

DARTFORD LOCAL PLAN

**Business and Retail
Topic Paper**

December 2021

DARTFORD
BOROUGH COUNCIL

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1 PURPOSE

- 1.1 Dartford Borough Council has produced a series of Topic Papers to support the submission of the 2021 Dartford Local Plan¹, after the publication of pre-submission (Regulation 19 stage) plans² in February and September 2021. This followed early public participation documents and consultation on the Plan (under Regulation 18)³ that culminated in the 'Preferred Options' Local Plan document in January 2020.
- 1.2 The purpose of the five Topic Papers is to set out, in summary form, the justification and evidence behind policies in the pre-submission Dartford Local Plan published September 2021 (referred to as "the Local Plan" here). It brings together relevant local evidence, and reviewing key strands of applicable national policy.
- 1.3 This Topic Paper 5 focusses on the theme of Business and Retail, specifically:
- Strategic Policies: S1 (part) and S4 (part), policy D3
 - Development Management Policies: M19 to M24
- 1.4 Economic development strategy, and guidance on overall levels of provision, is set out within policies S1 and S4 respectively. Policies within the non-strategic (Development Management) part of the plan are particularly important for this topic; including M19's principles on the location of business/ retail development, and specific policies for identified employment areas, Bluewater and the smaller centres in the retail network in policies M21, M22 and M23 respectively. Further provisions are set out in M20 and M24 as applicable.
- 1.5 Some of the most pertinent Strategic Objectives set out in relation to Business and Retail in the Local Plan include:
- W2:** Improving health and wellbeing, and air quality arising from congestion, through reducing the need to travel by private vehicle, particularly by retaining and providing jobs, services, shops, community facilities and open space at suitable locations close to residential areas and where good public transport services are within easy walking distance.
- I3:** Achieving a vibrant Dartford Town Centre with an attractive public realm in an enjoyable and accessible environment, new residential communities, improved connections and services, and a flourishing day and evening economy with an enticing cultural, retail and leisure offer.
- I4:** Retaining a prosperous economy with a good choice of jobs per resident, increasing high quality, accessible, local employment opportunities, maintaining a diverse supply of premises and supporting existing business needs, with Ebbsfleet providing a productive mix of new commercial, community and residential activities.

¹ under section 20(1) of the Planning and Compulsory Purchase Act 2004

² under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

³ under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

2 NATIONAL PLANNING POLICY

- 2.1 Chapter 6 'Building a strong, competitive economy' and chapter 7 'Ensuring the vitality of town centres' are the key areas of the NPPF relating to business and retail.
- 2.2 Table 1 lists the key NPPF requirements in relation to economic development and provides a corresponding reference to the Local Plan policy that achieves each requirement.
- 2.3 Not all potentially relevant National Planning Policy Framework (NPPF) content is replicated in topic papers. More detail on national policy and guidance is provided within individual evidence documents (see below).

Table 1: NPPF Paragraph and Relevant Policy

NPPF Paragraph	Plan Policy
<p>11 Achieving sustainable development: The Presumption in favour of sustainable development</p>	<p>S1:7 A sustainable pattern of economic development for the Borough is set out in Policy S1. Criterion 7 prioritises significant jobs, major commercial activity and new employment premises at Central Dartford and Ebbsfleet, with economic growth planned at other locations in the urban area where ‘consistent with sustainable growth patterns’ and improving/ intensifying commercial locations. This therefore has a focus for economic growth where best infrastructure provision is found, especially to promote low-carbon travel, and environmental improvements to employment sites.</p> <p>S1:8 This delivers the strategy for significant economic growth to meet needs through provision of a clear set of business locations. These are based on identified employment areas, which are expanded, and a network of retail centres including Dartford Town Centre and Bluewater. These locations on the Policies Map, well served by infrastructure, have significant potential for sustainable growth to meet needs and meet climate change strategy aims.</p> <p>S4:6 Meeting economic development needs through planned intensification, expansion and updating stock at the above locations (and delivered through growth criteria in policies M19 to M24), is complemented by strategic policy S4 (criterion 6). This quantitative guidance confirms the aggregate scale economic growth that is sufficient in scale to meet needs. This policy importantly also seeks a balance mix of land uses in the Borough and in neighbourhoods to reduce the need to travel, mitigating climate change impacts of growth.</p>
<p>82a) Building a strong, competitive economy: clear economic vision and strategy that encourages sustainable economic growth</p>	<p>S1:7/8. The economic strategy in policy S1 (Criteria 7 and 8) is clearly positive, setting out specific locations to accommodate economic development. The Borough Vision (paragraph 1.35) seeks a strong economy, with economic development and jobs to address social deprivation; and a diversified Town Centre economy, and an enterprising urban hub/ dynamic place to work in at Ebbsfleet Central. A vision for growth locations and the future of the local economy is also featured later in the plan (paragraphs 2.8-2.12 and 2.51 for example).</p>
<p>82b) Building a strong, competitive economy: set criteria or identify sites</p>	<p>M21. This features specific criteria to secure growth at identified employment areas – including with new strategic expansions - across the Borough, in line with economic strategy. More widely, sites and areas with clear development management criteria to secure economic growth to deliver the strategy are included in policies M19 to M24. These provisions are allied with strategic sites included in sections 3 and 4, and proposals with a strong economic focus included at policies D4, D6 and E4. This promotes town centre transformation and a large scale high quality business hub at Ebbsfleet Central.</p>

NPPF Paragraph	Plan Policy
	M19:3 Importantly, this ensures economic development needs will be met, by setting out criteria as sought in national policy. It enables specific exceptions to planning for economic development located at Central Dartford, Ebbsfleet, the identified employment areas, and the retail network.
82c) Building a strong, competitive economy: address barriers to investment	M21: 2/3 This policy sets criteria for industrial and service development proposals to meet in order to gain planning permission, centred on the need to provide a better environment for employment areas, and to ensure sustainable transport benefits are secured.
82d) Building a strong, competitive economy: be flexible	M19: 3 Provides for changing economic circumstances, and identified locations in the economic strategy are considered well placed and responsive (for example see paragraphs 5.174-5.177)
83 Building a strong, competitive economy: address specific locational requirements	<p>S1:7 Drawing from national policy and local strategy this part of the strategy seeks to support existing business, SMEs, promoting productive sectors including high technology and creative industries, and increasing professional/ managerial employment.</p> <p>M19:3 Allows additional flexibility for research and development facilities, offices or high technology industrial premises, chiming with national policy.</p> <p>D2:1 In Central Dartford, criteria such as policy D2:1b promote development for a range of economic growth sectors (paragraphs 3.21 to 3.22, for example elaborate on future town centre business, retail/leisure and culture industry dynamics).</p>
84a) Supporting a prosperous rural economy: sustainable growth and expansion of all types of business in rural areas	S1: 6 The extent of the Borough that can be regarded as clearly and genuinely rural is considered to be very limited. Provisions are made for sustainable economic growth running through the Borough. Focussing on the area outside the 'urban areas' defined in policy S1 (criterion 6) i.e. south of the A2 the retail network includes six Local Centres and an important District Centre (Longfield) south of the A2 and inset from the Green Belt, which can provide a range of business opportunities. (Clear criteria for changes of use/ new buildings in the Green Belt are within policy M13).
84b) Supporting a prosperous rural economy: development and diversification of agricultural	M21 There has been no demand for a specific policy on this in the Local Plan. However there is ample opportunity for this form of economic development. This includes the positive provisions in policy M21 for the five identified employment areas in the south of the Borough, some of which are in farm-based settings/ buildings.

NPPF Paragraph	Plan Policy
and other land-based rural businesses	
84c) Supporting a prosperous rural economy: sustainable rural tourism and leisure developments which respect the character of the countryside	M13 There has been no demand for a rural tourism policy in the Local Plan; however tourism/ leisure facilities can locate in the applicable centres in the retail network. (Policy M13 sets out when developments that respect the character of the Green Belt will allowed).
84d) Supporting a prosperous rural economy: retention and development of accessible local services and community facilities	<p>M23/ 24 Policies M23 to M24 are focussed on the retention and development of accessible local services and community facilities, for example shops and pubs, applying the new Use Classes. (They also are justified on the basis of reducing the need to travel and supporting the social sustainability of neighbourhoods). The District and Local Centres (characterised in summary in paragraph 5.208) are promoted in M23 to accommodate change to provide local economic and social benefits through redevelopment and changes of use, with criteria providing scope for appropriate flexibility whilst maintaining the overall role of the centre.</p> <p>M24 allows for the appropriate growth of food and drink uses, and seeks specifically to retain public houses (unless it shown not to be not be viable, including for Class F2 uses).</p>
86a) Ensuring the vitality of town centres: support the role that town centres play	<p>S1:8 Outlines the structure of the retail network. This is set out in full in Table 7, which helps guide the nature of change expected and services provided, to maintain vitality and viability; with change anticipated in Dartford town centre, in particular in the hierarchy/ network, to ‘diversify uses..’. This sets a flexible framework on which retail/ leisure representation can change rapidly at appropriate locations as demand requires, and a suitably wide range of uses (for example in policy M23), including opportunities for increased residential development. The Policies Map defines their spatial extent, supported by the list of addresses in Plan Appendix D.</p> <p>D1 to D7: The Local Plan is heavily focussed on the positive growth and adaptation of Dartford Town Centre, with a whole section dedicated to this (section 3). Various policies in the Central Dartford section, including D3, set out the broadening mix of functions (in new Use Classes) expected at locations within/ adjoining the town centre to achieve growth, and delivering diversification in the context of Dartford’s character. The diversification of the town centre economy is a principle enshrined in the vision set out for the Plan.</p> <p>M22 The future of the unique facility at Bluewater is set out in policy M22, seeking its appropriate evolution in the context of also supporting the vitality of other differing retail centres. (Policy S1 Criterion 8bii identifies Bluewater to be retained as part of the economic strategy and retail network, noting it will maintain its regional economic</p>

NPPF Paragraph	Plan Policy
	<p>contribution). The Plan maintains the Borough's longstanding approach of including Bluewater within its network/ hierarchy of centres/ town centres, but with criteria to manage wider potential local/ regional implications for other centres. A diversity of potential uses under the new Use Classes is outlined in criterion 2 of policy M22, subject to being appropriate to its planned function, maintaining quality and performance. Further provisions are set out for retail and leisure proposals addressing national policy. M22 criterion 3a requires its planned role to be maintained in development, distinct from nearby town centres. Criterion 3b uses the national default threshold (NPPF paragraph 90) to require impact testing, and introduces the sequential test for the key issue of indoor leisure facilities. Further detail on its role is within Table 7.</p>
<p>86b) Ensuring the vitality of town centres: define the extent of town centres and primary shopping areas</p>	<p>D3 Provides clear guidance for development on the permissible range of uses. Covering the most important frontage and making up the primary shopping area, a focused 'Core Frontage' is defined. Within the Core Frontage (clause 1a) the priority is Class E uses. Clause b covers elsewhere in the town centre, and also vacant units in the Core Frontage, with sufficient effective marketing, where other main town centre uses hotels, cultural and other Class F uses are also permitted. Clause 2 of this policy sets out specific provisions on the various ways/ locations where new residential development is allowed and encouraged.</p> <p>Diagram 5 maps out key aspects of positive proposals for the town centre including redevelopment sites, areas of investment in the public realm, the town centre boundary and core frontage. The Town Centre, allocations, and Core Frontage are defined on the Policies Map, with addresses for the latter listed in plan Appendix D. The town centre boundary has been reviewed and updated with minor amendments, for example to take account of a supermarket built adjoining the previous boundary and to match town centre site allocation boundaries.</p>
<p>86c) Ensuring the vitality of town centres: retain and enhance existing markets</p>	<p>D1/2/3 Policy D1 criterion 2b directly highlights Dartford's street market and other positive attributes of the town's identity. Section 3 of the Plan makes clear the need to retain Dartford's market town character/ features e.g. in policies D2 and D3.</p>
<p>86d) Ensuring the vitality of town centres: allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed</p>	<p>D4/D5/D6 Complementing D3, uses envisaged in the redevelopment of allocations D4 to D6 include hotels, residential, retail/ leisure, cinema, cultural and visitor facilities, community premises, anchor and independent shops, public spaces and infrastructure. There was a good range of development sites in the previous strategic Plan, and they remain largely available, or in delivery, providing responsiveness to current and future needs (paragraph 3.26). Paragraph 2.52 confirms that evidence shows, accounting for existing permissions, there is no net quantitative retail need to address (looking 10 years ahead), albeit qualitative requirements may drive redevelopments.</p> <p>D7 Further flexibility for the future is afforded though the variety of potential sites covered under policy D7 (see Diagram 9).</p>

NPPF Paragraph	Plan Policy
86e) Ensuring the vitality of town centres: edge of centre sites	This does not apply, sufficient sites are available within the town centre to meet quantitative and qualitative needs.
86f) Ensuring the vitality of town centres: residential development	<p>D2:1c Explicitly seeks 'a neighbourhood community'.</p> <p>D3:2 Promotes redevelopment through the strategic allocations.</p> <p>D4 to D6 These propose major new housing development as part of their mix; totalling at least 1,220 dwellings, and also supporting residential through conversions, identified housing land, and other town centre locations.</p> <p>D7 Paragraph 3.59 suggests the wider regeneration area under policy D7 is estimated to hold future potential for at least 1,000 additional dwellings (and other uses), when/if land becomes available.</p>
90) Ensuring the vitality of town centres: impact assessment	<p>M19:2 For applicable development outside retail centres, a 280sqm impact test threshold is applied.</p> <p>M23:2 The default 2,500sqm level of threshold in national policy for impact testing is featured within Bluewater policy M23 (criterion 3b).</p>

3 SUSTAINABILITY APPRAISAL

- 3.1 The Sustainability Framework is made up of 15 objectives for which the Local Plan policies have been assessed against. The principal Sustainability Appraisal (SA) objective relating to business and retail is:
SA 5: Facilitate a sustainable and growing economy and a vital and viable town centre
- 3.2 Overall, the SA has determined that the economic objective will be positively met by the Local Plan strategies and policies, when taken together as a whole.
- 3.3 Additionally, the sustainability appraisal assessed each policy against all 15 of the Sustainability appraisal's objectives, see chapter 5. The outcome for S1 and M19 are found below in tables 2 and 3 respectively. A full key of the symbols used in the SA can be found at appendix 1 and a brief description is provided below table 2.

Table 2: Sustainability Appraisal outcome for S1

SA objective	S1
1. To ensure that everyone has the opportunity to live in a decent home.	++
2. To ensure ready access to essential services and facilities for all residents.	++/-
3. To strengthen community cohesion.	+
4. To improve the population's health and reduce inequalities.	++/-
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	++
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	++/-
7. To conserve the Borough's mineral resources.	-
8. To conserve the Borough's soils.	++/-?
9. To maintain and improve the quality of the Borough's waters.	-
10. To reduce air pollution and ensure improvements in air quality.	++/--
11. To avoid and mitigate flood risk.	--?
12. To minimise the Borough's contribution to climate change.	++/-
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	++/-
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	--/+?

SA objective	S1
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	+/-

KEY:

- ++ significant positive effect
- ++/- significant positive and minor negative effects
- + minor positive effect
- minor negative effect
- /+ significant negative and minor positive effects
- significant negative effects
- ? effect is uncertain
- +/- an equal mixture of minor positive and minor negative effects
- ++/-- an equal mixture of significant positive and negative effects

3.4 As can be seen, policy S1 is set to have a largely positive impact across the whole (including on essential services and facilities), with significant positive impact expected for the economy.

3.5 S1 is however expected to have some sort of negative impact on four objectives. These are relating to:

- Conserving mineral resources (SA7)
- Maintaining and improving the borough's waters (SA9)
- Avoiding and mitigating flood risk (SA11)
- Conserving and/ or enhancing the historic environment (SA14)

Table 3: Sustainability outcome for Policy M19

SA objective	M19
1. To ensure that everyone has the opportunity to live in a decent home.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To strengthen community cohesion.	0
4. To improve the population's health and reduce inequalities.	0
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	++
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	0
7. To conserve the Borough's mineral resources.	0
8. To conserve the Borough's soils.	0

SA objective	M19
9. To maintain and improve the quality of the Borough's waters.	0
10. To reduce air pollution and ensure improvements in air quality.	+
11. To avoid and mitigate flood risk.	0
12. To minimise the Borough's contribution to climate change.	+
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	0
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	0
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	0

- 3.6 As can be seen, policy M19 is set to have a similarly positive impact across the whole, including with significant positive impact expected for the economy.
- 3.7 No material identified negative impacts are associated with M19 under the assessment.
- 3.8 The assessment scoring of other policies can be found at appendix 1.

4 POLICY S1 (PART) BOROUGH SPATIAL STRATEGY

Relationship with existing policy

- 4.1 Policy S1, establishing the Borough’s overall spatial strategy, includes clauses on the economic strategy. In terms of the overall planned distribution of economic development, the areas featured in adopted plans remain proposed for further growth in the new Local Plan. This reflects the successful establishment/ maintenance of employment areas, with substantial new economic development, and the continuing general vitality of local retail centres, under existing strategy.
- 4.2 Amendments to the adopted policies include featuring (through policy S1: 8 for example) a more coherently expressed set of locations driving economic related development. Updating also includes reference to targeting development for enhanced productivity, and - reflecting recent progress in Dartford Town Centre for example - an emphasis on creative industries. There is no change to the centres included within the retail network other than confirming individual future centres expected/ in delivery within Ebbsfleet Garden City; however strategic expansions are proposed to some Identified Employment Areas on the Policies Map.

Table 3: Proposed and Existing Policies

Proposed Policy	Existing Policy
<p>S1:7 Significant jobs, major commercial activity and new employment premises will be prioritised within Central Dartford and Ebbsfleet Garden City. Economic development will occur at locations elsewhere in the urban area where this is consistent with sustainable growth patterns and provides suitable improvement and expansion/ intensification of commercial locations. Economic growth will be based on a strategy of:</p>	<p>CS2 and CS3: - Several parts of these policies seek commercial development/ jobs, and retention of existing employment, at Central Dartford e.g. CS2:c,d and f; and CS3:1b,5</p> <p>CS7: - The clear emphasis of new employment development is on locations at Ebbsfleet, Central Dartford and elsewhere in the urban area e.g. The Bridge in criteria 2 and 3</p>
<p>S1:7a) supporting the growth of existing local businesses within the Borough, and encouraging start-ups and small/ medium sized enterprises;</p>	<p>DP20: - The need to support small or medium size enterprises in the Borough is mentioned in Development Policies Pplan paragraph 13.5</p>
<p>S1:7b) promoting enhanced productivity, targeting growth sectors and clusters of high technology or creative, industries; and</p>	<p>CS8: - Key “growth sectors” for the Core Strategy are listed in criterion 1 - Specific knowledge based (technology/ science/ research and development) opportunities are promoted in criterion 4</p>
<p>S1:7c) increasing professional and managerial employment.</p>	<p>CS9: - Finance, business and IT are included as future growth sectors for skills</p>

Proposed Policy	Existing Policy
	<p>development (amongst others) at criterion 1a</p> <p>CS8:</p> <ul style="list-style-type: none"> - A knowledge based economy and office uses are promoted throughout CS8, with clause 3 seeking government offices relocated from central London
<p>S1:8. Economic development and jobs growth will be delivered principally through supporting development opportunities, to deliver:</p> <p>a) Planned strategic expansions at, or additional floorspace within, the identified employment areas.</p>	<p>CS7:</p> <ul style="list-style-type: none"> - Job growth will be achieved through planned measures including protection of existing employment areas and take up of vacancies
<p>S1:8b) Redevelopment for modern retail/ leisure premises and community facilities within the retail centres. The network of retail centres comprises:</p> <p>i) Dartford Town Centre, which will attract a wide range of new businesses;</p> <p>ii) Bluewater, which will continue its regional economic contribution;</p> <p>iii) District Centres at Dartford, Ebbsfleet, Swanscombe and Longfield; and</p> <p>iv) Local Centres in the urban area and at villages.</p>	<p>DP14:</p> <ul style="list-style-type: none"> - A network of centres including Dartford Town Centre, Bluewater, Ebbsfleet, District Centres and Neighbourhood Centres is confirmed Paragraph 2.2, all centres across the Borough are illustrated in DP Plan Figure 4

Local evidence

4.3 The primary Local Plan evidence on Business and Retail relevant here is contained within:

DBC (2021) Economic Land Report

4.4 This report focuses on job-generating development proposals and policies, especially the main industrial/ office locations. It considers changes at the identified employment areas in the Borough and their continued viability, concluding on the resulting distribution at paragraph 5.14.

4.5 Identifies and justifies in detail the expansions to identified employment sites (Policy S1: clause 8a). The strategic expansion opportunities are identified in section 2A of the Report, assessed in detail against national criteria at Section 3/ Appendix A, and confirmed in conclusions (Report section 5).

DBC (2020) Employment Needs Review

- 4.6 This reviewed Dartford's levels and patterns of economic development activity, and remains applicable (although certain quantitative evidence is updated in the 2021 Report above).
- 4.7 The growth and potential of certain sectors, notably high technology industries (featured in policy S1 clause 7b) at locations in the Borough is highlighted in the conclusions chapter, notably at Paragraphs 5.1 to 5.7.
- 4.8 It shows there are locations in the Borough that have attracted office development (for example in section 3 of the document) and have the potential to address the deficiency in professional/ managerial employment documented in Local Plan paragraph 1.27 and addressed in policy S1: 7c.

LSH (2021) Dartford & Ebbsfleet Retail and Leisure Study, published in four parts

- 4.9 The Part 1 document, has chapters 5 and 6 devoted to Dartford Town Centre, chapter 7 on the District Centres, and at Chapter 8, Bluewater.
- 4.10 Part 2 outlines the makeup of the retail network for policy S1 (clause 8b) with current centres and national policy addressed at paragraphs 12.106 to 12.112 of chapter 12 of the study.

5 POLICY S4 (PART) BOROUGH DEVELOPMENT LEVELS

- 5.1 Policy S4 Borough Development Levels (Criterion 6) outlines the strategic Borough-wide approach to delivery rates of new town centre, community and employment development.

Relationship with existing policy

- 5.2 In terms of the scale of growth, changes are made as a result of the new provisions of the Plan and Use Class Order changes. The total in the old policy equated to an average of 37,500sqm a year business uses through the Core Strategy. The total average development quantum in 6 b) and c) of the new policy totals 47,000sqm and therefore represents an increase of 25.3% from the Core Strategy rate; albeit this now includes community infrastructure.

Table 4: Proposed and Existing Policies

Proposed Policy	Existing Policy
<p>S4:6 Supporting the delivery of sustainable development aims and Dartford’s economic strategy and regeneration areas, planning decisions will take account of the desirability of providing:</p> <p>a) a balanced mix of land uses in the Borough and within neighbourhoods;</p>	<p>CS11: - The opening sentence of this policy focuses on “the delivery of a balanced relationship between homes, jobs and infrastructure”, with the rest of the policy outlining how to should occur in the Borough</p> <p>DP6: - Concerning “Sustainable Residential Locations”, unplanned windfall development should be within/create communities well served by accessible community facilities, shops, employment etc.</p>
<p>S4:6 b) approximately an average rate of 22,000sqm per annum of new commercial, business and services uses, and community and learning uses (including offices, health facilities and schools); c) approximately an average rate of 25,000sqm per annum of new industrial/ distribution premises.</p>	<p>CS7: - Part 1 of this policy seeks employment through 750,00sqm of B1, B2, B8, A2 and sui generis development</p>

Local evidence

- 5.3 The primary Local Plan evidence on Business and Retail relevant here is contained within:

DBC (2021) Economic Land Report

- 5.4 This includes the derivation of the part of economic development policy at S4:6b) and c).
- 5.5 The Local Plan approach within which S4:6 operates is identified in the report. Paragraph 5.3 notes that under the proposed policies “economic development proposals would therefore be supported ‘in principle’ after consideration of compliance predominantly with spatial policy and area based criteria” (which would include M19 and M21), the chapter goes on to focus on identified employment areas accordingly. Paragraph 4.12 states that quantitative criteria should be applied flexibly, consistent with national policy objectives, as “points with the potential to surpass where sustainable land capacity is demonstrated”.
- 5.6 Section 4 outlines the methodology, supported by the details and calculations in Appendix C. Consistent with housing strategy, the Borough applies a regeneration potential based strategy for high growth. Paragraph 4.98 presents the findings featured in policy criteria b) and c), and a chart is included to show the resulting further uplift in delivery rates - the solid lines - against a scenario where recent (relatively high) levels of delivery rates continue – shown dotted. Appendix C sets out the clear methodology, and calculations in columns of the table, left to right:
- Column ‘a’ shows the recent delivery total (4years in plan period).
 - Column ‘b’ shows the large pipeline and commitments, accounting fully for planning permissions, Local Plan development allocations, and the extensions to employment areas proposed by the Plan.
 - Column ‘c’ provides a market adjusted figure to support future delivery, including an extra 10% buffer or allowance for choice and competition, reflecting best practice.
 - Column ‘d’ provides an aggregate total (made up mostly of the total at column ‘c’ but also accounting for delivery in ‘a’).
 - Column ‘e’ is this grand total annualised. It is calculated on delivery to 2031/32 inclusive as sites are anticipated to be available until build out by that point. However the annual target should be rolled forward to apply to the end of the Plan period.
 - Appendix C also applies the floorspace figures to generate indicative job estimates, using national standard employment density assumptions.
- 5.7 The summary context for the S6 criteria b) and c) is set out in brief in at paragraph 5.2’s summary of section 4, stating: “The resultant quantitative guidance (average floorspace rates) for the two broad development types are shown to imply an acceleration in business/ employment generating rates of development, compared to the current delivery trend. This is due to the new floorspace arising from proposals included in the Local Plan (employment area expansions, and mixed use allocations), new planning permissions, recent delivery, and adding onto this a buffer uplifting the rate further. This would provide an overall guiding context as to Borough- wide performance.”

LSH (2021) Dartford & Ebbsfleet Retail and Leisure Study, published in four parts (including appendices)

- 5.8 The Part 1 document, has chapter 9 on Catchment, Competition and Market Shares, and Chapter 10 setting out the resulting Retail Capacity Assessment in line with national guidance and best practice; with further detailed data and analysis in appendices.
- 5.9 Part 2 (paragraph 12.14) confirms there is no retail capacity net of commitments for 10 years. This is noted in Local Plan paragraph 2.52, and therefore policy S4 and the Plan does not include any floorspace need requirement specifically for retail; albeit ample development sites are available and identified within designated centres in the Local Plan for retail and other main town centre use development.

6 POLICIES M19 AND M20 ECONOMIC DEVELOPMENT

- 6.1 Policy M19 provides overall requirements for sustainable economic locations for the full range of economic development. M20 includes criteria for applicable developments to demonstrate appropriate provision for local business and skills.

Relationship with existing policy

- 6.2 There is strong consistency with existing distribution of economic development locations, but a selective, criteria based, exceptional sites policy is introduced (M19:3) to further comply with national policy, ensuring unanticipated strategic proposals can appropriately be accommodated.
- 6.3 A 280sqm threshold for out of centre retail impact assessment is now applied, reduced from 500sqm on the recommendation of the retail and leisure study.

Table 5: Proposed and Existing Policies

Proposed Policy	Existing Policy
<p>M19:1 New business and services in use classes B and E will be supported where appropriately located and designed, with major developments to be accessible by good public and active transport, at:</p> <p>a) Central Dartford and Ebbsfleet Garden City; or b) Identified employment areas; or c) The network of retail centres (Table 7).</p>	<p>CS1: - Dartford Town Centre/ Northern Gateway and Ebbsfleet to Stone are priority areas to maximise regenerate benefits</p> <p>DP20: - At Identified Employment Areas, development for B class and industrial uses is supported, subject to details</p> <p>CS12: - Shopping centres (Core Strategy Table 3) are to be developed and supported, and the main foci for retail and leisure activity. Core Strategy Table 3 Role of Retail Centres of the new Plan is now mirrored in Table 7, featuring the same column headings</p>
<p>M19:2 Outside the network of Retail Centres, and where not in accordance with Identified Employment Area policies, developments classified as main mown centre uses must be accompanied by:</p> <p>a) a sequential assessment; and b) an impact test for developments of 280sqm gross or more.</p>	<p>DP14: - Clause 1 applies the sequential test - Clause 4 applies the impact test for proposals over 500sqm outside centres</p>
<p>M19:3 Strategic investment proposals for large new research and development facilities, offices or high technology industrial premises, of a form not already provided in the Borough, will be supported where</p>	<p>CS8: - A knowledge based economy and office uses are promoted throughout CS8, with clause 3 seeking government offices relocated from central London</p>

Proposed Policy	Existing Policy
<p>sustainably located at Central Dartford, Ebbsfleet Garden City or at/ adjacent to identified employment areas. If there is no prospect of accommodating the development at these locations, such uses may exceptionally be considered elsewhere where:</p> <p>a) it is robustly evidenced that clear substantial local benefits are secured, including through the scale and type of new employment opportunities generated and improved sustainable transport provisions; and</p> <p>b) there is a demonstrable extraordinary economic need for the development in the Borough.</p>	<p>- Specific knowledge based (technology/science/ research and development) opportunities are promoted in criterion 4</p> <p>DP20:</p> <p>- Criterion 2 and 3 of this development management policy mean that wider economic/ job benefits can be used to justify development at priority areas, where identified employment areas would not otherwise allow</p>
<p>M20:1 Large proposals for offices, industrial/ distribution, retail/ leisure and other uses in use classes B and E exceeding 20,000sqm gross, should contribute to the accommodation needs of local businesses and training needs of the Borough's workforce. Applicable developments will be permitted where they:</p> <p>a) include a mix of premises/ commercial land commensurate with total site size which deliver:</p> <ul style="list-style-type: none"> • a proportionately significant number of small units or premises designed to provide for local start-up/ 'move on' business accommodation; or • premises/ land that is shown to be constructed for, or targeted to, the needs of the Borough's small/ medium sized enterprises, including through premises available to rent or buy at a discount, or employment land premises delivered in a form to secure local businesses (potentially including land predominantly for open storage); and <p>b) secure the delivery of local skills training or apprenticeships and work placements within the completed development itself or through construction/ the supply chain.</p>	<p>CS9:</p> <p>- Seeks the economic transformation of the Borough with developments "commensurate to their size" required to contribute skills and training measures</p> <p>DP20:</p> <p>- The need for developments to provide business units for small or medium size enterprises is included in DP Plan Paragraph 13.5</p>

Local evidence

6.4 The primary Local Plan evidence on Business and Retail relevant here is contained within:

DBC (2021) Economic Land Report

- 6.5 This report notes Local Plan objectives I2 and I4 in particular and concludes (Section 5) there are extensive sustainable economic development opportunities, especially through strategic expansions, at the identified employment areas. Paragraph 5.24 confirms that, in light of Dartford's economic needs and strategy these need to be complemented by the opportunities at Ebbsfleet and Dartford town centre.
- 6.6 Paragraph 5.19 and 5.20 explain and map the existing economic development pattern matching with key identified employment areas and retail centres in policy.
- 6.7 Discusses area/ site specific policy being complemented by Borough-wide policy, with report section 5 noting the need for appropriate criteria to allow for "highly valuable new proposals of demonstrable substantial additional potential that may emerge over time".
- 6.8 Paragraph 5.23 also highlights the aim of provisions within large scale economic development for inclusive growth; similarly paragraph 5.21.

DBC (2020) Employment Needs Review

- 6.9 Section 2 notes a greater than regional average proportion of residents without qualifications.
- 6.10 The growth/ presence of large employers, and dominance of certain areas, is documented in section 3. In terms of new development, this section shows (over a 10year period) one completion over 20,000sqm, and six developments 10,000-20,000sqm. This supports the threshold in M20.
- 6.11 Section 4 documents the high and growing rental levels commanded by new employment developments in the Borough.

LSH (2021) Dartford & Ebbsfleet Retail and Leisure Study, published in four parts (including appendices)

- 6.12 Part 2 (Table 12.2) sets out the network of retail centres as featured in Local Plan Table 7.
- 6.13 Paragraph 12.119 onwards confirms an impact threshold should apply and for locations outside centres in the retail network of the new Local Plan this should be 280sqm, aligning with Sunday Trading legislation.

7 POLICY M21 IDENTIFIED EMPLOYMENT AREAS

7.1 Policy M21 is an important development management policy, covering the many identified employment areas across the Borough, four of which now feature additional land (for strategic expansions). It is structured around the nature of the development proposal so it is clear how appropriate additional floorspace can be accommodated.

Relationship with existing policy

7.2 The approach of retaining employment areas and seeking better quality areas has remained but become more refined to address new use classes and range of economic potential: confirming the appropriate scope for diversification, and providing better development management criteria relevant to the proposal i.e. the contrasting needs of industrial and service proposals (and environmental/ transport requirements).

Table 6: Proposed and Existing Policies

Proposed Policy	Existing Policy
<p>M21:1 Identified employment areas will be maintained and developed for additional high quality, accessible and affordable commercial premises, and a more diverse range of new jobs in line with the Plan's economic strategy, with improved transport provision and environmental benefits achieved. Additional business floorspace will be supported where proposals meet criteria 2 or 3.</p>	<p>CS7: - The principle of protection of employment areas is set in criterion 1c</p> <p>DP20: - At Identified Employment Areas, development for B class and industrial uses is supported depending on minimising adverse local and environmental impacts</p>
<p>M21:2 <u>Industrial development proposals</u> Development for industrial or distribution uses will be supported where they will improve the commercial quality, functional operation and environment of sites. Proposals will be expected to:</p> <p>a) Be designed to be of a form to reduce adverse impacts through new suitably scaled and designed buildings and layouts, landscaped buffers, and other environmental improvement or physical regeneration measures across the site; and</p> <p>b) Achieve better management of:</p> <p>i. Harmful or nuisance creating activities, including from dust, paint or other chemical over-spray, glare or light spill; or</p> <p>ii. Goods vehicles access, parking, waiting (including for loading and</p>	<p>DP20: - Includes within criterion 1 a requirement for compatibility within the area, promotes enclosure of operations within buildings, and lists a range of detailed factors/ processes against development should be made acceptable (including 'traffic')</p>

Proposed Policy	Existing Policy
unloading) on amenity, safety and congestion, as applicable.	
<p>M21:3 <u>Services business development</u> Development for other service based business premises will be supported where they enhance and sustainably intensify employment sites in line with the economic strategy. Proposals will be expected to:</p> <p>a) For major development for office or research and development, be located within easy walking distance of a railway station or Fastrack stop, or, failing this, the Travel Plan should achieve measures that demonstrate significant reductions per job in private vehicle movements during peak hours.</p> <p>b) For supporting businesses for visitors, be located and designed for use by employees of other businesses in the identified employment area, and not individually or cumulatively undermine the operation and status of the employment area or nearby centres in the retail network.</p>	<p>CS7:</p> <ul style="list-style-type: none"> - Employment areas expected to include B1 and A2 uses (criterion 1c) <p>DP20:</p> <ul style="list-style-type: none"> - Criteria 4 and 5 are devoted to facilities that are ancillary to employment areas allowing small scale walk-to services, and appropriate direct goods sales (where not harming nearby centres)
<p>M21:4 <u>Other proposals at Identified Employment Areas</u> Where a need from businesses in the vicinity is shown, hotels will be supported if the proposal supports sustainable transport, and the sequential test is passed in relation to alternative in centre and edge of centre locations. Non-job generating development will not be permitted within identified employment areas.</p>	<p>CS7</p> <ul style="list-style-type: none"> - Criterion 1c protects employment areas from “non-employment uses”

Local evidence

7.3 The primary Local Plan evidence on Business and Retail relevant here is contained within:

DBC (2021) Economic Land Report

7.4 This report is heavily centred on the definition of, and policy for, identified employment areas.

7.5 A structured process of identification of sources for changes to the areas is included in the report:

- As outlined at paragraph 1.18, Section 2 looks at planning applications, employment locations put forward by businesses to feature in the Local Plan and the potential loss of employment land considered through the SHLAA.
 - This feeds into an evaluation/ findings at Section 3 for strategic expansions of the areas, proposing c.100ha of additional identified employment area land.
 - Appendix A includes the detailed scoring against PPG criteria. All new employment (B-class) sites put forward through the stages of Local Plan formation are included. Consequently, expansions to the Riverside/ Northern Gateway, Crossways, The Bridge/ Littlebrook and Burnham Road identified employment areas are featured in the Report conclusions (section 5) and proposed Policy Map changes.
- 7.6 The report concludes on the basis of market evidence no employment areas in the Borough should be wholly deleted in this Local Plan. Section 2 points to evidence of healthy developer interest in new employment land and only limited proposals to change use (including to residential). Boundary updates include both expansions and reductions reflecting market demand in line with national policy (reput paragraphs 5.5 to 5.6). Minor proposed deletions are explained/ shown in Appendix B.
- 7.7 At the end of the main body of the report, Part C of section 5 reflects on overall Plan objectives, including in relation to the location of travel generating uses by good public transport. It recognises the economic importance of non-industrial areas (e.g. offices/ service business) and mixed use strategic sites, particularly where co-location promotes walking and cycling.
- 7.8 Paragraph 5.19 and 5.20 explain and map the existing economic development pattern matching with key identified employment areas and retail centres in policy.
- 7.9 It discusses area/ site specific policy being complemented by a Borough-wide policy, with section 5 noting the need for appropriate criteria for “highly valuable new proposals of demonstrable substantial additional potential that may emerge over time”.
- 7.10 Paragraph 5.23 also highlights the aim of providing within large scale economic development for other/ local forms of business i.e. inclusive growth; similarly paragraph 5.21.

DBC (2020) Employment Needs Review

- 7.11 This report researches and illustrates the positive economic development of the Borough, underpinning the case for retention of the principle of identified employment areas; in particular:
- The clusters of large employers, including at identified employment areas, are set out in section 3
 - Providing a robust basis for consideration of needs (in accordance with national guidance) the market segment analysis is in section 4.

8 POLICY M22 BLUEWATER

- 8.1 This policy provides a specific approach for development at Bluewater, which is part of the identified retail network and shown on the Policies Map.

Relationship with existing policy

- 8.2 Bluewater as a special, purpose built facility, for a growing region identified for regeneration, has been subject to extensive consideration in previous Local Plans/ planning applications. However the fundamental changes in the retailing landscape are now as relevant to Bluewater in addition to traditional town centres, and therefore new evidence is also pertinent.
- 8.3 The principle of recognising Bluewater as a centre within the hierarchy in the Core Strategy is retained, as are criteria for it to appropriately develop and evolve, tested through assessment and consultation with other authorities and with regard to impact on other (town) centres. A number of criteria are rolled forward unchanged, but the policy has been updated in response to changing circumstances and latest evidence. The Local Plan has now however set out when the wide range of E and F class (and C1 hotels) are allowed. Reflecting the retail and leisure study and the basis for growth potential in other town centres, the sequential test is proposed to be introduced specifically for indoor leisure uses proposed at Bluewater. A retail/ leisure impact assessment will be required for proposals over 2,500sqm, drawing from national policy; updating the previous approach of a 5,000sqm allowance for certain developments.

Table 7: Proposed and Existing Policies

Proposed Policy	Existing Policy
<p>M22</p> <p>1. The appropriate evolution of Bluewater, to maintain its economic contribution, quality and distinctiveness as a contemporary regional centre, will be supported subject to assessment of local and regional implications as set out in criteria 2 and 3.</p> <p>2. Development for activities including those in use classes C1, E and F at Bluewater will be permitted where:</p> <p>a) Proposals do not individually or cumulatively undermine its role as a regional shopping centre, and are shown to be necessary to maintain or enhance its quality and performance relative to other regional centres/ competitors;</p> <p>b) Impact on the highway network is minimised, and improved access by and to public and active transport is</p>	<p>CS4:</p> <ul style="list-style-type: none"> - Criterion 1f) of this policy seeks the physical integration of Bluewater through foot/ cyclepaths and Fastrack; and options for the evolution of Bluewater will be discussed <p>CS12:</p> <ul style="list-style-type: none"> - Bluewater is identified as a centre within the Borough's network of shopping centres, along with Dartford Town Centre and small centres in the Borough, in criterion 1 (and Table 3). (Sequential testing has therefore not been applied under current policy for any proposals within Bluewater as defined on the 2017 Policies Map). - Criterion 2 confirms centres including Bluewater as a focus for shopping and leisure - Criterion 3 supports development according with the planned role of

Proposed Policy	Existing Policy
<p>secured where appropriate. Measures to be featured in a robust Travel Plan should include: high quality/ expanded interchange facilities; support for further Fastrack services where feasible segregated and safe walking and cycling routes; and secure cycle parking. particular focus should be given to measures to increase uptake of sustainable travel by employees and nearby communities;</p> <p>c) The original design integrity of the centre is maintained; and</p> <p>d) The parkland setting is maintained and enhanced as a recreational and biodiversity resource and as flood risk mitigation;</p> <p>3. Development for retail or leisure use also needs to demonstrate that the proposal:</p> <p>a) Is of a use and form demonstrated to be consistent with Bluewater’s role (Table 7), and offers activities and premises that create an overall experience that is distinct from that of nearby town centres; and</p> <p>b) Is acceptable after evaluation through impact assessment for retail/ leisure proposals over 2,500sqm (gross), and sequential testing for indoor leisure, which will take into account neighbouring town centres and regional implications. Assessment/ testing shall be carried out in consultation with neighbouring local and strategic authorities.</p>	<p>centres (Table 3) which at Bluewater includes providing services such as specialist comparison and top-up convenience goods, leisure, and hotel uses</p> <ul style="list-style-type: none"> - Criterion 5 sets out how proposals at Bluewater will be assessed, including supporting Ebbsfleet, and sustainable travel. The shopping offer should be distinct from nearby town centres, and any retail assessment of impact required should be in consultation with neighbouring authorities - Criterion 6 sets out environmental related requirements for development proposals. Clauses b) and c) have been rolled forward to become c) and d) in proposed policy M22 criterion 2 <p>DP14:</p> <ul style="list-style-type: none"> - Paragraphs 12.11 to 12.12.15 clearly explain how the existing Bluewater strategy operates for planning applications i.e. application of the impact test from national policy, and the justification for the still largely unimplemented permission to expand Bluewater

Local evidence

8.4 The primary Local Plan evidence on Business and Retail relevant here is contained within:

LSH (2021) Dartford & Ebbsfleet Retail and Leisure Study, published in four parts (including appendices)

8.5 Part 2 has a chapter devoted to Bluewater, including:

- Paragraph 8.4 notes it employs over 7,500 people, mostly local residents.

- Paragraph 8.5 sets out construction was permitted in 1990 by the Secretary of State. Paragraph 8.6 outlines subsequent planning permissions, noting their small scale; with the exception of a 2017 outline permission (superseding a similar scale unimplemented one from 2013). Paragraphs 8.7 to 8.9 explain this large permission and progress on the development. Paragraph 8.10 outlines a major outdoor leisure facility proposal that has been recently implemented.
- Paragraphs 8.13 to 8.16 briefly summarise local planning policy.
- Paragraph 8.17 shows that Bluewater has grown by 5.6% due to the delivery so far of the 2017 permission.
- Table 8.2 shows Bluewater is the fourth largest shopping centre in the UK, however it is smaller than the centre at Stratford built by Westfield in 2008.
- The chapter then details the nature of retailer representation at Bluewater. For example paragraph 8.19 states it is “dominated by comparison goods retailing”, over half of units (59%) are for comparison retail.
- Paragraphs 8.31 discusses vacancy levels at Bluewater. Paragraphs 8.35 to 8.38 detail rental values.
- Paragraph 8.49 summarises Bluewater’s position through a table of strengths, weaknesses opportunities and threats (SWOT). It is concluded that opportunities include its setting, Fastrack, leisure and hotel potential, and the extant retail permission. Threats include declining demand/ restructuring of sectors, and nearby competition e.g. at Stratford and Lakeside.

8.6 Part 2 provides key conclusions:

- Paragraph 12.93 states that evidence shows there is unlikely to be a need for further retail permissions over the plan period, as there is not the capacity/ quantity of economic need.
- Paragraph 12.94 advises new foodstores/ convenience retail are generally inappropriate, given the need to deliver this form of retailing elsewhere within the planned network of centres.
- Paragraphs 12.95 to 12.97 recognise questions arise over how Bluewater should evolve, but point to viable development potential for hotels and new outdoor leisure uses. Paragraph 12.100 concludes policies should be in place for assessment of the “impact” of retail/ leisure proposals. Paragraph 12.101 concludes that although not required under current policy, the sequential test should be introduced to cover indoor leisure uses.

9 POLICIES D3, M23 & M24 TOWN CENTRE, DISTRICT/ LOCAL CENTRES AND FOOD/DRINK ESTABLISHMENTS

- 9.1 Policy D3 outlines the mix of ground floor uses expected in Dartford Town Centre, M23 sets criteria for uses in District and Local Centres, M24 sets requirements concerning pubs, bars, takeaways and nightclubs.

Relationship with existing policy

- 9.2 There is continuity of general approach, although new use classes have been applied and produce some liberalisation of requirements. In particular the policy on mix of uses within Dartford town centre is new and its scope has become more focussed, with a smaller Core Frontage, flexible so that it is open to all Class E uses; elsewhere in the town centre a very wide range of uses are permitted (including but not limited to nationally defined main town centre uses); and residential activity is now actively promoted across the town centre as a whole through a range of sources.
- 9.3 Policy for smaller centres have effectively been rolled forward from before i.e. M23 is just a merger of 2017 policies DP17 and DP18 (with Neighbourhood Centres now called Local Centres), but recast in the new use classes; the only material change being introducing a clause on the explicit promotion of mixed use redevelopment including for local environmental benefit. This reflects the relative strength (for instance low vacancy rate) of the Borough’s smaller centres. M24 is very similar to DP19 apart from a pub clause now reflects recent legislative moves to enhance retention where appropriate.

Table 8: Proposed and Existing Policies

Proposed Policy	Existing Policy
<p>D3:1 A diverse mix of ground floor uses is expected in Dartford Town Centre. The Core Frontage identifies the Town Centre’s streets that should be characterised by an active mix of uses at ground floor, high levels of daytime pedestrian activity, and a clear sense of history, all befitting a bustling market town. In this respect, the following will apply:</p> <p>a) In the Core Frontage, changes of use, or redevelopment consistent with Conservation Area and other design/ heritage principles, for retail, leisure, services and other uses in use class E will be permitted where an active window display to the frontage is maintained if possible.</p>	<p>DP15:1/2</p> <ul style="list-style-type: none"> - Seeks revitalisation of the town centre through new town centre uses, with requirements in the primary frontage for A1 or A2 use, or A3 or A4 activities subject to certain criteria. The primary frontage included the proposed Core Frontage, and other streets and the shopping centres
D3:1	DP16:

Proposed Policy	Existing Policy
<p>b) Elsewhere in the town centre, and at vacant units in the Core Frontage where sufficient effective marketing for Class E use has occurred, other main town centre uses, businesses and services will also be permitted, including food and drink uses, hotels, cultural, local community uses and other uses within use class F.</p>	<ul style="list-style-type: none"> - Sets a range of criteria for which other uses are allowed across the rest of the town centre
<p>D3:2 It is expected that residential development will occur principally through:</p> <ol style="list-style-type: none"> a) strategic allocations identified in policies D4, D5 and D6; b) high quality conversion/ extension of upper floors or under-used buildings; and c) new residential developments in the housing land supply, located in accordance with policy D7, or sites demonstrated to be suitable in the town centre. 	<p>CS2:1c</p> <ul style="list-style-type: none"> - Seeks to deliver town centre homes and jobs in addition to retail and leisure uses. Other parts of CS2 promote residential use on certain sites <p>DP16:</p> <ul style="list-style-type: none"> - Makes provision for residential uses in non-designated parts of the town centre
<p>M23: 1 Mixed use development within District and Local Centres will be acceptable where:</p> <ol style="list-style-type: none"> a) At ground floor level, one or more viable modern commercial/ community units are provided for suitable active uses in line with criterion 2 or 3 as applicable, and is of proportionate scale and form to the vitality and purpose of the centre (Table 7); and b) It is demonstrated to improve the local environment of the centre. 	<p>CS12:</p> <ul style="list-style-type: none"> - The sole District Centre identified in the Core Strategy (Longfield in Table 3) is included in centres for development in Criterion 1 <p>DP15 :</p> <ul style="list-style-type: none"> - Permits full use of upper floors in developments, and seeks maintenance of a shop unit at ground floor level
<p>M23:2 <u>District Centres</u> Change of use for use class E, F or service sui generis use will be permitted at District Centres where:</p> <ol style="list-style-type: none"> a) more than 50% of the ground floor units are currently in use classes E and F use; or b) the existing unit is vacant and has been demonstrated to be not viable for use class E, F or service sui generis use through sufficient effective marketing. 	<p>DP17:</p> <ul style="list-style-type: none"> - This policy, exclusively on District Centres, is very similar - The changes are limited to updating due to new Use Class e.g. clause on class A5 removed. It is now proposed to permit a wider mix of uses as a result
<p>M23:3 <u>Local Centres</u> Change of use will be acceptable where two or more units within use classes E or F2 are to be retained within the Centre and:</p>	<p>DP18:</p> <ul style="list-style-type: none"> - This policy, exclusively on what were then called Neighbourhood Centres, is extremely similar - The changes are limited to updating due to new Use Class

Proposed Policy	Existing Policy
<p>a) the prospective activity is not already provided within the centre, and is non-residential; or</p> <p>b) the existing unit is vacant and has been demonstrated to be not viable for any use class E use through sufficient effective marketing.</p>	
<p>M24</p> <p>1. Hot food takeaways, nightclubs, bars and public houses will only be acceptable where the following criteria are met, taking account of potential cumulative impacts:</p> <p>a) there will be no material detrimental effects on the residential amenity of neighbours;</p> <p>b) there will be no material detrimental effects on the local environmental quality as a result of noise, vibration and smells; and</p> <p>c) access, servicing and parking arrangements for the proposal will not result in an adverse material impact on the safety and traffic flows or cause unacceptable increases to traffic and parking.</p> <p>2. The local planning authority will seek to prevent the inappropriate location or clustering of takeaway premises. Hot food takeaways will normally be acceptable only within the designated network of retail centres, and will normally be refused adjacent to an existing or approved hot food takeaway unit (other than at Bluewater).</p> <p>3. The proposed loss of public houses in the Borough will only be acceptable where sufficient effective marketing of the premises has been carried out which demonstrates that it is not viable as a public house or for local community (use class F2) use.</p>	<p>DP19:</p> <ul style="list-style-type: none"> - This policy, is very similar with changes due to updating from new Use Classes. - Use Class changes have created a need for Criterion 3 which is new

Local evidence

9.4 The primary Local Plan evidence on Business and Retail relevant here is contained within:

LSH (2021) Dartford & Ebbsfleet Retail and Leisure Study, published in four parts (including appendices)

- 9.5 The Part 1 document, has chapter 7 on the District Centres, confirming their overall viability and vitality, with some potential for environmental improvements.
- 9.6 Part 2 outlines the makeup of the retail network including these centres:
- Paragraphs 12.107 and 12.108 discuss centres covered by M23. Table 12.2 highlights the appropriate new centres (within Ebbsfleet) for inclusion. Paragraphs 12.108 to 12.111 explain the renaming of Neighbourhood Centres as Local Centres in M23/Table 7.
 - Paragraphs 12.116 to 12.117 are the justification for the Core Frontage i.e. a single primary shopping area (primary and secondary frontages are considered outmoded). It is confirmed this “should be a relatively compact area, to include the core part of the high street”. Paragraph 12.118 supports minor refinements made to the Town Centre boundary, it should include “key town centre facilities and assets, such as the library/museum and the town centre’s supermarkets” which it now does.

APPENDIX 1 SUSTAINABILITY APPRAISAL EXCERPTS

Symbols – Key

++	This option is likely to have a significant positive effect on the SA objective(s).
++/-	The option is likely to have a mixture of significant positive and minor negative effects on the SA objective(s)
+	The option is likely to have a minor positive effect on the SA objective(s).
0	The option is likely to have a negligible or no effect on the SA objective(s).
-	The option is likely to have a minor negative effect on the SA objective(s).
-/+	The option is likely to have a mixture of significant negative and minor positive effects on the SA objective(s).
--	The option is likely to have a significant negative effect on the SA objective(s).
?	It is uncertain what effect the option will have on the SA objective(s).
+/- or ++/--	The option is likely to have an equal mixture of both minor or both significant positive and negative effects on the SA objective(s).

Policy S4: Borough Development Levels

SA objective	S4
1. To ensure that everyone has the opportunity to live in a decent home.	++
2. To ensure ready access to essential services and facilities for all residents.	+
3. To strengthen community cohesion.	+
4. To improve the population's health and reduce inequalities.	+
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	++
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	+
7. To conserve the Borough's mineral resources.	-?
8. To conserve the Borough's soils.	++/-
9. To maintain and improve the quality of the Borough's waters.	-?
10. To reduce air pollution and ensure improvements in air quality.	+/-
11. To avoid and mitigate flood risk.	-?
12. To minimise the Borough's contribution to climate change.	+/-
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	-?
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	-?
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	-?

Policy M20: Provision for Local Business and Skills

SA objective	M20
1. To ensure that everyone has the opportunity to live in a decent home.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To strengthen community cohesion.	0
4. To improve the population's health and reduce inequalities.	0
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	++
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	0
7. To conserve the Borough's mineral resources.	0
8. To conserve the Borough's soils.	0
9. To maintain and improve the quality of the Borough's waters.	0
10. To reduce air pollution and ensure improvements in air quality.	0
11. To avoid and mitigate flood risk.	0
12. To minimise the Borough's contribution to climate change.	0
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	0
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	0
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	0

Policy M21: Identified Employment Areas

SA objective	M21
1. To ensure that everyone has the opportunity to live in a decent home.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To strengthen community cohesion.	0
4. To improve the population's health and reduce inequalities.	0
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	++
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	0
7. To conserve the Borough's mineral resources.	0
8. To conserve the Borough's soils.	0
9. To maintain and improve the quality of the Borough's waters.	0
10. To reduce air pollution and ensure improvements in air quality.	+/-
11. To avoid and mitigate flood risk.	0
12. To minimise the Borough's contribution to climate change.	+/-
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	0
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	0
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	0

Policy M22: Bluewater

SA objective	M22
1. To ensure that everyone has the opportunity to live in a decent home.	0
2. To ensure ready access to essential services and facilities for all residents.	0
3. To strengthen community cohesion.	0
4. To improve the population's health and reduce inequalities.	0
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	++
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	+
7. To conserve the Borough's mineral resources.	0
8. To conserve the Borough's soils.	0
9. To maintain and improve the quality of the Borough's waters.	0
10. To reduce air pollution and ensure improvements in air quality.	+/-
11. To avoid and mitigate flood risk.	+
12. To minimise the Borough's contribution to climate change.	+/-
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	+?
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	0
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	+?

Policy D3: Mix of uses in Dartford Town Centre

SA objective	D3
1. To ensure that everyone has the opportunity to live in a decent home.	+
2. To ensure ready access to essential services and facilities for all residents.	++?
3. To strengthen community cohesion.	+
4. To improve the population's health and reduce inequalities.	+
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	++
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	+?/-
7. To conserve the Borough's mineral resources.	-?
8. To conserve the Borough's soils.	+
9. To maintain and improve the quality of the Borough's waters.	-?
10. To reduce air pollution and ensure improvements in air quality.	--/+?
11. To avoid and mitigate flood risk.	--?
12. To minimise the Borough's contribution to climate change.	+?/-
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	0
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	+/-
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	+

Policy M23: District and Local Centres

SA objective	M23
1. To ensure that everyone has the opportunity to live in a decent home.	+
2. To ensure ready access to essential services and facilities for all residents.	+
3. To strengthen community cohesion.	+
4. To improve the population's health and reduce inequalities.	+
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	+
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	0
7. To conserve the Borough's mineral resources.	0
8. To conserve the Borough's soils.	+
9. To maintain and improve the quality of the Borough's waters.	0
10. To reduce air pollution and ensure improvements in air quality.	0
11. To avoid and mitigate flood risk.	0
12. To minimise the Borough's contribution to climate change.	0
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	0
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	0
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	+

Policy M24: Food and Drink Establishments

SA objective	M24
1. To ensure that everyone has the opportunity to live in a decent home.	0
2. To ensure ready access to essential services and facilities for all residents.	+
3. To strengthen community cohesion.	0
4. To improve the population's health and reduce inequalities.	+?
5. Facilitate a sustainable and growing economy and a vital and viable town centre.	+
6. To reduce the need to travel and encourage sustainable and active alternatives to motorised vehicles to reduce congestion.	0
7. To conserve the Borough's mineral resources.	0
8. To conserve the Borough's soils.	0
9. To maintain and improve the quality of the Borough's waters.	0
10. To reduce air pollution and ensure improvements in air quality.	0
11. To avoid and mitigate flood risk.	0
12. To minimise the Borough's contribution to climate change.	0
13. To conserve, connect and enhance the Borough's wildlife, habitats and species.	0
14. To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the Borough's historic environment.	0
15. To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the Borough's settlements, countryside and landscape.	0