

# Representation Form

## Stone Neighbourhood Plan 2020-2035

### The Neighbourhood Planning (General) Regulations 2012 (as amended) – Regulation 16

Stone Parish Council as the qualifying body has prepared a Neighbourhood Development Plan (the Plan) for its Parish (using the previous parish boundaries as they existed until May 2019) with the help of the local community. The Plan sets out objectives for the future of the area and contains planning policies to guide the development and use of land. Following submission to Dartford Borough Council, the Plan is now subject to a six week public consultation. Following this consultation, the proposed Plan will be submitted for independent examination which is expected to lead to a local referendum. If successful, the Stone Neighbourhood Plan will be made (brought into legal force) and will form part of the Dartford Development Plan and be used in the determination of planning applications relating to land in the neighbourhood plan area.

A copy of the Stone Neighbourhood Plan and supporting documents are available to view on Dartford Borough Council's website: <http://www.dartford.gov.uk/stoneneighbourhoodplan>. The supporting evidence base is available to view on the dedicated neighbourhood plan website: <https://www.stoneparishcouncil.com/evidence/>

You can make comments by completing this form and emailing it to: [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or by printing this form and posting it to us at: Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR

Comments on the Plan should be submitted by **4pm on Friday 25<sup>th</sup> June 2021**. **Late representations will not be accepted.**

Please remember that the Examiner is only testing whether the Plan meets the Basic Conditions and other relevant legal requirements. 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.

This form comprises 3 parts:

- Part 1: Your details
- Part 2: Your representation(s).
- Part 3: Declaration

## Part 1: Your details

	1. Personal details	2. Agent details (if applicable)
Title	Mr	Mr
Name	Alister Fawley	Nigel Abbott
Organisation / group	Kent County Council	Tetra Tech Limited
Address 1		
Address 2		
Address 3		
Postcode		
Telephone number		
Email address		

## Part 2: Your comments

Please fill this part of the form out each time for every separate comment you make.

Name or Organisation:	Tetra Tech Limited on behalf of Kent County Council
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### Which part of the Stone Neighbourhood Plan does this comment relate to?

Page	24	Policy Number	GS4 and supporting text	Figure Number	3
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### Do you support, object or wish to comment on this Plan? (Please place a cross in one box)

Support	<input type="checkbox"/>	Support with modifications	<input type="checkbox"/>	Object	<input checked="" type="checkbox"/>	Have comments	<input type="checkbox"/>
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Please give details of the reasons for your support/objection or make other comments in the box below. If objecting, please give details of the grounds for your objection. Please be as precise as possible.

Kent County Council (KCC) as the landowner objects to the designation of the St Clements Way buffer as proposed under Policy GS4. The policy refers to the land as open space and a green buffer. However, the land mainly comprises use as a car park, enclosed hardstanding and has no public access beyond the car park. The land is enclosed with an acoustic fence and landscaping that was provided as part of the recently completed highways scheme along the eastern and southern boundaries of the site.

It is noted that Dartford Borough Council (DBC) in its role as local planning authority, following the decision of its Cabinet meeting held on 27 May 2021, also objects to the designation of the St Clements Way buffer, a position that KCC fully supports. DBC's representation sets out the various grounds as to why it considers that the proposal to designate the land as local open space is not merited.

We can confirm that KCC is in dialogue with the local Clinical Commissioning Group (CCG) for West Kent to deliver the healthcare facility that will replace three existing surgeries located at Ivy Bower Surgery (part of the Temple Hill Group Practice) and the Greenhithe and Elmdene Surgeries (part of the Swanscombe and Bean Partnership).

This engagement with the CCG and constituent GP practices has taken place over the past 16 months. Provision of a medical centre on the Steele Avenue site, which is the preferred location of the CCG in relation to the catchment areas of the three surgeries that it will replace, will meet DBC's requirement set out in its Regulation 19 Local Plan consultation in the Community Facilities requirements of Table 2 (Summary Illustration of Types and Locations of Development) as well as Table 10 Infrastructure Aims and Potential Main Projects which indicates by 2024 there will be a primary healthcare facility in Stone/Greenhithe.

The site is considered central to the populations of Stone, Greenhithe and Swanscombe for the provision of a new medical centre and pharmacy to be delivered by December

2022 to serve these local populations. It is noted that proposed NP Policy HC1 states in part that proposals for a new health centre at the Horns Cross Neighbourhood Centre will be supported however as is set out, the CCG's preference for the new health centre is on the site currently proposed as the St Clements Way buffer.

The more central location at Steele Avenue reduces travel times for the potential 30,000 residents served by the three surgery practices and for the future residents of the East Quarry development which this medical centre will serve.

On behalf of KCC we submitted representations in April 2021 to the Regulation 19 Dartford Local Plan consultation seeking the allocation of the land for medical and residential purposes. Development of the site is considered developable and deliverable according to DBC's Strategic Housing Land Availability Assessment.

In addition, there are a number of benefits that the provision of the medical centre on the site will achieve which include:

- addressing the deficiencies of the existing surgery premises;
- forms part of the CCG's strategy for addressing the population growth anticipated in the area;
- enabling the recruitment of additional staff to a multi-disciplinary team;
- enabling greater capacity to deliver core GP services and enhanced services and increased training capacity for GP's and nurses;
- the new facility will embrace new digital technologies improving the level and standard of care of patients.

Concurrently, we have sought formal pre-application advice from DBC in relation to a mixed use development comprising a three storey 1,428sqm medical centre, incorporating a Pharmacy located at the northern end of the site and a residential development rising to four storeys in height now comprising 19 apartments in the southern part of the site.

DBC has provided its pre-application advice feedback in June 2021 which in summary states that taking into account the status of the Neighbourhood Plan, DBC's objection to Policy GS4, the fact that the site is not an existing open space and that the Neighbourhood Plan does not set out details of how the objective could be implemented, DBC does not consider that the conflict with GS4 would be likely in itself to result in development on this site being considered unacceptable in principle.

Moreover the advice indicates, quite rightly in our view, that the proposal to develop the site will offer significant benefits to the principle of the proposed development in terms of both the provision of a new health facility and the provision of new housing including affordable housing, which align with the objectives of the DBC Local Plan.

DBC's advice continues by stating that in order for the scheme to be considered acceptable, a high quality scheme is required and matters presented in the advice need to be addressed which we can confirm that KCC will consider and action in developing the detailed scheme proposals prior to the submission of a formal planning application later in 2021.

For the above reasons therefore, in parallel with DBC, KCC seeks the deletion of Policy GS4 from the Neighbourhood Plan.

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

If relevant, please set out what change(s) you consider necessary to make the Plan able to proceed. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

Policy GS4, its supporting text and all references to the policy should be deleted from the plan.

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

**The Neighbourhood Plan, and comments made on it, are expected to proceed to an examination by an independent Examiner. The majority of examinations are held through written representations. The Examiner will decide if there is a need for a public hearing. Please place a cross in the appropriate box to indicate whether you would like to participate in the hearing, if one is held.**

No, I do not wish to participate  
at a hearing

☐

Yes, I wish to participate in  
a hearing

☒

**If a hearing is required, please outline why you consider that your participation is necessary.**

Whilst the County Council would prefer for this issue to be dealt with by written representations, should the Examiner decide that a hearing is necessary in relation to this particular issue, the County Council would wish to attend to explain and expand upon its concerns with the proposed draft policy.

(Continue on separate sheet if necessary)

If you would like to be notified of Dartford Borough Council's decision to make the Plan under Regulation 19 (to bring it into legal force after examination and local referendum), please place a cross in the box below.

Please notify me

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## 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 Stone Neighbourhood Plan. Under Regulation 17, we have a duty to send all representations to the appointed Examiner. Your name, organisation name (if relevant) and comments may be made publicly available 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, and representations being made available for public inspection.**

**Signature:**

Nigel Abbott for and on behalf  
of Tetra Tech Limited

**Date:**

22 June 2021

**All comments must be received by 4pm on Friday 25<sup>th</sup> June 2021**



## Growth and Communities

Mark Aplin  
Planning Policy Manager  
Planning Policy Team  
Dartford Borough Council  
Civic Centre  
Home Gardens  
Dartford  
Kent DA1 1DR

**BY EMAIL ONLY**

25 June 2021

Dear Mark,

### **Re: Stone Parish Neighbourhood Plan - Regulation 16 Consultation**

Thank you for consulting Kent County Council (KCC) on the Stone Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

### **Chapter 2 – Stone parish story**

Public Health: The County Council recommends that the data provided regarding life expectancy is more accurately sourced, with the geographical area of the data included. Stone parish appears to cover two wards (Stone Castle and Stone House) which, using the [Public Health England Local Health tool](#), have different life expectancies.

The life expectancy presented within this Neighbourhood Plan is the same as that identified in the ward of Stone House, which is considerably lower than that of Stone Castle. It is important to reflect life expectancy accurately within the Neighbourhood Plan to ensure that proper consideration is given in identifying how to prioritise objectives on a granular level to reduce health inequalities and improve the overall health and wellbeing of the area.

### **Chapter 4 - Neighbourhood Plan Area**

Heritage Conservation: The Neighbourhood Plan does not make reference to the history of Stone, nor of its surviving heritage, which has the potential to help deliver the wider objectives of the Neighbourhood Plan. There are no policies directly related to the historic environment and the background section on the history of Stone only starts with the Saxons.

The County Council considers this to be a missed opportunity, given that Stone has an important archaeological resource spanning geographically the transition from the Thames and former wetland edge to the higher ground of the chalk to the south, and chronologically from the Palaeolithic to the present day.

Stone sits in an area of international importance for palaeolithic archaeology (up to one million years ago to c. 11,000 BC). The oldest skull found in Britain was found a short distance away at Swanscombe and within Stone there have been numerous finds of palaeolithic hand axes. At Crossways Business Park, these were accompanied by finds of lemming. Other extremely important discoveries undoubtedly remain to be found in the parish. There have also been numerous finds of Mesolithic and Neolithic worked flints across the parish and a rare middle Neolithic pit at the allotment gardens. Important 'Beaker period' (late Neolithic to early Bronze Age transition period) pottery was found north of Beechin Wood Cottages in the 1930s.

There are similarly numerous later prehistoric sites from Stone parish. These include a Bronze Age ring-ditch and associated features at Waterstone Park, Bronze Age features from St Clements Valley, London Road and Iron Age settlements at Louvain Road, Stone Castle Quarry and especially Waterstone Park, as well as Iron Age cremation burials from Cotton Lane Pit.

Roman Watling Street ran from Canterbury to London through the Neighbourhood Plan area, probably following earlier routes, and a large number of Roman sites have been discovered alongside. These include settlements at Stone Castle Quarry, Stone Castle and Waterstone Park, and many cemeteries as at Stone Court Pit, Cotton Lane and Stone Cemetery. Numerous finds of Roman pottery and coins have also been discovered in the parish.

From the Anglo-Saxon period, discoveries include a system of tide walls on Littlebrook Marshes, known as Littlebrook Walls, mentioned in a charter of Ethelred, A.D.995, and a small cemetery at Littlebrook Farm. Stone also contains notable Medieval buildings in the form of Stone Castle and the church of St Mary (both Listed Buildings), as well as the former site of Stone Court and the Old Rectory (both now lost).

More recent and perhaps more visible remains can be seen in the form of Stone's 19<sup>th</sup> and 20<sup>th</sup> century industrial heritage. Numerous cement works were developed in Stone in the 19<sup>th</sup> century. Some of these cement works used pioneering technology, and some of the industrial structures survive today as Listed Buildings. The cement industry also used a network of tramlines to connect to the Thames where pontoons and wharves can still be seen. Farmsteads also survive from this period. In the 20<sup>th</sup> century, this heritage was joined by military and civil defence structures, particularly domestic and industrial air-raid shelters.

The factors that produced this diverse heritage remain important in the future of the parish. The geological history that helped Palaeolithic artefacts survive and be discovered, for example, later encouraged the development of the cement industry. The routeway that became Roman Watling Street was associated with the wealth of later prehistoric and Roman sites and still forms the southern boundary of the parish in the form of the A296. Many of the residential developments along the Thames are sited to take advantage of the historic waterfront, which is largely what makes up the remains of the industrial past of the

parish. Stone's heritage thus provides numerous visible markers that connect the landscape and townscapes of today with its past and which show the continuity of settlement and land use throughout prehistory and history. As such, these could be used to help anchor new development in the parish to the existing community, but the Neighbourhood Plan does not seem to recognise this or the role that heritage could play in other goals of the Neighbourhood Plan.

The County Council notes that the 'Vision' on page 13 includes a number of phrases which could relate to heritage. The vision for people to be 'proud' of Stone, for it to be a place where they can 'put down roots' and for Stone to have a strengthened environment, can all be more effectively delivered if people have a connection with past generations, with their achievements and struggles and with a sense that the community has existed in Stone over the years. The parish's heritage can directly help in achieving this by ensuring that new development is well integrated with the old, that older generations retain their connection with the past, rather than seeing it swept away, and by contributing to health and well-being for all. The County Council would therefore recommend that Neighbourhood Plan has better consideration for the historic environment to ensure the Vision is delivered upon.

**Sport and Recreation:** The enablement of a local sustainable community by maintaining and improving the availability and quality of community services within the parish is welcomed. KCC would recommend consideration is given on the accessibility of services and connections available for the wider community, to seek limit car usage where possible.

KCC seeks to ensure the adequate provision for sport and recreation within the surrounding area and open spaces, and would recommend consideration in how activity, green space and services are accessed and provide opportunities, where possible, for Active Travel.

Consideration of the Kent Design Guide and the Sport England Active Design Guide is recommended, and it is important to ensure that these strategies and any subsequent developments take account of the KCC and Sport England Guidance that is available<sup>1</sup>.

Sport England currently runs two surveys: Active Lives Adult, which is published twice a year, and the world-leading Active Lives Children and Young People, which is published annually. Both surveys give a unique and comprehensive view of how people are getting active and can be focused down to local authority level. The latest Adult report can be read [here](#). Data can also be explored and filtered using the [Active Lives Online tool](#). A summary of the Children and Young People report can be found [here](#).

The latest figures support the notion that inactivity significantly impacts on an individual's physical and mental health, as well as social/community development. Therefore, any development needs to consider this and seek to provide a mix of formal and informal areas/spaces (indoor and out) where people can be active.

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<sup>1</sup> <https://www.sportengland.org/facilities-planning/active-design/>  
<https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/>  
<https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>  
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>  
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/>  
<https://www.sportengland.org/facilities-planning/active-design/>



## *GS1 Local Green Space*

Heritage Conservation: The County Council considers that the strategic goal for 'Green Space and Recreation' could be more effectively delivered by including aspects of Stone's heritage. At present, the text discusses a few key green spaces but an effective green space and recreation strategy also needs to include routeways between the interior of the parish and the riverbank. These routes could incorporate heritage assets such as historic buildings, information and interpretation and the historic waterfront.

## *Policy GS2 - Stone Recreation Ground*

Highways and Transportation: Within this policy, the principles of the masterplan are generally supported, but will need to be reviewed in detail once an application has been submitted. In general, parking provision should be in line with Dartford Parking Standards and / or based on a first principles assessment, including provision of disabled spaces, electric vehicle charging provision and cycle parking. Where routes are improved or new routes are created, they should be constructed in line with Kent Design Guide and LTP 1/20 (and other relevant guidance) and provide for both walking and cycling. Appropriate visibility splays, swept path analysis and Road Safety Audits will be required to demonstrate that any amended vehicular access points adhere to appropriate guidance.

## *Policy GS4 – St Clements Way Buffer*

The County Council is in dialogue with the local Clinical Commissioning Group (CCG) for West Kent (whose duties are to be delivered through the West Kent integrated Care Partnership) to deliver a healthcare facility at this site.

As such, the County Council as landowner objects to the designation of the St Clements Way as a buffer, as proposed under Policy GS4. KCC seeks the deletion of Policy GS4 from the Neighbourhood Plan, alongside the supporting text and all references to the policy.

Full comments in respect of the County Council's position on this policy have been submitted to Dartford Borough Council as a separate submission and for ease, are also provided within Appendix 1.

## *Health and Wellbeing*

Heritage Conservation: The Neighbourhood Plan goals for health and well-being, as presented on page 25, could be enhanced by incorporating the parish's heritage. The current and substantial pressures faced by health and social care demand a search for innovative solutions in order to continue meeting the demands of a modern population over the coming years. As such, heritage can play an important role in the contribution of the arts to person-centred, place-based care through means such as arts-on-prescription activities, cultural venues and community programmes, as well as walks, trails and educational actions. The historic environment, archaeology and heritage form part of our experience of being human and can provide individual as well as collective opportunities to engage with arts and culture whilst having positive effects on our physical and mental health and wellbeing in the process.

### *Policy HW1 - Trees, shrubs and air quality*

Biodiversity: The Stone Neighbourhood Planning Area does not encompass any statutory or non-statutory designated sites for biodiversity. To maximise biodiversity value, KCC would recommend that the 'additional tree cover, shrubs and hedgerows' referred to in this policy consists of native species only. This is because native species offer the foliage and woody material which invertebrates (the faunal basis of ecosystems) require to complete their lifecycle. Often, non-native species cannot provide this. The County Council also recommends that native species are incorporated into the design of the 'Future Stone Recreation Ground' and other areas where vegetation planting is planned.

Highway verges are one of the most important remaining reservoirs of wildflowers, particularly important for pollinating insects. This includes ecologically rich verges on historic routeways as well other highway verges in the parish, including new highways and public rights of way in new developments. Other important areas to protect and enhance include coppiced woodland and rare remaining areas of semi-improved grassland and lowland heathland.

KCC would be highly supportive of the inclusion of consideration of biodiversity net gain to ensure alignment with local and national policy.

### *Policy HW2 – Travel Plans*

Highways and Transportation: This policy is generally supported and KCC would like to see walking and cycling for shorter journeys as 'the norm'. However, with regard to the length of time over which the Travel Plans should be monitored, Government guidance, 'Travel Plans, Transport Assessments and Statements' states that *"The length of time over which monitoring will occur and the frequency will depend on the nature and scale of the development and should be agreed as part of the Travel Plan with the developer or qualifying body for neighbourhood planning"*. Whilst the monitoring period should therefore be decided on a case by case basis, in line with the period for which monitoring fees apply, KCC generally requires Travel Plans to be monitored for a minimum of five years post full occupation, unless the Travel Plan has not achieved its target, in which case monitoring may be required to be continued.

### *HW3 Walking & Cycling Neighbourhood*

Highways and Transportation: KCC supports the principles of this policy. It is agreed that proposed routes should join the existing network, though it is unclear from the plans which routes are proposed for walking and which are proposed for cycling. Any applications put forward will need to be designed in line with Kent Design Guide, LTP 1/20 and other relevant guidance (e.g. Wheels for Wellbeing), providing sufficient width and gradients for intended users. With regard to land ownership, the County Council Highway Definitions Team would need to be contacted to determine which land is within the publicly maintainable highway; proposed routes on third party land can be considered during the planning application stage. Whilst not stated in the Neighbourhood Plan, KCC considers that where relevant, developers

should be encouraged to fund the installation of cycle and pedestrian counters and maintenance for a minimum of five years.

With regard to the evidence base 'Proposed Pedestrian and Cycle Network, Preferred Projects for Stage One' 2019 (as referenced within the supporting policy paragraphs), KCC has concerns regarding the proposed structural changes at M25 / A282 Junction 1a (as shown on page 6 of the Preferred Projects for Stage One). These would be very challenging to construct and the junction is maintained by Highways England, not KCC. However, the junction is the subject of a current joint study between KCC, Highways England and Dartford Borough Council, seeking to resolve congestion. Any mitigation put forward should consider pedestrian and cycle movements across the junction.

Proposals that include lighting on the footways / cycleways would need to be reviewed and agreed by the KCC Lighting Team. Whilst no detail has been given in the document, KCC would also need to be consulted on surfacing materials. Tarmac type surfaces are preferable, as they reduce future maintenance, however, cycle paths through green space may need to be softer/more permeable, to consider surrounding impact on trees and wildlife.

#### *Housing – Context*

Biodiversity: To support declining wildlife, such as swifts, KCC would recommend that new residential developments should seek to incorporate simple yet effective ecological enhancement measures. This includes integrated bird nest bricks, native species landscaping and hedgehog gaps in any close-boarded boundary fencing.

KCC highlights that all three 'common' reptiles have recently been found at a site to be developed along Crossways Boulevard – these have been/will be translocated to the seawall grassland area running along the entire northern boundary. Where possible, KCC would advise that more protection/ecologically-beneficial management is implemented for the green areas in the north of the parish.

#### *Policy LI1 Stone Crossing Station*

Highways and Transportation: KCC supports the principles of this policy and considers walking and cycling links to this facility to be key. Consideration should also be given to funding step-free access to both platforms and improved cycle parking facilities.

#### *HC1 – Horns Cross Neighbourhood Centre*

This policy supports the development of a new health centre. The provision of a health centre in this location conflicts with plans being progressed by KCC to provide a health centre at St Clements Way. The County Council advises that this policy is amended to remove its support for a health centre at this location. KCC's full position on the provision of health centre is set out in Appendix 1.

Highways and Transportation: Any planning applications for this site should be accompanied by a Transport Statement / Transport Assessment (depending on scale of development) that

demonstrates the impact of the development on the local highway network. This would be reviewed by KCC during the application stage.

## **Chapter 7 – Our key themes and objectives**

Public Health: To ensure the robustness of the themes and objectives within the Neighbourhood Plan, the County Council would recommend greater use of data from the [Kent Joint Strategic Needs Assessment](#) (JSNA) and other sources of public health data from the [Public Health Outcomes Framework](#) (PHOF), including ward level data. Reference should also be made to set out how the policies support the [Kent Health and Wellbeing Strategy](#). Providing evidence of the health needs of the population is in line with the National Planning Policy Framework and will justify health and wellbeing policies.

## **Annex 2 – Pedestrian and Cycle Network**

Public Rights of Way (PRoW): The County Council would draw attention to the following factual clarifications required within this Neighbourhood Plan:

- On page 51, the path shown as 4C on Figure 10 is not a PRoW.
- The PRoW DR13 is not shown and goes from the lower end of 4C in a south west direction to meet Hedges Place Road.
- On Figure 9, the new route for DR9 is not shown and the original proposal which was not adopted is shown instead.

The County Council would welcome further engagement on these points to ensure that the PRoW network is being properly represented within this Neighbourhood Plan.

## **Additional commentary**

Sustainable Urban Drainage Systems: The Neighbourhood Plan covers a geographical area that includes areas of defended flood risk and with areas shown as potentially subject to surface water flood risk as shown on the Environment Agency Surface Water Flood Risk Mapping, yet there is no reference within the document to the importance of surface water drainage and the water environment.

It would be beneficial if the Neighbourhood Plan considers the importance of surface water management within new development but also more opportunistically within improvements to green and open spaces. Recent development proposals at Stone Pit included sustainable drainage improvements.

The County Council would specifically encourage the Neighbourhood Plan to consider what protections should be in place and what aspects the Parish would like to see implemented in relation to the management of surface water. The NPPF, at paragraph 165, specifically requires that major developments incorporate sustainable drainage systems and that they should, where possible, provide multifunctional benefits. The Parish should require all development drainage systems to include drainage systems which are at surface and provide water quality benefits, promote amenity and increase biodiversity.

The County Council would also recommend that the Neighbourhood Plan considers Kent County Council's Drainage and Planning Policy<sup>2</sup>.

Minerals and Waste: The Neighbourhood Plan area does have safeguarded land-won minerals (Alluvial and Sub-alluvial River Terrace Sand and Gravels), though the vast majority is also within the defined urban area of Dartford and are thus exempt from land-won mineral safeguarding as set out in Kent Minerals and Waste Local Plan (KMWLP) Policy CSM 5: Land-won Mineral Safeguarding. There is also significant safeguarded mineral infrastructure at the river frontage, Johnsons Wharf, of which the relevant policy is Policy CSM6: Safeguarded Wharves and Rail Depots of the KMLWP.

The Neighbourhood Plan is not allocating sites and the area is mainly urbanised and is therefore exempt from the land-won mineral safeguarding policy provisions of the KMWLP. However, it is recommended that the Neighbourhood Plan does include reference to the KMLWP and minerals safeguarding issues to demonstrate that they are not applicable to ensure that this matter is properly considered.

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KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,

**Stephanie Holt-Castle**  
Director for Growth and Communities

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Appendix 1: Tetra Tech Limited Response submitted on behalf of Kent County Council regarding St Clements Way

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<sup>2</sup> <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/flooding-and-drainage-policies/drainage-and-planning-policy-statement>