We are after your initial views on the big development and environmental issues facing the Borough. This will help in reviewing Dartford's main existing town and country planning document, the Core Strategy.

Dartford New Local Plan

Strategic Issues Consultation 2018

June 2018

DARTFORD BOROUGH COUNCIL

CONTENTS

Contents

A. CONTEXT 3

LOCAL PLANNING FOR THE BOROUGH'S DEVELOPMENT 3

NATIONAL PLANNING POLICIES APPLYING IN DARTFORD 4

ABOUT THIS CONSULTATION AND FUTURE STEPS 4

B. DARTFORD'S STRATEGIC DEVELOPMENT OBJECTIVES AND ISSUES 6

NATIONAL POLICY AND SCOPE OF THE LOCAL PLAN 6

STRATEGIC PLANNING, INFRASTRUCTURE AND THE DUTY TO COOPERATE. 9

C. FEATURES OF THE DEVELOPMENT STRATEGY FOR THE BOROUGH 12

EXISTING STRATEGIC ISSUES 12

HOMES, WORKPLACES, AND RETAIL AND LEISURE DEVELOPMENT 14

BACKGROUND INFORMATION 14

HOMES (1) 15

HOMES (2) 16

WORKPLACES 17

RETAIL AND LEISURE (1) (INCLUDING DARTFORD TOWN CENTRE) 18

RETAIL AND LEISURE (2) 19

QUESTIONS 19

TRANSPORT AND COMMUNITY INFRASTRUCTURE 21

BACKGROUND INFORMATION 21

TRANSPORT (1) 22

TRANSPORT (2) 23

TRANSPORT (3) 24

COMMUNITY INFRASTRUCTURE (1) 25

COMMUNITY INFRASTRUCTURE (2) 26

QUESTIONS 27

CLIMATE CHANGE MITIGATION & ADAPTATION, AND THE NATURAL & BUILT ENVIRONMENT 28

BACKGROUND INFORMATION 28

NATURAL ENVIRONMENT 29

CLIMATE CHANGE, ENERGY AND AIR QUALITY (1) 30

CLIMATE CHANGE, ENERGY AND AIR QUALITY (2) 31

DESIGN AND CONSERVATION 32
QUESTIONS 33
D. MAIN AREAS AND TYPES OF FUTURE DEVELOPMENT 34
PATTERN OF DEVELOPMENT. 34
STONE, GREENHITHE, SWANSCOMBE AND THAMES RIVERSIDE 36
EBBSFLEET DEVELOPMENT CORPORATION AREA 39
BROWNFIELD LAND AND FUTURE RESIDENTIAL POTENTIAL. 41
ENHANCING OPEN SPACE PROVISION 44
MAINTAINING GREEN BELT LAND 46
LOCAL PRIORITIES 48

SECTION A: CONTEXT

1. Dartford Borough's population and economy is growing. Development of the urban area is bringing regeneration and prosperity. This brings redundant and underused land back to life, and supports local facilities and the plans for new infrastructure. To maximise the benefits of the extra jobs and facilities, and new communities, the Local Plan - which co-ordinates regeneration in Dartford and protects the Green Belt - should be kept up-to-date. The Local Plan plays an important role as the legal basis for deciding whether to approve or refuse new development proposals for the Borough.

LOCAL PLANNING FOR THE BOROUGH'S DEVELOPMENT

2. We are asking for your thoughts on what the next Local Plan for the Borough should contain[1]. This stage is about the 'Big Issues' to address in Dartford's local planning strategy. As explained below, although it will flow from local characteristics and public consultation, it cannot only reflect the views of Dartford's residents and Council; wider needs will also have to be taken into account. In particular, the total level of future housing to find development locations for in the Borough has been set by the government. However, many important questions need to be considered by Dartford as to where new housing, commercial and community development should be located, what form it should take and which existing uses and buildings are a priority to retain.

3. This is the first consultation on a new Local Plan. It looks at current information and asks questions about: the most important strategic development issues now facing the Borough. What are the main economic, environmental and social priorities looking ahead (towards the 2030s); and how these can be addressed through local planning policies that the government will allow to have legal force against developers?

4. The overall approach is currently set out in the adopted 2011 Dartford Core Strategy Local Plan document. The first step in considering a new Dartford Local Plan is reviewing the existing Core Strategy for the Borough, including major development locations, the amount and type of housing, and the approach to commercial uses. Although more than five years old, we think evidence shows that this Plan is performing well in many respects. However, as preparing a new Local Plan is based on substantial technical work and rounds of public consultation, and is not expected to take force for two or three years, we consider we need to start now on updating future development strategy for the Borough.

5. We introduced new development management policies in the adopted 2017 Development Policies Local Plan. This complements the development locations and levels in the Core Strategy by providing more detailed guidance for planning applications received by the Council and the Ebbsfleet Development Corporation (EDC). It accords with national policy, particularly the 2012

[1] This is officially known as a Regulation 18 public consultation, undertaken under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012, as amended

National Planning Policy Framework (NPPF). These policies are all shown on the 2017 Policies Map for the Borough.

NATIONAL PLANNING POLICIES APPLY IN DARTFORD

6. The government have been revising the planning system. In particular, there is now a strong emphasis on housebuilding, and on ensuring this is led by up-to-date Local Plans. We need to look ahead 15 years (or more) in producing strategic, longer term, policies[2]. Dartford's Local Plan documents currently plan towards 2026, so a review of the strategic approach to future development is required.

7. In March 2018 the government issued a revised draft National Planning Policy Framework for public consultation. Dartford has responded to this, and some of the questions below pick up from new proposals by government. A new version of the NPPF will be finalised by government and will apply to the next stages in forming Dartford's new Local Plan.

8. National policy is a very important starting point as the Local Plan will be assessed by an independent Planning Inspector as to whether it complies. This will occur via an Examination in Public process, which takes place after the Council has considered public consultation responses and the results of technical work and then prepared a full draft Plan.

9. Having no Local Plan, or out of date policies, risks many more planning decisions being taken by central government, rather than Dartford Council. This is because developers have a right of appeal to the Planning Inspectorate where Councils do not grant planning permission. Appeals are much more likely to succeed and development be granted where Local Plans are outdated (including by not making sufficient provisions for housing). National planning policy currently requires Local Plans to plan at least 10 years ahead for future housing land supply[3].

ABOUT THIS CONSULTATION AND FUTURE STEPS

10. At this stage it is important to get the views of local residents, businesses and the organisations that provide infrastructure and services for Dartford and the wider area. We welcome all relevant comments, but given the breadth of issues looked at the outset of a Local Plan we have asked some key questions. It is likely that some people may only wish to respond to a selection of questions, but please try and comment on as many as possible.

11. There are considerable existing documents and data to consider when responding to Dartford's strategic issues, especially current and proposed national policy. This document guides people and organisations to them through hyperlinks i.e. embedded links which direct readers to the background documents online. Please email or call us if you have to access this document in hard copy form and need to discuss some of the hyperlinked information (ldf@dartford.gov.uk or 01322 343213).

[2] DCLG, National Planning Policy Framework (2012) para 157
[3] DCLG, National Planning Policy Framework (2012) para 47

12. A review of Core Strategy policies and overall performance has been prepared for this consultation. It is one of the most important accompanying documents prepared alongside this consultation document and we recommend that you consider the documents in parallel. This is a very useful document if you are interested in the context and performance of existing local strategy and the state of play in regenerating the Borough.

13. Section B of this document outlines the existing approach to Dartford's Local Plans and the wider picture in the area. Section C looks at, in turn, housing and economic development, transport and community infrastructure, and then, environmental matters. Finally, Section D focuses on individual areas and current sites, including the Green Belt, Ebbsfleet and local neighbourhoods.

14. The results of this consultation will inform Dartford's consideration of what the preferred and alternative options are for the future development strategy in the Borough. The future strategy will also take into account the results of further detailed technical studies. Further public consultation will follow, providing residents and others with a chance to respond to specific policy proposals. This is likely to be in 2019. For a formal outline of the planned Local Plan programme, see the Local Development Scheme.

    You may wish to view Dartford's glossary of terms set out in the adopted Development Policies Plan in 2017.

SECTION B: DARTFORD'S STRATEGIC DEVELOPMENT OBJECTIVES AND ISSUES

15. This chapter begins to look at what is meant by big strategic planning issues, the most relevant broad topics to consider in preparing a Local Plan, and how to tackle more detailed policy. The strategic issues relate to planning for the long-term through sustainable development and involve revisiting the Core Strategy's aims. This chapter then considers strategic planning issues which go beyond the Borough's boundaries. This raises some major issues to consider in setting goals and local rules, helping outline preparation of Dartford's development strategy.

NATIONAL POLICY AND SCOPE OF THE LOCAL PLAN

16. National policy sets out there are three dimensions to achieving sustainable development, with planning having *an economic role, a social role, and an environmental role*[4]. Usefully, it currently also sets out twelve core land use principles[5] for planning, including Local Plans.

The Core Strategy formulated ten Strategic Objectives for planning, and a Vision for Dartford 2026.

1. What do you think of the current strategic objectives and future vision for Dartford?

17. The review of Core Strategy policies shows that current local strategy has had particular success in achieving economic development and new housing in line with the planned settlement pattern whilst protecting the Green Belt. This major progress also achieves national policy objectives.

18. Eight years remain until the planned end date of the Core Strategy (2026). Whilst several specific objectives have been achieved, some are work in progress or require significant further planning as set out in the review document. This is attributed to the reduction in private development activity, and cuts in public expenditure, following the major economic recession. In the last few years, development levels in the Borough have substantially increased as economic conditions have allowed planned objectives to be delivered. In summary, planned new homes and jobs are on track.

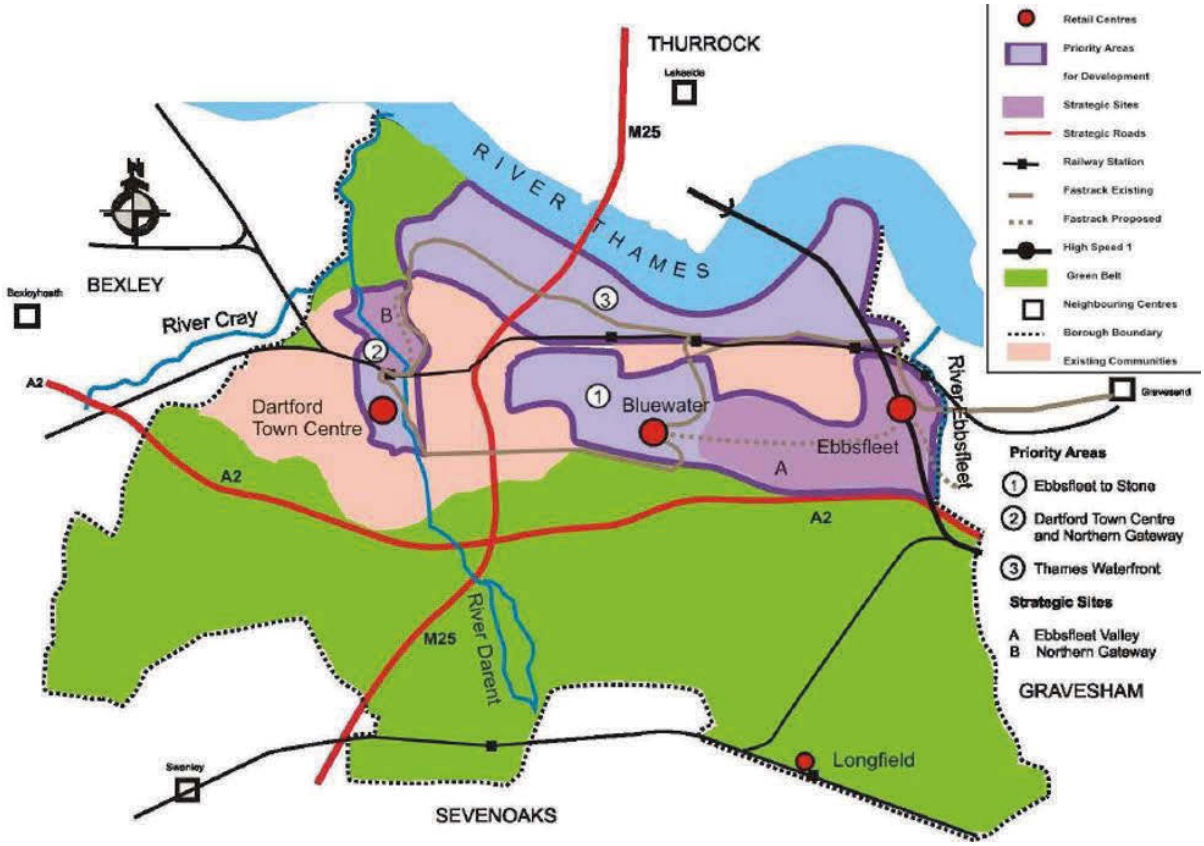
19. Planning local strategy forward to the 2030s is not simply about projecting the existing approach ahead (or just rejecting it). Changes planned are, in some localities in Dartford, well progressed. Elsewhere in the Borough, there are a few planned developments that have not started, for

[4] DCLG, National Planning Policy Framework (2012) Para 7
[5] DCLG, National Planning Policy Framework (2012) Para 17

example by Ebbsfleet International station. Nationally, some changes have also occurred or are planned that were not envisaged when the Core Strategy was in preparation nearly 10 years ago. This includes changes to national planning policy.

20. The successful adherence to the Core Strategy's approach means that the Borough as a whole is being maintained and developing in line with the Dartford Local Plan. The spatial approach is set out in the Core Strategy Key Diagram, shown in Figure 1 below.

Figure 1: Core Strategy: Key Diagram



21. This depiction of the future is still relevant; the Borough's Green Belt designated lands, across the southern half of Dartford, and at Dartford Marshes, have been protected, with development directed to the north of the Borough. Green Belt land is a special planning designation all about openness and permanence. There are no current signals that any further strategic Green Belt changes (or significant greenfield development in it) need occur in the Borough.

22. Nevertheless, preparation for a new Local Plan is considered appropriate to allow for general updating given changes ahead, including:

- the impact of major development (to reflect on the ground circumstances or the emergence of new local environments/ neighbourhoods)
- past and proposed shifts in national policies and legislation, and
- the need to increasingly focus on planning ahead to ensure infrastructure delivery alongside development.

23. The government's focus is on ensuring that local areas have an agreed up-to-date plan in place that covers strategic policies. However it is often qualitative issues such as character and providing the full range of uses for residents in a timely manner, that are typically of local concern. This was one reason for Dartford's production of the 2017 Development Policies Plan; and other additional policy to current strategy (such as the Housing Windfall and draft Dartford Town Centre Framework Supplementary Planning Documents). One consideration now is the extent to which, if at all, we need to revisit the development management policies (e.g. standards for new development, protective designations etc.) in the adopted Development Policies Plan 2017. This could lead to a single Local Plan for the Borough.

24. Supplementary Planning Documents can be produced for the Borough more rapidly but have less power in supporting decisions on planning applications. Similarly, interest in setting out policy to manage local change has also lead to Stone Parish Council starting work on preparing of Neighbourhood Development Plan. This type of Plan can be as influential as a Local Plan. In any event, these local policies should be in general conformity with the Dartford's Local Plan strategy.

2a. Should the next Dartford Local Plan be predominantly concerned with major strategic policies, or is it also necessary to prepare a further update of detailed development management policies?

2b. What do you think is the most important long-term topic for future strategic policies for the Borough?

2c. Is there a pressing need to deliver new local guidance on other policy areas? If so, what should this cover?

STRATEGIC PLANNING, INFRASTRUCTURE AND THE DUTY TO COOPERATE

25. Local Plans have to be produced in the context of a Duty to Co-operate with other public bodies. Notably, there is a focus on co-ordinating with neighbouring Local Planning Authorities so that all Local Plans are informed by consideration of how/ where total housing and commercial development needs and infrastructure requirements will be met in the wider area. This is a legally binding test that the Planning Inspector must be satisfied is met at the start of examining a Local Plan.

26. Dartford has a strong economy and local identity. The Borough however occupies a relatively small area in a very accessible location, so there are high levels of people flowing in and out. This increases the challenge of effective cooperation across boundaries. There are multiple district, county and unitary authorities with which Dartford has a functional or administrative connection. On many measures, including official Travel to Work Areas, the geographic origins of people moving in and independent national assessments of strategic level housing market areas Dartford is within a functional area extending across much of south east England's population that is centred on Greater London[6]. Dartford is one of many authorities that border London, and many more also have significant functional relationships with it.

27. The Council set out its understanding of the current cross boundary strategic matters for the Examination in Public of the Development Policies Plan, and is now in discussion with other authorities producing Local Plans. It is clear that major strategic (cross boundary) matters in Dartford may include:
    - Infrastructure: including problems and future potential improvements to the strategic road and rail network, and education and health provision.
    - Ebbsfleet: Although this plan will focus on Dartford Borough, and planning applications are administered by the Ebbsfleet Development Corporation, Ebbsfleet Garden City also extends into Gravesham Borough,.all within Kent County Council's administrative area.
    - Development needs: including housing, and retail/ economic development.

28. We have been working proactively and collaboratively with public bodies on cross boundary issues, such as input with other South East authorities to the draft London Plan 2017, and, in particular, to take forward strategic transport projects in Dartford e.g. M25/ Dartford Crossing, A2 improvements, and future new rail services.

29. Funding arrangements are a priority consideration in cross boundary infrastructure work led by local authorities. Dartford introduced the Community Infrastructure Levy (CIL) to build up a pool of funds to contribute to the provision of infrastructure in the Borough, as Dartford favours the transparency and simplicity of a levy set out in advance. CIL however is set at a level at which development is generally not rendered unviable, rather than to fill the infrastructure funding

[6] DBC, Interim Duty to Cooperate Statement (2014)

gap. Developer contribution funding for necessary policy and infrastructure requirements should originate from the existing value of land prior to development proposals.

30. The government have reviewed the operation of CIL nationally, alongside Section 106 legal agreements for developer contributions on individual, usually large, developments. This has suggested that the current regime should continue, but be refined. More radical developer contribution proposals under exploration by the government include aiming to front load discussions over developer contributions and requirements to the Examination of Local Plans i.e. in advance of planning applications. The government's consultation suggests a greater interrelationship between the viability evidence used in Local Plan making and CIL rate setting[7]. Updated Borough viability evidence, together with the proposed future operation of CIL and Section 106 agreements, will almost certainly require a review of Dartford's CIL rates.

31. On the geographic scope of a Local Plan, the government recognises potential for strategic policy to be addressed though joint Plans. There are no arrangements in place or proposed in Kent.

32. Dartford Council's view is that the current pattern of individual single Borough Local Plans in the area are capable of being produced most speedily and efficiently, and are best placed to respond decisively to local environmental needs, economic uncertainties and changing central government and local requirements. Accordingly, and in light of the pressing need to maintain ongoing work on new infrastructure within Dartford, the current expectation and programme is a Local Plan for Dartford Borough[8].

33. Any Local Plan will be well informed by key considerations from other areas through the Duty to Cooperate. This should be assisted by the revival of central government interest in the growth potential of authorities on the Thames/ East of London, and cross boundary infrastructure needs[9]. To this end, we outlined and discussed a framework for positive enhanced cross boundary working through a local Protocol for Action and Communications.

34. The government has set out new expectations for cooperation between planning authorities to lead to agreements (Statements of Common Ground) on the development of the wider area, to be reflected in Local Plans. Alongside this, the government also published the proposals for their new national housing need methodology, providing an important context for local authorities as they seek to meet the Duty to Cooperate. The annual requirement for each authority is set out in Figure 2 below for Dartford and its neighbours; along with information on their administrative area.

[7] MHCLG, Supporting housing delivery through developer contributions – consultation document (2018)
[8] DBC, Local Development Scheme (2018)
[9] MHCLG, Thames Estuary 2050 Growth Commission priorities confirmed (2017)

Figure 2: Homes per year under the proposed national methodology (government's 2017 totals)

Local Planning Authority	Area (hectares)	Homesper year under the proposed national methodology
Dartford	7,600	778
Bexley London Borough	6,100	1,723
Gravesham	9,900	508
Sevenoaks	37,000	698
Thurrock Unitary	16,300	1,158

35. This picture is complicated by emerging proposals in the draft London Plan and other Plans in preparation. The government have chosen not to confirm the specific geographies relevant to Dartford or the other authorities for the purposes of taking forward cross boundary cooperation/ agreements.

3a. What do you consider is the main cross boundary planning/ infrastructure issue extending beyond the Borough for the Council to work on with other councils and public sector bodies?

3b. Do you support the aims in the Protocol for Action and Communication?

3c. What do you think are the main implications for the Dartford Local Plan, in the Borough and with cross boundary working, of the government's consultation on the approach to development contributions?

SECTION C: FEATURES OF THE DEVELOPMENT STRATEGY FOR THE BOROUGH

36. This chapter looks at the issues that need to be addressed in planning for the future of the Borough, highlighting key existing evidence and the most critical matters arising looking forward.

EXISTING STRATEGIC ISSUES

37. The government's strategic priorities[10] for Local Plans are as follows:
    - Pattern and scale of development.
    - Homes and workplaces needed.
    - Retail, leisure and commercial development
    - Infrastructure provision for transport, utilities, and flood risk etc.
    - Community, health and cultural facilities.
    - Climate change mitigation and adaptation, and the natural and built environment.

38. The pattern and scale of development is considered in the following chapter, including Green Belt protection. The other topics are addressed in the next part of this chapter, with a series of data sources provided that you may wish to consider. Homes and workplaces are considered alongside retail and leisure; and community infrastructure alongside physical infrastructure (including transport).

39. In terms of local issues within current policy, the Core Strategy Local Plan's themes for Dartford were:
    - Context and Priority Areas for Development [Chapter 1 and 2]
    - Economy, Homes, Shopping, Green Belt & Green Space, and Transport [Chapter 3]
    - Creating Strong and Prosperous Communities [Chapter 4]
    - Sustainable Growth [Chapter 5]
    - And Delivery & Implementation [Chapter 6]

40. These were supplemented by policies in the Development Policies Plan (2017), which includes multiple policies on Transport Management, Housing in Dartford, Heritage & the Historic Environment, Dartford Town Centre and The Green and Open Space Network, and other topics.

[10] MHCLG, Draft National Planning Policy Framework (2018) para 20

41. We consider the above issues are still applicable in the Borough, with a fundamental need to plan for the right type and level of development, for infrastructure provision and environmental protection. The need to have robust plans in place for these issues has, in some cases, intensified; for instance, for transport and travel in Dartford, and maintaining sufficient greenspace, especially in the Green Belt.

4a. Looking at issues identified in current policy, is there anything additional that needs to be tackled in the new Local Plan?

4b. Which issues are of less importance in terms of future strategic policies for the Borough?

42. The remainder of this chapter looks at strategic issues thematically and in turn, setting out a range of information sources and outlining key points for consideration.

HOMES, WORKPLACES, AND RETAIL AND LEISURE DEVELOPMENT

BACKGROUND INFORMATION

EXISTING POLICIES:	
Core Strategy	**Development Policies Plan**
CS2: Dartford Town Centre	DP1: Dartford's Presumption in Favour of Sustainable Development
CS3: Northern Gateway Strategic Site	DP6: Sustainable Residential Locations
CS4: Ebbsfleet to Stone Priority Area	DP8: Residential Space and Design in New Development
CS5: Ebbsfleet Valley Strategic Site	DP9: Local Housing Needs
CS6: Thames Waterfront	DP10: Gypsy, Traveller, and Travelling Showpeople Accommodation
CS7: Employment Land and Jobs	DP14: Retail and Town Centre Development
CS8: Economic Change	DP15: Dartford Town Centre and its Primary Frontage
CS10: Housing Provision	DP16: Dartford Town Centre's Secondary Areas
CS11: Housing Delivery	DP17: District Centres
CS12: Network of Shopping Centres	DP18: Neighbourhood Centres
CS18: Housing Mix	DP19: Food and Drink Establishments
CS19: Affordable Housing	DP20: Identified Employment Areas
CS20: Gypsies and Travellers	

HOMES (1)



• The Borough's **housing requirement** under the proposed **national standard housing methodology**[a] was calculated in 2017 at a minimum of 778 homes per year.

• This is more than past calculations of local need, but less than the averaged current 'up to' aim of 865 homes per year to 2026 to deliver the regeneration of specific large brownfield sites (capacity set out in adopted policy CS10).

• Under Core Strategy policy 622 homes per year have been provided since 2006 (a period both including the recession and aftermath, and recent economic recovery period).

• The Core Strategy was formed in the context of generous brownfield land availability to 2026 across the urban area/ north of the Borough. There is not currently clarity beyond this point, but the availability of brownfield land will likely reduce at some point, depending on the rate of build out, and development may become more focussed on certain locations/ land sources.

• On the basis of existing permissions, at present the Borough has signifcantly over 10 years' worth of housing supply - the national policy obligation for Local Plans - if the requirement is 778 homes per year. However, the developable supply of housing land is changeable, and the annual requirement could increase in the Plan.

• The Borough has **five years' deliverable housing land**[b] supply as required under current and proposed national policy when considering planning applications. In the last three years (2015/16 – 2017/18) in the Borough, total housing delivery equalled 3,164 units, compared to a current requirement (under the government's new methodology) of 2,334 units. If the proposed new Housing Delivery Test were to be applied in this way, the Borough also has sufficient housing land supply on the basis (equating to 136%).

• House prices have grown above the national average. Locally, for example, an increase in house prices of 13% occurred in 2016/17[c].

• In 2016/17, total delivery of **affordable housing** was bolstered by direct-build new council housing by Dartford, and amounted to 213 new affordable homes for residents. According to official national statistics, Dartford provided 550 new affordable units in 2017/18[d].

• Affordable housing delivery, as currently defined in the NPPF, includes social and affordable rented, and applicable 'intermediate' tenures.

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[a] MHCLG, Draft Planning Practice Guidance (2018)

[b] DBC, Five Year Housing Supply (2018)

[c] ONS, UK House Price Index (2017)

[d] KCC, Affordable housing 2016/17 Kent Local Authorities (2018)

HOMES (2)



• The new draft NPPF's glossary proposes to define 'affordable housing' as including Affordable housing for rent, Starter Homes, Discounted market sales housing and Other affordable routes to home ownership. It also identifies Build to Rent, Entry Level Exception Sites, and Rural Exception Sites[e]. This would considerably broaden out the definition of affordable housing and other housing products than under the current 2012 NPPF.

• There is currently no up-to-date local evidence on the overall scale of need for these different types of housing. There are however strong indications to the Council of particularly high needs for affordable housing for rent.

• The government seeks to ensure that only sites of ten dwellings or more contribute to affordable housing provision. This is contrary to existing Dartford policy CS19.

• There are 12 households on the Council's Self Build Register, lower than the level of entries on a number of Registers elsewhere in Kent.

• More information on the type of housing that has been provided is available in Dartford's Authority Monitoring Reports.

• In common with other parts of the country, the **housing needs of specific groups** of the population will require close consideration[f]. Populations are overall increasingly skewed towards old age groups (with major implications for services such as elderly care). The proportion of people aged over 55 is projected to slowly increase in Dartford, but the Borough has a lower than national/county average proportion of these older age groups.

• Through policy DP8, Dartford introduced the nationally described space standards. It also seeks new housing development that is designed to be **accessible/adaptable** for all users and their changing needs over time (through triggering national Building Regulations based standards), particularly by promoting dwellings complying with Category M4(2). The London Plan requires all new build housing to meet these standards, with 90% category M4(2). This provides flexibility of layout/ spaces in homes, and specific construction features, which benefit older people, for example.

• Dartford policy DP6 sets out requirements that developments providing five or more new dwellings, that were not identified with potential at the Core Strategy stage (the existing 'SHLAA') are '**windfalls**' and subject to high sustainability criteria. This is in order to ensure that the focus of additional development is on brownfield sites and that impact on infrastructure such as transport is minimised.

• New national policy is proposed to require one fifth (or more) of Local Plan sites identified for housing **to be on land of half a hectare** or less in size, and additional sources

• The government also expect Local Plans to quantify and address the accommodation needs of Gypsies, Travellers and Travelling Showpeople. And a more 'focused' definition of **traveller** for planning purposes now applies.

[e] MHCLG, Draft National Planning Policy Framework (2018) glossary

[f] MHCLG, Housing and economic development needs assessments guide (2015)

[g] MHCLG, Draft National Planning Policy Framework (2018) para 69

WORKPLACES



• Significant **employment development** has occurred[h]. This has not been split equally between the sectors identified in policy CS8 e.g. 147,000 sq m new B8 (logistics/distribution) compared to 53,250 sq m of B1 (office/light industrial) between 2006-17. Industrial rents are amongst the highest in the country.

• Dartford has increased its volume of jobs by more than any other Kent authority. Over a third of the county's net **increase in jobs** in the five years to 2014 comes from Dartford alone. In that period, Dartford provided nearly 9,000 additional jobs; more than the surrounding four larger Boroughs put together (Bexley, Thurrock, and Sevenoaks and Gravesham).

• The Borough has provided jobs alongside growth. ONS reports Dartford is unusual in having a job density of 1.04 in 2016 i.e more jobs than workers[i].

• Policy DP20 identifies the main **employment areas**[j], across the urban and rural parts of the Borough, allowing for their purpose to be maintained and appropriate diversification to be managed[i]. Crossways is Dartford's largest.

• Economic activity rates have increased overall but female rates are lower than average. The largest proportion of jobs by industry within Dartford (as at 2016) is Wholesale and Retail Trade (21.3%), Health and Social (16.6%), Construction (11.9%) and Administrative and Support Services (11.9%)[j].

• The Borough's economy is robust compared to other Kent districts. **Unemployment** is low (1.2% in 2018) and median weekly full-time earnings for Dartford for both resident based and workplace based remain higher (~£600) than both the Kent and Great Britain average[i]. More people travel to the Borough for work, than leave it for work elsewhere (including London) - net in-commuting. At the time of the last census, a net inflow of more than 5,000 people a day travelled in to the Borough for work.

• Longer distance **commuting** occurs not just to central London, but also into Dartford from and to locations such as Greenwich and non-metropolitan Kent.

• The acceleration of new job provision in Dartford ahead of all the surrounding areas has transport implications. In short, significant transport demand in, out and through the Borough is present. This is problematic especially as north-south links are road dependent, and train stations are generally not well located near the largest employers. Economic investment may be impacted by the high-profile congestion suffered by Dartford.

[h] DBC, Authority Monitoring Report 2015-2016 (2016)

[i] DBC, Economic and Employment Paper (2018)

[j] DBC, Development Policies Plan (2017) Figure 6

RETAIL AND LEISURE (1) (INCLUDING DARTFORD TOWN CENTRE)



• There has been fundamental **change in the retail sector** since the Core Strategy was prepared. Online expenditure has grown substantially; but town centres are still places that provide a vibrant mix of uses, opportunities for people to travel sustainably and access essential facilities, as places of leisure, to meet and for communities to come together, and reflect local identity and history.

• As with the preparation of the Core Strategy, national policy requires Local Plans to identify and **support town centres**, including meeting future growth needs positively, and locating development within centres first.

• The national trend for retailing to be increasingly associated with either online deliveries (or click and collect) or leisure visits to shopping locations where there are attractive facilities (particularly for eating out) has been observed in the Borough. Going back to the start of the Core Strategy period (2006), an overall loss of A1 shop floorspace in the Borough has been almost completely offset by the growth in café/restaurant floorspace; with a good performance by Dartford town centre in recent years[k].

• **Dartford town centre** contains significant potential for further new jobs and homes in line with local and national policy. A number of development sites are available, including as set out in adopted policy CS2, and detailed regeneration plans are being drawn up in the Dartford Town Centre Framework Supplementary Planning Document (SPD).

• There is evidence of how the town centre is improving, with lower vacancy, higher footfall, new uses and major opportunities for investment[l]. The high level of growth expected (including new households from 2,850 dwellings with planning permission) within a mile of the town centre provides the opportunity to significantly increase footfall and expenditure at the town centre's shops[m].

• Of nearby centres in Kent and London, independent data provides a basis for comparison. This suggests Dartford's retail offer and performance can be most closely compared to Orpington, with both having a similar quantity of retail floorspace and comparable 'Venuescore' (Dartford at 261 is slightly better ranked than Orpington at 290). However it remains essential to plan positively for the distinct offer the town centre will have in future to attract local residents/working population, and avoid the need for regular journeys to more distant centres by car.

[k] DBC, Authority Monitoring Report 2015-2016 (2016)
[l] Aspinall Verdi, Dartford Town Centre Market Review (2017)
[m] DBC, Dartford Town Centre Draft Development Factsheet (2018)
[n] SDC, Sevenoaks District Retail Study, Volume One — Main Report (2016)

RETAIL AND LEISURE (2)



- Bluewater is a major employer in the Borough and for adjoining areas. It provides a regional shopping facility in Kent and the wider region, mainly competing with other facilities of a similar scale, including Westfield's Stratford City, shops at Lakeside, and (in future) a further Westfield major shopping centre at Croydon.
- Bluewater's Core Strategy policy CS12 set out strategy in the context of it functioning as a specialist regional comparison centre. With a regional function, extensive discussion between Local Planning Authorities occurred both at the Core Strategy stage and recently[o].
- A review of retail strategy is anticipated in current policy for the next Local Plan. This should take account of changing overall retail and leisure trends, pressures across the country for existing centres to update their purpose and appeal, and major issues more locally, such as changes in expenditure patterns arising from the new consumers occupying new housing developments.

QUESTIONS

5. Considering available evidence on homes, workplaces, retail and leisure, including the Core Strategy Policy Monitoring Review, what are the main respects in which the policy approach should be maintained or updated?

Homes

6a. What types of housing, including those now within the new draft National Planning Policy Framework, are particularly relevant to Dartford Borough, and why?

6b. Are there circumstances/ locations in Dartford that may provide a robust justification to continue to seek affordable housing contributions on private developments of ten units or less, despite government policy?

[o] DBC, Bluewater and the Duty to Cooperate Paper - part of Examination of the Development Polices Plan (2017)

6c. Should Dartford's Local Plan expect all dwellings to be accessible/ adaptable for all users and ages through national design standards? If so, what proportions should be set in referring to the Building Regulations that will apply?

7a. Do you think unplanned (windfall) housing in the Borough is problematic in the case of: i) small sized plots of land, and ii) larger plots of land?

7b. Does the windfall sites policy DP6 continue to have relevance for Dartford, or is it necessary for local policies for new housing on small sites (under half hectare/1.24 acres) to be relaxed to better reflect the direction of government policy?

Workplaces

8a. What development is needed for the economic activities most important to Dartford's long-term economy and future quality of life?

8b. Can new economic growth in the Borough be primarily focussed on sectors that will deliver development and prosperity in locations that are, or will be in future, very well served by public transport?

8c. Should new economic growth be primarily focussed on sectors which match the local skills and experience of the resident workforce, so as to reduce the need for long travel to work journeys?

Retail and Leisure (including Dartford Town Centre)

9a. With the progress in delivering a revival of Dartford town centre as set out in the Local Plan and the Town Centre Framework Supplementary Planning Document, what do you think are the main further strategic planning opportunities in the Town Centre?

9b. How can change be planned by the Dartford Local Plan in order for Bluewater to maintain an appropriate and sustainable role in the future as a Borough and regional centre for retail and/or leisure?

TRANSPORT AND COMMUNITY INFRASTRUCTURE

BACKGROUND INFORMATION

EXISTING POLICIES:	
Core Strategy	**Development Policies Plan**
CS9: Skills and Training	DP3: Transport Impacts of Development
CS15: Managing Transport Demand	DP4: Transport Access and Design
CS16: Transport Investment	DP21: Securing Community Facilities
CS21: Community Services	
CS26: Delivery and Implementation	

TRANSPORT (1)



• Adverse consequences arising from transport problems such as **congestion and poor air quality** is one of the most acute issues in the Borough. This requires actions both to tackle highway problems, but also to make public transport and other travel modes such as cycling much more attractive in Dartford.

• Nationally, levels of road usage have significantly increased. The last census (2011) shows that the majority of Dartford working residents who work drive to their place of work by car/van (58%). This is above the national average, but slightly below the regional average, with a further proportion privately travelling in vehicles as passengers. Few people go to work by bus or walk all the way. Only 1% of Dartford's residents cycle to work. Working from home was limited in 2011.

• The Borough has both the London Orbital (M25/A282) and A2 London to Dover running through it. The whole Borough suffers from a lack of resilience in these routes, particularly when incidents on the Dartford Crossing occur, resulting in significant congestion at Dartford town and gridlock in the wider area. The government are proposing a new lower river crossing to the east of the Gravesend (Lower Thames Crossing) to relieve the Dartford Crossing in future[p].

• Detailed proposals have been drawn up for improvements on the A2 Bean and Ebbsfleet junctions and major improvements are being advanced for the town centre. Work has started on a scheme at St Clements (A206/A226/B255) junction, Greenhithe.

• These all form part of the Kent Thameside **Strategic Transport Infrastructure programme**, a package of major improvement schemes that have been agreed by the Council, Kent County Council and Highways England[q].

• To alleviate local road issues that arise due to congestion on the A282 and Dartford Crossing, further work is underway to both understand in detail the triggers for severe congestion on this route, and to identify the most effective actions. Improvements already being taken forward include enhanced flow of traffic via greater synchronisation of signal management; achieved through close co-ordination between Highways England (responsible for strategic routes including the London Orbital/Dartford Crossing) and Kent County Council (responsible for local-level roads).

[p] Highways England, Lower Thames Crossing (website)
[q] DBC, Strategic Transport Infrastructure Programme (2011)

TRANSPORT (2)



• **Buses** play an essential role for many groups in the community, young and old. Short and long-term plans, particularly for the award winning Fastrack routes, are being progressed by partners, including bus providers. Improvements to the location of bus stops, service frequency and, provision of new routes and expansion of services are all being considered.

• Following liaison with bus operators and public consultation, close consideration is being given to how Dartford town centre can best be served by the various bus services that connect the town.

• The number of passengers using Fastrack has increased, but needs to grow further to enable continued development and improvement. These plans include the expansion of the service as new developments are occupied. Dedicated bus lanes/ tracks have and will continue to be provided, where possible.

• **Railway upgrades** are a priority to give realistic alternatives to the car for commuting in and out of the Borough, and other journeys. Dartford railway station remains the most used station along the North Kent Line in the county, and overall usage has increased by over 40% in 20 years. Ebbsfleet International is a new station served by Eurostar and High Speed 1 services, but poorly integrated to the east of the Borough and with limited public transport connectivity (other than by Fastrack).

• The growing urban commnunities are served by the North Kent railway line, which is seeing an ehanced choice of destinations with the introduction of Thameslink services. Southern parts of the Borough are served by mainline services to London Victoria.

• On the North Kent line, Greenhithe station and part of Dartford station have been rebuilt, but **Swanscombe and Stone Crossing stations** suffer from very poor facilities and accessibility. The links from the now very busy Dartford station to the platforms still present challenges to accessibility, and are not of high quality or sufficient for convenient travel during peak times.

• Peak time **capacity** issues impact on all rail services in the Borough (including Ebbsfleet). Reliability and adverse journey times detract from travel by rail, and may foster reliance by residents on the use of the car to travel.

• Network Rail, the national provider of track and associated key railway infrastructure, consulted on its Route Study to enhance railway capacity, reliability and train journeys in Kent[r]. There is some opportunity to increase capacity in the next decade through longer trains. However it is apparent they have not confirmed specific proposals to meet demand into the 2030s.

[r] Network Rail, South East Route: Kent Area Route Study – Draft for Consultation (2017)

TRANSPORT (3)



- The ***Route Study for Kent*** (page 67) identifies a long-term option in the Borough to **improve connectivity**. This is to fully utilise the section of railway line that forks northwards - between Farningham Road and Longfield stations - from the London Victoria mainline services to Medway and beyond. This would loop up and provide direct access to Ebbsfleet International from the south, if a small section of track were constructed to complete the junction with the existing High Speed 1 line.
- The Council is involved in exploring how services between Dartford and Ebbsfleet can be enhanced to encourage rail use over private vehicles, by becoming part of the London Underground system via an extension of the Elizabeth line (**Crossrail**)[s]. If successful, this could bring major opportunities to increase train capacity, journey times to some central/west London destinations, and new development and business investment options. An important current question is how a financial contribution can best be made by developers in support of securing an extension.
- **Schemes for cyclists** are planned with new development and across the Borough more widely, with the aim of ensuring that a comprehensive network of off road cycle routes are available in Dartford.
- New cycle lanes and shared footpaths/ cycle paths have been secured within the design of larger sites, and within junction improvement schemes, and off road schemes have been delivered over the last few years outside development sites. The network will particularly join new residential areas with local destinations to provide a platform to encourage modal shift, enhancing the choice of travel modes realistically available as an alternative to the car for local trips.
- Through Local Growth funding, secure cycle parking facilities have been provided at all of Dartford's railway stations.

[s] Crossrail, Crossrail to Ebbsfleet (C2E) Campaign (website)

COMMUNITY INFRASTRUCTURE (1)



• Since 2006 approximately 3,000 sq m per year of community floorspace has been provided. This has been through new build and change of use. This has included new and expanded schools, dentists, health facilities, gyms, community spaces and places of worship.

• Dartford has an ***Infrastructure Delivery Plan*** **(IDP)** that sets out the projects that are required to support planned development[t]. The plan is a living document and has been revised since it was first published in 2011 alongside the Core Strategy.

• The IDP sets out all the main planned projects, gives details of when they are expected to be provided and sets out some background on who is responsible and how it will be funded. The latest update has taken account of the most up-to-date Local Plan and input by infrastructure partners, and ongoing changes to how infrastructure is funded and delivered.

• The Council introduced a new mechanism for developer contributions in 2014, the Community Infrastructure Levy (CIL). Payments are collected and held in a pot which will be used by the Council to support the delivery of infrastructure alongside other funding sources. As stated in section B, the amount of CIL receipts are not expected to cover estimated costs. It is also anticipated that the public funding environment will continue to be constrained. In almost all cases, the funding of infrastructure projects in the Borough will be dependent upon securing a range of funding sources including CIL.

• Provision of sufficient infrastructure is challenging particularly with regard to the funding and approval processes required to provide sufficient certainty for projects to commence. Resolving these issues often delays the delivery timetable.

• The population growth in the Borough has recently been based on relatively high levels of natural growth (e.g. **birth rates**) for Kent, with the rest accounted for by new residents being attracted to the Borough[u]. This suggests that relative to overall pressures on services as a whole, Dartford faces particularly acute demand for facilities such as schools.

[t] DBC, Infrastructure Delivery Plan Update (2017)
[u] Kent County Council, Migration indicators in Kent 2016

COMMUNITY INFRASTRUCTURE (2)



• The types of infrastructure that are planned with growth and are progressing to delivery or are underway include:

- **new road junctions** e.g. St Clements
- new and expanded **primary and secondary schools** e.g. Cherry Orchard primary school in Ebbsfleet Garden City
- new **health facilities:** major opportunities are being taken forward working with the NHS for Stone and Dartford Town Centre
- **flood mitigations**.

• More community facilities will be provided in Ebbsfleet Garden City as part of planning Section 106 negotiated developer contributions.

• As time elapses, additional schemes will be required such as further flood resilience as part of the Thames Estuary 2100 project, additional schools, expansion of health and hospital facilities, expanded Fastrack and other sustainable travel schemes.

• The nature of Dartford's population growth means Borough residents are overall comparatively young, however the Borough will not be immune to the impacts of the nationally **ageing population** and the implications on demand for services such as health and care.

QUESTIONS

10. Considering available evidence on transport and community infrastructure, including the Infrastructure Delivery Plan and Core Strategy Policy Monitoring Review, what are the main respects in which the policy approach should be maintained or updated?

Transport and Community Infrastructure

11a. In addition to the planned Strategic Transport Infrastructure Programme Schemes, should priority be given to improvement projects that tackle traffic congestion at the Dartford crossing, and would this focus assist with congestion and capacity issues on the Borough's roads?

11b. In addition to all these improvements, what do you think are the other highway measures which could improve the performance and free running of local roads in Dartford?

12. How can the Dartford Local Plan best promote and encourage use of sustainable transport, such as bus/Fastrack services and cycle facilities?

13a. What do you think are the three most important long-term issues facing future rail services in the Borough, and why: (i) journey times, (ii) peak capacity (overcrowding), (iii) punctuality/reliability, (iv) quality of rail stations in the Borough, (v) cost of travel, or (vi) maintaining access to existing London termini stations?

13b. Should there be investigation as to whether some train stations on the North Kent Line can be rebuilt in a new slightly different location (remaining within their local area) to provide improved facilities and access for all users, and closer proximity to major employers and the greatest concentrations of residents?

13c. Given the potential identified by Network Rail for a new train service linking London Victoria to the north east of the Borough, via a link based on the existing underused railway south of Ebbsfleet International, what would be the implications of exploring the route further and/or seeking private funding?

14a. To what extent will transport and community infrastructure planned in the Infrastructure Delivery Plan meet the range of needs arising from new development in the Borough? Are there other types of infrastructure that will be required by development?

14b. Are there new funding mechanisms and approaches that the Council and infrastructure partners should explore to deliver the infrastructure needed in the Borough?

CLIMATE CHANGE MITIGATION AND ADAPTATION, AND THE NATURAL AND BUILT ENVIRONMENT

BACKGROUND INFORMATION

EXISTING POLICIES:	
Core Strategy	**Development Policies Plan**
CS1: Spatial Pattern of Development	DP2: Good Design in Dartford
CS13: Green Belt	DP5: Environmental and Amenity Protection
CS14: Green Space	DP7: Borough Housing Stock and Residential Amenity
CS17: Design of Homes	DP11: Sustainable Technology and Construction
CS22: Sports, Recreation and Culture Facilities	DP12: Historic Environment Strategy
CS23: Minimising Carbon Emissions	DP13: Designated Heritage Assets
CS24:Flood Risk	DP22: Green Belt in the Borough
CS25: Water Management	DP23: Protected Local Green Space
	DP24: Open Space
	DP25: Nature Conservation and Enhancement

NATURAL ENVIRONMENT



- The Local Plan will be informed by an overall **Sustainability Appraisal** to ensure it pursues options that support genuinely sustainable development.
- Recent detailed national research, prominently highlighted by the BBC, has calculated a significant minority of Dartford is now built up in character (30% 'built on' with 12% 'green urban'). However, most of the Borough is rural (**50% 'farmland'**, plus 7% 'natural')[v].
- Under adopted policies ***DP22*** and ***CS13***, most of the Borough is metropolitan Green Belt, which has protected the openness of the southern half of the Borough, together with the Dartford Marshes adjoining the River Thames). There is 395 sq m of Green Belt per Borough resident in 2016.
- There are now 350 designated Borough Open Space sites, covering 1,449 hectares, defended under this designation (***DP24***) alone[w]. This equates to 139 sq m per resident of **parkland, playspace, outdoor sports, churchyard, and green verges** and so on, mostly with public access.
- The majority of the proposed major new green spaces to contribute to the ***Core Strategy (Diagram 8)*** have been completed or are underway[w]. For example, at The Bridge development a series of pocket parks and biodiversity corridors are being created.
- Policy ***DP7*** sets out criteria to manage and retain the quality of existing dwellings, family homes and residential **gardens**, reflecting economic and environmental pressures in Dartford and the existing character of established local communities.
- The government are proposing that in "rural areas", business and community needs may have to be recognised "outside existing settlements, and in locations that are not well served by public transport"[x]. This has yet to be explained and finalised, but it would appear that if introduced this would in practice apply infrequently in the Borough, if at all; not least given overall character and Green Belt policy (where) applicable.
- Policy ***DP25*** introduces specific protections for Nature Conservation and Enhancement. Part of the policy sets a need for large residential developments in the east of the Borough to contribute to mitigation measures, due to the significance of **habitats** found in the wider north Kent coastal area. This is part of the Habitats Regulations Assessment regime that will also apply to the new Local Plan.

[v] BBC, How much of your area is built on? (2017)

[w] DBC, Authority Monitoring Report 2015-2016 (2016)

[x] MHCLG, Draft National Planning Policy Framework (2018) para 85

CLIMATE CHANGE, ENERGY AND AIR QUALITY (1)



• Dartford's **CO2 emissions** from transport have declined overall since 2006, however they still remain high – accounting for 47% of per capita emissions (higher than the 33% seen across the rest of the South East)[y].

• A number of the strategic issues and measures which are being taken or are planned, already described in this section of the document, will assist in mitigating and alleviating climate change. These include reducing the need to travel through provision of homes near to complementary destinations and provision of infrastructure for sustainable travel which will reduce the need to use vehicles.

• These measures will assist in reducing use of carbon fuels and therefore production of C02 and greenhouse gases in the Borough. Other measures will provide climate change mitigation such as flood alleviation schemes which will assist in defending development from rising sea levels, and protecting and safeguarding open spaces to alleviate the effects of rising temperatures and other climate change effects.

• **Air pollution** is associated with a number of adverse health impacts and therefore residential areas are most susceptible to air quality issues. **Four Air Quality Management Areas (AQMAs)** have been declared in Dartford along roads which are in close proximity to residential areas and where exceedances of nitrogen dioxide and fine particles will not meet national air quality objectives by the prescribed target date.

• Emissions primarily arise from diesel vehicles although other sources contribute including emissions from commercial, industrial and domestic development. Ongoing monitoring indicates that emissions remain high in these areas of the Borough. AQMAs have to be accompanied by action plans for the designated areas to reduce emissions. However it is extremely difficult to improve air quality other than through targeting the source of emissions.

• It is anticipated that the transport measures identified above that will help to combat climate change and will also lead to a reduction of the key source of emissions – diesel vehicles. Monitoring will continue and is undertaken by a leading national research team. This will enable the Borough to consider the application of other alleviation measures identified by ongoing research.

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[y]DBC, Authority Monitoring Report 2015-2016 (2016)

CLIMATE CHANGE, ENERGY AND AIR QUALITY (2)



• **Electric powered or hybrid vehicles** will be increasingly used for travel in the future. The government have announced in its **Clean Air Plan** that new petrol and diesel vehicles will be banned from 2040[z]. Manufacturers are increasingly turning to electric vehicle production, leading to improvements in affordability and greater distance of travel.

• This change will require significant new charging infrastructure to be provided for residents, public transport, businesses and in public places. It also has potential to bring sustainability benefits such as reduced environmental impacts, particularly local pollution and noise.

• The ***Dartford Parking SPD*** allows greater flexibility in sustainable locations, and encourages electric vehicle charging points, but technology and options are expanding and policy needs to be kept up-to-date.

• Other innovations, such as autonomous vehicles, may bring further changes to the way people own and travel by road in the future. This could potentially lead to profound changes in the urban environment and the typical streetscene of areas.

• Encouraging use of **renewable energy and energy efficient** development is a key contributor to both responding to climate change and issues of poor air quality.

• The government do not permit local planning policy to set out specified proportions of renewable energy etc on individual residential development, with policy instead set nationally through Building Regulations. The majority of Energy Performance Certificates for Dartford's dwellings in 2016/17 were in the top half categories of performance (A-G)[aa].

• Adopted Policy ***DP8*** includes standards on size and accessibility of dwellings to better facilitate sustainable buildings. Policy ***DP11*** also requires all new dwellings to demonstrate delivery of the higher water efficiency standard.

[z] DEFRA, UK plan for tackling roadside nitrogen dioxide concentrations (2017)
[aa] DBC, Authority Monitoring Report 2016-2017 (2017)

DESIGN AND CONSERVATION



• Development and design varies according to local characteristics. There has been a balance between houses and flats in new residential development; and evidence does not suggest flatted accommodated results in smaller unit sizes i.e. providing more residential space overall[ab].

• Proposals in Conservation Areas have been regularly monitored, identifying applications that were refused to satisfy conservation objectives in these special areas.

• Significantly, it has been possible to remove St Mary's Church in Stone from the national Heritage at Risk register.

• Dartford has set out its **heritage strategy** in adopted policy ***DP12***. The introductory text to this policy outlines milestones in the evolution of the Borough's defining characteristics. The policy outlines criteria for non-designated heritage assets in Dartford (i.e. those which are of local rather than national importance), including sites with **significant industrial heritage, historic open spaces**, and applicable sites within the local **Areas of Special Character**[ac]. Policy ***DP13*** sets out strict protections for designated heritage assets, notably Listed Buildings, Scheduled Ancient Monuments and Conservation Areas (i.e. those which are of national importance).

• **Dartford Town Centre** has the largest Conservation Area in the Borough, centred on the historic Watling Street route. Measures in the ***Dartford Town Centre Framework SPD*** will contribute towards the setting of historic buildings and reinforce Dartford's market town character and status.

• Dartford specific **design policy** for all new development is set out in adopted policy ***DP2***. For the design of new sites, the draft new NPPF states that "Local Planning Authorities should ensure they have appropriate tools and processes for assessing an improving the design of development." It highlights that such tools could include Building for Life[ad], and design reviews.

[ab] DBC, Authority Monitoring Report 2015-2016 (2016)

[ac] DBC, Areas of Special Character Appraisals (website)

[ad] Design Council, Building for Life 12 (2015)

QUESTIONS

15. Considering available evidence on the natural environment, climate change, energy and air quality, and design and conservation, including the Core Strategy Policy Monitoring Review, what are the main respects in which the policy approach should be maintained or updated?

Natural Environment

16. Do you think that Dartford's mitigation approach to the protection of international habitats and species on the North Kent coast will continue to be suitable for large developments in the east of the Borough, helping mitigation and strategic greenspace provision in the area; and are there other approaches to achieving mitigation that should be considered?

Climate Change, Energy and Air Quality

17a. How important to you are measures to reduce impact on climate change, and what do you think is the most relevant issue?

17b. How can local planning best support action to reduce harmful emissions at source, decrease reliance on diesel and petrol vehicles through providing alternative travel options, promote electric/ hybrid vehicles, and deliver improved air quality in Dartford?

17c. What are the main future implications for the Local Plan of how new technology and alternative options can reduce the need to travel in environmentally impactful ways, minimise pollution or help save energy usage in buildings?

Design and Conservation

18a. How can the Local Plan better ensure local environmental, economic and community heritage is respected and reflected in future development?

18b. How should the need for a strategy for good design inform the preparation of the Local Plan and potential new redevelopment?

SECTION D: MAIN AREAS AND TYPES OF FUTURE DEVELOPMENT

PATTERN OF DEVELOPMENT

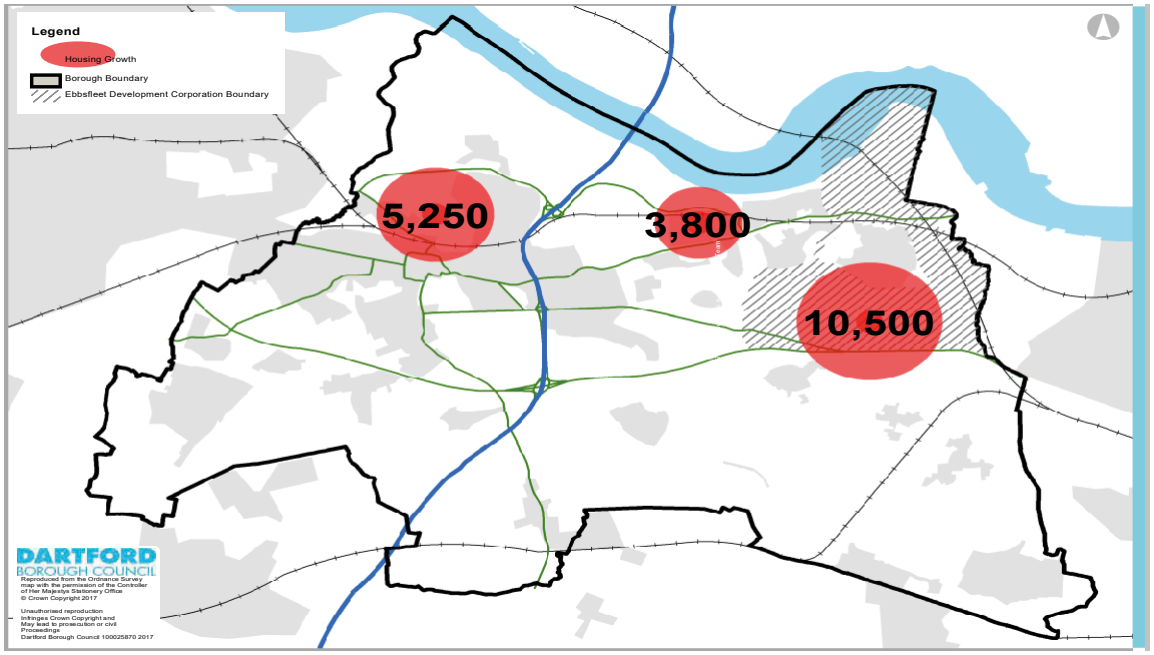
43. This final Section looks at the overall pattern of development, and then current areas of change. General sources of future housing land e.g. brownfield sites are considered. Open space and Green Belt issues in planning ahead for the Borough are discussed. The document concludes with further information and questions for local neighbourhoods.

44. The Core Strategy sets out three principles that guide the pattern of development in the Borough:
    - Developing in areas with the most regeneration potential
    - Protecting and enhancing the quality of life
    - Ensuring a balance and sustainable pattern of land use and transport

45. The Core Strategy seeks to protect the Green Belt and use the potential of the urban area. Adopted policy CS1 sets out that particular defined Priority Areas are the focus of urban development:
    1. Ebbsfleet to Stone
    2. Dartford Town Centre & Northern Gateway
    3. Thames Waterfront

43. Figure 3 below provides an indication over the very long-term (from 2006 onwards into the 2030s) of the projected maximum growth of housing in the Borough, with previously granted permissions forming a clear focus on the three Priority Areas. In contrast, only around 400 dwellings are found (and have already come forward) in the southern part of the Borough, reflecting the strategy. To inform a new Local Plan, this evidence for the Borough will be updated.

Figure 3: Borough Potential Housing Growth (Completions since 2006 and Current Permissions)



Source: DBC Monitoring Information

44. Information from the Core Strategy Review shows that these three broad Priority Areas have promoted regeneration and sustainable development of homes alongside jobs and infrastructure in the north of the Borough, where most brownfield land is located. It also helps to protect areas such as the Green Belt and heritage and environmental assets.

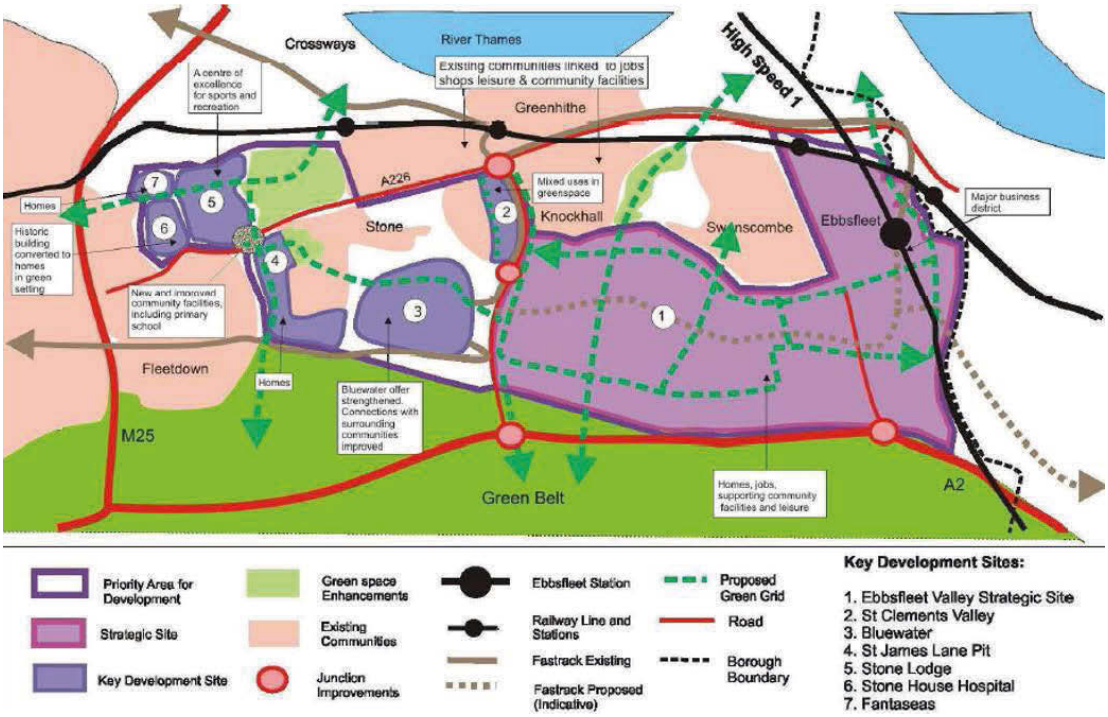
19. Should the focus of development generally remain on the locations identified in the Core Strategy? Are there any other feasible major alternatives?

STONE, GREENHITHE, SWANSCOMBE AND THAMES RIVERSIDE

45. The continuing sustainable development of the north west of the Borough – and much of Dartford as a whole – is expected to be driven by a major regeneration of Dartford town centre and its surrounds, plus additional facilities and economic development at Dartford's Northern Gateway and The Bridge large sites. The Dartford Marshes Green Belt will be maintained in the north west corner of the Borough.

46. The Borough's urban area in the Core Strategy is defined as north of the A2, to the east and west of the Dartford Crossing. It therefore also extends east of Dartford town including several existing communities at Stone, Greenhithe and Swanscombe. Core Strategy policy CS4 identifies several locations for growth in this area, east of the M25/ Dartford Crossing and south of the North Kent railway line, as illustrated in Figure 4 below

Figure 4: Core Strategy: Diagram 5 Ebbsfleet to Stone Priority Area



47. The diagram recognises the existing communities and infrastructure improvements Within the Priority Area, nearly all the remaining land is designated as key development sites 1-7 (which are all built or being taken forward, apart from parts of Ebbsfleet) or for green space enhancements.

20. How should strategy for the Ebbsfleet to Stone Priority Area be updated consistent with overall Borough objectives?

48. One of the characteristic features of the landscape in this part of Borough is the presence of very large former pits, associated with the history of quarrying and industrial activity. Several of

these have been or are being redeveloped, most notably at Bluewater and Ebbsfleet. However many (particularly in the Stone and Greenthithe areas) were subsequently used for landfill purposes.

49. These extensive areas account for much of the remaining open land between existing communities in the urban part of the Borough from Dartford to Swanscombe. However this land is typically in private ownership and has restricted access. Looking to the long-term, consideration of how to secure sufficient and appropriate local benefit from the land is warranted.

50. The remaining former landfill sites are typically capped, grassed and undulating, but contain land that may remain unstable and subject to gas emissions due to the gradual degradation of the waste. The associated land management, development and financial issues lead to uncertainty, including as to whether development proposals can fully meet normal planning policy requirements. In the context of the Borough's delivery of residential development, and the outstanding infrastructure needs, Dartford has successfully introduced a policy (DP5:3) to confirm that this land is not included in the current housing supply, and that the characteristics of these sites does not mean inadequate proposals will be supported.

21a. What do you think should be the long-term future of former landfill sites in Stone and Greenhithe?

21b. Should the Local Plan explore the potential to capture public benefits or access on these sites?

21c. What are the implications for the identity of surrounding existing communities, and the sustainable development strategy for the Borough, if the landowner takes forward proposals on these sites?

51. Swanscombe is a highly distinct town in north Kent, surrounded by cliff-faces, past and present industrial uses, and open sites available for redevelopment.

52. Swanscombe has particularly benefited from a fall in unemployment, and there are indications of a decrease in individuals resident in the town only in the shorter term. Owner occupied homes are still in a minority in Swanscombe, which is unusual for Dartford. House prices remain lower than most parts of the Borough, which may be attributable to the prevalence of terraced/smaller properties. However, average household size (2.3 people) is not substantially less than across the Borough as a whole.

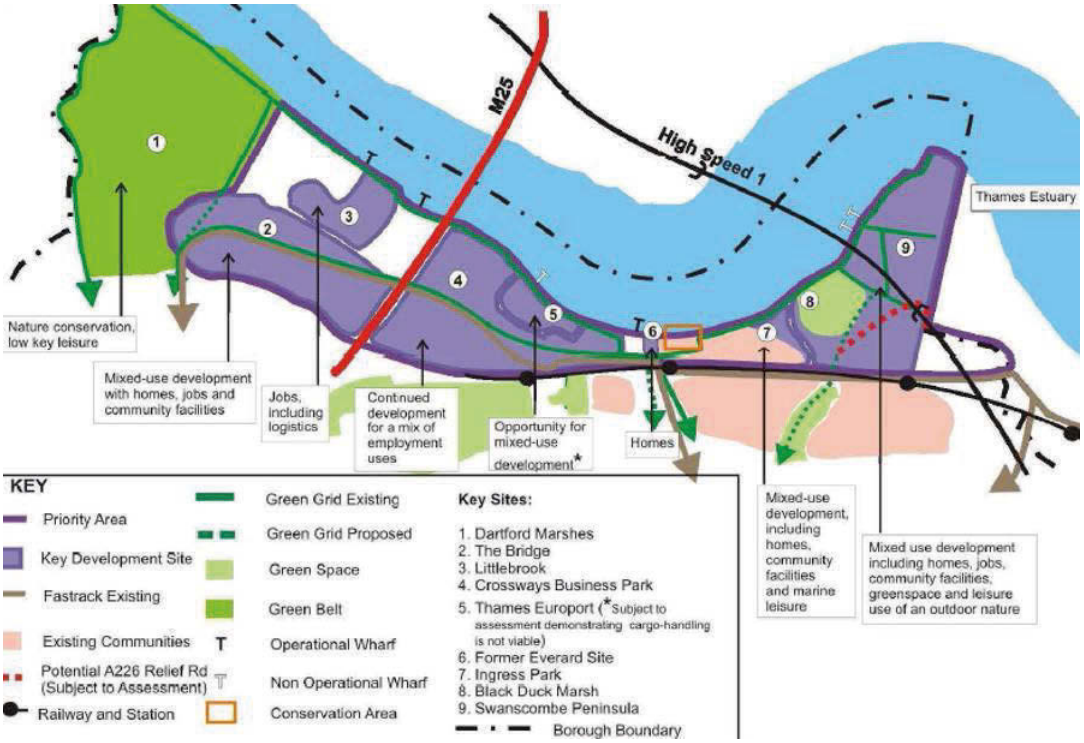
53. A Swanscombe and Greenhithe Masterplan (2005) was prepared and used as part of the 2011 Core Strategy evidence base. This provides further information about the area, particularly on ambitious options to regenerate Swanscombe. The town benefits from a quiet core of residential areas and large parks, as well as major community facilities and a traditional High Street. However, Swanscombe has seen less economic development, and has few confirmed significant brownfield opportunities, than the rest of Dartford's urban area. The Local Plan can

help to ensure that Swanscombe's needs are considered alongside proposals for major development on the large sites within Ebbsfleet Garden City.

22. How can the Local Plan best support regeneration within Swanscombe?

54. The remaining Priority Area in the Core Strategy is the Thames Waterfront in policy CS6, shown in Figure 5 below.

Figure 5: Core Strategy: Diagram 7 Thames Waterfront Priority Area



55. This land, between the Thames and the North Kent railway line, is characterised by its estuarine environment and major transport infrastructure that has attracted large scale employment uses (past, present and proposed). The historic riverside neighbourhood of Greenhithe has been expanded through the award winning new community at Ingress Park.

56. Swanscombe Peninsula, Thames Europort and the Littlebrook area (north of The Bridge development site) have not been redeveloped or are undesignated land including brownfield.

23. How should strategy for the Thames Waterfront Priority Area be updated consistent with overall Borough economic, transport and infrastructure objectives, and best reflecting its riverside characteristics?

EBBSFLEET DEVELOPMENT CORPORATION AREA

57. Land at Ebbsfleet has been identified by the government for a potential Garden City. The principles of a full Garden City are distinct and ambitious[11], but may often face delivery challenges in the current national policy, land supply and development industry context. Moreover, at Ebbsfleet much of the land has longstanding planning permissions.

58. As set out in chapter 2 of the Development Policies Plan, the government set up the Ebbsfleet Development Corporation (EDC) in 2015 to drive forward the ambitions for Ebbsfleet, within both Dartford and Gravesham Boroughs. This followed limited activity in implementing the planning permissions that had been granted (and remain in place) for substantial new economic and residential accommodation and other uses. The predominant form of development to date has been houses constructed by volume house-builders.

59. The EDC have produced an Implementation Framework for the whole area, but have recently been subject to a Tailored Review of its purpose and operation. This highlights various issues that have hindered its effectiveness in bringing forward substantial major regeneration at pace. However it was concluded that progress has recently been made on some key issues and that the EDC's role remains justified and necessary. The review called for greater government support, and suggested a relaunch of the vision for a Garden City.

59. Land in and around the Ebbsfleet International rail station (Ebbsfleet Central) was given planning permission in November 2002 for major commercial and other uses including 2,320 dwellings by Dartford Council. This permission has not been started and currently appears to have no prospect of being implemented in full. Responsibility for determining a new planning application would now lie with the EDC.

60. The Core Strategy in policy CS5 seeks that any new proposals lead to the "*Creation of a high density business district adjacent to Ebbsfleet Station, with a mix of uses, including residential, generating activity in the daytime, evenings and weekends and ensuring a lively area.*" More recently, land north east of the station extending into Gravesham, at Northfleet Rise, was awarded Enterprise Zone status to help foster redevelopment of the site for business purposes. This land, in common with much of that around the station, functions and generates revenue as a car park for station commuters. The Tailored Review found that co-ordinated government action was necessary in Ebbsfleet Central.

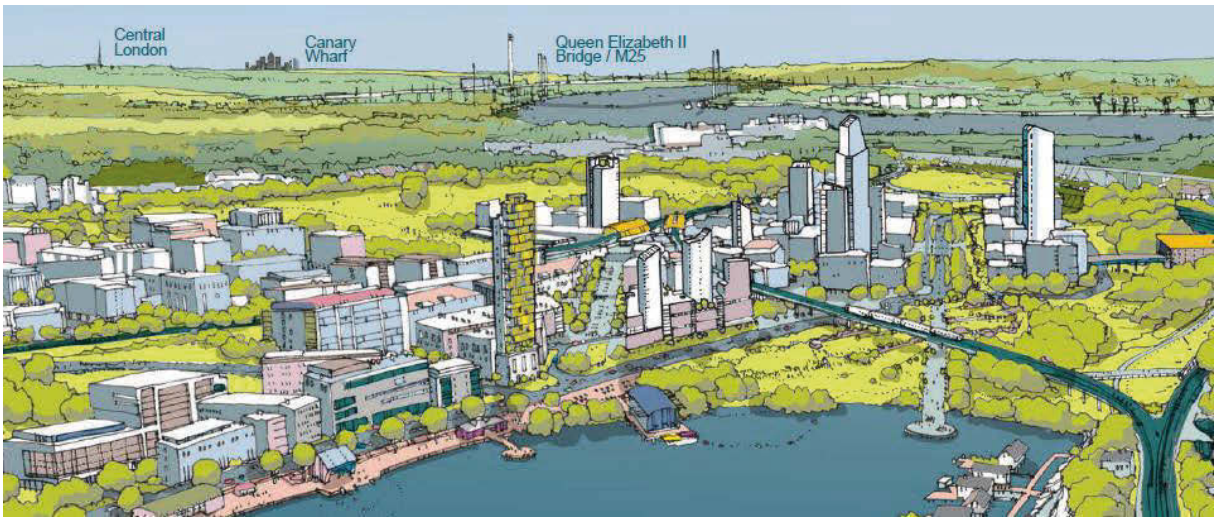
61. The critical objectives for Ebbsfleet Central should be to secure a high quality development that optimises the potential of the location (see Figure 6). As recognised in the draft NPPF, development must not be supported where it fails to make efficient use of land at a major and growing public transport interchange such as Ebbsfleet International. Moreover, it is essential that the balance of uses sustain a strong sense of place and vibrancy. Development in Ebbsfleet area has so far been predominantly residential; and it is essential to Garden City and local and national sustainable development principles – particularly for services and local employment to

[11] TCPA, Garden City Principles

minimise travel needs – that major economic development and high order community/ cultural facilities are delivered alongside further residential.

62. Elsewhere within the Ebbsfleet Development Corporation's area, at Swanscombe Peninsula, ideas for a major leisure resort have been publicised. This proposal has not been subject to an application for planning consent, which would be made directly to the government via the Planning Inspectorate. Many key details are unclear and this uncertainty is impacting on several areas including vacant land at Swanscombe and at Ebbsfleet Central itself (due to a potential access route from the A2 sought by the promoters of the resort).

Figure 6: Example illustration of potential future development at Ebbsfleet Central



Source: EDC, Ebbsfleet Implementation Framework (2017)

24a. What new planning policies are suitable and applicable for undeveloped land in the Ebbsfleet Development Corporation area in line with a modern, successful Garden City vision?

24b. What planning measures should be taken and tools used to ensure the sustainable development of the major development opportunity at Ebbsfleet Central (by the International Station)?

24c. What development and infrastructure should occur on other sites within the Ebbsfleet Development Corporation area if existing proposals/ planning permissions do not materialise on them?

BROWNFIELD LAND AND FUTURE RESIDENTIAL POTENTIAL

63. Making effective use of land is now a government priority to the extent that it is the title of a new chapter in the proposed revised NPPF. This seeks to make more efficient use of land by:
    - redeveloping underused developed (brownfield) land; and
    - increasing the amount of dwellings per hectare (acre) in new development.

    This would allow more development whilst continuing to protect locations such as the Green Belt. However other factors are also relevant, such as design and quality of development, impact on the local environment, and the projected costs of developing different types of building (viability).

64. The government recognise that it is particularly important to use efficiently land that is well served by infrastructure, and is well located to promote sustainable forms of travel. This accords with Dartford's focus on areas with very good access to public transport or within walking distance of major facilities.

65. It is recognised that circumstances can change, and the character of each proposal needs to be considered on its merits. However, it is important to maintain a local focus on the efficient use of land and increasing the intensity of land use. This approach is considered likely to meet the quantity of new housing required of the Borough without the need to release Green Belt or any significant new greenfield land.

66. Dartford has focused on previously developed (brownfield) land in the Core Strategy, and has a good record in delivering physical regeneration by finding suitable new uses for sites. The Borough has achieved 79.4% of new dwellings located on brownfield land under the Core Strategy (since 2006). This is just below the ambition of 80% included in the Plan.

67. Dartford has completed its first Brownfield Land Register for the Borough. This outlines sites which may be suitable, available and achievable to deliver dwellings on previously-developed land. These are entered in Part 1 of the Register. There are currently zero entries in Part 2 of the Register. Part 2 entries would require significant further preparation and consultation, giving land a new form of development consent, Permission in Principle.

68. The Register's capacity figures are a conservative minimum, totalling slightly over 2,000 dwellings. The Register identifies minimum capacities of:

Area	Minimum Net Dwellings
Ebbsfleet	1,000
Stone	610
Dartford Town Centre	239
Greenhithe/Swanscombe	285
Elsewhere north of A2	79
South of the A2	10
Total	2,223

69. The total, although indicative and based on minima, can be compared to the 7,780 dwellings currently expected as required in the first 10 years of the plan period (using the new national standard methodology). A caveat is required that sites such as Ebbsfleet Central have

permission for many more dwellings than included as a minimum. Nevertheless, there can be particular uncertainty over the cost and timescale for getting brownfield land ready for development. In the case of brownfield sites, it may be a prerequisite for the site to achieve a certain amount of development in order for it to be financially viable and for the developer to proceed.

70. It is apparent from the Register and under national policy housing requirements that there is a need to avoid non-delivery of anticipated brownfield land, or achieving only low densities on brownfield sites.

71. Housing densities result from many factors concerning the appropriate development potential of a site including both sustainability (e.g. proximity to public transport and services) and the local setting. New development density has varied hugely in Dartford, reflecting the diverse characteristics of sites and locations[12]. The average residential density across a broad sample of new developments is 67 dwellings per hectare, meaning that Dartford is achieving efficient use of land. This is line with traditional urban densities generally, and is within the range of residential densities found in Dartford's urban neighbourhoods that have not seen new development.

72. Existing policy CS17 seeks diverse densities, with maximum levels set at 40 dwellings per hectare for the villages, and higher levels at settlements elsewhere. Policy CS18 seeks a balance of houses and flats in new development, resulting in houses remaining as the main form of residential accommodation across the Borough's whole housing stock.

73. Dartford is now starting a refresh of its Strategic Housing Land Availability Assessment (SHLAA) and there has been a recent Call for Sites. The SHLAA needs to be updated to support a Local Plan beyond the current 2026 period. The particular focus of land identification is to seek land:
    - In Dartford Town Centre; or
    - At locations very well served by public transport; or
    - On brownfield or small sites which are sustainably located/ accessible.

74. This is necessary, despite a liberal supply of land with planning permission, to update evidence on the potential land which may be available in the Borough for residential development in the long-term, and the scale and type of development which it could accommodate. This will help explore options for further consultation in taking forward the Local Plan. Further information is available on the Call for Sites and proposed local assessment methodology.

[12] DBC, Housing Density Paper (2018)

25a. What is the best way in Dartford Borough to make efficient use of land in line with government priorities?

25b. Should a target of 80% of housing to be on brownfield land be confirmed as a central part of Local Plan policy?

25c. Should the focus be on delivering sites currently in Part 1 of Dartford's Brownfield Register; if selected sites are also included in Part 2 of the Register (granting permission in principle for suitable development), where is most important?

ENHANCING OPEN SPACE PROVISION

75. The Borough has a well-defined network of open spaces and links[13]. One fifth of the Borough's land area (350 playing fields, sports pitches, parks and playspaces, and cemeteries and similar uses) has been designated as Borough Open Space and is protected by policy DP24[14]. Also, as set out under the following topic, 27 small greenspaces that are special within their neighbourhoods have been given the highest level of local policy recognition under policy DP23.

76. The value of open spaces is not just their accessibility for recreation use but often also their wider social and wellbeing/ health roles. A study in Kent found problems of physical inactivity and related potential health problems in neighbourhoods are not limited to the location and quality of greenspace; possibly as wider socio-economic factors are at play[15]. Greenspace however plays a positive role in new and existing communities, and in supporting nature conservation.

77. In terms of outdoor recreation and team sports specifically, the recent Playing Pitch Study of the Borough noted recent improved facilities in the Borough. It also found however the main issue to be quality and type of sports pitches; with future needs projected to be focussed on achieving additional artificial grass pitches and provision for children's participation in certain team sports.

78. In terms of nature conservation, 90% of SSSI land in the Borough remains categorised as in favourable condition[16]. However, there is a need to improve the conditions in greenspace in the Borough-wide network of Biodiversity Opportunity Areas[17]. Ancient woodland in the Borough has been strongly protected from development.

79. Existing open spaces accessed by the public in the Borough are complemented by new greenspace provided in new development. Policy CS14 requires sites over two hectares to provide 20% of their area as greenspace and sites over 20 hectares to provide at least 30% greenspace. This greenspace may be multi-functional which means that it can contribute to water/ flood risk management, biodiversity and recreational needs including child play areas. Policy DP8:3&4 set out additional requirements for landscaped communal open space for sites of more than 100 dwellings, and qualitative criteria for residential gardens/ balconies. The size of private amenity space in new developments is not prescribed, but local policy protects existing gardens from inappropriate development.

[13] DBC, Development Policies Plan (2017) Figure 7
[14] DBC, Dartford Policies Map (2017) East I West I Town Centre [note large file sizes]
[15] Kent Nature Partnership, Using the natural environment to deliver better health in Kent (2014)
[16] DBC, Authority Monitoring Report 2016-2017
[17] Kent Biodiversity Partnership/ also see Dartford Policies Map (2017)

26a. Where do you think should be the focus of greenspace and outdoor recreation improvements, why is this the case and what type of provision is necessary?

26b. How would the local open space enhancement be funded/ delivered and managed?

26c. What is the most important feature of new open space provision at small and large new residential development?

MAINTAINING GREEN BELT LAND

80. Dartford Borough Council attaches the very highest importance to the permanence and openness of the Green Belt. The Metropolitan Green Belt in Dartford can be regarded as an essential characteristic of the Borough.

81. The Metropolitan Green Belt surrounds Greater London, separating its built up area from settlements in Kent, including in Dartford Borough. Green Belt land was designed to maintain the openness of land in the south of the Borough, and at Dartford Marshes near the Thames.

82. Dartford has recently given protection to 27 special local greenspaces across the Borough. These Protected Local Green Spaces[18] are smaller highly valuable open spaces to their own communities e.g. allotments. They are often characterised by their outstanding local contribution in terms of tranquillity, history or recreation value. Their planning protection for development proposals is akin to Green Belt, i.e. it is a very strong protection. 21 are found within the urban area and six are within villages surrounded by Metropolitan Green Belt.

83. The government only see proposed extensions to enlarge the Green Belt as being possible in a Local Plan under exceptional circumstances[19]. No candidate land of open and permanent character has been put to the Council in this respect. This kind of change to land designation, it would have to meet the specific purposes set out for Green Belt, but also demonstrate compliance with five further strategic planning and sustainable development requirements[20].

84. By efficient use of land (and only after that has been fully explored by Duty to Cooperate discussions with neighbours, who however may also have Green Belt land) the government consider that exceptional circumstances to release Green Belt should be avoided. With efficient use of land and planning actions already taken, Dartford is well placed to avoid requiring strategic development in the Green Belt or outside the Borough.

85. Dartford's robust housing land supply position and clear protection of the open southern part of the Borough is partly as a result of clear decisions having been taken, including over the Green Belt. With the adoption of the Core Strategy in 2011, strategic release of former Green Belt land for development occurred to enable proposals in/around the sustainably located Ebbsfleet area to gain permission and to better use brownfield land. Consequently, on the basis of current information and existing planning permissions, it is not expected that any major strategic release of Green Belt land is necessary to accommodate the Borough's development needs into the 2030s. The Core Strategy demonstrated necessary unique circumstances for the past change for Ebbsfleet but it remains the case that the defining feature of Green Belt is its permanence, and maintaining its essential openness.

86. This position is based on no significant increase in the final housing target in the Local Plan (from the government's new methodology for calculating Dartford's need) and planning permissions

[18] DBC, Open Space Report 2015/16 (part of the Development Polices Plan Evidence Base), page 20
[19] National Planning Policy Framework (2012) para 83
[20] National Planning Policy Framework (2012) para 82

being implemented as currently expected i.e. the density of major development sites not being reduced.

87. The Green Belt, in addition to influencing the overall pattern of development in the Borough, can also have a major impact on how individual proposals – even by individual households – are decided. Dartford's Green Belt now benefits from more detailed local criteria for planning applications of all types and sizes through the introduction of policy DP22. This local policy helps achieve principal Green Belt objectives enshrined in national policy. However when government proposals to amend the decision making approach for certain types of proposals in Green Belt land in the NPPF are finalised, consideration of national provisions will also be required in future applications.

88. Green Belt boundaries need to continue to be logical and be correct at a fine-grained scale as well as from the overall Borough perspective. Advances in mapping technology have raised the question over some small areas of potential inconsistency. Even if minor, these can only be properly resolved through the Local Plan. This means that small sections of the Green Belt boundary may be unclear on certain maps or appear to cut across individual homes and gardens, including brownfield sites. Over time, development has occurred which has changed the openness and character of certain plots of land, in particular development of individual smaller sites and infrastructure, such as the construction of the A2. Despite these changes, much of the Metropolitan Green Belt boundary in Dartford has not been clarified or remapped for several decades. This is relevant as national policy states that there is a need to ensure that boundaries are based on readily recognisable physical features, e.g. major highways; but in any event the delineation of a boundary needs to be clear for it to be effective[21]. Any administrative tidying up required is not driven by future development needs, but would help protect the Green Belt by helping to ensure clarity and consistency of operation.

27a. What are the implications of the draft NPPF Green Belt amendments for Dartford's Local Plan?

27b. Are there any individual properties/ small parcels of brownfield land, or minor strips of land lying outside readily recognisable physical boundaries, where the Green Belt boundary may be unclear or not based on a permanent feature, or the land does not meet the formal purposes of Green Belt?

[21] DCLG, National Planning Policy Framework (2012) para 85 final bullet point

LOCAL PRIORITIES

90. Factual area profiles for the following parts of the Borough have been prepared:

- Dartford Town Area
- Stone and Castle
- Greenhithe
- Swanscombe
- Longfield, New Barn and Southfleet
- Wilmington
- Sutton-at-Hone and Hawley
- Bean and Darenth
- Joydens Wood

91. More detailed planning studies undertaken in parts of the urban area by Dartford Borough Council[22] and the Ebbsfleet Development Corporation[23]. Stone Parish are preparing a Neighbourhood Plan to consider how development can enhance the parish, particularly through providing a cluster of community focussed facilities at the Horns Cross area.

92. The local profiles above provide facts on the changing make-up of local communities, information on patterns of provision and uptake of local jobs, facilities and infrastructure, and outlines data on existing housing and services. They may provide a further context in which the broad points in the preceding sections of this document may be considered. For example, implications for individual neighbourhoods of national policy, economic change, new forms of residential accommodation to meet the needs of local households, and infrastructure requirements.

28a. What are the strategic development needs of each of these areas and why; what new uses can be delivered and how would they sufficiently contribute to providing for infrastructure needs?

28b. Are there any small or brownfield sites in these local areas suitable for jobs, leisure, community or other development?

28c. How and where should specialist residential needs or alternative sources of housing be appropriately encouraged locally e.g. sheltered care/ accommodation for the elderly or disabled, local rural exceptions homes, build to rent development or custom/ self -build housing?

[22] EDAW, Swanscombe and Greenhithe Masterplan (2005) and DBC, Dartford Town Centre Framework Draft Supplementary Planning Document (2018)
[23] EDC, Ebbsfleet Implementation Framework (2017)