

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

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
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2. Do you consider the Local Plan is:

Please mark with a cross in the boxes as appropriate

(1) Legally compliant	Yes	<input type="text"/>	No	<input checked="" type="text"/>
(2) Sound	Yes	<input type="text"/>	No	<input checked="" type="text"/>
(3) Complies with the duty to co-operate	Yes	<input type="text"/>	No	<input checked="" type="text"/>

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:

H.Hunjan

Date:

27/10/21

Land North of London Road, Greenhithe

Dartford New Local Plan

Regulation 19 Second Stage Consultation

Representations

Prepared by Barton Willmore LLP on behalf of
Imperial Corporate Capital Plc

October 2021

Land North of London Road, Greenhithe

Dartford New Local Plan

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Barton Willmore

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1.0 INTRODUCTION

1.1 These Representations are made on behalf of Imperial Corporate Capital Plc in response to Dartford Borough Council's Local Plan Pre-Submission Regulation 19 Second Stage consultation (DBPD) published in September 2021. Imperial Corporate Capital Plc (ICC) owns land known as 'Land North of London Road, Greenhithe', hereinafter referred to as 'the 'Site' and therefore has a direct interest in the Local Plan and the long-term development strategy for Dartford. ICC submitted representations to the previous second stage Regulation 18 consultation in January 2020 and Local Plan Pre-Submission Regulation 19 First Stage consultation (DBPD) published in February 2021 expressing concern with some aspects of the Local Plan.

1.2 The site is the subject of a pending planning application (DA/19/01557/FUL) for the following development:

Full planning application for the erection of 187 residential apartments, associated parking, open space, landscaping, infrastructure and groundworks.

1.3 The Site comprises a 0.87 hectare area of land to the North of London Road and south of the North Kent Railway line. A site location plan is included at Appendix 1. It is located in a sustainable location, being within the settlement of Greenhithe and well located in respect to public transport hubs, services and local facilities. The site is identified in the Dartford Development Policies Plan as 'Borough Open Space' (BOS) under Policy DP24 and forms part of a wider area of BOS which includes the BT Exchange Site to the west, intervening land up to the railway embankment and a triangular parcel to the east of the Site.

1.4 These representations are focused on the Site and demonstrate that it is deliverable and should comprise an allocation within the new Local Plan, having regard to National policy and a number of technical considerations. It also reviews the Local Plan in terms of soundness of the Duty to Co-operate and other policies in the Local Plan for development management purposes.

1.5 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).

1.6 We also draw upon the following documents produced by Dartford Borough Council (DBC):

- Strategic Housing Land Availability Assessment (September 2021);
- SHLAA Site Summary Compendium;
- Residential Requirement Report (September 2021);
- Green Infrastructure Paper (September 2021);
- Duty to Cooperate Statement 2020/2021;
- Duty to Cooperate Update and Addendum (September 2021);
- Local Plan Viability Assessment 2021.

1.7 These representations are structured as follows:

- Section 2.0 – National Planning Policy;
- Section 3.0 – Duty to Co-operate;
- Section 4.0 – Review of Evidence Base;
- Section 5.0 – Proposed Spatial Strategy;
- Section 6.0 - Development Management Policies; and
- Section 7.0 – Conclusions.

2.0 NATIONAL PLANNING POLICY FRAMEWORK

i) National Policy & Plan Making

2.1 The NPPF (July 2021) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF (para. 8). These include:

- an economic objective – to help 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 and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

2.2 Para. 11 notes that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- Local Planning Authorities (LPAs) should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate and adapt to climate change;
- Strategic policies should as a minimum provide for objectively assessed needs, as well as any needs that cannot be met within neighbouring areas, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted.

- 2.3 The NPPF recognises that, to support the Government's objective of significantly boosting the supply of homes, it is important that sufficient amount and variety of land can come forward where it is needed. (Paragraph 60).
- 2.4 Planning policies should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Planning policies should promote and support the development of under-utilised land and buildings. (Paragraphs 119 and 120).
- 2.5 Paragraph 122 confirms that planning policies need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability.
- 2.6 LPAs should 'submit a plan for examination which it considers is "sound" – namely that is:
- **Positively prepared** – the plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – the plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic matters 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.
- (Paragraph 35).
- 2.7 The NPPF considers that Local Plans should:
- be prepared with the objective of contributing to the achievement of sustainable development;
 - be prepared positively, in a way that is aspirational but deliverable;
 - be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- be accessible through the use of digital tools to assist public involvement and policy presentation;
- serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant). (Paragraph 16).

2.8 Paragraph 20 notes that Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- housing (including affordable housing), employment, retail, leisure and other commercial development;
- infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- community facilities (such as health, education and cultural infrastructure); and
- conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

2.9 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 in infrastructure. (Paragraph 22).

2.10 Furthermore, strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies). (Paragraph 23).

2.11 The NPPF directs that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals. (Paragraph 31).

ii) Duty to Co-Operate

- 2.12 The 'Duty to Co-operate' between LPAs is a clear requirement of National planning policy; ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to strategic matters (Paragraph 24).
- 2.13 In addition, Paragraph 26 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and relevant bodies is integral to the production of a positively prepared and justified strategy. This should be demonstrated through the preparation and maintenance of one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. (Paragraphs 26 and 27).

iii) National Planning Practice Guidance

- 2.14 The National Planning Practice Guidance (NPPG) builds on the principles within the NPPF and provides further detailed technical guidance, with reference to relevant legislation and other guidance.
- 2.15 We have also had regard to the various provisions of the Government's Planning Practice Guidance (PPG), in particular "Guidance on plan-making"¹ and sections:
- Maintaining Effective Cooperation [Para: 009 Ref ID: 61-009-20190315] onwards;
 - Evidence Base [Para: 034 Ref ID: 61-034-20190315] onwards;
 - Open Space, Sports and recreation facilities, public rights of way and local green space [Paragraph: 001 Reference ID: 37-001-20140306] onwards.

iv) Planning for Growth Written Ministerial Statement (March 2011)

- 2.16 Ministerial Statements represent material considerations in the context of policy evaluation. The Written Ministerial Statement 'Planning for Growth' (March 2011) remains relevant and sets out the steps that the Government expects local planning authorities to take to identify

¹ <https://www.gov.uk/guidance/plan-making>

and meet the housing, business and other development needs of their areas, and respond positively to wider opportunities for growth.

2.17 The Written Ministerial Statement incorporates the following provisions:

- The Government's clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy; and
- When deciding to grant planning permission local planning authorities should take into account the need to maintain a flexible and responsive supply of land for key sectors, including housing and business; consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies and ensure they do not impose unnecessary burdens on development.

3.0 DARTFORD BOROUGH COUNCIL DUTY TO CO-OPERATE

i) Policy Framework

- 3.1 Section 11 of the Localism Act 2011 introduced a requirement for Planning Authorities to co-operate with neighbouring LPAs on cross boundary issues.
- 3.2 The NPPF requires that strategic policy making authorities collaborate to identify the strategic matters to be addressed through their plans and requires that LPAs engage in effective and on-going joint working between strategic policy making authorities and relevant bodies. In order to demonstrate that “the Duty” has been met, the NPPF (para 27) suggests that LPAs prepare and maintain Duty to Cooperate (DtC) Statements with relevant bodies.

ii) DBC’s Duty to Co-operate

- 3.3 The Gravesham Strategic Housing Market Assessment (SHMA) 2016 concluded that Gravesham forms part of a wider Housing Market Area including Medway and Dartford. The Dartford and Ebbsfleet Housing Needs Assessment (October 2019) notes that the latest information on market flows suggests that the interaction between Dartford and Gravesham is reducing and is more aligned to Bexley due to the level of migration between the two areas and similarity of the housing markets. However, Bexley is considered as part of London and covered by the London Plan. The Assessment concludes that Dartford should therefore be considered as its own housing market, although one with close links to neighbouring authorities. However, the level of inward migration and outward migration flows between Dartford and Gravesham as indicated by tables 1.2 and 1.3 within the Assessment remain relatively high, demonstrating strong links remain between the two boroughs.
- 3.4 As part of the supporting evidence base, DBC have produced Dartford’s Duty to Cooperate Statement of Activities 2020/2021. The Statement confirms that DBC has engaged with neighbouring authorities regarding cross-boundary matters. However, the Residential Requirement Report (DRRR) (February 2021) notes that *“In 2015, Gravesham Borough wrote to Dartford Borough to request it takes on some of Gravesham’s need. Dartford Borough requested further information and discussion. Gravesham has yet to take a Local Plan to Regulation 19 stage, since its Core Strategy adopted in 2014 and the necessary further information (including on scale of unmet need) has yet been confirmed.”*

- 3.5 However, this does not take into consideration that Gravesham Borough Council are currently preparing a partial review of their Local Plan Core Strategy, Site Allocations and a Development Management Policies Document. A Regulation 18 Stage 2 consultation was carried out between October and December 2020. Therefore, due to the advancement of GBC's New Local Plan, we consider that discussions with GBC regarding its unmet housing need should have progressed further. We note that the Addendum Duty to Cooperate document confirms that Statements of Ground (SoCG) are in preparation with six Local Planning Authorities and are expected to be in place by the time that the Local Plan is submitted for Examination. The SoCG should be made available for review and comment ahead of the Examination to ensure legal compliance.
- 3.6 In our previous representations, we noted that the Borough of Dartford has strong locational and strategic connections with London and that the Borough will undoubtedly have a role to play in meeting some of London's unmet housing need. The level of shortfall identified within the Examination Report of the new London Plan set out 140,000 homes between 2018 and 2028. We do not consider that this matter has been adequately addressed within the Duty to Cooperate Statement of Activities 2020/2021 document or Addendum.
- 3.7 We note that the letter from the Mayor of London to the Secretary of State (dated 13 March 2021) referred to London's unmet needs and conveyed that he has no intention of asking other authorities across the South East to meet London's unmet needs. However, this makes it clear that a neighbouring authorities should consider this matter further through the Plan making process in order to try and address the significant shortfall from Greater London.

4.0 REVIEW OF EVIDENCE BASE

- 4.1 We consider that the strategy should allow for suitable greenfield sites outside of Dartford Town Centre but within urban locations to come forward. Para. 2.14 of the new Local Plan notes that significant new development has previously been permitted at a number of sites within the urban area at Greenhithe and Stone and that this part of the urban area will principally see much needed community and green infrastructure and the completion of existing proposals moving into the new Local Plan period. Whilst we acknowledge the level of development that these areas have historically undergone, we consider that this should not restrict the future further development potential of these urban areas aligned with the principles of sustainable development and in so far as appropriate infrastructure or proportionate contributions towards such infrastructure can be provided.
- 4.2 Policy S1: Borough Spatial Strategy notes that growth shall be located at strategic allocations, sites identified in the housing land supply and in line with the economic strategy and development is directed to brownfield land not within the Green Belt and sites with good access by public transport and walking/cycling to a range of local supporting services/infrastructure. Whilst the Site is not located within any of the afore-mentioned locations and not defined as brownfield land, the particular site specifics should be taken into account, including the site's location within the settlement boundary of Greenhithe and within a highly sustainable location.

i) Strategic Housing Land Availability Assessment (SHLAA)

- 4.3 The SHLAA considers potential land within Dartford and whether it is suitable, available and achievable for residential development to meet the Borough's housing needs over the Plan period. The Site has been reviewed as part of the SHLAA process and is referred to by DBC as 'Land East of Telephone Exchange (Little Hithe), London Road, Greenhithe, DA9 9HU' (site ref. 87). The Site has not been considered by the Council to be deliverable due to the present Borough Open Space designation of the Site.
- 4.4 The SHLAA notes that representations on the draft SHLAA were made by the landowner on the suitability of the Site. However, no additional information was supplied as to why the suitability criteria should not apply or were incorrectly assessed. DBC have considered that the Site remains unsuitable. Since the representations made to the previous second stage Regulation 18 consultation in January 2020, further technical work has been produced in support of the planning application at the Site including an Open Space Assessment (February 2021). This was submitted in support of the first stage Regulation 19 Local Plan consultation

but is included again as it is understood that this second stage consultation requires the resubmission of any representations made to the first stage consultation. The Open Space Assessment is discussed further within para's 4.15 to 4.22 of this Report.

- 4.5 The NPPG notes that as part of the SHLAA Methodology sites which have been discounted from contributing towards the housing land supply should provide sufficient evidence justifying reasons given. (Para. 026 Reference ID: 3-026-20190722). It is not considered that robust justification based on reasonable evidence has been provided to conclude that the Site is not suitable for development.
- 4.6 Broad locations for development including general areas where regeneration may be encouraged in the future but where specific individual sites have not yet been confirmed as deliverable have been identified by DBC. The SHLAA notes that such sites could be within locations that are generally sustainably located or clusters of potential brownfield sites. A number of sites within Central Dartford and North of Swanscombe, Ebbsfleet Garden City which have been considered to be successful at the SHLAA location and accessibility suitability stage in the urban area have been identified. It is noted that despite being assessed as being non-deliverable, the Site is not included as such on the maps included within Appendix C of the SHLAA.
- 4.7 Notwithstanding the overall assessment identification, the Site has been confirmed within the SHLAA Site Summary Report as being 'Suitable' in terms of its location as it is well served by public transport. Notwithstanding our view that the Site is considered to be deliverable within the short term, we consider that the locational sustainability of the Site should have been considered more favourably within the broad location's identification process. Furthermore, the sites considered to be suitable for broad locations seem to be too narrowly focused within Central Dartford and North Swanscombe, Ebbsfleet Garden City and no further explanation as to why sites within the rest of the urban area have been discounted.
- 4.8 The SHLAA methodology notes in relation to open space that:

"Applicable local planning policy may prevail for greenfield land that is identified on the Policies Map. New open space should be provided along with residential developments, but as a growing Borough it is important existing open spaces are retained. Development on designated open space is therefore likely to be unsuitable. Borough Open Space land is only considered suitable in the SHLAA, if it is clear how policy M14 can be satisfied."
(para. 2.28)

- 4.9 The Open Space Assessment which accompanies the planning application demonstrates that the existing area of Borough Open Space is surplus to current and future requirements for the amenity and health/wellbeing of residents and no longer serves the biodiversity functions that it was once designated for.

ii) SHLAA Site Summary Report

- 4.10 The 'Physical Overview' of the Site within the Report notes that:

"The site is suitable for residential development. It would be important to ensure that a safe access is created. Development would also need to address air quality, contaminated land, railway noise, heritage, landscape and ecological issues."

- 4.11 Furthermore, the Location Suitability Outcome notes that the Site is well served by public transport. The Site is in a highly sustainable location with excellent public transport connectivity being located directly to the south of Greenhithe Railway Station. The planning application also includes off site pedestrian enhancements, namely the widening of the footway along London Road, adjacent to the Site to improve pedestrian connectivity. The physical overview has indeed confirmed that the Site is suitable for residential development and the aforementioned technical matters have been addressed through the planning application process.
- 4.12 However, the Site is deemed to be 'Unsuitable' in terms of the Community and Open Space Outcome and, as a result, the overall SHLAA result for the site is deemed to be 'Unsuitable' by DBC. This is due to the present Borough Open Space designation of the Site. The Dartford Open Space Report 2015/2016 notes that the evidence to support this designation on the grounds of biodiversity was based upon aerial photography and planning mapping. We have previously noted that this methodology for designating the area as Borough Open Space was not based on robust evidence.
- 4.13 It is understood that the Site was included within the designation of Borough Open Space due to its perceived role as part of a wider ecological corridor for wildlife and would have potentially provided foraging habitats for bats and birds. the vegetation and trees previously present on the Site.
- 4.14 The Arboricultural Assessment undertaken prior to the clearance of trees confirms that there were no trees of individual merit on the Site and no trees were noted as offering particular ecological significance. The Site had some Arboricultural value with the combined value of

the trees as secondary woodland however, the Arboricultural Assessment considered that intensive management would be required to improve the value of the woodland through diversifying the species range and the overall woodland structure.

- 4.15 The Open Space Assessment produced in support of the planning application confirms that the Site no longer serves the purposes of Borough Open Space that it was once designated for. Furthermore, we consider that allowing this Site to come forward for housing delivery could unlock some of its potential and deliver publicly accessible open space and additional benefits to wildlife and biodiversity.
- 4.16 This identifies the current functions and physical attributes of the Site and provides a high level review of other notable Borough Open Space areas that are located within the Site's localised townscape setting. Part 3b of emerging policy M14 is relevant to the development proposals which is similar to the requirements of adopted Development Policies Plan policy DP24 part 1b. The Open Space Assessment considers that the character and setting of the surrounding Borough Open Space could be enhanced through the proposed landscape strategy.
- 4.17 The Open Space Assessment demonstrates that the existing provision is surplus to current and future requirements for the amenity and health/wellbeing of residents and no longer serves the biodiversity functions. The Site is currently vacant, derelict land, bordered to the north by the railway and to the south by London Road, located above the site's southern boundary where a steep chalk cliff is present. The site's boundaries are mainly made of established treebelts (none of which are designated as TPO trees) and metal fence and there are no buildings present within the Site. The Site is not publicly accessible and is not considered to be well served by Public Right of Way routes which could provide direct access to the neighbouring accessible Borough Open Space areas.
- 4.18 The Open Space Assessment notes that the Sites function for ecological purposes has clearly been reduced as has been highlighted within the supporting ecological report as a result of the previous woodland removal. The reduced ecological characteristics of the Site no longer serve to provide the original functionality of BOS that the site was originally designated for.
- 4.19 The Site's current and future requirement for amenity and health/wellbeing of residents has been reviewed in terms of any benefits that could be provided through its visual impact. The Landscape and Visual Impact Assessment which supports the planning application considers that:

"Localised vegetation cover and topography reduces the extent of this visibility and therefore views of the site are localised. Where the site is visible, there are few landscape features of note that contribute to the scenic quality of the area. The site appears unremarkable within the existing urban area of Greenhithe forming its immediate setting. The key feature of note is the maturing treescape that characterises the top of the cliff on the southern boundary of the site. The scenic quality of the Site is therefore reduced by the presence of the built form which forms a notable component in views of the Site from any directions. It is considered that the scenic quality of the Site and its setting is low."

- 4.20 Given that the Site is relatively contained and separated from views from nearby residential areas, it is not considered that the Site currently provides a contribution to amenity, health and wellbeing in visual terms. It is also not publicly accessible and therefore does not presently provide a physical contribution to health and wellbeing. In comparison with other BOS sites which have been designated for ecological purposes, other BOS sites are considered to be more valuable in terms of contributing to the civil amenity and biodiversity functions of the BOS network.
- 4.21 In conclusion, presently the Site does not provide a significant contribution to the value and functionality of the Borough Open Space designation and is therefore surplus to current and future requirements. It is considered to make a limited contribution to the existing Green Grid network within the Borough, supporting habitats of no more than low value and is limited in providing opportunities for protected species. Furthermore, the NPPF requires policies to promote under-utilised land where this would meet identified needs for housing (para. 120 d).
- 4.22 The landscape strategy which forms part of the planning application demonstrates how the landscape and ecological value of the Site could be enhanced. The proposals seek to create a high quality and attractive open space and reinforce the vegetation structure within the Site's boundaries to provide enhanced green links and wildlife corridors. Additionally, there would be significant health and wellbeing benefits for new residents and the surrounding community.
- 4.23 The Annex to the NPPF notes that to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. We believe that the Site meets such criteria and should be considered favourably as a deliverable site.

iii) Green Infrastructure Paper

- 4.24 The Green Infrastructure Paper (GIP) notes that DBC is proposing to designate new Borough Open Space sites, amend some existing ones and delete one BOS designation. None of these amendments presently include the Site. The GIP confirms that the principal reason for the original designation is due to biodiversity reasons and the woodland present on the site. DBC's response to ICC's previous Representations notes that:

"Much of the woodland has been removed, and now the site is currently subject to a planning application for residential development (ref. 19/01557/FUL). It forms part of a wider BOS area that provides linear provision in the urban area, N.B. These parts of the BOS designation have not been contested. It is premature to amend this BOS designation prior to development proposals being approved/implemented. However, the residential proposals include provision for replacement landscaping and a small play area. The plans show the provision of wild meadow planting, native tree planting and green roofs. It is considered that these measures could contribute to the biodiversity and linear interest and the BOS designation should be retained, and any full review/boundary refinement should be after proposals have materialised". (pg 10).

- 4.25 We consider that the Site no longer serves the biodiversity functions that it was originally designated for and a review and redrawing of the boundaries of this particular BOS should be undertaken given the fact that the Open Space Assessment in support of the planning application demonstrates that the BOS is surplus to current and future requirements. We do not consider that DBC is justified within its approach which should be reviewed in light of the further evidence provided by the Open Space Assessment.
- 4.26 We support that DBC's response recognises that the landscaping strategy as part of the development proposals could contribute to the biodiversity and linear interest of the Site. This is aligned within the conclusions drawn within the Open Space Assessment which considers that:

"Arguably, therefore, the BOS value of the site is significantly reduced, however the proposed landscape enhancements and potential off-site mitigation measures seek to provide ecological

improvements, that would assist in reinstating the functions and purposes of the site within the localised BOS framework.

It is considered therefore, that through the adoption of the proposed landscape enhancements, as set out within the accompanying landscape strategy plan, the site could successfully contribute to the local BOS framework and would enhance its contribution to BOS through new recreational opportunities, enhanced biodiversity that will benefit the future health and wellbeing of residents and the surrounding community alike."

- 4.27 We note that these positive conclusions do not align with the SHLAA 'Unsuitable' outcome for the Site which is based on the Borough Open Space designation and it is considered that this should not preclude the Site being considered favourably and contributing towards the housing land supply within the Borough.

5.0 PROPOSED SPATIAL STRATEGY

i) Housing Need

- 5.1 The Dartford Residential Requirement Report (DRRR) provides an assessment of Dartford's past housing requirements levels and delivery and future housing need. The DRRR indicates that historically Dartford Borough has had a strong track record with housing delivery. The standard method figure for Dartford Borough is 750 dwellings per annum and DBC have confirmed that it is not proposing an alternative methodology for quantifying the level of housing need as a starting point for setting the Borough residential requirement. The housing supply to meet this requirement has been identified through the SHLAA, which shows suitable, available and achievable sites in excess of 750 dwellings per annum. The 15 year horizon period up until 2031/32 results in a total housing capacity of 11,900 which provides for an annualised housing requirement of 790 dwellings per annum.
- 5.2 The DRRR confirms that there is a 5.47 years deliverable housing land supply from the housing trajectory from sites identified within the SHLAA when applying the 790 home requirement.
- 5.3 The NPPG notes that there may be situations where previous levels of housing delivery in an area or previous assessments of need are significantly greater than the outcome of the standard method and authorities should take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests. (Paragraph: 010 Reference ID: 2a-010-20190220).
- 5.4 The DRRR includes an assessment against the NPPG in respect of where an acceleration in housing delivery beyond local trends and setting a requirement in excess of the standard method figure may be appropriate. The following criteria have been reviewed by DBC:
- Past delivery;
 - Local need evidence;
 - Strategic infrastructure;
 - Growth funding strategies; and
 - Statements of Common Ground.
- 5.5 The review concludes that the only likely rationale for Local Plan housing development levels in excess of the standard method is if this is agreed through Statements of Common Ground.

It is acknowledged that further work needs to be undertaken in respect of this point and this should support the evidence base prior to the Local Plan being submitted for Examination.

- 5.6 We have previously noted our concerns that the Local Plan fails to adequately consider unmet housing needs from Greater London and consider that this should be addressed through DBC's Local Plan process.
- 5.7 It is recognised that within the past five years (excluding 2020) DBC have consistently far exceeded housing delivery rates in excess of the Core Strategy housing target (up to 865 dwellings per annum and a minimum 585 dwellings per annum). Whilst it is recognised that a large part of this delivery relates to large scale brownfield sites which will not continue to contribute towards future supply, we consider that flexibility should be built into the approach to consider a higher level of housing need, particularly within the early part of the Plan period. This would ensure that the Local Plan is positively prepared and based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- 5.8 We consider that there remains scope for DBC to be more ambitious within its approach to housing delivery. The NPPG confirms that the standard method figure identifies the minimum annual housing need figure and does not produce a housing requirement figure. (Paragraph: 002 Reference ID: 2a-002-20190220).

ii) Windfall Development

- 5.9 DBC have adopted a different approach to windfall development within the new Local Plan which now places a very low reliance of delivery from windfall sites. In our previous Representations we noted that the Council's strategy towards windfall sites should be aligned with the NPPF and provide a positive strategy for incorporating windfall sites into local planning policy.
- 5.10 The NPPF, recognises the valuable contribution that small and medium sized sites can make with meeting the housing requirement of an area and the relatively quick build out rate of such sites. Paragraph 69 states that:

To promote the development of a good mix of sites local planning authorities should:

- a) **identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;**
- b) **use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;**
- c) **support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and**
- d) **work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.**

5.11 Whilst we recognise that windfall sites and such allowance should be carefully planned for and considered to ensure that they do not place undue burden on infrastructure, it is clear that the NPPF recognises the benefits that small and medium sites can bring towards providing much needed housing built out at a faster rate.

5.12 The SHLAA states that of the 87 deliverable sites nearly all are under the government's threshold for smaller sites of 1 hectare. Criteria c of para. 69 of the NPPF notes that LPAs should 'support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.' We consider that the Council's approach to windfall sites should be consistent with national policy. Notwithstanding this, it is considered that the Site forms a suitable location for planned development and the technical information which has been produced in support of the planning application indicates that there are no technical constraints to development and development proposals aligned with the principles of sustainable development can be delivered.

iii) Borough Spatial Strategy

5.13 The spatial strategy directs development to brownfield land not within the Green Belt and sites with good access by public transport and walking/cycling to a range of local supporting services/infrastructure. Ebbsfleet Garden City and Central Dartford are the key focus for new

development. In addition to strategic growth at these locations, policy S1 supports additional development at a number of Urban Area neighbourhoods including Greenhithe. However, this only supports residential development at sites identified in the housing land supply. We consider that this policy wording seeks to exclude sites located within the Urban Area in highly sustainable locations with good access to services and facilities such as our client's site. Furthermore, the NPPF requires policies to promote under-utilised land where this would meet identified needs for housing (para. 120 d). To this end the proposed strategy and aims are not justified or positively prepared and will not deliver balanced growth across the Borough.

6.0 DEVELOPMENT MANAGEMENT POLICIES

i) Affordable Housing

- 6.1 Policy M7: Affordable Housing requires a target of 35% affordable housing provision for development that meet the relevant criteria across the Borough apart from Central Dartford where a provision of 20% affordable homes is required. We note that the level of affordable housing that has been proposed is supported by the Local Plan Viability Assessment and has justified the provision of 20% affordable homes within Central Dartford by noting that viability will be more challenging in this location given the typically higher costs associated with higher density development on previously developed land. In other areas of the Borough, a higher figure is supported due to the wider variety of likely development and site types. We support that the recommendation for the proportion of affordable housing to be a 'target' within the Local Plan Viability Report has been carried through into the Local Plan policy wording, and that the provision of affordable housing would be subject to viability.

ii) Housing Mix

- 6.2 Policy M8: Housing Mix requires all development to provide an appropriate mix of housing types, requiring major development to include provision for 3 and 4 bedroom homes. We welcome the change to the proposed policy wording from the previous iteration of the draft Local Plan which required major developments to make significant provision for both 3 and 4 bedroom family homes. This aligns with the development strategy on small and medium sites where the provision of larger bedroom homes may not be suited to that particular location or market.

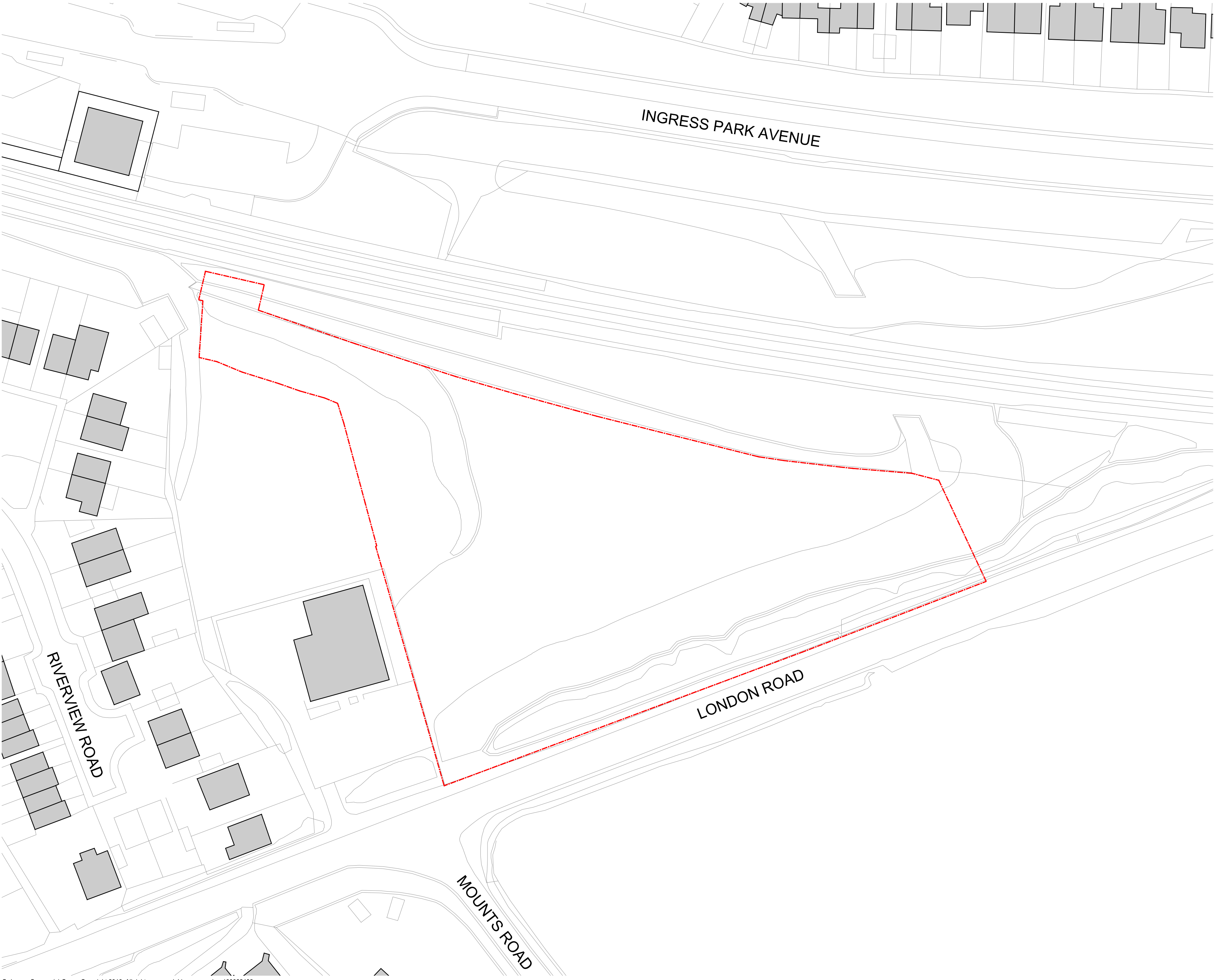
7.0 CONCLUSION

- 7.1 The Pre-Submission Local Plan (February 2021) has been produced by Dartford Borough Council seeking to address its growth needs until 2036/37.
- 7.2 The Council's spatial strategy is centred around strategic sites and Dartford town centre and Ebbsfleet Garden City, as well as sites within the Urban Area identified within the housing land supply. We consider that this is too narrowly focused and should enable the delivery of sites within the urban area on under-utilised land which have been demonstrated to be suitable for residential development, such as 'Land at Little Hithe.'
- 7.3 We believe that there is scope for the Council to be more ambitious in its approach to housing delivery based on recent historic delivery rates, particularly within the early part of the Plan period. Little Hithe is considered to be a highly sustainable location within Greenhithe which can contribute towards meeting housing needs.
- 7.4 We consider that the Open Space Assessment produced as part of the planning application should be reviewed within the context of amending the Borough Open Space boundaries to exclude the Site. The Site no longer serves the biodiversity functions that it was originally designated for and the Open Space Assessment demonstrates that the Borough Open Space is surplus to current and future requirements. We do not consider that DBC is justified within its approach which should be reviewed in light of the further evidence provided by the Open Space Assessment.
- 7.5 We consider Statements of Common Ground with neighbouring authorities should be made available once these have been agreed, prior to the Examination to enable review and demonstrate how the issue of unmet housing needs within neighbouring authorities has been appropriately addressed.
- 7.6 We do not believe that the Local Plan evidence base adequately addresses the matter of London's unmet housing need and the Council should consider whether an additional uplift is appropriate.
- 7.7 In summary, we consider that there are elements of the evidence base which are not sound and do not take into consideration up to date information. This should be reviewed and addressed before the Plan is submitted for Examination.

- 7.8 Land at Little Hithe offers the opportunity to incorporate within the Plan a site that would deliver much needed new housing development that would meet the ongoing needs of the Borough. The Site is suitable for development, does not service the functions it is designated for and is in a highly sustainable location.

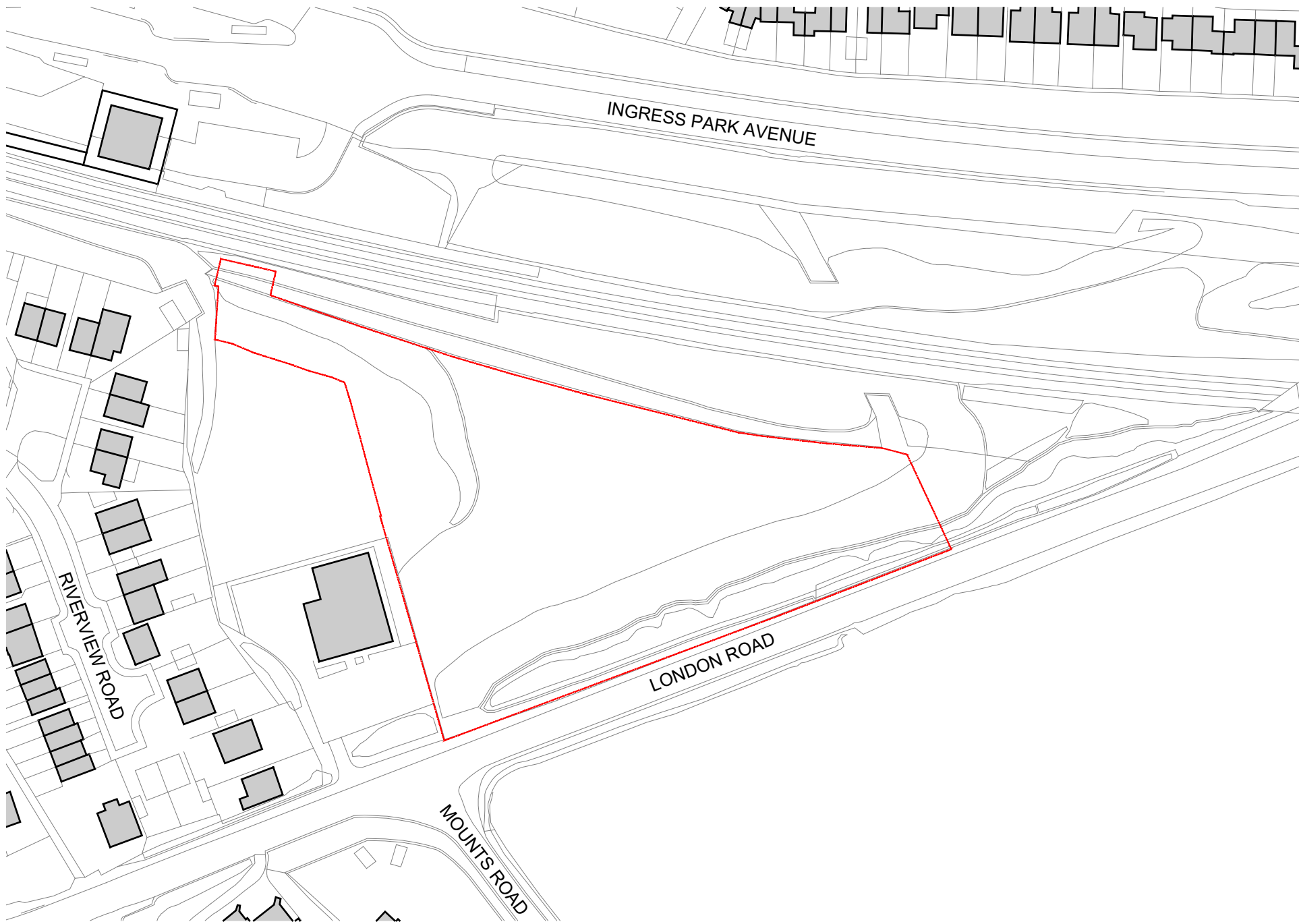
APPENDIX 1

Site Location Plan

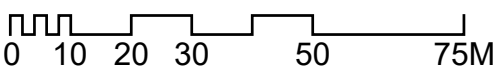


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BLOCK PLAN 1:500 @ A1



SITE LOCATION PLAN 1:1250 @ A1



SURROUNDING BUILDINGS

SITE BOUNDARY



GREENHITHE SITE LOCATION AND BLOCK PLAN

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All dimensions are to be checked on site prior to fabrication and the Architect should be notified of any discrepancy
Do not scale from this drawing

Revisions

Project | Greenhithe
Land Adjacent to London Rd, Greenhithe
Client | Imperial Corporate Capital Plc
Title | Site Location and Block Plan

Status | **PLANNING**

Scale@A1 | 1:500 Date | **AUG 19** Drawn | **AB** Chkd |

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Project Number
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Drawing Number
001
Revision
Rev Number

APPENDIX 2

Open Space Assessment

Open Space Assessment

Project: Land North of London Road, Greenhithe

February 2021

Introduction

- 1.1. The site is currently subject to a live planning application (ref: 19/01557/FUL) for the erection of 187 residential apartments, new publicly accessible pedestrian and cycle connection to Greenhithe Railway Station, vehicular drop off, new ticket barrier and machine, associated parking, open space, landscaping, infrastructure and groundworks. Following recent discussions with Dartford Borough Council (DBC), Aspect Landscape Planning received instruction on behalf of Imperial Corporate Capital Plc. to undertake an Open Space Assessment of the site, in order to assess its current contribution to the open space network within the Borough.
- 1.2. This assessment is a desk based study and reviews the relevant adopted local plan policies and supporting evidence resource. The assessment will set out the current functions and physical attributes of the site and provide a high level review of other notable 'Borough Open Space' (BOS) areas that reside within the site's localised townscape setting. A 1km radius centred on the site, establishes the study area for this assessment and is identified on Plan ASP1 (Enclosure 1), which illustrates the site within its localised setting.

Planning Policy Context

- 1.3. The site is identified within 'BOS 0138' within DBC's online policy map and forms part of a wider area of BOS, which includes the BT Exchange Site to the west, intervening land up to the railway embankment and a triangular parcel to the east of the application site as shown on plan ASP4 'Site & Setting Extract.' BOS spaces are described within the 'Dartford Open Space Report (2015/16 Final)' (DOSR) SPD, as areas within the built-up fabric of the Borough that contribute (amongst other forms of open space) to a proposed 'Green Grid' network, which is envisaged within the adopted Core Strategy, will provide a framework for enhancing the environment and the wellbeing of the surrounding communities, stating:

"A variety of multi-functional green spaces to meet differing needs, and also serving biodiversity and flood mitigation functions, is vital in creating a stable community and shaping the future character of the area. It helps define individual communities and contributes to their character. It also helps support a number of objectives in the Council's Sustainable Community Strategy, including health and wellbeing improvements resulting from access to open space and outdoor sports activity; reduction in anti-social behaviour through provision for young people in parks and open spaces; and adaptation to climate change through the implementation of a green infrastructure network."

The long-term aspiration is to develop a linked network of open spaces and routes across the Borough, joining with a strategic network beyond the Borough boundaries. The Thames Estuary Path and the Darent Valley Path form key routes east-west and north-south across the Borough. Water is a key element in the network with large existing and potential stretches of green spaces and links between them following the course of rivers and lakes. This network is referred to as the Green Grid. (underlined for emphasis)

- 1.4. The Core Strategy provides a specific Green Grid definition, within footnote 129, which states:

“Green Grid – a strategic network of multi-purpose, attractive public open spaces consisting of green corridors, rivers, lakes and landscapes linked via a series of urban and countryside footpaths, Public Rights of Way, cycle paths and roads, and designed to connect the main open areas within the urban area.”

- 1.5. The DOSR focuses on green spaces that are located outside of the Green Belt, in proximity to locations where it is anticipated that a significant proportion of DBC’s future housing development will take place, with BOS forming a broader secondary tier of open space, below the more selective and specific ‘Protected Local Green Spaces’ (PLGS) that are protected at national as well as local level, through NPPF policy. In conjunction with PLGS, BOS areas are located within and immediately around the Borough’s communities, protecting land from inappropriate development, and it is assumed therefore that their significance and contribution to the Green Grid, should be based on the level of contribution that these spaces make to the surrounding residents and communities at a local level.

- 1.6. In relation to BOS, the DOSR states:

“...These green spaces provide various important functions across the Borough including visual screening and noise reduction buffers between residential development and railway lines/ main highways. They also may contribute to ecological objectives.”

“...Overall land and sites identified as BOS are considered to provide a variety of important functions to residents, wildlife and habitats and will provide an important component of the Borough’s Green Grid network. The spaces identified accord well with land that can be managed on a policy based on the clear approach set in national policy (NPPF paragraph 74).”

- 1.7. The type of features and spaces that are classified as BOS within the DOSR, are summarised as follows: parks, outdoor sports / play / sports pitches (including school playing fields), Cemeteries, Linear green features (including railway embankments, bunds / key green (and non-agricultural) buffers and allotments.
- 1.8. ‘Appendix B: Dartford Borough Open Space Technical Record 2016’ of the DOSR, provides a detailed overview of BOS in Dartford and identifies several ‘types’ of BOS, categorised as follows: Civic Amenity, Biodiversity, Linear and Other Features. The findings of the DOSR ‘Technical Record’ with regards to the relevant neighbouring BOS locations within the 1km radius study area, will be reviewed in more detail further on within this report.

- 1.9. Areas identified as BOS are protected by **Policy DP24 - Borough Open Space**, within the 'Dartford Development Policies Plan (Adopted July 2017)' which states:

"1. Development on playing fields, sports pitches, and any land shown on the Policies Map as Borough Open Space, will not be permitted unless it is clearly demonstrated that one of the following criteria is satisfied:

a) Where the sports/ open/ green space will be retained in its current primary function, with development limited to a small proportion of land, the proposal must support or enhance the existing space in this overall role. The proposal must not lead to any significant loss or deterioration in quantity and level of open space/ recreational provision.

b) Where development will result in a significant loss in the quantity of open space or loss of sports pitches, replacement provision will be delivered within accessible walking distance of the site; unless it is clearly demonstrated that the existing provision is surplus to current and future requirements for sports and recreation in the locality and the Borough, the amenity and health/ wellbeing of residents and/ or biodiversity. The replacement must be shown to be of an equivalent type and of equal or greater quantity and quality to that being lost..."

- 1.10. Discussions held with DBC, have confirmed that part 1b of policy DB24 is relevant to the planning application and therefore forms the basis and scope of this assessment. DBC, have acknowledged that site is not in use for sports and recreation and is not likely to be so in the future due to the unique topography of the site. The site is not currently accessible to the public, reducing its value to the Green Grid, with respect to the provision of formal recreation opportunities to the local community. The development proposals do not seek to remove the application site from the Borough Open Space, rather enhance the character and setting of the surrounding Borough Open Space through the proposed landscape strategy.

Site Context

- 1.11. A description of the site and its immediate townscape setting is provided within the submitted Environmental Statement (Rev 1 – 26.09.2019). This is summarised, for ease of reference, below.
- 1.12. The site is located in Greenhithe, set back from the southern side of the River Thames to the east of Dartford. The Site is currently vacant, derelict land, bordered to the north by the railway and to the south by London Road. This road is located above the site's southern boundary where a steep rock cliff is present. The site's boundaries are mainly made of established treebelts and metal fence and there are no buildings present within the Site.
- 1.13. The immediate area surrounding the site is characterised by a series of residential built-up areas to the north, west, east and southwest and a large pasture is present to the south-southeast, beyond the London Road corridor. A network of tree belts and hedgerows is established along the boundaries of the nearby pasture and numerous residential areas, which has created a compartmentalised townscape within Greenhithe.

- 1.14. The existing residential developments and treescape ensure that the site setting is well contained and only visible in its extreme vicinity.
- 1.15. The site is not publicly accessible and is not considered to be well served by PRoW routes which could provide direct access to the neighbouring accessible BOS areas, such as the River Thames, noting that the long distance Thames Path PRoW does not extend to this section of the river and that the localised PRoW paths are fragmented along this stretch with no accessible routes provided along the river bank located to north of the site. The closest Public Right of Way (PRoW) is located approximately 135m to the south of the site and runs west to east to connect Bean Road to Mounts Road. Other footpaths run within the wider setting of the site, with one running in parallel to the B255 to the south west of the site and a further footpath running along the railway that stops on Crossways Boulevard, at approximately 270m to the northwest of the site.
- 1.16. The localised setting of the site is characterised by an undulating topography typical of the North Kent Plain. The topography within the site itself ranges from approximately 16m AOD in the north western corner to 21m AOD in the south eastern corner. The site is located below London Road which runs along its southern boundary. A steep chalk cliff defines the southern edge of the site, separating the floor of the Site from London Road.
- 1.17. The positive trees and treebelts within the site, are constrained to the site's boundaries. A full arboricultural survey of the site has been undertaken in line with BS:5837 2012 and supports this application (Refer to Aspect Arboriculture Arboricultural Impact Assessment Report, dated June 2019, Ref: 9368.AIA.002). There are no specific Tree Preservation Orders (TPOs) which affect the application proposals with the main tree belts and groups located on the upper level of the site, immediately adjacent to London Road and adjacent to the site's north eastern and north western corners.
- 1.18. A Baseline Ecological Report (refer to Aspect Ecology Baseline Ecological Report, dated June 2019, Ref: 5099-EcoAp.vf2 /MD/DM) accompanies this application and states that the site **'...supports habitats of no more than low value whilst limited opportunities for protected species are present on-site.'** It is acknowledged that the internal part of the site was cleared of woodland over 2 years ago by the previous site owner, which would have reduced any inherent ecological interest associated with it, however at present the internal parts of the site are noted as largely comprising bare ground and areas of tall ruderal vegetation and Ivy cover.
- 1.19. It is considered therefore that the proposed development offers significant opportunities to enhance both the landscape and ecological value and condition of the site, which would strengthen the localised Green Grid network.

BOS Review

- 1.20. A desk based assessment of the key BOS areas within the study area has been carried out. These areas are illustrated on the attached Site and Setting Plan (ASP2) within Enclosure 1 of this note.

- 1.21. Table 1 below, provides a summary of the BOS provision, within the study area as set out within 'Table 3: Full List of BOS' within the DOSR, and identifies the level of BOS provided within the site's localised setting.

Table 1: BOS Provision Within the Study Area

Location	Group / Role	Category	Description	Is it Publicly Accessible?
1. Worcester Park, Steel Avenue (BOS0142)	CA (Civic Amenity)	1b (Country Park) 6 (Equipped Play Provision)	Large informal countrypark, including open grass areas, pathways, woodland and playground.	Yes
2. Land Between Bean Road & St. Clements Way (BOS0091)	B (Biodiversity)	2b (Semi-Natural Green Space)	Woodland	No
3. Allotments Alkerden Lane, Swanscombe (BOS0096)	B (Biodiversity)	7 (Allotments)	SSSi and Nature Reserve	Yes
4. Knockall Academy, Eynsford Road (BOS0118)	CA (Civic Amenity)	4 (Outdoor Sports and Formal Recreation Facility)	2x Hard Netball courts 3x Rounders pitches & an Athletics Track.	No
5. Woodland as part of Ingress Abbey Grounds & Extending Areas around Ingress Park Housing (BOS0119)	B (Biodiversity)	2b (Semi-Natural Green Space)	Woodland	Yes
6. Charles Lake, Crossways Boulevard (BOS0151)	CA (Civic Amenity)	5c (Other Incidental Space not regarded as semi-natural) 2b (Semi-Natural Green Space)	Foliage surrounding lake with public footpath (DR1)	Yes
7. Land North of Crossways Boulevard (BOS0152)	B (Biodiversity)	2b (Semi-Natural Green Space)	Crossways Lakes (1 & 2) and surrounding open space	Yes

8. Open Space between Thames and the Crossway Site (BOS0157)	B (Biodiversity)	2b (Semi-Natural Green Space)	Buffer of green space adjacent to the Thames including PRoW – 13/00072/PRWRF.	Yes
9. Area around Bluewater Quarry (BOS0086)	B (Biodiversity)	2b (Semi-Natural Green Space)	Various trees and grassland that have been placed around the Bluewater development	Yes
The Application Site: Land East of Telephone Exchange, London Road (BOS0138)	B (Biodiversity)	2b (Semi-Natural Green Space)	Small strip of woodland area between Station Road and the A206	No

- 1.22. Whilst it is noted that the study area is characterised by significant transport corridors, including London Road (A226), Crossways Boulevard (A206) and Saint Clement's Way (B255), all of these routes provide positive accessible public footpaths along them, promoting sustainable connectivity between the identified BOS areas. The study area is well served by accessible BOS, with notable open space and parkland locations including Worcester Park, the landscaped parkland established around the Bluewater development, Swanscombe Heritage Park (National Nature Reserve) the Thames River corridor and the Crossway Boulevard Lakes. These spaces provide a range of experiences and settings from informal countrypark settings, woodland, semi-natural landscapes, access to the Thames river corridor and areas of increased tranquility and ecological interest.
- 1.23. The majority of the BOS areas located within the study area, have been found to perform important 'Civic Amenity' or 'Biodiversity' functions. No 'Linear' features are identified, however the woodland belt established alongside the busy Saint Clement's Way could conceivably be regarded as such. It is noted that there is only one BOS which provides access to an equipped area of play, which is located within Worcester Park approximately 800m to the west of the application site, suggesting a shortage of accessible equipped play opportunities within the study area.
- 1.24. The application site is one of seven BOS areas that provide a Biodiversity function, of which four are publicly accessible. Feedback from DBC has indicated that the site was designated as BOS, primarily for its role as part of a wider ecological corridor for wildlife, and would have potentially provided foraging habitats for bats and birds, however, its function for these purposes has clearly been reduced as has been highlighted within the supporting ecological report as a result of the previous woodland removal.
- 1.25. It is acknowledged that BOS areas are not required to be accessible and that benefits are provided through the visual presence of these areas and their features, such as the mature woodland belt alongside the busy Saint Clement's Way, which contributes to the Green Grid and the wellbeing of the local communities that surround them. However, it is considered that the small scale of the site and its contained character, reduces its visual presence to a short section along London Road and those properties that back onto the site, from within the

residential setting along Riverview Road to the immediate west, reducing its function as a relief and green backdrop to the surrounding built up locations.

- 1.26. The site is not publicly accessible, further reducing its perceived contribution to the localised Green Grid and it is noted that the Technical Briefing Note, provided by Aspect Ecology, has identified the site as supporting habitats of no more than low value and is limited in providing opportunities for protected species.
- 1.27. The site's key landscape features are represented by its boundary treescape. These features provide green link connections established along the adjacent section of railway and the wider treescape established along London Road, both visually and physically. However, the treeline established along London Road, which consists of a mix of Sycamore, Hawthorn, Cherry, Ash, Holm Oak, English Oak, Blackthorn and Buddleia, is identified as being of 'Poor to Indifferent condition' within the accompanying AIA. It is characterised by a mix of establishing trees and scrub and it is noted that should certain specimens be allowed to mature, they could become hazardous and unstable, due to the limited rooting area available at the top of the rock face. The group is identified as being of 'low arboricultural quality' and evident gaps perceived within the structure of the treeline, reduces its contribution to the visual amenity along this section of road. Therefore, whilst the boundary treelines do provide some inherent value to the localised Green Grid, it is considered that the site's contained character, inaccessibility, small scale, reduced ecological interest and a poor structure within its most prominent landscape feature established along London Road, reduces its overall value to the Green Grid and as such the site is considered to be surplus to the current BOS network.
- 1.28. Furthermore, the other BOS sites assessed within the study area also meet the objectives of BOS whereas the reduced ecological characteristics of the application site no longer serve to provide the original functionality of BOS that the site was originally designated for. Arguably, therefore, the BOS value of the site is significantly reduced, however the proposed landscape enhancements and potential off-site mitigation measures seek to provide ecological improvements, that would assist in reinstating the functions and purposes of the site within the localised BOS framework.

Opportunities for Off-Site Improvements to Open Space

- 1.29. The applicant has been in discussions with Swanscombe and Greenhithe Town Council regarding providing appropriate financial contributions towards improvements to Knockhall Recreational Ground which is designated as Protected Local Greenspace within the Dartford Development Policies Plan (Policy DP23). Furthermore, the feasibility for contributions towards an unmanaged area of land adjacent to St Clements Way (known as St Clements Way Buffer) is being explored by the applicant. This parcel of land is identified within Stone Parish Council's Neighbourhood Plan (Pre-Submission version, March 2020) as an important green buffer which currently ***"... does not meet Local Green Space criteria but can make a positive contribution to the public realm on a key route to Greenhithe station."*** The buffer is also seen as contributing to the Plan's health and wellbeing policy. However, upon further investigation, the parcel of land is within Kent County Council's land ownership and further

inquiries have been made with KCC Estates team to establish its future intentions for the site and is awaiting a response from the Estates Team surveyor allocated to the inquiry. In principle, the applicant is willing to make appropriate contributions towards improvements to St Clements Way Buffer subject to further discussions with KCC.

Proposed Landscape Enhancements

- 1.30. The accompanying Landscape Strategy Plan ASP3 (refer Enclosure 2), provides an illustration of how a positive landscape-led approach, could assist with integrating the proposed development within the application site, whilst also providing ecological and arboricultural enhancements, that would increase the site's contribution to the envisaged Green Grid.
- 1.31. The loss of internal trees is acknowledged and it is considered that the proposal to establish a native Silver birch woodland, within the central courtyard, will help to mitigate for this loss and re-establish some of the biodiversity that would have been lost as a result of the previous tree removals. The Silver birch would be planted as semi-mature specimens and an understorey of native evergreen ferns and ornamental grasses, providing an instant presence and vertical structure within the proposed landscaping.
- 1.32. The roof top terrace design provides an opportunity to establish a diverse extensive series of green roofs. A varied planting palette, consisting of a mixture of sedums, wildflower rich grassland and fine leaved grasses, planted within a varied substrate depth would enhance biodiversity and provide a visually appealing backdrop to the accessible decked terrace areas. Additional features such as log piles, designed insect hotels and vertical garden towers or small scale stacked dry stone columns could also provide valuable habitat opportunities for invertebrate species within the roof top areas as well as other locations within the lower level courtyard.
- 1.33. Noting the weak structure within the boundary vegetation it is proposed that additional high quality native tree and shrub / ground cover planting is incorporated within these locations. This would provide an enhanced green edge to the site and visual amenity along the London Road street scene, whilst also providing a continuous tree line and green links along the adjacent railway line corridor.
- 1.34. An internal LAP play area will incorporate high quality play equipment which will double up as sculptural features, that set scene for the landscaped courtyard and will help to directly address the identified short fall of equipped play opportunities within the study area. Lower level multi stem feature shrubs / trees, such as Amelanchier or Cornus kousa species are also proposed, providing an intimate setting and a degree of privacy from the surrounding apartments. These will be supplemented with areas of ornamental shrub planting that will incorporate a mix of evergreen topiary and looser ornamental grasses and herbaceous planting, incorporating species identified within the RHS 'Plants for Pollinators' list.

- 1.35. A row of box top Holm Oaks (*Quercus ilex*), will be established to align the proposed access point, reflecting the current tree species already on site and visually screening the presence of the adjacent Telephone Exchange property.
- 1.36. Pedestrian access is encouraged, with direct footpath links provided from London Road to the lower level POS setting, allowing for the surrounding community to make use of the new high quality landscaped courtyard and LAP play area. The new courtyard will be set down below the busy London Road streetscene, creating a localised tranquil garden space, that will contribute to a vibrant townscape and the wellbeing of the surrounding community through the provision of new accessible open space and biodiversity enhancements.
- 1.37. It is considered therefore, that through the adoption of the proposed landscape enhancements, as set out within the accompanying landscape strategy plan, the site could successfully contribute to the local BOS framework and would enhance its contribution to BOS through new recreational opportunities. The proposed landscape enhancements seek to improve the setting and character of the surrounding Borough Open Space. The site will be opened up to the local community through an enhanced and safe access point off London Road, with access to a new high quality landscaped environment and intimate playspace, replacing what is currently a derelict uninviting space. The new enhanced open space seeks to enhance biodiversity through a diverse planting palette, incorporating native urban woodland, wild meadow and extensive green roof planting that will set the scene for a high quality landscape whilst strengthening the site's green links to surrounding GI.
- 1.38. Consideration has been given to the setting of the adjacent BT Exchange, with a row of evergreen 'Box-Top' *Quercus ilex* trees providing a sensitive landscape buffer along its eastern boundary. Reinforcement native planting is proposed along the adjacent section of London Road, which will enhance the physical structure of this key landscape feature and reinforce the positive treescaped character and visual amenity within the surrounding urban setting, that will be of benefit to the future health and wellbeing of residents and the surrounding community alike.

Summary & Conclusions

- 1.39. The site in its present form is considered to make only a limited contribution to the existing Green Grid network within the Borough, supporting habitats of no more than low value and is limited in providing opportunities for protected species. The site is not presently accessible to the public and DBC acknowledge that it is not in use for sports and recreation purposes and is not likely to do so in the future, due to its unique topography, which presently impedes access into the internal parts of the site.
- 1.40. The site is derelict and characterised by areas of bare ground and patches of ruderal vegetation. The most prominent and key landscape feature is associated with the tree line established alongside London Road, which has been identified as being of 'Poor to Indifferent condition' and of 'low arboricultural quality.' The treeline is characterised by established self-set scrub, gaps within the tree line and palisade fencing, reducing its contribution to the visual

amenity along the London Road streetscene. The site is limited in its contribution to the Green Grid, with other BOS spaces established within the study area, considered more valuable in terms of contributing to the Civil Amenity and Biodiversity functions of the BOS network. It is considered therefore, that the site represents an appropriate location and opportunity for development of the type proposed.

- 1.41. However, the illustrative landscape strategy proposals identify opportunities to successfully integrate the proposed development, whilst enhancing both the landscape and ecological value within the site, restoring it value to the BOS network. The landscape strategy seeks to enhance the setting and character of the BOS both with the application site and surrounding areas of BOS. The proposals will create a high quality and attractive open space and reinforce the vegetation structure within the site's boundaries to provide enhanced the green links and wildlife corridors. It is considered that the proposals would contribute to a healthy multi-functional Green Grid within the Borough whilst providing health and wellbeing benefits for the new residents and surrounding community alike.
- 1.42. The landscape proposals reflect a sustainable approach to design and development of the site, through the proposed strategic planting and enhanced foot and cycle links which will open up access to the wider public, whilst providing direct links through to the Greenhithe Railway Station. This approach is considered to be entirely compatible with the principles and functions for BOS as set out within DBC's Open Space Report and would represent betterment to the existing Borough Green Grid Network. Furthermore, the development provides opportunities for additional offsite enhancements to the Borough Green Grid, ensuring that the proposals contribute to a wider positive legacy towards the health and wellbeing and green infrastructure of the local community.

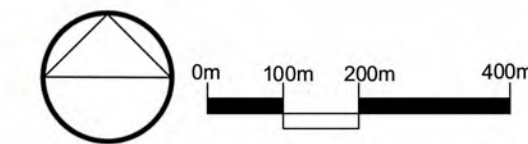
Aspect Landscape Planning
February 2021

Enclosure 1 – Aspect Plans



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- Key:
- Application Site Boundary
 - Greenhithe Conservation Area
 - Ebbsfleet to Stone Priority Area for Development (Policy CS 4)
 - Thames Waterfront Priority Area for Development (Policy CS 6)
 - Railway
 - Public Rights of Way (PRoW)
 - Listed Building
 - Designated Borough Open Spaces

A	22.12.20	Updated to latest comments	NB	JM
REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

aspect landscape planning

TITLE
Little Hithe, Greenhithe
Site & Setting Plan

CLIENT
Imperial Corporate Capital Ltd

SCALE 1:10,000 @ A3	DATE Jun 2019	DRAWN SFB	CHK'D AM
DRAWING NUMBER 6043 / SSP / ASP 2		REVISION A	



Block of tall semi mature native Silver birch, with native evergreen fern understorey planting (Felix mass), bronze Carex & Liriope Muscari. Will act as a natural focal point, visually softening the presence of the southern rock face whilst providing natural verticality within the presence of the proposed apartment blocks. Silver birch are well suited to urban environments and will provide welcome dappled shade during summer months.



Row of evergreen 'Box Top' Holm Oaks (*Quercus ilex*) to provide a high quality entrance and screen to the adjacent development.



LAP play space to incorporate sculptural steel play elements to encourage informal play while maintaining a high end design, in keeping with the surrounding development & doubling up as land art / sculptures within the P.O.S to be enjoyed by all residents and visitors



Extensive green roof with sedum turf, fine leaved grassland, wildflower-rich grassland & heathland, planted within varied substrate depths to create a diverse mosaic of habitats, forming a pleasant backdrop to the decked terrace areas. Additional features such as log piles / deadwood piles & bug hotels will provide additional habitat opportunities for invertebrate species.



Additional feature, multi-stem tree planting, such as *Amelanchier* species etc. providing natural structure and privacy within the courtyard space from surrounding high-rise windows. These specimen trees will also provide seasonal flowering interest & provide dappled shade during summer months.



Ornamental shrub planting to reflect the contemporary architecture, will combine a mix of ornamental herbaceous & shrub planting with clipped topiary and ornamental grasses. Native species from the RHS 'Plants for Pollinators' list will also be blended into this mix.



Wild meadow planting introduced to diversify the woodland edges and the foot of the rock face.

Existing boundary tree planting to be retained & enhanced with native infill planting to reinforce the existing green links and visual amenity along London Road.

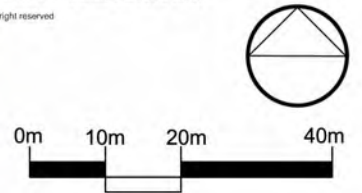


Hard standing pedestrian routes through the courtyard will be lined by high quality planting & bench seating, creating intimate, verdant spaces for residents and the wider community



Feature seat to double up as a sculptural feature

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Key:

- Proposed Extensive Green Roof
- Proposed Feature Small Tree / Large Shrubs (i.e. *Amelanchier* sp. or similar) and ornamental shrub planting
- Proposed *Betula* Woodland (Semi-mature *Betula pendula* 20-25cm girth)
- Sculptural Play Equipment (Double Up as Land Art)
- Proposed Timber Bench Seating
- Feature Seating
- Proposed Box Top Screening Trees (semi mature Holm Oak sp.)
- Specimen Feature Trees (*Carpinus* sp. *Betula* sp. and *Acer* sp. underplanted with robust understorey ornamental shrub planting)
- Proposed Wild Meadow (such as Emorsgate 2 Standard General Purpose Mix)

REV	DATE	NOTE	DRAWN	CHK'D

aspects landscape planning

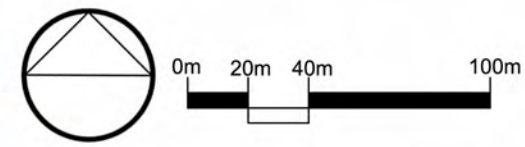
TITLE
Greenhithe
Landscape Strategy Plan
CLIENT

SCALE	DATE	DRAWN	CHK'D
1:1000 @ A3	Dec 2020	NB	SB

DRAWING NUMBER	REVISION
6043 / ASP3	



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- Key:
- Application Site Boundary
 - Designated Borough Open Space

United Kingdom

REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

aspect landscape planning

TITLE
Little Hithe, Greenhithe
Site & Setting Plan Extract

CLIENT
Imperial Corporate Capital Ltd

SCALE 1:10,000 @ A3	DATE Feb 2021	DRAWN JM	CHK'D .
DRAWING NUMBER 6043 / SSPE / ASP 4		REVISION .	

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