

**Statement of Common Ground
between
Dartford Borough Council
and
London Borough of Bexley
November 2021**

List of parties involved

1. This Statement of Common Ground (SOCG) has been prepared by Dartford Borough Council (DBC) and London Borough of Bexley (LBB).
2. Both DBC and LBB are plan making authorities for their areas but the development management function within Ebbsfleet Garden City (within DBC) is carried out by the Ebbsfleet Development Corporation.
3. LBB is a unitary authority but falls within the area of the Greater London Authority (GLA) which provides London-wide government. DBC is lower tier authority within a wider area for which Kent County Council (KCC) is the upper tier authority. KCC is the minerals and waste planning authority for DBC, the local transport authority and provider of a number of important local services. It is not a party to this SOCG.

Timescale

4. This SOCG is intended to reflect the current position at this stage of the local plan making process. It sets out the key strategic cross-boundary issues and areas of agreement on them. The SoCG is provided without prejudice to other matters of detail that the parties may wish to address at Local Plan examination.
5. The SOCG is a live document which is expected to be reviewed and updated on an ongoing basis, specifically:
 - The need for an update should be discussed after 6 months of the signature date of this SOCG, a process which must be fully completed within 1 year at the latest.
 - This applies unless the local plan of either party has been submitted for examination and the hearing sessions have not completed at that point, in which case it shall be updated as required within 3 months as a result of the examination process.

Strategic geography

6. DBC and LBB adjoin each other and lie to the south of the River Thames, illustrated in Figure 1.
7. DBC is also bounded by Gravesham Borough to the east, Sevenoaks District to the south and Thurrock Council on the opposite side of the river to the north. LBB is also bounded by the London Borough of Greenwich to the west, London Borough of Bromley to the south and the London Boroughs of Havering and Barking & Dagenham on the opposite side of the river to the north.
8. Much of the area to the north of the A2 in DBC and across much of LBB, with the exception of areas in the east of the borough, is urban. The main town in DBC is Dartford though there are a number of smaller settlements to the east of Dartford along the A226 – Stone, Greenhithe and Swanscombe. The largest town in LBB is Bexleyheath though there are a number of other significant sized towns including Erith, Sidcup, Welling and Crayford. The latter adjoins Dartford.
9. The urban area of DBC includes the Bluewater Regional shopping centre and the Darent Valley Hospital. The urban area of LBB includes Erith Hospital, Queen Mary's Hospital and, along the Thames, Crossness Sewage Treatment Works and the Riverside Resource Recovery (energy from waste) facility.

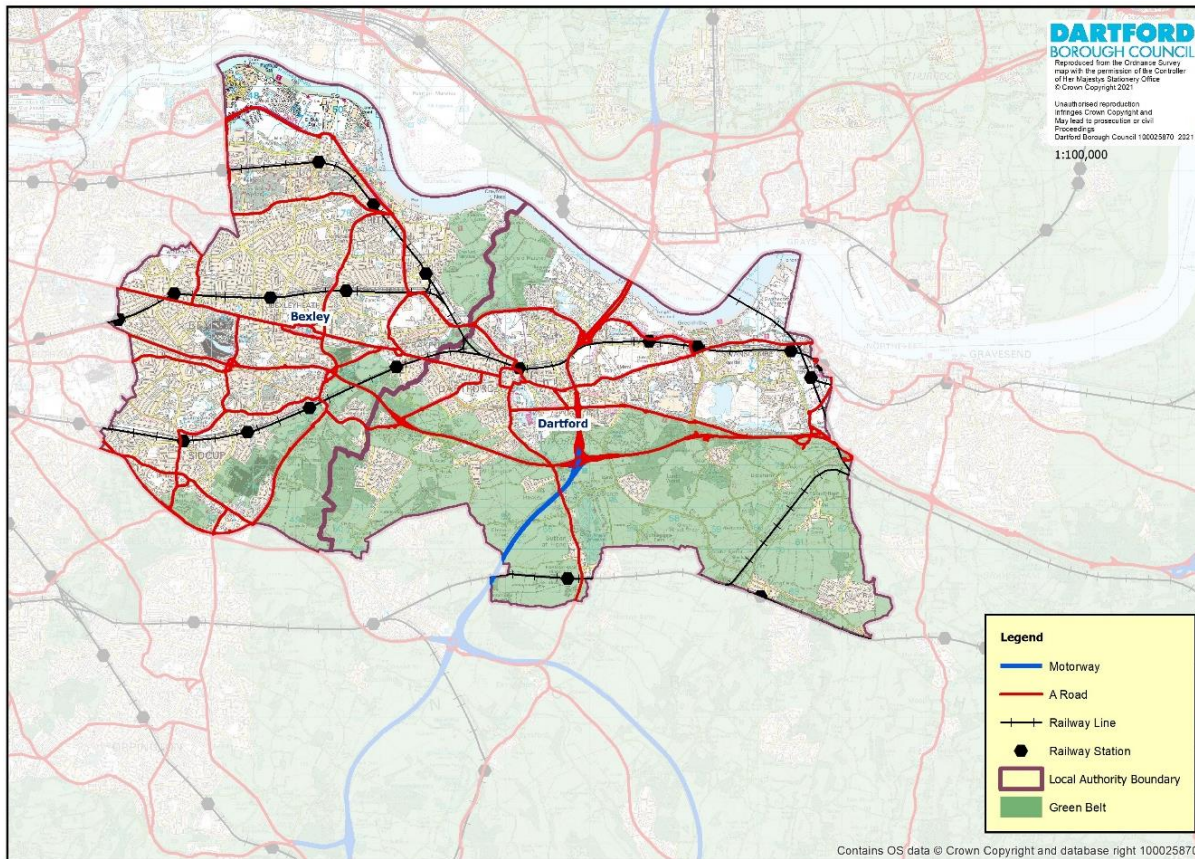


Figure 1: Administrative areas of Dartford Borough Council and London Borough of Bexley

10. The area to the south of the A2 in DBC is more rural. Some areas in the east of LBB perform an urban fringe function between the more urban areas in Greater London and the more rural areas in Kent.
11. Much of these rural and urban fringe areas are designated as Green Belt. The Green Belt comprises 54% of the land area of DBC and 17% of the land area of LBB. The Crayford and Dartford Marshes are designated as Green Belt and provide an important break in development between settlements in DBC and LBB.
12. There are a number of strategic highway routes which run through the boroughs – the M25/A282 Tunnel Crossing runs through DBC and the A2 runs through both DBC and LBB. The A20 runs along LBB's southern boundary. There are also a number of A roads which link different urban settlements in the north. This includes the A207 Dartford Road/London Road which links Dartford and Crayford and the A206 Bob Dunn Way/Thames Road which links north Dartford and the M25/A282 with Crayford and Erith. The A223 North Cray Road is a strategic north/south route in LBB that connects the A2 with the A20.
13. The north Kent line is the main train line which links settlements in the two boroughs with each other and with London. Ebbsfleet International Station is located within DBC. This is on the High Speed 1 line which provides connections to Stratford and London St Pancras.

Local Plans – current status

Dartford Local Plan

14. DBC's current adopted Local Plan comprises the adopted Dartford Core Strategy 2011 and the adopted Dartford Development Policies Plan 2017. DBC is preparing a new Local Plan which will replace these documents. Information on the consultations which have taken place and the expected timescales for the new Local Plan is contained in the table below.

Reg 18 consultations	Reg 19 consultations	Target Submission Date	Target Adoption Date
Strategic Issues June – July 2018 Preferred Options January – March 2020	First Publication February – April 2021 Second Publication September – October 2021	December 2021	2022 (covering period to 2037)

Bexley Local Plan

15. LBB's current adopted Local Plan comprises the adopted Bexley Core Strategy 2012 and saved policies from the Bexley Unitary Development Plan 2004. LBB is preparing a new Local Plan which will replace these documents. Information on the consultations which have taken place and the expected timescales for the new Local Plan is contained in the table below. Policies in the London Plan 2021, which took effect from 2 March 2021, form part of the Development Plan for Bexley.

Reg 18 consultations	Reg 19 consultation	Target Submission Date	Target Adoption Date
Preferred approaches to planning policies and land use designations February – April 2019	Proposed Submission Draft Local Plan May – Jul 2021	November 2021	2023 (covering period to 2038)

Strategic cross-boundary matters

Pattern of development

16. There has been a longstanding strategy for the regeneration of the Thames Gateway area extending from east London to north Kent and South Essex. As part of this, Dartford Borough north of the A2 was identified as part of the Kent Thames-side growth area of regional significance in the government's Thames Gateway Planning Framework in 1995 (RPG9a). The Framework also identified Erith Reach and Thamesmead in the northern part of London Borough of Bexley as areas with significant opportunities for development/regeneration. This focus for growth/ regeneration was taken forward in the South East Plan 2009 (for the relevant parts of Dartford Borough) and the first London Plan (April 2004) and all subsequent London Plans (for the relevant parts of Bexley).
17. The part of DBC south of the A2 did not fall within an identified sub-region in the South East Plan but largely comprises Green Belt which the South East Plan sought to retain. The South East Plan was formally abolished in 2013 and there are no longer any regional strategies or policies covering DBC.

18. The London Plan continues to identify two Opportunity Areas (OAs) in north Bexley: Thamesmead and Abbey Wood OA and Bexley Riverside OA. The latter OA extends along the north of the borough and along the boundary with Dartford to Crayford town centre, and includes areas of designated Green Belt. The London Plan approach to development in the Green Belt is clear – it should be protected from inappropriate development that should not be approved except in very special circumstances, in line with paragraph 147 of the NPPF.
19. It is regarded that there are key elements of the established approach that are relevant for authorities to consider taking forward. Importantly, these are in line with the policies set out in the National Planning Policy Framework.

Points of agreement

- Both new local plans will optimise the potential for development of sites in the existing urban areas, subject to other Local Plan policies and designations.
- Both DBC and LBB include Metropolitan Green Belt land. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Any release of Green Belt land will be subject to the exceptional circumstances tests set out in paragraph 141 of the National Planning Policy Framework.
- Development will be located, planned and designed to improve the quality and provision of sustainable modes of transport, i.e. walking, cycling, buses, trains, and all opportunities will be taken to improve the sustainable transport network for users (also relates to Transport and Infrastructure).

Housing Market Area and housing needs

Dartford Borough Council

20. The Dartford and Ebbsfleet Residential Needs Assessment (DERNA) 2019, supplemented by an update in September 2021, sets out housing needs for DBC in the new Dartford Local Plan period to 2036/2037. It shows that there are established linkages between the boroughs of Dartford and Bexley in terms of migration flows.
21. The assessment indicates that there has been a reduction in proportion of people moving from Dartford to Bexley between 2011 and 2019. Despite this, Bexley is now the most common location for households relocating from Dartford Borough. In 2019, this amounted to 12.7% of those leaving, equating to 889 people.
22. The DERNA indicates that whilst the proportion of all people moving to Dartford Borough from Bexley has reduced between 2011 and 2019, Bexley remains by far the most common location of origin for households relocating to Dartford Borough. In 2019, 21.2% of those who moved to Dartford Borough came from Bexley, equating to 1,906 people.
23. In terms of defining housing market areas, the DERNA concludes as follows:

The analysis of Dartford and its neighbouring authorities presented above suggests that the most established linkages are those with the neighbours immediately to the west and east of the Borough – Bexley and Gravesham reflecting the pattern of migration flows around London to move radially outwards. It is interesting to note that the flows between Dartford and Bexley are strong both ways. Whilst the Gravesham SHMA concluded that Dartford was part of a housing market area with Gravesham and Medway, the latest information on market flows suggest that the interaction between Dartford and Gravesham is reducing. In fact, the authority with which Dartford appears most aligned appears to be Bexley, not only for the number of people moving between the areas, but the similarity of

the housing markets. As Bexley is considered as part of London administratively and is covered by the London Plan, and Dartford is not, it seems suitable to consider the Borough as its own housing market, although one with close links to neighbouring authorities. This approach aligns with what is suggested in the PPG.

24. The DERNA update 2021 confirms that the Borough is its own housing market, although one with close links to neighbouring authorities.
25. Policy S4 (Borough Development Levels) of the second Publication Dartford Local Plan makes provision for 790 dwellings per annum. As set out in paragraph 2.57 of the Plan, this amount of dwellings:
 - is based on the actual developable supply of housing land, accounting for the confirmed regeneration capacity to achieve sustainable new homes in the Borough;
 - provides for the national objectively assessed need for the Borough and includes flexibility;
 - boosts provision of new homes and supports plans for new local communities to continue to materialise now in planned locations, by providing a sufficient deliverable supply for 5 or more years from now; and
 - is consistent with potentially supporting delivery of some unmet residential needs in the wider area.

London Borough of Bexley

26. The Bexley Strategic Housing Market Assessment (SHMA) 2020, updated in 2021, has been produced as evidence supporting the emerging local plan. Bexley, as a London Borough, is required to meet a 10 year housing target set out in the London Plan 2021 of 6,850 between 2019/20 and 2028/29, and is rolling forward an annual target of 685 net new dwellings to the end of the Plan period of 2037/38. Bexley Draft Local Plan Policy SP2 seeks to meet the Mayor's housing target for the borough.
27. Draft Local Plan Policy SP2 also identifies 50% of all housing to be affordable, with a recommended tenure split of 70:30 between affordable rent and intermediate housing respectively. It is considered that the Draft Local Plan affordable housing policies will deliver the maximum amount of affordable housing possible and viable within Bexley. This is in line with London Plan Policy H4.
28. Bexley's minimum housing need calculated using the updated standard methodology is 1,295 net new dwellings per year. This includes a 35% 'cities and urban centres uplift' introduced in December 2020. Affordable housing need is assessed separately from general housing need using a different methodology and this has been calculated as between 958 and 1,378 per year.
29. The Bexley SHMA is accompanied by a demographic study, which notes that in terms of migration linkages between Bexley and surrounding areas, net inflows are largest from the Royal Borough of Greenwich, with the largest net outflows being Dartford. Both of these are a significant margin higher over other migration areas. Bexley however is considered to be part of the wider London housing market area.

Points of agreement

- The parties have a history of positive cooperation on Local Plan content and collaboration on strategic matters, including new development and infrastructure. The parties fully agree the need for effective cooperation on strategic planning, in parallel with the principle of recognising each other's right to develop their own plans informed by cross boundary dialogue that fit the specific circumstances of Borough communities; and both also acknowledge the necessity for Local Plans to

reflect differing local needs and the contrasting statutory planning and service provision arrangements present in two tier Kent, and in Greater London.

- The parties agree that each authority has robustly assessed the ability of its respective area to accommodate housing development. They each consider that they are doing the maximum reasonable to meet their required housing needs in line with national policy.
- It is agreed there are clear links between the LBB and DBC housing markets.
- DBC and LBB are aware of the potential economic and social benefits of sustainable urban regeneration in north Kent. Also noted is the scale of the government's housing ambition, and the inability of some other Local Plans in Kent to progress and successfully meet their own housing needs. The parties agree that the housing needs arising from their respective areas will first fall to be met by up to date site provisions within each authority area, via each Local Plan.
- It is noted that the new London Plan is not able to demonstrate that London's housing needs can be met within the Greater London area.
- The Dartford Local Plan includes the ability to make a contribution towards unmet housing needs in the wider area. The Local Plan housing requirement is above the current standard method level, with some limited potential over time to support housing delivery required from elsewhere. The indicative scale of the aggregate allowance by Dartford (when meeting its requirement over its full plan period) is projected to be up to approximately 800 dwellings.
- Given the close migratory links between the boroughs as set out in the evidence base and recognising current status of plan-making, both parties consider that it would be appropriate for any available future housing delivery contribution from Dartford to be drawn down in the first instance if required by Bexley as the logical priority authority of those adjoining Dartford.
- The parties agree that there is a housing land supply allowance in the plan period to March 2037 in the Publication Dartford Local Plan to contribute towards future needs outside Dartford. This allowance is not relied upon in the Bexley Draft Local Plan to meet its London Plan housing target. However, if there is a need then both parties consider that there could be scope to call upon Dartford's allowance.
- The parties agree to continue to work positively together to seek to address the future housing needs as far as possible, taking into account key constraints, and the need for sustainable development. This will be via regular meetings, joint action and updates as necessary to the Statement of Common Ground.

Retail

30. The most significant locations for retail provision in DBC are Dartford town centre and Bluewater. Bluewater was completed in 1999 as a regional shopping centre and serves a catchment that includes parts of South East London, Kent including Medway and Essex including Thurrock.
31. Policy M22, the supporting text and table 7 of the second Publication Dartford Local Plan September 2021 set out the regional role of Bluewater and DBC's approach to development in this location.

Points of agreement

- The parties agree that Bluewater operates as a regional shopping centre, and a suitable policy recognising its need to develop on this basis in response to competing regional centres, but providing safeguards for local town centres in Bexley and Dartford Boroughs, is appropriate.

Infrastructure

32. The Dartford Infrastructure Delivery Plan sets out the list of projects to support planned new development in DBC and meet the demands that this will generate. It indicates projects where: the full level of funding has been identified (including direct provision by developers); the application of Community Infrastructure Levy funding could help to unlock delivery; and other projects which may be needed to support development but currently need to be further defined to confirm delivery timescale and potential funding. The Infrastructure Delivery Plan includes transport, health and education projects. Furthermore, the second Publication Dartford Local Plan includes an Infrastructure Diagram which includes various transport improvements linked to the Infrastructure Delivery Plan. Further information is set out in the Transport section below.
33. The Bexley Infrastructure Delivery Plan (IDP) is a living document that will be kept under review and updated as needed. It sets out the infrastructure necessary to support and deliver good growth in the borough. It is focussed on the infrastructure needed to support the identified growth in the Draft Local Plan (2021-2038), which considers the first part of the adopted Bexley Growth Strategy (2020-2050). The infrastructure types addressed in the IDP cover social and community infrastructure, transport, waste, utilities and green and blue infrastructure.

Health and education

34. The Infrastructure Diagram in the second Publication Dartford Local Plan shows the locations of new schools and health facilities as well as search zones in areas where further such facilities are required.
35. In relation to education and health infrastructure, many pupils and patients travel across boundaries to access important services. This includes to secondary schools in both Boroughs. It also includes the Darent Valley Hospital in DBC which provides a strategic healthcare facility serving residents living in DBC, parts of LBB and the wider area.

Point of agreement

- LBB and DBC will continue to work internally within their organisations and with service providers (including Kent County Council, the Kent & Medway and South East London Clinical Commissioning Groups and Dartford and Gravesham NHS Trust).

Transport

Local Plan transport modelling work

36. To support work on the new Dartford Local Plan, DBC has published the outputs from transport modelling work carried out by Stantec. In relation to the parts of the strategic road network in closest proximity to LBB, the modelling found the following:
 - M25 (A282) J1a – Further detailed studies of this junction may be necessary to demonstrate its ability to serve Reference Case and Preferred Local Plan development. This may require a detailed modelling exercise of this junction to be completed using stand-alone junction modelling software or microsimulation modelling software. With respect to serving the Preferred Local Plan development, a detailed modelling review of the Cotton Lane arm may be required.
 - A2/A2018 assessment – Further detailed studies of this junction may be necessary to demonstrate its ability to serve Reference Case and Preferred Local Plan development. This may require a detailed modelling exercise of this junction to be completed using stand-alone junction modelling software or microsimulation modelling software.

37. The Dartford Transport Background Paper September 2021 shows that, prior to the outputs from the modelling work, a number of local transport assessments were available, providing a reasonable understanding of the future transport implications of development growth on the local and strategic network in Dartford Borough. The Sustainable Transport Strategy outlines a framework for a range of sustainable travel actions to support modal shift and mitigate impacts on the highway network.
38. Bexley has also carried out local plan transport modelling work both for key local junctions within the borough and specific junctions on the strategic road network outside of the borough. These are set out in the Local Plan Transport Assessment (LPTA) and conclude that the growth identified in the draft Local Plan is sustainable from the transport perspective given the proposed spatial strategy, confirmed transport improvement schemes, policy approaches which reduce the need to travel, encourage mode shift away from the car and improve air quality and future targeted road enhancements at specific junctions, particularly on the South Thames Development Route. The strategic highway modelling work has confirmed a modest impact on Junctions 1a, 1b and 2 of the M25 which will form the context for further joint working with sub regional transport partners to identify required improvements, develop schemes and agree appropriate funding approaches (see below).

Abbey Wood to Ebbsfleet transport enhancement options

39. There has been a Safeguarding Direction in place since 2009 which covers a possible future Crossrail route from Abbey Wood to Gravesend and Hoo Junction which bisects both LBB and DBC. This requires local planning authorities to consult with Crossrail Ltd regarding planning applications within the limits shown on the safeguarding plans before granting planning approval as they may conflict with the proposed route.
40. There has been collective working between a number of partners since 2015 on potential options to improve public transport between Abbey Wood and Ebbsfleet. In 2020, LBB and DBC, along with the Ebbsfleet Development Corporation, Kent County Council, Gravesham Borough Council, Thames Gateway Kent Partnership, the Greater London Authority, Network Rail and Transport for London, signed a Memorandum of Understanding (MoU) with the government (Ministry of Housing, Communities and Local Government and the Department for Transport) on Transport Enhancement Options between Abbey Wood and Ebbsfleet. Under the MoU, the Partnership is working together to take forward a study into transport capacity and connectivity options between Abbey Wood and Ebbsfleet with a view to delivering ambitious and sustainable housing and economic growth in the area. This study was completed in November 2021 and submitted to Government for consideration. A response is expected sometime in the first half of 2022.

Road network, public transport, walking and cycling

41. DBC continues to work with partners within Kent and the wider area in relation to transport matters. The transport priorities within DBC include:
 - Expansion of the Fastrack bus network
 - Public transport service improvements
 - Improvements to walking and cycling infrastructure and links
 - A2 junction improvements
 - Crossrail extension to Dartford and Ebbsfleet (see section above)
42. Bexley's Local Implementation Plan (LIP) sets out both the local strategy for transport in the borough and a three-year programme of measures for implementation. The LIP supports delivery of the Mayor's Transport Strategy (MTS), including the Mayor's objective that, by 2041, 80% of all

journeys in London should be by means other than the car. The LIP includes a local mode share target for the borough for 2041, set at 63%, a lower level than the outer London average, taking some account of Bexley's connectivity issues. In addition the Council is both highway and traffic authority for all roads in the borough apart from the A2 and the A20. This includes the strategic road network for London (which takes in the A206/A2016 STDR), although Transport for London (TfL) also has a network management role in respect of those roads.

43. DBC and LBB are committed to continue working in partnership with the relevant stakeholders to seek funding for and make improvements to the road network, public transport, walking and cycling in their respective areas to ensure that transport infrastructure is delivered in a timely manner to support sustainable growth.

A282/M25 and Junction 1A

44. A key issue for DBC is the operation of junction 1A on the A282/M25, immediately south of the Dartford Crossing. Traffic incidents on the Dartford Crossing commonly occur which adversely affect the operation of junction 1A and cause significant congestion on the A2 trunk road and local roads in DBC, in particular those around Dartford, Stone and Greenhithe; and westwards along the A206 towards Bexley. DBC and LBB are working with National Highways and Kent County Council to seek funding solutions and achieve the implementation of improvements to junction 1A.

Points of agreement

- DBC and LBB will continue to safeguard land potentially required for public transport enhancements between Abbey Wood and Ebbsfleet. This is reflected in policy M16 of the second Publication Dartford Local Plan and policy SP11 of the Bexley Draft Local Plan.
- LBB and DBC will continue to support the improvement of public transport routes, services and facilities and active travel routes and facilities (including for walking and cycling) so that they provide an attractive alternative to the private car. This is reflected in policies S2, M16 and M17 of the second Publication Dartford Local Plan and policies SP10, SP11, DP22 and DP24 of the Bexley Draft Local Plan.
- DBC and LBB will continue to work with National Highways and Kent County Council to address issues associated with the operation of junction 1A on the A282/M25; and will work together cooperatively on the link route (A206) into Bexley. Bexley Draft Local Plan policy SP10 Part 2 notes this partnership working to address necessary infrastructure interventions on the strategic road network.

Green and blue infrastructure


45. The Dartford Marshes, Dartford Heath and Joyden's Wood Local Wildlife Sites in DBC adjoin the M031 River Thames and tidal tributaries, M107 Crayford Marshes, BxBI18 Crayford landfill and Howbury Grange, BxBI13 Braeburn Park, BxBII12 Churchfield Wood, Meadows and St Mary's Church, M118 Chalk Wood and Joyden's Wood Sites of Importance for Nature Conservation (SINC) in LBB.
46. The Crayford and Dartford Marshes are divided by the River Darent, which is characterised by embankments on either side. There are also a number of strategic and local footpath and cycle links which cross the boundaries of the two authorities, including National Cycle Route 1 and the Thames Path/ England Coast Path. Taken together, these form part of the Green Grid/ Green Infrastructure network. They are shown on the existing Dartford Local Plan Policies Map, in the Policies Map Changes document which accompanies the second Publication Dartford Local Plan

Sept 2021 and/or in Diagram 3 of the second Publication Dartford Local Plan. SINC, strategic green corridors and the Thames Path in LBB are shown on the submission policies map. SINC are also shown in the SINC Report.

Point of agreement

- The Local Wildlife Sites, Sites of Importance for Nature Conservation, National Cycle Route 1 and the Thames Path/ England Coast Path form part of the Green Grid/ Green Infrastructure network. They will be protected and opportunities to enhance them and any other cross boundary Green Grid links/ Green Infrastructure will be taken. This is reflected in policies S2, M15 and M17 of the second Publication Dartford Local Plan and policies SP8, SP9, SP10, SP11, SP13, DP19, DP20, DP22, DP24, and ERI04 of the Draft (Proposed Submission) Bexley Local Plan.

Signatories

Signed on behalf of London Borough of Bexley	Signed on behalf of Dartford Borough Council
	
Position: Head of Strategic Planning	Position: Head of Planning Services
Date: 24 November 2021	Date: 23 rd November 2021