

# DBC-GBC Statement of Common Ground

## List of Parties Involved

This Statement of Common Ground (SOCG) has been prepared by Dartford Borough Council (DBC) and Gravesham Borough Council (GBC).

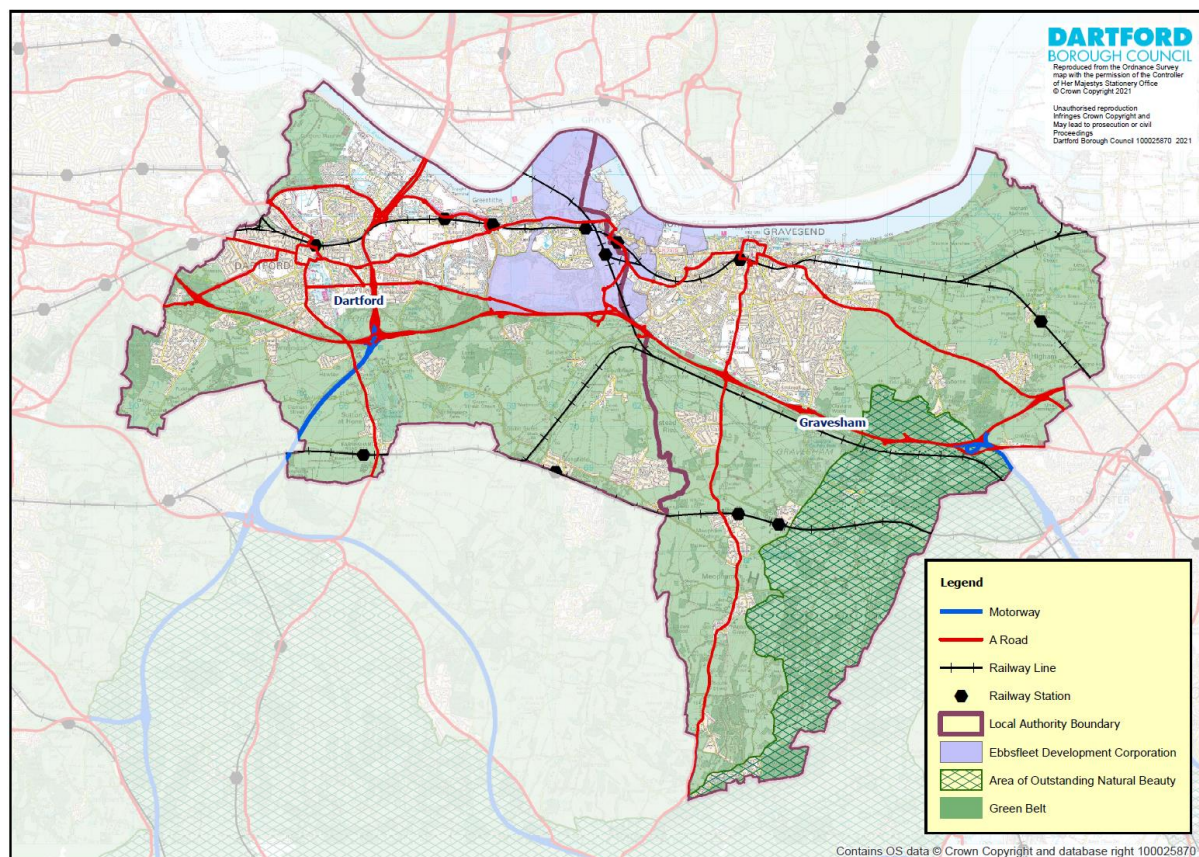
Both DBC and GBC are plan making authorities for their areas but only exercise a development management function outside Ebbsfleet Garden City, which straddles the boundaries of the two authorities. The Ebbsfleet Development Corporation is the development management authority for Ebbsfleet Garden City.

Kent County Council is the minerals and waste planning authority for the DBC, GBC and EDC areas, the local transport authority and provider of a number of important local services. It is not a party to this SOCG.

This SOCG reflects the most up-to-date position between DBC and GBC in respect of our respective emerging Local Plans. It sets out the key strategic cross-boundary issues and areas of agreement and disagreement on them.

## Strategic Geography

DBC and GBC are second tier local authorities which adjoin each other and lie to the south of the River Thames. Their location is shown in the map below. The Councils share an upper tier authority, Kent County Council.



DBC is also bounded by London Borough of Bexley (and the Greater London Authority) to the west, Sevenoaks District to the south and Thurrock Council on the opposite side of the river to the north.

GBC is also bounded by Medway Council to the east, Sevenoaks District and Tonbridge and Malling Borough to the south and Thurrock Council on the opposite side of the river to the north.

Much of the area to the north of the A2 in DBC and in the north west of GBC is urban. The main settlements are Dartford in DBC and Gravesend/ Northfleet in GBC. There is a series of smaller settlements running between them along the A226 – Stone, Greenhithe and Swanscombe, which all lie in the DBC area. The urban area of DBC includes the Bluewater Regional shopping centre and the Darent Valley Hospital. The Ebbsfleet Valley is a key natural feature which runs along the boundary of the two Boroughs and Ebbsfleet International Station is located within this area. This is the central area around which Ebbsfleet Garden City is being taken forward but there are other areas at Northfleet Riverside and Castle Hill/ Western Cross/ Alkerden/ Ebbsfleet Green. There are current proposals for the London Resort at Swanscombe Peninsula which is a Nationally Significant Infrastructure Project. An application for a Development Consent Order for the London Resort was submitted to the government in December 2020 and subsequently accepted in January 2021. The start of the examination has been deferred at the applicant's request, principally due to Natural England's notification of the Swanscombe Peninsula Site of Special Scientific Interest, which includes a large part of the land within the Order Limits.

The areas to the south of the A2 and east of Gravesend are more rural. Much of the rural area is designated as Green Belt. The Green Belt comprises 56.4% of the land area of DBC and 76.8% of the land area of GBC. There are marshes of international biodiversity importance to the east of Gravesend (designated as a Ramsar site and a Special Protection Area), habitats of national and local importance at Swanscombe Peninsula and in parts of the Ebbsfleet Valley (the recently notified Swanscombe Peninsula SSSI and the Ebbsfleet Marshes Local Wildlife Site) and some marshland of more local wildlife importance to the north of Dartford (the Dartford Marshes Local Wildlife Site). Areas in the east and south of GBC are within the nationally important Kent Downs Area of Outstanding Natural Beauty which comprises 24.4% of the Council's land area.

There are a number of strategic highway routes which run through the Boroughs – the M25/A282 Tunnel Crossing runs through DBC and the A2 (T) runs through both DBC and GBC. There are also a number of A roads which link different urban settlements in the north (A226) and urban settlements in the north with the more rural areas to the south (A225, A227). National Highways is progressing plans for the Lower Thames Crossing to the east of the Gravesend urban area, which will run through the AONB and the Green Belt. This is intended to relieve congestion at the existing A282/M25 Dartford Crossing in the short to medium term and will be dealt with through the Nationally Significant Infrastructure Project process in due course.

There are also a number of train lines running through the area:

- the North Kent line which connects the Gravesend, Dartford and intervening stations with London
- the High Speed 1 line which connects Gravesend, Northfleet and Ebbsfleet with Stratford and London St Pancras
- the Medway to Victoria line which connects stations in the south of both Boroughs to London Victoria

The only non-motorised crossing of the River Thames is the Gravesend – Tilbury Ferry, which runs weekdays and Saturdays between Gravesend town centre and Tilbury Riverside.

## Local Plans – Current Status

### Dartford Local Plan

DBC's current adopted Local Plan comprises the adopted Dartford Core Strategy 2011, which has an end date of 2026, 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.

<b>Reg 18 consultations</b>	<b>Reg 19 consultations</b>	<b>Target Submission Date</b>	<b>Target Adoption Date</b>
Strategic Issues Jun-Jul 2018	First Publication Local Plan Feb-Apr 2021	Dec 2021	2022 (covering period to 2037)
Preferred Options Jan-Mar 2020	Second Publication Local Plan Sep-Oct 2021		

### Gravesham Local Plan

GBC's current adopted Local Plan comprises the adopted Gravesham Core Strategy 2014, which has an end date of 2028, and saved policies from the Gravesham Local Plan First Review 1994. GBC is preparing a partial review of its Core Strategy and producing a Development Management Policies Document. Information on the consultations which have taken place and the expected timescales for the Core Strategy Partial Review and the Development Management Policies Document is contained in the table below.

<b>Reg 18 consultations</b>	<b>Reg 19 consultation</b>	<b>Target Submission Date</b>	<b>Target Adoption Date</b>
Stage 1: Site Allocations Issues and Options Apr-Jul 2018	Expected early 2022	Expected summer 2022	Expected 2023
Stage 1: Development Management Policies Document Apr-Jul 2018			
Stage 2: Local Plan Core Strategy Partial Review and Site Allocations Document Oct-Dec 2020			
Stage 2: Draft Development			

<b>Reg 18 consultations</b>	<b>Reg 19 consultation</b>	<b>Target Submission Date</b>	<b>Target Adoption Date</b>
Management Policies Document Oct-Dec 2020			

## **Kent Minerals and Waste Local Plan**

The Kent Minerals and Waste Local Plan 2013 – 2030 (KMWLP) was adopted in July 2016 and was subject to a partial review adopted following examination in September 2020. A Minerals Site Plan was also adopted in September 2020. The KMWLP is accompanied by safeguarding mapping in relation to minerals resources and transshipment facilities. The County Council commenced a full review of the KMWLP in September 2021.

## **Marine Plan**

Whilst not part of the adopted Development Plan, it is relevant to note that parts of both DBC and GBC fall within the coastal area covered by the South East Inshore Marine Plan, adopted in 2021.

## **Strategic Issues**

### **Pattern of Development**

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 and Gravesend north of the A2 were identified a growth area of regional significance in the government's Thames Gateway Planning Framework in 1995 (RPG9a), known as Kent Thames-side. This set out a focus on the development of damaged land and identified a number of development opportunities, some of which have already been implemented or are in the process of being brought forward. The opportunities identified were at North Dartford, Stone Marshes, Ebbsfleet Valley, Eastern Quarry (which involved the release of land to the north of the A2 from the Green Belt), Swanscombe Peninsula, Gravesend Waterfront and East Gravesend.

This focus for regeneration was taken forward in the South East Plan 2009, which covered the period to 2026. The parts of DBC and GBC to the north of the A2 were within the Kent Thames Gateway Sub-Regional Strategy Area, identified as a growth area. Policy KTG1 set out the overall strategy for this area, including:

- i. as a first priority, make full use of previously developed land before greenfield sites, except where there are clear planning advantages from the development of an urban extension that improves the form, functioning and environment of existing settlements or a new community*
- ii. locate major development in order to exploit the potential of the regional hubs at Ebbsfleet and the Medway Towns and locations served by the Channel Tunnel Rail Link, and locate housing, employment and community services where they are accessible by a choice of transport*
- vii. create higher density development in the main urban areas, linked by public transport to one another and to London*
- x. protect from development the Metropolitan Green Belt, the Area of Outstanding Natural Beauty and avoid coalescence with adjoining settlements to the south, east and west of the Medway urban area and to the west of Sittingbourne.*

Policy KTG2 sought the development of a dynamic and widely based economy in Kent Thames Gateway, to provide employment for the community as a whole. It included the criterion that *'Ebbsfleet will be developed as a major office centre of more than 20,000 jobs linked directly to central London and other European capitals, drawing its workforce from Thameside and beyond.'*

Policy KTG4 acknowledged the potential development capacity within each Borough, with 17,140 dwellings to be brought forward in Dartford and 9,200 dwellings in Gravesham between 2006-2026.

In relation to the role of retail centres, Policy KTG5 included the following criteria:

*'i. Bluewater will continue to maintain its specialist regional role as an out of centre regional shopping centre for comparison goods shopping. Any proposals for additional floorspace at the centre that would maintain this role will be considered through a review of the RSS. Any such proposals should provide for improved access to the centre by non-car modes.*

*ii. the town centres of Dartford, Gravesend...will be further developed as the major town centres at which new mixed retail, leisure and service uses will be concentrated.*

*iii. at Ebbsfleet, ancillary retail and service space will be provided at a scale and character to serve the resident and daytime population.'*

The South East Plan was formally revoked by the government in 2013, except for policy NRM6 relating to the Thames Basin Heathlands SPA. There are no longer any regional strategies or policies covering DBC and GBC. Dartford's existing Local Plan was adopted prior to the abolition of the South East Plan. Gravesham's Local Plan Core Strategy was adopted subsequent to this.

Two of the key issues addressed during the examination of Gravesham's Local Plan Core Strategy, related to meeting its identified local need for housing and the deliverability of development sites within the urban area and settlements inset from the Green Belt. One of the ways in which these issues was addressed was through GBC making a firm commitment made to a Green Belt boundary review. This is reflected in policy CS02 of the Gravesham Local Plan Core Strategy and the supporting text identifies the Green Belt as a broad location for future growth.

The Regulation 18 stage 2 consultation on the Gravesham Local Plan Core Strategy Partial Review and Site Allocations was carried out from October to December 2020. As part of work on the Core Strategy partial review, and in accordance with its commitment in the Core Strategy, GBC is carrying out a green belt review. In this respect, the Regulation 18 stage 2 document was accompanied by a number of evidence base documents. The Local Plan document included potential sites capable of accommodating the Borough's development requirements taking into account existing constraints, including a number within the Green Belt.

DBC made comments on the consultation document in this respect, in particular, the need for GBC to consider all available options for maximising development in its urban area and to give consideration to the redevelopment of large scale employment areas within its urban area for residential development, in preference to the release of large scale land in the Green Belt. In the event that Green Belt release is needed, DBC commented that GBC should give greater consideration to the east of Gravesend option. However, GBC consider that the east of Gravesend option is significantly impacted by the proposals for Lower Thames Crossing and associated mitigation identified by National Highways.

### Points of Agreement

- Both parties note that there has been Green Belt release in DBC in the past to support the delivery of housing and employment and associated improvements to transport infrastructure, primarily at Eastern Quarry (now within Ebbsfleet Garden City). The strategic importance of the remaining Green Belt is therefore recognised and any further releases would need to accord with national policy.
- It is agreed that both Local Plans in keeping with the National Planning Policy Framework should seek to optimise the potential for the development of sustainably located sites within the urban area and rural settlements not within the Green Belt, where this is commensurate with the principles of good design responsive to context. This process will also have regard to statutory and policy obligations relating to key designations.
- Both parties recognise that GBC previously committed to carry out a Green Belt boundary review in its adopted Core Strategy, which was only found sound on this basis. It is agreed that any release of Green Belt land will be subject to the exceptional circumstances test set out in the National Planning Policy Framework and supported by proportionate evidence.
- Both parties agree that development across the two boroughs should be co-ordinated, located, planned and designed as far as possible 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.

### Point of Disagreement

- The requirement to undertake a Green Belt review in GBC to accommodate development as a broad location for growth is embedded in policy CS02 of the adopted Gravesham Local Plan Core Strategy (2014). In the absence of neighbouring authorities accepting unmet need, GBC considers that it has provided sufficient evidence to support the release of Green Belt in the Gravesham Local Plan Core Strategy Partial Review and Site Allocations for residential development.
- DBC consider that GBC need to provide further evidence to justify the release of Green Belt land for development. In this respect, GBC needs to provide evidence to demonstrate that it has considered all available options in line with national policy for maximising the redevelopment of sites and density of development in the urban area and to give consideration to the option of redeveloping large scale employment areas within its urban area for residential development.

## **Housing Market Area and Housing Needs**

It is noted that the urban areas of Dartford and Gravesham are contiguous and that such linkage will be reinforced by the building out of the Ebbsfleet Garden City as a cross-boundary strategic development area.

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 Dartford and Gravesham Boroughs in terms of migration flows. The assessment indicates that there has been a marked reduction in people moving from Dartford to Gravesham Borough between 2011 and 2019. Bexley is now the most common location for households relocating from Dartford Borough. The DERNA indicates that whilst moves to Dartford Borough from Gravesham have reduced in importance between 2011 and 2019, moves from London Boroughs have become more significant. The London Borough of Bexley remains the most common location of origin for households relocating to Dartford Borough.

DBC is using the government's standard method for calculating housing needs, and Dartford Borough's current requirement is 750 dwellings per annum. The Dartford and Ebbsfleet Residential Needs Assessment (DERNA) 2019, reviewed in the DERNA Update 2021, used the previous standard method requirement of 797 dwellings per annum and concluded that planning based on this figure (and similar levels) was appropriate to meet affordable housing needs. DBC's evidence sets out that DBC can demonstrate a Five Year Deliverable Housing Land Supply.

In terms of defining housing market areas, the DERNA 2019 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.*

The DERNA update 2021 confirms that the Borough is its own housing market, although one with close links to neighbouring authorities. The North Kent Strategic Housing and Economic Needs Assessment (SHENA) 2015 was commissioned by GBC along with Medway Council and predates the DERNA. In terms of assessing migration into and out of Gravesham, it uses data from 2014. This shows that most people relocating to Gravesham came from Dartford Borough. It also indicates that most of those moving out of Gravesham relocated to Medway. Based on an assessment of migration, commuting and house prices, the SHENA found that Gravesham's Housing Market Area encompasses Gravesham Borough, Medway Council's area and Dartford Borough.

The standard method for calculating housing needs results in a current requirement of 646 dwellings per annum for Gravesham Borough (compared to the previous requirement of 365 dwellings per annum set out in the Gravesham Local Plan Core Strategy). This standard method figure applies as the adopted Gravesham Local Plan Core Strategy is more than five years old. The North Kent Strategic Housing and Economic Needs Assessment (SHENA) 2015, commissioned by GBC along with Medway Council, also predates the standard method for calculating housing needs though it should be noted that GBC is currently updating its SHENA. GBC cannot currently show a five year deliverable housing land supply and fails the housing delivery test set out in the National Planning Policy Framework. As a result, GBC has applied a 20% buffer to the standard method figure for the period from April 2020 to March 2025 and put a Housing Delivery Action Plan in place.

Paragraph 35 of the National Planning Policy Framework sets out the tests of soundness for Local Plans. In terms of the "positively prepared" test, Local Plans are required to provide a strategy which, as a minimum, seeks to meet the areas' objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

On 5 June 2015, GBC wrote to DBC with a request for Dartford Borough to take some of Gravesham Borough's housing needs. DBC first responded on 5 August 2015 stating that it



would be premature to respond to this request, including in the absence of structures and mechanisms for such a request and in the absence of studies which underpin Gravesham's housing requirements and allocations. Dialogue on the matter has continued since then and GBC consider that the request from GBC to DBC to consider meeting unmet need remains 'live'.

#### Points of Agreement

- There are links between the GBC and DBC housing markets; and there is now the Ebbsfleet Garden City, which straddles the urban boundaries of both authorities and includes strategic development sites, e.g. Eastern Quarry, Ebbsfleet, Northfleet Embankment, as well as other locations such as Swanscombe Peninsula which will link the two urban areas.

#### Points of Disagreement

- No agreement has been reached on the scale of GBC's unmet needs and whether DBC can meet GBC's housing needs. In this respect:
  - DBC considers:
    - The Dartford Local Plan includes the ability to make some 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 to support housing delivery required from elsewhere.
    - That it has undertaken suitable full consideration and discussion of relevant policy/ legislation to the June 2015 request, and any information subsequently released by GBC, in line with national planning policy requirements.
    - The priority is for any available future housing delivery contribution from the Borough to be drawn down first from Bexley Borough with which it has closer migration links. DBC also notes that in the case of both Sevenoaks District and Gravesham Borough, the Local Plan process and their related Duty to Cooperate discussion with their own neighbours are not presently advanced to the stage that it can be confirmed that assistance will necessarily have to be required, (or the only option is DBC).
  - It needs solid, up to date, published data on GBC's housing supply and more clarity in relation to how GBC intends to take its Core Strategy Partial Review and Site Allocations Plan forward. There has not been an update in light of DBC's responses made on the Regulation 18 stage 2 consultation. DBC also notes it has not had meaningful information since 2015 on the progress of discussions or agreements made with GBC's other neighbouring authorities on accommodating housing need.
  - GBC considers that it has met the requirements of paragraph 141 of the NPPF (2021) in that it has engaged in discussions with neighbouring authorities as to whether they could accommodate some of the identified need for development requiring Green Belt release. GBC contends that there is no requirement for it to set out the absolute level of unmet need before DBC is obliged to consider whether or not it can assist. In any event, the scale of unmet need as evidenced through GBC's Regulation 18 Stage 2 consultation in late 2020 is sufficiently clear. GBC is also of the view that there is no provision in national policy that allows a neighbouring authority to require others to consider meeting unmet need before it considers its own ability to do so.

#### **Gypsies, Travellers and Travelling Showpeople**



It is recognised that identifying suitable accommodation for gypsies, travellers and travelling showpeople is a potential cross-boundary issue as a result of the proximity of sites in DBC, GBC and Sevenoaks District. Families occupying Green Belt land in those areas can result in them living within two authorities. There are also likely to be flows which are rooted in historic patterns of movement of the gypsy and traveller community linked to seasonal work.

The Dartford GTAA 2019 has been produced to support DBC's new Local Plan. It sets out the needs for gypsies, travellers and travelling showpeople to 2035. For gypsies and travellers who meet the planning definition, the need is for 48 pitches to 2024 and an additional 22 pitches from 2024-2035 (total of 70 pitches). For travelling showpeople who meet the planning definition, the need is for 1 plot to 2024 and no additional plots from 2024-2035. Taking into account planning permissions which have since been granted and the need for a five year supply of pitches/ plots, the needs are now 34 pitches and 1 plot respectively from 2019-2026.

In relation to the new Dartford Local Plan, DBC is carrying out further work on identifying sites to meet the needs of gypsies, travellers and travelling showpeople which has been delayed as a result of Covid-19 related tier and national lockdown restrictions. The latest position on this work is outlined in the "Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report September 2021."

The Gravesham GTAA 2018 has been produced to support GBC's Local Plan Core Strategy Partial Review and Site Allocations Document. It sets out the needs for gypsies, travellers and travelling showpeople to 2037. For gypsies and travellers who meet the planning definition, there is a known need for 24 pitches to 2028 and an additional 7 pitches from 2028-2037 (total of 31 pitches). This will be updated in advance of GBC's Regulation 19 Local Plan consultation in 2022.

The Regulation 18 stage 2 consultation on the Gravesham Local Plan Core Strategy Partial Review and Site Allocations October 2020 did not set out any options on how GBC is intending to meet its needs of gypsies, travellers and travelling showpeople. Instead, it asked a question asking how and where these needs should be met. A draft development management policy relating to applications for gypsy and traveller sites was included in the consultation.

### Point of Agreement

DBC and GBC are currently considering all reasonable options to provide pitches to meet their Borough needs for gypsies and travellers within their respective areas. This is notwithstanding the fact that meeting such need may justify exceptional circumstances for the allocation within and release of land from the Green Belt.

### **Employment**

DBC's DERNA 2019 shows the pre Covid 19 patterns of commuting into and out of DBC. Whilst one third of DBC's working residents are employed within the Borough, significant numbers commute to work in Bexley, Westminster and the City of London. In terms of those who work within DBC, nearly 30% of those who work in the Borough also live there. Over 14% of workers in DBC commute from GBC and more than 12% of workers in DBC travel from Bexley.

DBC includes a number of large employers, including company headquarters, and construction, transport and service sectors. There are some significant sized business parks at Crossways, Questor and The Bridge. Other locations where the land use supports a high

concentration of jobs includes Darent Valley Hospital and Bluewater. As a result, DBC is a net importer of labour.

DBC has produced an Economic Land Report 2021 and Employment Needs Review 2020 to justify the approach it is taking towards the provision of employment land in the emerging Dartford Local Plan. This is available as part of the evidence base.

GBC's SHENA 2015 sets out information on the patterns of commuting into and out of GBC. Similar to DBC, this indicates that around one third of GBC's working residents are employed within the Borough. 17% of economically active residents commute from GBC to DBC to work, with fewer commuting to Westminster and the City of London and Medway. In terms of those who work in GBC, 56% of those who work in the Borough also live there, with 14% travelling from Medway and 8% commuting from DBC.

The SHENA refers to the relatively small scale of the local economy and small levels of economic growth in GBC in recent times. It states that there are good future prospects for growth across a range of activities but it is not envisaged that there will be a pronounced shift in the scale and nature of the GBC economy in the short to medium term without intervention. In the absence of intervention, the SHENA considers that economic growth is likely to occur at a rate that enables jobs and homes growth to be balanced.

GBC has jointly commissioned an updated Economic Land Needs Assessment (ELNA) with Medway Council to support the emerging GBC Local Plan and this will be available to support the GBC Regulation 19 consultation.

#### Point of Agreement

- There are links between the GBC and DBC employment markets but it is agreed that there are differences in the economic performance and type of employment on offer in each Borough. The proposals for Ebbsfleet Central include significant commercial floorspace based around Ebbsfleet International Station, which is supported, but the implications of this on the wider employment market are not fully understood at the current time.

#### Points of Disagreement

- DBC consider that its evidence base is sufficient to justify its approach towards employment land supply and provision in the emerging Dartford Local Plan.
- GBC consider that DBC's evidence is insufficient as it does not include a formal assessment of employment space, workforce requirements and linked housing need over the plan period.

### **Retail**

The most significant locations for retail provision in DBC are Dartford town centre and Bluewater. Dartford town centre comprises a historic high street, two purpose built shopping centres (The Orchards and Priory) and the Prospect Place Retail Park. 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.

The main retail centre in GBC is Gravesend town centre. This is centred around New Road and includes two purpose built shopping centres (St Georges and Thamesgate). The Imperial Retail Park lies to the north west of Gravesend town centre.

All retail centres will continue to need to evolve in the context of:

- changes to the retail market, including the forecast growth of online shopping;
- recent amendments to The Town and Country Planning (Use Classes) Order 1987; and
- ongoing changes to permitted development rights which remove the requirement for planning permission for certain types of development.

#### Point of Agreement

- It is agreed that there is uncertainty regarding the future retail environment in light of changes that are taking place. These changes may provide opportunities for centres to change or reinvent themselves to provide multi-functional services for existing and new communities.

#### Points of Disagreement

- The parties do not agree on the status of Bluewater as a centre and when the sequential and impact tests should be applied.
  - DBC highlight that the policy in the publication Dartford Local Plan is the outcome of a review of the policy in the Core Strategy (and will replace it) and a new retail study has been undertaken which addresses Bluewater and supports the proposed approach. DBC note that there have been several discussions with GBC and others, including a duty to cooperate event specifically on the retail study (incorporating a Q&A with the retail consultant during preparation of the study) which GBC attended.
  - GBC consider that this remains an outstanding issue from the examination of DBC's Development Management Policies in 2017 which the Inspector concluded should be dealt with thorough this review of the Local Plan. GBC has also expressed concerns regarding whether DBC has engaged sufficiently with affected local planning authorities within the Bluewater catchment given as a regional centre.

### **Ebbsfleet Garden City**

Ebbsfleet Garden City straddles the boundaries of Dartford and Gravesham Boroughs and also includes land at Northfleet Riverside. DBC and GBC remain the plan making authorities but the Ebbsfleet Development Corporation (EDC) is the development management authority, dealing with planning applications in this area. The EDC was set up by the government in 2015 to speed up delivery of up to 15,000 homes and create a 21st century Garden City in north Kent.

Since 2016, DBC, EDC, GBC and Kent County Council have maintained a Memorandum of Understanding (MoU) on the collective working the parties will undertake in support of the development objectives set by government for Ebbsfleet Garden City. The MoU includes a section on Duty to Cooperate and partnership working and paragraph 38 states the following:

"It is agreed between the Parties that the overall objective of this Memorandum is to assist in achieving the sustainable development and regeneration of the Development Corporation Area, areas within the immediate vicinity and, where appropriate, its wider hinterland and to do so in the context of the Boroughs and County's adopted development plans and in a co-ordinated manner with other development taking place within the Boroughs' boundaries."

The MoU commits the parties to contributing towards the Planning Liaison Group which shall conduct "engagement on strategic planning, including planning policy, major applications and infrastructure matters and ensure effective working between the EDC and the local

authorities". The Planning Liaison Group has met and will continue to meet regularly, with cooperative information sharing between the parties on the Dartford and Gravesham Local Plans, and the Kent Minerals and Waste Local Plan.

The following are cross boundary issues of relevance in relation to Ebbsfleet Garden City:

- The EDC has purchased much but not all of the Ebbsfleet Central area, is currently undertaking masterplanning work and is intending to submit a planning application for significant commercial and residential development.
- Natural England notified DBC and GBC of the Swanscombe Peninsula Site of Special Scientific Interest (SSSI) in March 2021 and this was confirmed on 10 November 2021. This covers the western part of the Ebbsfleet Central strategic development area (within DBC) and much of the Swanscombe Peninsula strategic development area (within DBC and GBC) identified in the Ebbsfleet Implementation Framework. The outcome of the notification will be known by December 2021.
- The London Resort is proposed as a Nationally Significant Infrastructure Project on the Swanscombe Peninsula. London Resort Company Holdings submitted an application for a Development Consent Order to the Planning Inspectorate in December 2020. There have been delays to the progress of this as a result of the need for further information and the notification and subsequent confirmation of the Swanscombe Peninsula SSSI. DBC is working with the EDC to assess the implications of the proposed development. DBC is not assuming that the London Resort will be delivered in taking forward its new Local Plan but has committed to reviewing the Local Plan in the event that the London Resort proposals are approved and proceed.
- GBC's existing adopted policy in relation to the undeveloped part of Swanscombe Peninsula within its area (Policy CS03 and supporting text at 4.4.3 – 4.4.4) recognises that there is development potential in this location subject to addressing constraints and the adoption of a wider masterplan approach. However, this pre-dated both the designation of the SSSI and the Swanscombe Marine Conservation Zone, which would further add to constraints on development.
- The Ebbsfleet Marshes Local Wildlife Site straddles the boundaries of DBC and GBC and is within the Ebbsfleet Central strategic development area.

### Points of Agreement

- Both Local Plans will positively embrace the opportunities presented by Ebbsfleet Garden City.
- Both Local Plans will maximise the potential for significant mixed commercial and residential development at Ebbsfleet Central, which straddles the boundaries of GBC and DBC.
- GBC and DBC will continue to work on planning policy, major applications and infrastructure matters relevant to Ebbsfleet Garden City, including through membership of the Planning Liaison Group (also relates to Transport and Infrastructure).
- It is agreed that the London Resort proposals, if approved, have the potential to result in significant impacts on both Boroughs. These would need to be dealt with through respective Local Plans.

### **Transport**

The Dartford Infrastructure Delivery Plan 2020 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.

Appendix 6 to the adopted Gravesham Local Plan Core Strategy (2014) includes an infrastructure delivery schedule covering the existing local plan period to 2028. The Regulation 18 Stage 2 consultation undertaken in late 2020 included an Infrastructure Background Paper with a chapter 3 on transport. This work will be updated in due course in the form of a new Infrastructure Delivery Plan based on a comprehensive transport evidence base to be made available at the Regulation 19 consultation stage in 2022. Much of the transport infrastructure that raises cross boundary issues is shared in common with DBC including improvements in and around the Ebbsfleet Garden City and the expansion of the Fastrack network.

### Local Plan Transport Evidence

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 the GBC, the modelling found the following:

- A2 Ebbsfleet Interchange – The findings show that the principal issue with this junction relates to the east roundabout access road serving the Ebbsfleet development. Further detailed studies of this junction will be carried out as the Ebbsfleet development comes forward to ensure that there is sufficient capacity at this junction to serve the planned development without causing significant adverse effects on the strategic road network.
- A2 Pepper Hill interchange – The junction is predicated to operate within capacity under Reference Case conditions and the addition of the Preferred Local Plan traffic. On this basis, it is not anticipated that the implementation of the Local Plan would have a significantly detrimental effect on the operation of the junction compared to the Reference Case.

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.

Stantec has carried out further work for DBC on the transport issues and potential interventions and this report (Stage 4) will be made available and consulted on prior to the submission of the plan for examination.

The GBC Regulation 18 Stage 2 consultation in late 2020 was supported by a Baseline Transport Evidence Base document produced by Stantec. More detailed transport modelling is to be undertaken using the KCC multi-modal transport model to consider the implications of the Regulation 19 preferred option and the interventions required to support it. The outputs from this work will be available to support the Regulation 19 consultation in 2022 and will have regard to relevant development in the DBC area that raise cross-boundary issues. Both KCC and Highways England will be involved in this work and the DBC development schedule used to inform its local plan transport modelling will be considered as an input.

### Abbey Wood to Ebbsfleet Transport Enhancement Options

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. 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.

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, GBC and DBC, along with the EDC, Kent County Council, London Borough of Bexley, 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.

### Road Network, Public Transport, Walking and Cycling

Kent County Council's Local Transport Plan 4: Delivering Growth without Gridlock 2016-2035 is relevant to DBC and GBC. It includes the transport priorities for DBC and GBC over the period of the plan. These are intended to improve the capacity of the local and national road network and encourage a modal shift to more sustainable forms of transport. Common schemes across the two Boroughs are:

- 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)

There are also a number of other schemes proposed in each borough which form part of the overall programme of improvements in the area.

The Kent Thameside Strategic Transport Programme (STIP) is part of the wider transport strategy for DBC and GBC and complements the Local Transport Plan. It was created in 2005 in response to the anticipated impact of planned development across DBC and GBC. The broad aim of the programme is to deliver a package of transport improvements at key locations across the transport network that would enable the planned level of development to be realised. Substantial improvements to public transport provision and the better integration of development with more sustainable forms of transport are key elements of the transport strategies which aim to maintain an effective transport network. The programme was developed through a partnership involving DBC and GBC as the local planning authorities and Kent County Council as the local highway authority. Ebbsfleet Development Corporation subsequently joined the partnership.

DBC and GBC are committed to continue working in partnership with the relevant stakeholders, including Kent County Council and Highways England. Both authorities recognise that securing sufficient funding to deliver transport improvement schemes is essential. DBC and GBC are committed to working together to secure the necessary funding and to ensure that transport infrastructure is delivered in a timely manner to support sustainable growth.

### Lower Thames Crossing

The Lower Thames Crossing is a proposed road linking the A2 to the east of Gravesend (within GBC) across the Thames to the A13 and M25 in Essex to almost double road capacity across the Thames east of London and to ease congestion on the A282/M25 Dartford Crossing. It is a nationally significant infrastructure project which will be dealt with by the Planning Inspectorate through an application for a Development Consent Order. DBC (support) and GBC (oppose) have different positions on the proposed Lower Thames Crossing which deals primarily with traffic on the strategic road network but this is not infrastructure proposed through the new Dartford Local Plan. Whilst this is not infrastructure proposed through the new Dartford Local Plan, it will have implications for flows on both the strategic and local road network should it go ahead. The implications of this will be taken into consideration through Local Plan transport modelling.

### Points of Agreement

- GBC and DBC will continue to safeguard land potentially required for public transport enhancements between Abbey Wood and Ebbsfleet.
- GBC and DBC will continue to support the improvement of public transport routes, services and facilities (including Fastrack, buses, rail and river transport) and active travel routes and facilities (including for walking and cycling) so that they provide an attractive alternative to the private car.
- GBC and DBC will continue to work with Kent County Council to deliver transport related improvements to the local road network, including projects which utilise Kent Thameside Strategic Transport Infrastructure Programme funding.

### **Air Quality**

Both Dartford and Gravesham have areas that are adversely affected by poor air quality due largely to emissions from traffic and (in the case of GBC) industry. Whilst emissions from traffic are anticipated to decline over time due to changes to the vehicle fleet (including the increased use of electric vehicles etc) and the promotion of active travel/public transport as alternatives to the private car, air quality is likely to remain an issue over the plan period affecting both human health and the natural environment. In parallel with poor air quality due to traffic, noise is an associated issue particularly in proximity to the main transport corridors through both boroughs

DBC and GBC co-operate on air quality issues through membership of the Kent and Medway Air Quality Management Partnership. Both have declared a number of air quality management areas (AQMAS) to deal with exceedances of PM10 and NO2 emissions. As a result, both are required to prepare and implement Air Quality Action Plans to improve air quality in that area. As set out in paragraph 5.19 of its Publication Local Plan, the AQMAS in DBC are currently subject to review and Action Plans are being updated. Highways schemes can have impacts on air quality and receptors which are sensitive to poor air quality, primarily residential properties in close proximity to them. Impacts on air quality will be assessed and taken into account as part of these schemes and AQMAS will be reviewed as highways schemes come forward. In this respect, the proposals for the Lower Thames Crossing include an assessment of impacts on air quality, and the changes to the A2/Bean junction have resulted in the sensitive receptors (dwellings) being removed and the AQMA in that location being formally revoked.

The process of Local Air Quality Management (LAQM) is set down in the Environment Act 1995, associated regulations and directives and the UK Air Quality Strategy.

GBC has designated a number of urban air quality management areas (AQMAS) and produced an air quality strategy and continues to monitor air quality on a regular basis. The



majority of AQMAs in GBC have been designated due to NOX emissions from traffic in the urban area, although much of the waterfront in Northfleet has been designated due to particulate matter (PM10) emissions. Whilst historically emissions from traffic along the A2 trunk road resulted in the declaration of an AQMA, the affected area has since reduced since a scheme was implemented to re-align the carriageway to the south. The most recent position in relation to air quality in Gravesham is available through the 2020 Annual Status Report (August 2021) available at <https://kentair.org.uk/report/annual-status-report-2020>

### Points of Agreement

- Both parties will have regard to air quality issues in taking forward their Local Plans
- Air quality (and associated traffic noise) are issues in both DBC and GBC, although air quality impacts are likely to reduce over time due to changes to the vehicle fleet and the promotion of active travel/public transport. However, the extent to which these impacts will reduce and over what timescale has yet to be determined, given growth associated with planned development.

### **Infrastructure**

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 facilities serving residents of GBC, DBC and the wider area and which is located within the Green Belt.

The Dartford Infrastructure Delivery Plan 2020 sets out the list of projects to support planned new development in DBC and meet the demands that this will generate. Further information is set out in the Transport section above. 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.

Infrastructure is a significant issue in relation to supporting development coming forward in Ebbsfleet Garden City. As already set out in the Ebbsfleet Garden City and Transport sections above, partnerships exist which are working to address infrastructure matters.

Appendix 6 to the adopted Gravesham Local Plan Core Strategy (2014) includes an infrastructure delivery schedule covering the existing local plan period to 2028. The Regulation 18 Stage 2 consultation undertaken in late 2020 included an Infrastructure Background Paper with a chapter 3 on transport. This work will be updated in due course in the form of a new Infrastructure Delivery Plan based on discussions currently ongoing with service providers. The outcome of this process will be made available at the Regulation 19 consultation stage in 2022.

### Point of Agreement

- GBC and DBC will continue to work with service providers (including Kent County Council, Kent and Medway Clinical Commissioning Group and Dartford and Gravesham NHS Trust), produce up-to-date infrastructure planning documents and implement planning policies to ensure that new or improved services and facilities to support new development are funded and provided in a timely manner. This is reflected in policy S2 of the second Publication Dartford Local Plan.
- It is agreed that the Darent Valley Hospital provides strategic health infrastructure which serves the residents of both Boroughs.

- In the event that GBC wish to pursue the issue of its continued inclusion within the Green Belt, DBC consider that this should be through GBC's representations on the new Dartford Local Plan.

## **Green Infrastructure**

The recently notified Swanscombe Peninsula Site of Special Scientific Interest and the Ebbsfleet Marshes Local Wildlife Site are areas of biodiversity interest which straddle the boundaries of DBC and GBC (see also section on Ebbsfleet Garden City). 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.

### Point of Agreement

- The Swanscombe Peninsula SSSI, National Cycle Route 1, the Thames Path/ England Coast Path and the Ebbsfleet Marshes Local Wildlife Site 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.

## **Climate Change and Flood Risk**

DBC recognises the serious impact of climate change and the fact that there is a climate emergency. It welcomes the government's commitment to cut greenhouse gas emissions to net zero by 2050 but aspires to see the effects of climate change tackled earlier than the national target. DBC has committed to pursuing measures that are deliverable, measureable and practical and to co-operate with other authorities at every tier. As an example, at its Cabinet meeting in October 2020, DBC committed to supporting the Kent and Medway Energy and Low Emissions Strategy.

GBC declared a climate emergency in June 2019 with the ambition of achieving carbon neutrality by 2030. GBC is currently in the process of drawing up an action plan to achieve this and reports on progress on an annual basis. As with DBC, it also works in partnership with other local authorities, including KCC in this area. In this respect, joint working with DBC via the EDC is also important in terms of the Ebbsfleet Garden City being an exemplar development.

The River Thames forms the northern boundary of both DBC and GBC. There is a particular longer term issue in terms of growing risk of tidal flooding, and the TE2100 plan has been produced by the government to manage tidal flood risk in the Thames Estuary until the year 2100. This is a flexible response to the issue of sea level rise, with a range of measures capable of being implemented over time. The TE2100 measures for DBC's tidal rivers (River Thames and part of the River Darent) and for the urban parts of GBC include the management, maintenance and upgrading of existing flood defences. In the very long term before 2070, TE2100 also includes options to improve the existing Thames Barrier at Woolwich or construct a new downstream barrier at Long Reach within DBC or at Gravesend/Tilbury within GBC but no decision has yet been taken on this.

### Points of Agreement

- Both Local Plans will ensure that new development is located and designed to mitigate and adapt to the effects of climate change and that schemes which generate low or zero carbon technology are encouraged.
- Both Local Plans will ensure that strategic tidal flood defences required as part of the TE2100 project can be provided, by ensuring that development does not sterilise land which may be needed for this purpose in the future and that tidal riverside development makes provision for the future management, maintenance and upgrading of the strategic flood defences.

#### **FOR DARTFORD BOROUGH COUNCIL**

Signed:



Name: Sonia Collins – Head of Planning Services

Date: 18th November 2021

#### **FOR GRAVESHAM BOROUGH COUNCIL**

Signed:



Name: Wendy Lane – Assistant Director (Planning)

Date: 29 November 2021