are Sound and consistent with National planning policy.

bartonwillmore.co.uk

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
INFRASTRUCTURE &
ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS