

## **DARTFORD LOCAL PLAN**

### **Duty to Cooperate Compliance Statement December 2021**

**DARTFORD**  
BOROUGH COUNCIL

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# **1 BACKGROUND AND STRUCTURE**

- 1.1 This document demonstrates how the Council has complied with the legal duty to cooperate under section 33A of the Planning and Compulsory Purchase Act 2004 throughout the production of the Dartford Local Plan. It particularly focusses on the outcomes of duty to cooperate activities which have taken place since January 2020, just prior to the consultation on the Local Plan Preferred Options.
- 1.2 A Duty to Cooperate Statement of Activities (February 2021) was produced to support the first Publication Local Plan. This comprises Appendix 1 to this Statement (ref COR-12). This outlines the duty to cooperate activities which took place between 2016 (prior to the start of work on the new Local Plan) and March 2020. It focusses on the number and subject matter of active engagement which took place during that period.
- 1.3 A Duty to Cooperate Update and Addendum (September 2021) was published at the same time as the second Publication Local Plan, outlining the effect of cooperation and ongoing progress (for instance on Statements of Common Ground) (ref CON-2). This Duty to Cooperate Compliance Statement supersedes the September 2021 document though it has been included for information within the supporting submission documents.
- 1.4 Section 2 of this document sets out the list of duty to cooperate partners, the timeline for their Local Plans where relevant, how they responded to the second Publication Local Plan and the current position in relation to Statements of Common Ground (SOCGs). Section 3 sets out the active and ongoing engagement that Dartford Borough Council (DBC) has carried out on strategic cross-boundary matters, mainly on a topic by topic basis. Section 4 provides information on the effective engagement that DBC has carried out with partners on the Local Plan, including workshops and meetings which have taken place and the engagement with individual partners. In this respect, it provides sets out the responses by partners to the plan and key areas of agreement and disagreement in the various Statements of Common Ground. There has also been other ongoing partnership working and this is outlined briefly in Section 5. A number of abbreviations are used throughout the document and these are set out in Appendix 2.

## **2 DUTY TO COOPERATE PARTNERS – POSITION AND PROGRESS**

- 2.1 Dartford Borough Council must cooperate with various bodies on strategic matters. The list of bodies with whom the local planning authority (i.e. Dartford Borough Council) must co-operate is set out in Section 33A of the Planning and Compulsory Purchase Act 2004 and in Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In the case of Dartford Borough, these are:
- Local planning authorities – the neighbouring authorities of London Borough of Bexley, Sevenoaks District Council, Gravesham Borough Council and Thurrock Council, as well as the Ebbsfleet Development Corporation and Medway Council
  - Kent County Council
  - Environment Agency
  - Historic England
  - Natural England
  - Mayor of London
  - Civil Aviation Authority
  - Homes England
  - Clinical Commissioning Group
  - National Health Service Commissioning Board
  - Office of Road and Rail
  - Transport for London
  - Each highway authority – Kent Highways (Kent County Council), National Highways (formerly Highways England).
  - Marine Management Organisation
  - South East Local Enterprise Partnership
  - Kent Local Nature Partnership
- 2.2 Cooperation, communication and engagement with these organisations has taken many forms. Detailed discussions with fellow Local Planning Authorities (leading to six Statements of Common Ground), and other organisations has aimed to progress agreements on the basis of robust local information. Open discussion and ultimately the achievement of the signed agreements has been facilitated by data on matters such as confirmed development delivery rates and needs, where available to both parties.
- 2.3 It is relevant to note the various stages that the new Local Plans of neighbouring authorities have reached, as this is the principal determinant of information available to support detailed cooperation. Table 1 shows the timelines for Local Plan consultations which have taken place in this respect since 2018 (Dartford Borough adopted its last plan document in 2017). This shows that the timescales for the run up of the new Bexley and Dartford Local Plans to submission stage have been broadly aligned. Sevenoaks District was originally ahead of Dartford Borough in carrying out the work on its new Local Plan. Conversely, the new/ partial reviews of the Local Plans for Gravesham and Thurrock are significantly behind the new Dartford Local Plan. Therefore Dartford Borough Council had first SOCGs in place with the London Borough of Bexley (LBB) and Sevenoaks District Council (SDC) but later signed statements with Gravesham Borough Council (GBC) and Thurrock Council. (Medway Council is not a neighbouring authority but a SOCG is now in place).

- 2.4 Specifically in terms of neighbouring Local Plans reaching the pivotal Regulation 19 (publication) draft Plan stage, only Sevenoaks had reached the Regulation 19 stage by the time that Dartford Borough published its Regulation 19 Local Plan in February 2021. After that, the position with other neighbouring plans has been as follows:
- Bexley Regulation 19 Local Plan: May to July 2021.
  - Gravesham Regulation 19 Local Plan: Unavailable: not reached publication (as at 30 November 2021).
  - Thurrock Regulation 19 Local Plan: Unavailable: not reached publication (as at 30 November 2021).

It should be noted the Sevenoaks Local Plan ultimately did not pass its examination, and SDC is now reviewing its evidence to inform a new Local Plan future consultation under Regulation 18.

- 2.5 The London Plan is not a Local Plan but is a Spatial Development Strategy operating under separate legislation. Unlike Dartford, the Bexley Local Plan is directly impacted by the London Plan. In terms of the London Plan rate of progress:
- Following an extensive examination of the draft London Plan, the panel of Inspectors issued its report on 8 October 2019.
  - There then followed an extended period of correspondence by the Mayor of London, and directions by the Secretary of State (SoS) over a wide range of matters.
  - The London Plan finally came into full effect on 2 March 2021, completing a process started in 2016.

It is noted that the Bexley Regulation 19 Local Plan was unable to be drafted and published until after the resolution of issues between the Mayor and SoS allowed an amended London Plan to take effect.

- 2.6 The new Dartford Local Plan is the first Local Plan produced since the creation of the Ebbsfleet Development Corporation in 2015. The Corporation was in its infancy in the early stages of Local Plan preparation. A SOCG has subsequently been agreed.
- 2.7 There are now updated SOCGs in place with LBB and SDC and new ones have been agreed with GBC and Thurrock, as well as Medway Council which does not abut Dartford Borough. However overall progress towards SOCGs was impacted by information gaps and lack of clarity on some issues, largely arising from the rate of advancement of new plans outside Dartford Borough.
- 2.8 The Dartford Local Plan has been progressed in the context of a number of major uncertainties. This includes large scale development/ designation proposals arising in the Ebbsfleet and Swanscombe area from external organisations. Therefore despite steady progress by the Council in moving to next stages, some Dartford information was unable to be fully confirmed during parts of the plan making process.
- 2.9 Nevertheless, the Council has consistently sought to provide greater certainty for sustainable development by progressing its Local Plan in constructive cooperation with partners. However, as noted, this has had to evolve in the context of often more limited or very changeable information on plans for elsewhere. Rates of evidence gathering and the drafting of Plans in the wider area has had a direct impact on the rate of finalising SOCGs. Nevertheless, agreements have been successfully negotiated and now completed as documented in the rest of this Statement.

**Table 1: Timeline for Dartford and Neighbouring Authorities' Local Plans**

Timescale	Dartford	Bexley	Gravesham	Sevenoaks	Thurrock
2018 Q2	Strategic Issues Consultation (Reg 18)	Consultation Local Plan (Reg 18)	Issues and Options (Reg 18)		Stage 2 Issues and Options (Reg 18)
2018 Q3				Preferred Options (Reg 18)	
2018 Q4				Publication Plan (Reg 19)	
2019 Q1					
2019 Q2				Submission of Plan (Reg 22)	
2019 Q3					
2019 Q4					
2020 Q1	Preferred Options Consultation (Reg 18)		Stage 2 Consultation (Reg 18)	Inspector's Report - Plan failed	
2020 Q2					
2020 Q3					
2020 Q4					
2021 Q1	First Publication Plan (Reg 19)	Publication Plan (Reg 19)			
2021 Q2					
2021 Q3	Second Publication Plan (Reg 19)				
2021 Q4	Submission of Plan (Reg 22)	Submission of Plan (Reg 22)			

- 2.10 Table 2 indicates which of the duty to cooperate partners responded to the second Pre-Submission (Publication) Dartford Local Plan September 2021 (hereafter referred to as the Publication Local Plan) (ref COR-1), the nature of their responses and information on the Statements of Common Ground (SOCG) where relevant. Where a respondent completed a standard representations form, the table indicates the partner's response to the question of whether or not they considered that the Local Plan complies with the duty to cooperate. The representations and the SOCGs are included within the documents submitted for examination (refs REPS and SCG-1 to SCG-7). Further information is set out for the relevant partners in section 4 of this document.
- 2.11 It can be seen that seven duty to cooperate partners (Ebbsfleet Development Corporation, London Borough of Bexley, Medway Council, Sevenoaks District Council, Environment Agency, Natural England, Kent and Medway CCG) explicitly stated that the plan complies with the duty to cooperate. Medway Council noted that this was subject to further discussions, and a SOCG has subsequently been signed. A number of organisations did not specifically respond on this issue. Gravesham Borough Council was the only partner which explicitly stated that it did not consider that the plan complies with the duty to cooperate. Some national organisations did not submit a response on the Publication Local Plan.
- 2.12 Table 2 and paragraph 2.4 above indicate whether the partners who responded to the Publication Local Plan considered that it met the legal requirements in terms of duty to cooperate. LBB and SDC also made positive comments in this regard.
- 2.13 This issue of compliance with duty to cooperate and previous engagement with partners is also addressed in a number of the SOCGs. In this respect, there are points of agreement (some of which are summarised) in relation to:
- EDC and DBC agreeing that they (as well as GBC and KCC) have had ongoing, active and effective input to the Dartford Local Plan through the Planning Liaison Group and other discussions.
  - GBC, DBC and the EDC continuing to work with KCC and service providers to bring about improvements to transport and services, and also continuing to work together on matters relating to Ebbsfleet Garden City, including through membership of the Planning Liaison Group.
  - EDC and DBC agreeing that the Publication Local Plan has been informed by an evidence base that has had close consideration of the achievement of significant sustainable development at Ebbsfleet.
  - The positive cooperation between LBB and DBC on Local Plan content and collaboration on strategic matters, including new development and infrastructure.
  - SDC and DBC continuing to regularly meet, liaise and work together on a number of cross boundary strategic issues.
  - The good working relationship between Medway Council and DBC on sharing evidence base work and information on a bi-lateral basis or within the context of wider forums.



- Recognition that officers of DBC and Thurrock meet regularly to discuss cross boundary strategic matters under the Duty to Cooperate.
- NE and DBC having cooperated over the amendments to policies E1, E2, E4 and E6 between the initial Publication Local Plan February 2021 and the final Publication Local Plan.

**Table 2: Responses by Duty to Cooperate to the Publication Local Plan and Progress on SOCGs**

<b>Duty to Cooperate Partner</b>	<b>Local Plan Response to Plan by Partner Nature of Response</b>	<b>Duty to Cooperate Met*</b>	<b>SoCG Action</b>
<b>Neighbouring Authorities and EDC</b>			
Ebbsfleet Development Corporation Planning (EDC)	<ul style="list-style-type: none"> <li>• Support the spatial strategy</li> <li>• General support for the policies in the Ebbsfleet and Swanscombe chapter which overall align with the EDC vision</li> <li>• Some minor comments in relation to policies E2 and M3</li> <li>• The boundaries for the Ebbsfleet Central Allocation (policy E4) and the North of London Road Area, Swanscombe (policy E6), together with associated diagrams and maps, should be amended to accurately reflect the Swanscombe Peninsula SSSI boundaries, when confirmed</li> <li>• Policies E1, E2, E4 and E6 should recognise the need to avoid 'adverse impacts' rather than any impacts on the Swanscombe Peninsula Site of Special Scientific Interest</li> </ul>	Yes	Yes – signed on 18 November 2021
Gravesham Borough Council (GBC)	<ul style="list-style-type: none"> <li>• Question whether the DBC has properly considered unmet need from neighbouring authorities in its housing need figure and GBC awaits a formal response on its 2015 request in this respect (policy S4)</li> <li>• The start date fails to address the need for strategic policies to apply for at least 15 years from adoption and whether the employment figure is to 2031/32 or the end of the plan period (policy S4)</li> <li>• Question whether the site capacity approach towards employment development is justified in particular the relationship between employment, labour supply and housing needs (policy S4)</li> <li>• Lack of clarity about the amount and type of commercial, business, service, community and learning uses that will come forward (policy S4)</li> </ul>	No	Yes – signed on 29 November 2021

Duty to Cooperate Partner	Local Plan Response to Plan by Partner Nature of Response	Duty to Cooperate Met*	SoCG Action
	<ul style="list-style-type: none"> <li>• Issue of the status of Bluewater which should not be considered as a town centre but as an out of centre regional facility where the sequential test for retail should apply; it should not compete with traditional local town centres (policy M22)</li> <li>• Transport modelling: the outputs from the detailed modelling work and planned interventions need to be made available for consultation and the air quality impacts need to be assessed</li> <li>• Policy E4 (Ebbsfleet Central Allocation): Need for clarification regarding: the long term capacity of the site; the amount and type of use class E floorspace, the scale of education, health and community facilities; the purpose of the district centre; the rationale for the 20% retail figure; and the need for a retail/ leisure assessment</li> <li>• Policy E5 (Alkerden and Ashmere Allocation): the uses within class E need to be clarified and reflect the evidence</li> <li>• Policy E6 (North of London Road Area, Swanscombe): The policy should commit to a masterplan for the whole peninsula, and make references to a number of issues/designations affecting it</li> <li>• There are exceptional circumstances to remove Darent Valley Hospital from the green belt</li> </ul>		
London Borough of Bexley (LBB)	<ul style="list-style-type: none"> <li>• Support the strategy for housing and economic development as well as the approach towards infrastructure</li> <li>• Note that Dartford can meet its own housing and gypsy and traveller pitch needs over the plan period, and acknowledge the surplus housing identified in paragraph 2.57</li> <li>• Note the role of Bluewater and are assured that the requirements for impact assessment for retail/ leisure proposals will ensure that the impacts of any proposals on retail centres in Bexley would be taken into account</li> <li>• Note the allowance for flexibility in the plan in relation to future key proposals and infrastructure projects in the area</li> </ul>	Yes	Yes – signed on 24 November 2021

Duty to Cooperate Partner	Local Plan Response to Plan by Partner Nature of Response	Duty to Cooperate Met*	SoCG Action
	<ul style="list-style-type: none"> <li>Acknowledge the regular and ongoing duty to cooperate discussions that have taken place between the two boroughs</li> </ul>		
Medway Council (N.B. Not an adjoining authority but within north Kent)	<ul style="list-style-type: none"> <li>Query what consideration has been given to contributing to unmet housing needs in the wider area and what work has been carried out on Green Belt assessments</li> <li>There is a need to understand the implications of potential displacement of businesses at Swanscombe as a result of the London Resort on the demand for employment land at Medway</li> <li>The impact of proposals at Bluewater on neighbouring centres needs to be considered and some criteria/further wording could address this</li> <li>The outputs from the transport modelling are currently unavailable so they are unable to comment on the potential impacts and the need for mitigations</li> </ul>	Yes	Yes – signed on 8 December 2021
Greater London Authority (GLA)/ Mayor of London	<ul style="list-style-type: none"> <li>No response received</li> <li>[Note: a response was received at the first Publication Local Plan February 2021 that referred to comments made at the 2020 Preferred Options consultation.]</li> </ul>	N/A	See Appendix 8: Correspondence with the GLA. Note discussions have concluded in a SOCG with the London Borough of Bexley in the Greater London area.
Sevenoaks District Council (SDC)	<ul style="list-style-type: none"> <li>Support the approach towards transport improvement schemes, including junction upgrades on the strategic highway network</li> <li>Support policy S2 (Infrastructure Planning Strategy), note the cross boundary travel to health and education facilities and commit to working together with DBC and infrastructure providers</li> <li>Notes the annual housing need and proposed housing requirement supported by a supply of developable land. May wish to provide comments on housing provision and need at the hearing sessions and through duty to cooperate meetings</li> <li>Support the commitments in policy M4 (Flood Risk and Riverside Design)</li> </ul>	Yes	Yes – signed on 9 December 2021

Duty to Cooperate Partner	Local Plan Response to Plan by Partner Nature of Response	Duty to Cooperate Met*	SoCG Action
	<ul style="list-style-type: none"> <li>Support the provisions of policy M12 (Gypsy, Traveller and Travelling Showpeople Accommodation) and will continue joint working arrangements</li> <li>SDC continues to work with DBC to address strategic, cross boundary issues. Engagement has been constructive, active and ongoing and it is considered that DBC have met the legal requirements in relation to duty to cooperate</li> </ul>		
Thurrock Council	<ul style="list-style-type: none"> <li>No response received</li> </ul>	N/A	Yes – signed on 31 October 2021
<b>Environmental Partners</b>			
Environment Agency (EA)	<ul style="list-style-type: none"> <li>Detailed comments on the way in which the plan addresses flood risk and TE2100 (flood defences and a possible future barrier)</li> <li>Policy M4 (Flood Risk and Riverside Design) should make reference to the River Ebbsfleet, future Thames barrier and strategic flood defence zone, and there should be buffers for habitats when developments take place alongside rivers</li> <li>The plan does not include a mechanism for improving greenspaces that are not directly linked to development</li> <li>In terms of biodiversity net gain (policy M15), DBC should be seeking 20%, taking into account Kent Nature Partnership's work and there should be a mechanism for the delivery of off-site biodiversity net gain improvements</li> </ul>	Yes	Not currently being progressed
Historic England	<ul style="list-style-type: none"> <li>Welcome the inclusion of policies M5 (Designated Heritage Assets) and M6 (Historic Environment Strategy)</li> </ul>	N/A	Not currently proposed
Kent Local Nature Partnership	<ul style="list-style-type: none"> <li>No response received</li> </ul>	N/A	Not currently proposed
Marine Management Organisation	<ul style="list-style-type: none"> <li>Supporting text to policy M4 (Flood Risk and Riverside Design) should refer to the Marine Management Organisation as well as</li> </ul>	N/A	Not currently proposed

Duty to Cooperate Partner	Local Plan Response to Plan by Partner Nature of Response	Duty to Cooperate Met*	SoCG Action
	the Marine Plan. It should be noted that the Marine Plan can apply to economic, social and environmental aspects of the Local Plan.		
Natural England (NE)	<ul style="list-style-type: none"> <li>Support policies S1 (Borough Spatial Strategy), S3 (Climate Change Strategy), E1 (Ebbsfleet Garden City Strategy), E4 (Ebbsfleet Central Allocation), E6 (North of London Road Area, Swanscombe), M5 (Designated Heritage Assets) and M14 (Green and Blue Infrastructure and Open Space Provision).</li> <li>Support policy M17 (Active Travel, Access and Parking) but consider it could be strengthened by referring to the potential for transport infrastructure to be used as green infrastructure/ biodiversity corridors</li> </ul>	Yes	Yes – signed on 1 December 2021
<b>Infrastructure Partners</b>			
National Highways (formerly Highways England) (NH)	<ul style="list-style-type: none"> <li>Policies M1 (Good Design for Dartford) and M4 (Flood Risk and Riverside Design) should refer to the strategic road network in respect of the display of advertisements and drainage connections/ surface water flooding respectively</li> <li>In terms of the transport modelling, further information is needed to allow them to ascertain the impacts of the Local Plan on the strategic road network junctions. They will then be in a position to assess whether mitigation is required for the Local Plan.</li> </ul>	N/A	Anticipated.
Kent County Council Planning (KCC)	<ul style="list-style-type: none"> <li>Support the overall growth strategy (policy S1) which looks to deliver a sustainable future for Dartford by focusing growth through the delivery of large-scale, strategic mixed-use developments at Ebbsfleet Garden City and in central Dartford.</li> <li>There will be a need for additional schools and school places to support development. Some of the requirements in table 2 are unclear</li> <li>The plan should consider how new developments could reduce differences between communities and reduce health inequalities</li> </ul>	N/A	Anticipated.

Duty to Cooperate Partner	Local Plan Response to Plan by Partner Nature of Response	Duty to Cooperate Met*	SoCG Action
	<ul style="list-style-type: none"> <li>In terms of the transport modelling, the mitigation work for the Local Plan has not been completed and there needs to be an opportunity to comment on the outputs from this</li> <li>Policy M3 should have stronger requirements in terms of reduced carbon emissions and further sustainable energy installations</li> <li>Policy M6: DBC should develop a more detailed heritage strategy which takes a district-wide view of the historic environment</li> <li>Policy M17 should: have a more proactive approach towards the provision of segregated cycle routes; recognise the needs of those with disabilities/ mobility impairment; and give greater recognition to the users of public rights of way and the need to enhance and extend the network</li> <li>Should be specific policies in relation to: <ul style="list-style-type: none"> <li>Swanscombe Peninsula Site of Special Scientific Interest – management and issues;</li> <li>sustainable waste management/ provision of capacity as Pepperhill Waste Transfer Station is now at capacity; and</li> <li>gigabit capable broadband to new developments</li> </ul> </li> </ul>		
Kent and Medway Clinical Commissioning Group (CCG)	<ul style="list-style-type: none"> <li>The Plan supports the two key development opportunities for primary medical care services (general practice) at Steele Avenue, Greenhithe, and within a health and wellbeing centre at Ebbsfleet Central in line with the CCG GP Estates Strategy</li> <li>The Council has engaged with the CCG through the Local Plan process.</li> </ul>	Yes	Not currently proposed.
NHS England	<ul style="list-style-type: none"> <li>No response received</li> </ul>	N/A	Not currently proposed.
Office of Road and Rail	<ul style="list-style-type: none"> <li>No response received</li> </ul>	N/A	Not currently proposed
Transport for London (TfL)	<ul style="list-style-type: none"> <li>Any changes to street layout and circulation in Dartford Town Centre should improve bus stops and waiting areas, minimise any extra bus mileage and consider alternative bus routes to reduce</li> </ul>	N/A	Not currently proposed

Duty to Cooperate Partner	Local Plan Response to Plan by Partner Nature of Response	Duty to Cooperate Met*	SoCG Action
	<p>delays and improve connectivity. Redevelopment plans should contribute to improved bus infrastructure.</p> <ul style="list-style-type: none"> <li>• General support for joint work on C2E but any extension/ enhancement should not adversely impact on the existing route and Elizabeth line</li> <li>• Agree with the mechanism for the Local Plan to be reviewed if the London Resort development goes ahead</li> <li>• Suggest that some of the Mayor's strategic transport policy objectives could be extended to the Borough</li> </ul>		
<b>Other Partners</b>			
Civil Aviation Authority	<ul style="list-style-type: none"> <li>• No response received</li> </ul>	N/A	Not currently proposed
Homes England	<ul style="list-style-type: none"> <li>• No response received</li> </ul>	N/A	Not currently proposed
South East Local Enterprise Partnership	<ul style="list-style-type: none"> <li>• No response received</li> </ul>	N/A	Not currently proposed

\* Indicates the partner's response if the Local Plan response form was completed in this respect.



- 2.14 It is clear that many partners consider that DBC has met the duty to cooperate requirement to engage constructively, actively and on an ongoing basis. This is reflected in the fact that many of those organisations who responded on the Publication Local Plan indicated that the Local Plan complies with the duty to cooperate. It is also acknowledged in the points of agreement reached in the SOCGs with neighbouring authorities and the EDC. The timeline for the progression of neighbouring authorities' local plans as set out in table 1 is relevant to the points of agreement and (in the case of GBC only) disagreement reached in the SOCGs. In this regard, section 3 sets out further information on a topic by topic basis.

## 3 STRATEGIC CROSS-BOUNDARY MATTERS

### Introduction

- 3.1 National planning policy and guidance do not specify what constitute cross-boundary strategic matters. Paragraph 20 of the National Planning Policy Framework sets out the matters that should be covered by strategic policies and there is some overlap between these and cross-boundary strategy matters. In Dartford Borough, the following strategic cross-boundary matters have been agreed with partners and have been addressed to varying extents as applicable in the SOCGs:
- Strategy/ Pattern of Development
  - Housing Market Area and Housing Needs
  - Gypsies, Travellers and Travelling Showpeople
  - Employment
  - Retail
  - Ebbsfleet Garden City
  - Transport
  - Air Quality
  - Infrastructure
  - Green Infrastructure
  - Climate Change and Flood Risk

### Strategy/ Pattern of Development

- 3.2 The justification for the overall strategy/ pattern of development taken forward in the Publication Local Plan is set out in Spatial Strategy Topic Paper December 2021 (ref SPS-1). Both the Strategic Issues and Preferred Options duty to cooperate workshops, held in July 2018 and February 2020, included discussions on strategic issues. Policy S1 of the Publication Local Plan outlines the spatial strategy for development coming forward over the plan period to 2037. This sets out that the focus for development will be in the growth locations of Central Dartford and Ebbsfleet Garden City with other complementary development taking place within the urban area. In terms of the non-urban area, the openness and permanence of the Metropolitan Green Belt will be maintained and development in the Borough's villages will be of a proportionate scale and on non-Green Belt land.
- 3.3 A number of duty to cooperate partners made clear that they support the spatial strategy in their responses on the second Publication Local Plan. This includes the EDC, LBB, KCC and NE. None objected to the approach.
- 3.4 The SOCGs with LBB, the EDC, SDC and GBC set out points of agreement in relation to the spatial strategy/ pattern of development. Only the SOCG with GBC also includes points of disagreement in this respect.
- 3.5 In terms of the spatial strategy/ pattern of development, the following points of agreement are included in the SOCGs (some of which are summarised):
- LBB and DBC's 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 which 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 14 of the NPPF.
- EDC and DBC agree that the strategic policies of the second Publication Dartford Local Plan, including policies S1 to S4, set an appropriate sustainable growth framework, with Ebbsfleet Garden City identified as one of the two overriding priority development focal points in the Plan.
- GBC and DBC 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.
- GBC and DBC agree 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.
- GBC and DBC 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.
- SDC and DBC recognise that the Green Belt is a significant constraint that impacts both authorities and plays a key role in the separation of settlements. The Dartford Pre-Submission (Publication) Local Plan accommodates the Borough's development needs within the existing urban area using a regeneration potential based approach. It does not include any release of Green Belt for housing (use class C3) development.

## Housing Market Area and Housing Needs

- 3.6 The Council and Ebbsfleet Development Corporation commissioned HDH Planning Ltd to carry out the Dartford and Ebbsfleet Residential Needs Assessment (DERNA) to inform housing policies in the Local Plan. The DERNA 2019 (ref HOU-7) was published as part of the evidence base to support the Local Plan Preferred Options consultation. An update to the DERNA was commissioned by the Council to address a number of issues, including local housing market boundaries and overall housing need. This DERNA Update 2021 (ref HOU-8) was published to supplement the original DERNA to support the second Publication Local Plan consultation.
- 3.7 As part of work on the DERNA, the consultants ran a Duty to Cooperate session hosted by the Council on 7 August 2019 (see Appendix 3 for presentations and minutes). The purpose of the session was to set out the national policy requirements, the methodology/ key inputs to the study, the main findings from the study, and to enable

duty to cooperate partners to ask questions and discuss the pertinent issues. The discussions covered the following issues:

- Migration patterns
- Overall housing figures for DBC
- Model types
- Owner occupied dwellings/ houses in multiple occupation
- Purpose of the affordable housing model
- Types of affordable housing
- Older persons accommodation
- Accessible and adaptable accommodation
- Updates from the other authorities in attendance

- 3.8 The list of partners invited to this event and those who attended is set out in table 3 below.

**Table 3: Residential Needs Workshop Invitees and Participants**

<b>Residential Needs Workshop</b>
Ebbsfleet Development Corporation*
Gravesham Borough Council*
Greater London Authority
Kent County Council*
London Borough of Bexley*
Medway Council
Sevenoaks District Council*
Thurrock Council

\* Indicates those who attended the event

- 3.9 In terms of defining the housing market area, 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.

- 3.10 The DERNA 2019 and DERNA Update 2021 also set out the housing needs for the Borough using the standard method set out in national Planning Practice Guidance. In 2019 this resulted in a need for 797 dwellings per annum and by 2021 this had reduced

to a need for 750 dwellings per year. The 2019 report carried out modelling to assess whether the amount of dwellings needed in the Borough needed to be increased above 797 per annum to meet affordable housing requirements. In applying the 35% provision for affordable housing recommended in the DERNA (contained in policy M7 of the Local Plan), the DERNA 2019 concluded as follows:

The Council can be confident that the affordable housing need identified in the model will be addressed by the dwelling growth identified by the Standard Method and no adjustment is required to this figure.

- 3.11 In addition to the DERNA workshop, the duty to cooperate workshop on the Local Plan Preferred Options consultation in February 2020 addressed outputs from the DERNA and the issue of housing supply. There have been a large number of meetings and activities with neighbouring authorities, many of which have discussed housing needs and relevant Local Plan evidence. The most recent discussions have focussed on how to address this issue in the relevant SOCGs.
- 3.12 In June 2015, GBC sent DBC a letter requesting that DBC meet some of its housing needs. DBC responded agreeing to further discussions, noting Dartford's functional links with a range of areas (but particularly with Bexley) and the need for greater understanding of housing land supply positions; and considering it inappropriate to respond particularly in the absence of study outcomes which should underpin GBC's housing requirements and allocations. (As set out in Table 1, GBC did not release information for its first Regulation 18 stage consultation until 2018). Subsequent extensive discussions, correspondence and information sharing by DBC, as it has taken forward its Local Plan, have resulted in the current position as set out in the signed SOCG.
- 3.13 SDC sent a request for DBC to meet some of its housing needs in April 2019. DBC stated that it was not in a position to agree to take the unmet housing needs of Sevenoaks, given SDC's imminent target for Local Plan submission. The logic had not been demonstrated, and DBC was unable to respond positively to such requests until its own housing need and supply position were clearer. The late request by SDC did not lead to a successful Local Plan examination. This Plan has now been aborted and SDC are re-commencing work on a new Plan. As part of this process, SDC have not formally made a request for DBC to help take its housing need (see the SOCG for current details).
- 3.14 Policy S4 of the Publication Local Plan sets out the requirement for an average rate of 790 dwellings per annum to be provided. DBC considers it is fully providing for its own development requirements without requiring assistance of others. DBC has confirmed that it expects over time to meet slightly more than its current standard method housing level. Paragraph 2.57 of the Local Plan (reasoned justification for policy S4) states the proposed housing requirement "is consistent with potentially supporting delivery of some unmet residential needs in the wider area". The justification for this amount of housing is set out in the Residential Requirement Report September 2021 and the Housing Topic Paper December 2021.
- 3.15 The SOCGs with each of DBC's neighbouring authorities as well as Medway Council set out areas of agreement in respect of the housing market area and housing need, with the exception of GBC which also includes points of disagreement in this respect. These address the housing market area and the position in relation to housing needs.

- 3.16 In terms of the housing market area, there are the following areas of agreement in the SOCGs (some of which are summarised):
- There are clear links between the LBB and DBC housing markets.
  - There are links between the GBC and DBC housing markets.
  - SDC and DBC do not share a housing market but there are relationships between the two areas, particularly between Swanley and Dartford.
  - There is little current overlap between Thurrock Council and DBC in terms of the housing market.
- 3.17 In relation to housing needs, the following points are agreed in the SOCGs with LBB, SDC and Medway (some of which are summarised):
- LBB and DBC have robustly assessed the ability of their respective area to accommodate housing development and they each consider that they are doing the maximum reasonable to meet their required housing needs in line with national policy.
  - LBB and DBC note that the London Plan is not able to demonstrate that London's housing needs can be met within the Greater London area.
  - LBB and DBC agree that 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.
  - Given the close migratory links, LBB and DBC 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.
  - LBB and DBC will 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.
  - SDC and DBC agree that the Dartford Local Plan includes the ability within the plan period 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 to support housing delivery required from elsewhere. The context is discussions on Statements of Common Ground with local planning authorities and, in particular, Dartford Borough's identified strong migration and commuting relationship with the London Borough of Bexley.
  - Notwithstanding their strong functional links with London Boroughs, SDC and DBC recognise that the preferred first port of call for any future unmet need in Greater London in line with sustainable development principles is for it to be addressed at source, and this should be achieved through a rapid revision of the London Plan. Given that there are some functional cross-boundary housing links between parts of SDC and DBC, there is a case to be made for DBC to assist with some unmet needs from SDC (if required and if not met at source housing market area) in the future should they have the capacity to do so, and where consistent with DBC's sustainable development, and national policy.

- SDC and DBC will continue to have regular duty to cooperate meetings to consider if and how to positively facilitate new housing provision and to significantly boost housing supply and regeneration in sustainable locations.
- Medway and DBC are taking an appropriate approach and are positively tackling development needs in line with national policy, and no redistribution of housing is necessary or appropriate between them.

3.18 The SOCG with GBC includes a point of disagreement in respect of housing needs which is summarised as follows:

- DBC considers that: its Local Plan includes the ability to make some contribution towards unmet housing needs in the wider area: it has taken account of GBC's 2015 request and subsequent available information; the priority is for any housing contribution to be drawn down first from Bexley Borough with which it has closer migration links; and it needs up to date, published data on GBC's housing supply and clarity on GBC taking its Local Plan forward.
- GBC considers that: it has engaged with neighbouring authorities in relation to accommodating need; it does not need to set out the level of unmet need before DBC is obliged to consider whether or not it can assist; the scale of unmet need is clear; and national policy does not require others to consider unmet need before a neighbouring authority considers its own ability to do so.

### Gypsies, Travellers and Travelling Showpeople

3.19 A Gypsy and Traveller Accommodation Assessment (GTAA) (ref GAT-1) for the Borough was carried out by Opinion Research Services and finalised in 2019. As outlined in paragraph 3.10 of the GTAA, to help support the duty to cooperate and provide background information for the study, telephone interviews were conducted with Planning Officers in neighbouring planning authorities, i.e. LBB, GBC, SDC and Thurrock Council. The outputs from these interviews are contained in paragraphs 5.17-5.24 of the GTAA. In terms of cross boundary issues, paragraph 5.14 of the GTAA concludes:

Potential cross border issues identified were of the proximity of sites in Dartford, Gravesham and Sevenoaks, which are located near the borders. Families occupying Green Belt land in those areas can result in them living within two authorities.

3.20 Policy M12 of the Publication Local Plan sets out the approach towards making provision for Gypsies, Travellers and Travelling Showpeople Accommodation. It includes the numbers of gypsy and traveller pitches and travelling showpeople's plots required to 2026 and sets out the actions to accommodate these. Further information on how the Council is seeking to meet needs is set out in the Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report September 2021 (the Meeting Needs Report) (ref GAT-2).

3.21 There have been no requests from neighbouring authorities to accommodate any of their needs for gypsies, travellers and travelling showpeople.

3.22 As set out in paragraph 4.13-4.16 and Appendix C of the Meeting Needs Report, DBC has twice formally approached the EDC in relation to exploring land options to meet traveller needs, most recently in December 2020 in relation to the Ebbsfleet Central

site. The conclusion was that this would not be an appropriate use of the site but, in the event that the London Resort theme park does not proceed, there could be opportunities to explore gypsy and traveller provision on parts of that site that may be suitable for this use. Paragraph 4.19 of the Meeting Needs Report also indicates that DBC made a formal request to KCC to consider whether it owns any sites which could potentially be brought forward for gypsy and traveller pitches. DBC received a response from KCC on 14 October 2021, subsequent to the publication of the Meeting Needs Report. The response was that at this time, it is not felt that KCC own any sites which could potentially be brought forward for the provision of gypsy and traveller pitches in Dartford Borough. Therefore, DBC has not made any formal requests for neighbouring authorities to meet any of its needs.

- 3.23 The issue of gypsies and travellers was discussed at the Local Plan Preferred Options duty to cooperate event in February 2020 (see Appendix 3).
- 3.24 The SOCGs with the EDC, GBC, SDC and Thurrock Council reflect that gypsies, travellers and travelling showpeople are a cross boundary issue. The SOCGs outline that the following actions are taking place with and by duty to cooperate partners in relation to gypsies, travellers and travelling showpeople (some of which are summarised):
- agreement that the EDC and DBC will work together to explore opportunities for identifying a site or sites which may be suitable for gypsy and traveller pitches within Ebbsfleet Garden City, particularly in the event that the London Resort proposal does not proceed;
  - the need for both DBC and GBC to consider all reasonable alternatives to provide pitches to meet their Borough needs for gypsies and travellers within their respective areas, which may justify exceptional circumstances for the allocation within and release of land from the Green Belt;
  - continued joint working between DBC and SDC to ensure that suitable permanent and transit provision can be made as appropriate; and
  - Thurrock Council carrying out more evidence base work on travelling showpeople's accommodation needs.

## Employment

- 3.25 The Council has published the Dartford Employment Needs Review January 2020 (ref BAR-7), the Economic Land Report September 2021 (ref BAR-6) and the Ebbsfleet Garden City Inclusive Growth Strategy January 2019 (ref BAR-8) as evidence base to support the Publication Local Plan. Employment was discussed as an issue at the Strategic Issues duty to cooperate workshop in July 2018, and subsequently through other channels.
- 3.26 The Publication Local Plan sets out the approach towards employment development in the following policies:
- Policy S1: sets out the overall economic strategy;
  - Policy S4: outlines the amount of commercial, business and services uses and industrial/ distribution premises that are expected to come forward over the plan period; and



- Policy M19-M21: provides more detail on the locations and requirements for employment development, including at the identified employment areas.
- 3.27 A number of authorities responded in relation to employment issues on the Publication Local Plan. LBB supported the strategy. GBC questioned whether the site capacity approach towards employment development is justified and the relationship between employment, labour supply and housing needs. GBC also considered that there is a lack of clarity about the amount and type of business and service development that will come forward. Medway Council wished to understand the implications of potential displacement of businesses at Swanscombe as a result of the London Resort on the demand for employment land at Medway.
- 3.28 The SOCGs with GBC, SDC, Medway Council and Thurrock Council address employment as a cross boundary issue. The GBC-DBC SOCG includes agreement that there are links between the employment markets but there are differences in the economic performance and type of employment on offer. It sets out support by both parties for significant commercial floorspace at Ebbsfleet Central. However, whereas DBC consider that its evidence base is sufficient to justify its approach towards employment land supply and provision in the Local Plan, GBC do not agree as they consider that it does not include a formal assessment of employment space, workforce requirements and linked housing need over the plan period.
- 3.29 There are few cross functional linkages with the other authorities. The SOCG with SDC includes agreement that DBC does not share the same functional economic market area as SDC and, as such, economic development is not considered to be a key strategic matter. Similarly, there is relatively little current overlap between DBC and Thurrock in terms of travel to work areas/ employment provision. However the DBC-Thurrock SOCG recognises that this could change given the planning permissions for employment development in DBC and the anticipated completion of the Lower Thames Crossing and, as a result, will be kept under review. The SOCG with Medway Council commits both partners to sharing information on employment issues and continuing to engage as the London Resort proposals progress to seek common ground on the impacts of the proposals.

## Retail

- 3.30 To inform work on the Local Plan, consultants Lambert Smith Hampton were employed to carry out a Dartford and Ebbsfleet Retail and Leisure Study (refs BAR-2 to BAR-5) which was published as evidence base to support the Publication Local Plan. This was jointly commissioned by the Council and Ebbsfleet Development Corporation. As part of this work, the Council hosted a Duty to Cooperate workshop on 6 February 2020 while the consultation on the Local Plan Preferred Options was taking place (see Appendix 3 for presentations). This included a presentation on the initial outputs from the study. This included information on:
- The scope of the work
  - General challenges and how to fix 'broken' town centres
  - Draft headline findings in relation to Dartford Town Centre, Bluewater, Ebbsfleet and the Household Survey
- 3.31 The presentations were followed by a group discussion and a question and answer session. The list of partners invited to this event and those who attended is set out in

table 4 below. Given the presence of the Bluewater Regional Centre within DBC, the invitation was extended to all local planning authorities within Kent.

**Table 4: Retail Study Workshop Invitees and Participants**

<b>Retail Study Workshop</b>
Ashford Borough Council
Canterbury City Council
Dover Council
Ebbsfleet Development Corporation
Folkestone & Hythe Council
Gravesham Borough Council*
Greater London Authority
Kent County Council*
London Borough of Bexley
Maidstone Council
Medway Council*
Sevenoaks District Council
Swale Council
Thanet Council
Thurrock Council*
Tonbridge & Malling Council
Tunbridge Wells Council*

\* Indicates those who attended the event

- 3.32 The Study and this event was preceded by a number of retail specific discussions with Duty to Cooperate partners. Engagement on the topic is highlighted in the Duty to Cooperate Statement of Activities in Appendix 1. In addition to the session above, the consultants provided an update and carried out a question and answer session in the duty to cooperate meeting between the Borough Council and Ebbsfleet Development Corporation on 1 July 2020.
- 3.33 Figures 6.4 and 8.3 of the Study show the catchment areas for Dartford Town Centre and Bluewater respectively. It is clear that the study addressed retail as a cross boundary strategic issue. In this respect, it has considered catchments beyond the Borough boundaries. In the case of Dartford Town Centre, this extends into parts of LBB, GBC and SDC. In terms of Bluewater, this covers a wider area which includes north and west Kent, south east London and south Essex.
- 3.34 The Publication Local Plan provides for its own retail and leisure development requirements without requiring the assistance of others. There is uncertainty in the sector but the evidence shows that retail needs can be met through existing permissions. Local Plan policies on Bluewater, Dartford Town Centre and meeting needs flows directly from the study. The following Local Plan policies specifically relate to retail development:
- Policy D3: identifies the Core Frontage and sets out the mix of uses that will be acceptable in Dartford Town Centre;
  - Policy M19 and associated Table 7 identify the network of retail centres;
  - Policy M22 outlines the approach towards the Bluewater regional shopping centre; and

- Policy M23 identifies District and Local Centres and the types of development which will be acceptable within them.
- 3.35 Through their responses on the Publication Local Plan, duty to cooperate partners have not challenged the outputs from the Study. LBB responded that they were assured that the impacts of any retail/ leisure proposals at Bluewater would take into account impacts on retail centres in Bexley. However, GBC considered that the sequential test for retail should apply to Bluewater as it is an out of centre regional facility and it should not compete with traditional local town centres. Medway Council considered that the Bluewater policy needs to include additional criteria to address the impacts on neighbouring centres.
- 3.36 The SOCGs with LBB, GBC and Thurrock Council recognise retail as a cross boundary issue and set out points of agreement in this regard. LBB and Thurrock agree that the policy approach towards Bluewater is appropriate and provides safeguards/ will not have an adverse impact on local town centres in Bexley or the Lakeside shopping centre and retail park (within Thurrock). GBC agree that changes that are taking place to the retail environment may provide opportunities for centres to change or reinvent themselves. However, DBC and GBC disagree in relation to Bluewater. DBC consider that the Local Plan approach towards Bluewater is the outcome of a review of the policy in the Core Strategy and the new retail study supports the proposed approach. DBC have held extensive discussions with GBC and a duty to cooperate event on the retail study. Despite this, GBC still consider that the status of Bluewater as a centre and when the sequential and impact tests should be applied remains an outstanding issue which should be addressed. GBC also has concerns about whether DBC has engaged sufficiently with affected local planning authorities within the Bluewater catchment given its role as a regional centre.

### Ebbsfleet Garden City

- 3.37 Ebbsfleet Garden City straddles the boundaries of DBC and GBC and also includes land at Northfleet Riverside within GBC. 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.
- 3.38 The EDC has set out a Vision for Ebbsfleet in 2035. This is articulated through the Ebbsfleet Implementation Framework 2017 (ref SPS-2) approved by EDC for development management purposes as a material consideration and endorsed by DBC, GBC and KCC. The Implementation Framework forms part of the evidence base for the Publication Local Plan. The document combines the previously approved masterplans for the area and shows how the area will knit together and connect to existing communities to set out a vision for the Garden City. It includes an area-wide spatial framework and the principles which will apply to Ebbsfleet's four strategic development areas, including the following within DBC's area:
- Ebbsfleet Central
  - Castle Hill, Western Cross, Alkerden and Ebbsfleet Green
  - Swanscombe Peninsula
- It should be noted that Ebbsfleet Central and Swanscombe Peninsula also extend into GBC's area, but are predominantly located within DBC.

- 3.39 Chapter 4 (Ebbsfleet and Swanscombe) of the Publication Local Plan sets out the Vision, Strategy, Development Principles, site allocations and area approaches for the parts of the Borough within Ebbsfleet Garden City. The policies and policy boundaries were amended as a result of the notification of the Swanscombe Peninsula Site of Special Scientific Interest (SSSI) by Natural England (NE) in March 2021, which resulted in the need for a the republication of the Plan. The amendments between the first and second (February and September 2021) Publication Local Plans followed duty to cooperate discussions and informal consultation on the draft text of the Ebbsfleet chapter policies with the EDC and NE. The Swanscombe Peninsula Site of Special Scientific Interest (SSSI) was confirmed by NE's Board on 10 November 2021. DBC consider that the Publication Local Plan appropriately reflects the Vision and Spatial Framework set out in the Ebbsfleet Implementation Framework whilst ensuring that the ecological and geological interest of the recently designated Swanscombe Peninsula SSSI will be conserved and enhanced.
- 3.40 Since 2016, DBC, EDC, Gravesham Borough Council (GBC) and Kent County Council (KCC) 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.”
- 3.41 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 Planning Liaison Group has met bi-monthly since it was instigated (the dates of these since January 2020 are set out in Appendix 7).
- 3.42 In addition to the meetings of the Planning Liaison Group, there have been regular meetings with the EDC and GBC. More recently, there have been duty to cooperate meetings with NE in relation to how the Local Plan should address the recently designated Swanscombe Peninsula SSSI – see under section 4 below and Appendices 5 and 6.
- 3.43 The EDC were generally supportive of the approach towards Ebbsfleet Garden City set out in the Publication Local Plan though they considered that the boundaries of the Ebbsfleet Central Allocation (policy E4) and the policy area for North of London Road Area, Swanscombe (policy E6) should be amended in light of minor changes to the boundaries of the Swanscombe Peninsula SSSI. GBC considered that there is a need for clarification in relation to the amount and type of development coming forward at the Ebbsfleet Central and Alkerden and Ashmere Allocations (policies E4 and E5). Both GBC and KCC considered that there should be a broader policy/ commitment to a masterplan approach for Swanscombe Peninsula/ the wider SSSI. Natural England

supported the Ebbsfleet policies which have the potential for greatest impact on the SSSI (policies E1, E4 and E6).

- 3.44 The SOCGs with the EDC and GBC reflect the fact that Ebbsfleet Garden City is a strategic cross boundary issue. Both SOCGs note the work of the Planning Liaison Group and the role that this has played in cooperative information sharing between the parties on the Dartford Local Plan. They also set out points of agreement in terms of the opportunities presented by Ebbsfleet Garden City and the potential for significant development at Ebbsfleet Central. The SOCGs with EBC and GBC recognise the potential for impacts to arise from the proposed London Resort on Swanscombe Peninsula in the event that it is approved. In relation to the London Resort proposal, the SOCG with Thurrock Council outlines a number of matters which are of concern and need to be addressed. The SOCG with the EDC additionally includes points of agreement that Local Plan policies E1 (Ebbsfleet and Swanscombe Strategy) and E2 (Ebbsfleet Garden City Principles) suitably reflect EDC's vision and principles for the Garden City and that policy E5 (Alderden and Ashmere Allocation) appropriately provides strategic policy guiding what can be achieved on the site and reflects extant permissions and deliverable residential opportunities.
- 3.45 The SOCG with Natural England (NE) reflects the recent designation of the Swanscombe Peninsula SSSI. It confirms the agreed position that the relevant policies in the Ebbsfleet chapter of the Publication Local Plan and the areas to which policies E4 (Ebbsfleet Central Allocation) and E5 (Alderden and Ashmere Allocation) will apply will ensure that the ecological and geological interest of the recently designated Swanscombe Peninsula SSSI will be conserved and enhanced. It also confirms that both parties would be agreeable to the Policies Map being changed to reflect the modifications to the boundaries of the SSSI from those which were originally notified.

## Transport

- 3.46 The following Publication Local Plan policies relate to transport infrastructure:
- Policy S2: sets out opportunities for transport upgrades and refers to infrastructure planning documents;
  - Policy M16: outlines travel management measures including the need to address localised residual impacts on the highway network and the requirement for major development sites to include routes for Fastrack, buses and taxis; and
  - Policy M17: requires development to promote walking, cycling and public transport, and sets out needs in respect of travel plans.
- 3.47 These policies, particularly amendments with respect to requirements for active travel, reflect dialogue with the Kent County Council and Ebbsfleet Development Corporation.
- 3.48 However engagement has been active and ongoing from the outset due to the scale of some transport issues facing the Borough, and resultant cooperation on strategic transport projects, including the relationship between the programme of junction improvements by National Highways (then Highways England) and the build out of strategic developments. For example, to help deliver growth sites first identified in the Dartford Core Strategy, a Kent Thameside Strategic Transport Infrastructure Programme (STIP) was negotiated and delivered between DBC, GBC and KCC.

- 3.49 Many of these interventions and matters are set out in the Transport Background Paper (ref INF-4) which was first produced to support the February 2021 Publication Local Plan. This Paper:
- In the context of existing transport assessments accepted by the highways authorities, noted that “There is general agreement between stakeholders regarding which are the areas of sensitivity on the Dartford road network”.
  - Provided an update on the transport modelling work underway.
- 3.50 Consultants Stantec were employed to carry out strategic transport modelling of the new Local Plan, which is based on a cordoned model from National Highways. There have been several detailed meetings between DBC/consultants, National Highways, Kent Highways and EDC throughout 2020 and 2021 to discuss the methodology, assumptions and outputs from the transport modelling work, and outcomes such as an update letter on progress and next steps. This led directly to a series of revised and additional areas of research and new outputs to the study at various stages, with the aim of satisfying National Highways.
- 3.51 In addition to the Transport Background Paper, strategic transport modelling updates to wider partners were provided in a number of ways, including discussions set up by DBC with a wide range of neighbouring transport partners. For example, there was a meeting held with a number of partners on 23 March 2021 (see minutes in Appendix 6) and there have also been a number of updates at bilateral meetings.
- 3.52 Given Local Plan objectives and consistent with progress on the strategic transport modelling, DBC prepared a draft Sustainable Transport Strategy for informal consultation with key partners in summer 2021. This works with and complements plans formulated for the Ebbsfleet Garden City and specific plans on which Kent County Council are collaborating with DBC. The resulting document was published alongside the Publication Local Plan in September 2021 (ref INF-5).
- 3.53 As a result of progression on the strategic transport modelling in accordance with National Highways advice, the initial Publication Local Plan in February 2021 was supported by evidence from stages 1 (base year model), 2a (forecast year model report, 2b (reference case methodology) and 3 (Local Plan option testing methodology). The stage 2b and 3 reports were updated and published to support the Publication Local Plan in September 2021. The latter comprised the stage 3a report (Local Plan option testing methodology) and the stage 3b report (Local Plan option testing output report and appendices). The strategic transport modelling documents are included within the evidence base as refs INF-6 to INF-13.
- 3.54 GBC, Medway Council, KCC and National Highways commented on transport issues in their responses on the Publication Local Plan. In this respect, they considered that the transport modelling work on mitigation needs to be made available for comment. SDC supported the approach towards transport improvement schemes, including junction upgrades on the strategic highway network. TfL were concerned about the impacts of any changes to the street layout and circulation in Dartford Town Centre on bus operations, although no specific proposals in this respect are included in the new Local Plan or the evidence documents to support it.
- 3.55 Further discussion and work has been carried out since then and this led to the completion of the stage 4 Stantec report on Local Plan mitigation modelling which accompanies the Publication Local Plan.

- 3.56 Consistent with the culmination of the strategic transport modelling work, DBC, along with the consultant, ran a Duty to Cooperate session for partners on 26 November 2021. The presentations and minutes from this are included in Appendix 3. Prior to the workshop, a draft of the Stage 4 Stantec report was circulated, and changes were made to the final report as a result of the engagement/ comments made.
- 3.57 The duty to cooperate session covered the Local Plan, delivery of transport improvements, information on the outputs from all the different stages of the strategic transport modelling work, and information on the Sustainable Transport Strategy. The list of partners invited to this event and those who attended is set out in table 5 below.

**Table 5: Transport Modelling Workshop Invitees and Participants**

<b>Transport Modelling Workshop</b>
Ebbsfleet Development Corporation*
Gravesham Borough Council*
Kent Highways*
London Borough of Bexley*
Medway Council*
Sevenoaks District Council*

\* Indicates those who attended the event.

- 3.58 KCC, NH and DBC are working together to find effective long-term solutions to issues at Junction 1A on the A282/M25 Dartford tunnel approach. A regular steering group takes place with a view to completing a Memorandum of Understanding for continued collaboration to bring forward junction improvements but in the meantime consultants have recently been appointed to carry out a feasibility study for the junction.
- 3.59 On other strategic transport and future growth proposals, DBC has worked collaboratively with Network Rail, GBC, LBB, EDC, KCC and the Mayor of London on investigating options for the delivery of a new public transport service from the Ebbsfleet/ Northfleet area westwards (through Dartford) to the Crossrail terminus at Abbey Wood. After signing a Memorandum of Understanding with government, and intensive research and engagement, the partnership submitted a formal Strategic Outline Business Case to government in late 2021. Although addressed in signed SOCGs, details of recent collaboration on this project are not included in this document.
- 3.60 SOCGs (i.e. those with the EDC, LBB, GBC, SDC, Medway Council and Thurrock Council) recognise transport as a strategic issue. The SOCGs with LBB, SDC and Thurrock Council recognise the issues associated with the operation of the M25/ Dartford Crossing/ junction 1A on the A282/M25 and support measures to relieve congestion. In the case of LBB and SDC, this involves both parties committing to continue to work with National Highways (formerly Highways England) and other bodies (e.g. KCC) to address the issues. The SOCGs with the EDC and GBC support improvements to public transport and the active travel network to provide an attractive alternative to the private car. There are agreed commitments to continue working with KCC to deliver transport related improvements to the road network, including projects which utilise Kent Thameside STIP funding. In terms of Medway Council, there is a commitment to continue to share evidence base information and discuss issues in relation to transport matters.

## Air Quality

- 3.61 Air Quality Management Areas (AQMA) have been declared within DBC to deal with exceedances of PM10 and NO2 emissions. These are all declared as a result of road traffic and follow the routes of roads where there are sensitive receptors (dwellings). One radial AQMA reaches the boundary with LBB, another with GBC. As set out in paragraph 5.19 of the Local Plan, the AQMA in DBC are currently subject to review and Action Plans are being updated. The AQMA are shown on the current Policies Map. The Policies Map Changes document shows the deletion of the AQMA at Bean Interchange. This is because changes to the A2 Bean junction have resulted in the sensitive receptors (dwellings) being removed and the AQMA in that location being formally revoked.
- 3.62 Air quality is accepted as a cross boundary issue in the SOCGs with GBC and Medway Council in terms of its link with the strategic highway network. In the SOCG with GBC, there are areas of agreement in relation to: having regard to air quality issues in taking forward the Local Plan; sharing evidence base information; and uncertainties around the links between traffic and air quality impacts in the future given changes to the vehicle fleet and the promotion of active travel/ public transport. The DBC-Medway Council SOCG commits both partners to continue to share evidence base information and discuss issues relating to air quality matters.

## Infrastructure

- 3.63 Policy S2 (Infrastructure Planning Strategy) of the Publication Local Plan sets out the approach in relation to infrastructure. This is supported by the Infrastructure Diagram (Diagram 2) and information in Table 2 of the Plan. The Local Plan approach is to ensure that the delivery of new infrastructure is co-ordinated with the relevant agencies and service providers to ensure that it comes forward to support planned new development. The policy states that infrastructure planning documents will set out the Council's priorities for infrastructure, the key projects for which are currently outlined in the Infrastructure Delivery Plan November 2021 (ref INF-2).
- 3.64 This plan content reflects extensive engagement with bodies such as KCC, EDC, National Highways, CCG/NHS and the Environment Agency. This results from ongoing discussions, bilateral meetings and separate engagement arrangements to inform the Infrastructure Delivery Plan and CIL expenditure governance.
- 3.65 In terms of responses on the Publication Local Plan, SDC and the Kent and Medway CCG supported the overall approach towards infrastructure. KCC considered that there will be a need for additional schools and school places to support development and also commented that there is a need for a policy on sustainable waste management/ provision of capacity to address current capacity issues in the area.
- 3.66 The supportive approach of most service providers likely stems from extensive engagement as part of preparing the Local Plan and agreed CIL governance arrangements; and also that development sites (set out in the Publication Local Plan and supporting housing land supply and employment land reports) as a whole do not depend on significant infrastructure not previously identified. This lack of infrastructure 'showstoppers' is consistent with the fact that all but one of the proposed strategic sites are well advanced through the planning process, N.B. This counts both the outline permissions in the Ebbsfleet Garden City allocations – Ashmere and Alkerden, which



is being built out, and Ebbsfleet Central which is not. The exception is the Priory Centre, located within Central Dartford.

- 3.67 The SOCGs with LBB, the EDC, GBC and SDC commit to working with service providers including KCC and the CCGs. The ones with the EDC and GBC go further and commit to ensuring that new or improved services and facilities to support new development are provided in a timely manner. In the SOCG with the EDC, there is recognition that the infrastructure and community facilities to support new development in Ebbsfleet Garden City should maximise opportunities for access by residents of existing communities in the wider area.

### Green and Blue Infrastructure

- 3.68 The Swanscombe Peninsula SSSI is a cross boundary Green and Blue Infrastructure issue but this is dealt with in the Ebbsfleet Garden City section above. The approach towards green infrastructure is set out in various policies in the Publication Local Plan, in particular policies S2:6, S3:3, M14 and M15. Diagrams 3 and 10 of the Plan are also relevant. The Publication Local Plan is supported by a Habitats Regulations Assessment July 2021 (ref COR-9), the recommendations from which have been incorporated into the Plan.
- 3.69 There has been ongoing cooperation in relation to the impacts of residential development on the North Kent marshes Special Protection Areas and Ramsar sites (not within Dartford Borough) via the North Kent Environmental Planning Group (NKEPG) since 2009. These meetings are attended by officers from a number of local authorities in North Kent (including DBC), plus the EDC, KCC, Natural England, Kent Wildlife Trust and the RSPB. Further information is set out in section 6 and the recent meeting dates are included in Appendix 7.
- 3.70 Natural England (NE) and the Environment Agency (EA) are the key duty to cooperate partners in respect of Green and Blue Infrastructure issues. In their responses on the Publication Local Plan, NE supported a number of policies including S3 (Climate Change Strategy) and M14 (Green and Blue Infrastructure and Open Space Provision). The EA considered that the plan should include a mechanism for improving greenspaces that are not directly linked to development and that DBC should be seeking 20% biodiversity net gain.
- 3.71 The SOCGs with LBB, GBC and Medway Council recognise Green and Blue Infrastructure as a cross boundary issue and set out points of agreement in relation to protecting these assets and taking opportunities to enhance them. The SOCG with SDC recognises that the River Darent runs through both authority areas. SDC and DBC commit to ensuring that any development does not increase flood risk or lead to a reduction in water quality of the river and to working on projects to improve the landscape and access along it as well as to deliver natural flood management projects. The SOCG with NE confirms that DBC and NE consider that policy M15 is sound and accords with the requirements of the NPPF in respect of its approach towards sites of international biodiversity importance and Sites of Special Scientific Interest.

### Climate Change and Flood Risk

- 3.72 In terms of climate change, the key area relevant to duty to cooperate compliance relates to flood risk. The Council commissioned JBA Consulting to carry out a Level 1

and Level 2 Strategic Flood Risk Assessment (SFRA) for the Borough to support the new Local Plan (refs ECC-3 to ECC-6).

- 3.73 Paragraph 1.6 of the SFRA makes clear that the following duty to cooperate partners were consulted during the preparation of the Level 1 and Level 2 SFRA:
- Kent County Council
  - Environment Agency
  - Ebbsfleet Development Corporation
  - Natural England
  - Neighbouring authorities (Gravesham Borough Council, Sevenoaks District Council, Thurrock Council, London Borough of Bexley) plus London Borough of Bromley
- 3.74 As key stakeholders, the EA and KCC (in its role as Lead Local Flood Authority) had close involvement in the work on the SFRA. Officers from both organisations attended the inception meeting on 28 April 2020 and the stakeholder meeting held on 6 November 2020 to discuss outputs from the level 2 SFRA. They were given the opportunity to comment on the draft level 1 and level 2 SFRA and their comments were taken on board in the final documents. In terms of neighbouring authorities, paragraph 13.4.2 of the SFRA makes clear that development coming forward in their areas was taken into account when carrying out the cumulative impact assessment for different catchments. It lists the data provided by neighbouring authorities to carry out this work.
- 3.75 The SFRA was published as part of the evidence base to support the Publication Local Plan. There were no comments from duty to cooperate partners in relation to this; a positive outcome which reflects the involvement of relevant partners throughout work on the SFRA.
- 3.76 In addition to involvement in the production of the SFRA, DBC have had three duty to cooperate meetings with the EA as the plan has progressed through various stages (see Appendices 5 and 6). These have largely involved discussion on how the plan should deal with flood risk issues which DBC have taken on board. In their responses on the Publication Local Plan, both KCC and the EA indicated that the Local Plan complies with the duty to cooperate.
- 3.77 The Publication Local Plan includes a number of relevant policies in relation to climate change and flood risk as follows:
- Policy S3: sets out the overall strategy for climate change and includes reference to the sequential approach and the delivery/ maintenance of strategic flood defences;
  - Policy M3: outlines the detailed requirements for sustainable technology, construction and performance; and
  - Policy M4: states the requirements in respect of riverside developments, those located within the tidal flood defence raising zone (indicated in Diagram 2) and within flood risk areas, and expectations in relation to Sustainable Drainage Systems.
- 3.78 In their response on the Publication Local Plan, KCC considered that policy M3 should have stronger requirements in terms of reduced carbon emissions and further sustainable energy installations. The EA submitted detailed comments on the way in which the plan addresses flood risk and TE2100 and considered that policy M4 should

make references to the River Ebbsfleet, future Thames Barrier and the strategic flood defence zone.

- 3.79 After discussion of their position with DBC, SOCGs with KCC or the EA have not yet been taken forward, though it is recognised that there may be a role for relevant technical SOCGs to be agreed as the plan progresses through Examination. The SOCGs with GBC, Medway and Thurrock each address climate change and/or flood risk issues. In this respect, there are commitments with GBC and Medway to ensure that new development is located and designed to mitigate and adapt to the effects of climate change, to encourage schemes which generate low or zero carbon technology, and to ensure that provision can be made for strategic tidal flood defences. The SOCG with Thurrock indicates that both partners support the TE2100 plan to improve the existing flood defence system within both authority areas. Both also agree that they cannot safeguard land for a potential new downstream flood barrier between Long Reach (in DBC) and Purfleet (in Thurrock) until there is more certainty that this is the option which will be implemented and there is a clearer indication of the land required for the provision of such a barrier.

## Conclusion

- 3.80 This section has demonstrated the approach towards engagement with partners on a constructive and ongoing basis on a wide range of strategic cross-boundary matters. It is clear that there has been the opportunity for partners to actively have an input into a number of topic areas that have informed the Publication Local Plan.
- 3.81 This has occurred through joint evidence, workshops and meetings with relevant partners throughout the different stages of the plan process and has had a direct influence on the content of the Plan. Examples have included:
- direct meetings with the EDC and wider meetings, including the Planning Liaison Group with other councils, to inform the approach towards Ebbsfleet Garden City; and
  - meetings with NE to discuss the impacts of the notification (and subsequent designation) of the Swanscombe Peninsula SSSI on policies within the Ebbsfleet and Swanscombe chapter of the Publication Local Plan
  - dialogue with KCC and others leading to further travel/ transport evidence gathering and resulting policy refinements.

The positive approach has led to many areas of agreement with partners on strategic cross-boundary matters in the Statements of Common Ground.

## 4 ENGAGEMENT WITH PARTNERS ON THE LOCAL PLAN

- 4.1 The Council has undertaken extensive and effective engagement on the Local Plan. As set out in the previous section, this includes evidence based duty to cooperate workshops (on various strategic housing, retail and transport matters) and two wide-ranging duty to cooperate workshops at formative stages of the Local Plan. In addition, DBC has had extensive communication and purposeful meetings with partners as the Local Plan has evolved.
- 4.2 This section sets out summary information in relation to different partners in respect of: their Local Plan stage (where relevant); a broad picture of meetings held since the beginning of 2020; their attendance at workshops hosted by DBC; and the position in relation to the SOCG. Appendices 4 to 6 give further information.
- 4.3 This shows how Dartford Borough Council's engagement has been active, ongoing and constructive. With consistent and positive communication from the outset, and strategic planning focused activities, efficient two-way cooperation has been achieved. The Council has been proactive, with information sharing in the sub-region often led through DBC's events and Local Plan progress. Action and communication has been constructive, and not just reliant on plan consultations or bilateral or existing meeting arrangements. Effective cooperation has been particularly supported by hosting events that aim to be inclusive and participatory, at key stages or with consultants and officers preparing strategic evidence. Communication, open information sharing and these practical actions have resulted in positive cooperation outcomes, including the SOCGs.

### Local Plan Duty to Co-operate Workshops

- 4.4 In order to involve duty to cooperate partners and encourage their input into the Local Plan, DBC organised and hosted officer level collaborative workshops for both Regulation consultation stages of the Local Plan. The presentations and minutes for these are included in Appendix 3.
- 4.5 For the Strategic Issues consultation, a duty to cooperate workshop was held on 12 July 2018. This workshop included presentations and the opportunity for questions on:
- the Core Strategy Review and other evidence
  - Key content from the Strategic Issues consultation
  - Duty to Cooperate/ Statements of Common Ground
  - Strategic Issues
- 4.6 The purpose of the Strategic Issues workshop was to allow those attending to learn more about and contribute to the development of the Local Plan. A broad range of genuine cross boundary matters were discussed at this meeting including:
- Employment, including the proposed London Resort
  - The development of Ebbsfleet Garden City
  - Swanscombe Peninsula
  - SOCGs
  - Thames Estuary 2100 Plan
  - The Thames Estuary 2050 Vision
  - Links between Kent and Essex authorities

4.7 For the Local Plan Preferred Options consultation, DBC hosted a duty to cooperate workshop on 6 February 2020. This event involved a series of presentations and the opportunity for questions/ discussion on each of the following topics:

- Background to the Preferred Options
- the Dartford and Ebbsfleet Residential Needs Assessment outputs and proposed approach
- Housing Supply
- Gypsy and Traveller Accommodation Assessment outputs and proposed approach
- Further evidence work being carried out for the Publication Local Plan
- Strategic Issues including strategic options, preferred approaches, the overall strategy and the duty to cooperate

4.8 Following the presentations at the Preferred Options workshop, there was a collective discussion on duty to cooperate actions. In particular, there were discussions in relation to:

- Evidence
- How the findings and studies compared with outputs from their own authorities
- What the participants thought are the next practical measures needed to take further duty to cooperate actions in Kent and Greater London/ Essex.

There was a broad range of questions about the evidence base and the approach taken in the Local Plan Preferred Options. Participants engaged in the collective discussions and there was an update on the approaches being taken by those authorities represented at the event.

4.9 The list of partners invited to these events and those who attended is set out in table 6 below.

**Table 6: Local Plan Workshop Invitees and Participants**

<b>Strategic Issues Workshop</b>	<b>Preferred Options Event</b>
London Borough of Bexley	London Borough of Bexley
Ebbsfleet Development Corporation*	Ebbsfleet Development Corporation
Greater London Authority	Greater London Authority
Gravesham Borough Council*	Gravesham Borough Council*
Homes England	Kent County Council*
Kent County Council*	Sevenoaks District Council*
South East LEP	Thurrock Council*
Sevenoaks District Council*	
Transport for London	
Thurrock Council*	
Thames Gateway Kent Partnership*	

\* Indicates those who attended the event

4.10 Dartford Borough has also undertaken a series of workshops and discussions with partners since it introduced a formal governance regime for expenditure of the Community Infrastructure Levy (CIL) in 2017. Following an initial launch briefing and event, these workshops/ discussion have been based on an annual cycle of engagement culminating with an autumn meeting of infrastructure providers with the Leader of Dartford Council. This informs subsequent formal sign off of the Infrastructure Delivery Plan and other funding documentation prior to the new financial

year. For example, Kent County Council, National Highways, the Environment Agency and the Kent and Medway CCG participated at the 2021 Leader's meeting. However as this principally relates to CIL expenditure, this stream of engagement has not been documented in detail as part of Duty to Cooperate compliance.

### Local Plan Meetings

- 4.11 As well as the workshops, DBC has also had a series of ongoing meetings and discussions in relation to the Local Plan with different partners throughout its production. The list of meeting dates which have taken place since January 2020 is included in Appendix 4 and a short summary of the issues discussed at most of these meetings is set out in Appendix 5. The minutes of relevant meetings (apart from where unavailable) are within Appendix 6. The meetings were informed by extensive dialogue prior to that period as set out in the Duty to Cooperate Statement of Activities (Appendix 1).
- 4.12 This provides an extra layer of active cooperation in addition to the workshop events targeted at formative stages of plan (see paragraphs 4.4-4.9 above) and evidence production (see paragraphs 3.7-3.8, 3.30-3.31 and 3.56-3.57 above). The ongoing discussions have been particularly important in providing regular clarification of progress on meeting development needs, and delivering a Local Plan; and on addressing multi-tier issues, e.g. with the Ebbsfleet Development Corporation on its development management and regeneration activities, and with Kent County Council on highways, education, waste and other matters.

### Ebbsfleet Development Corporation (as local planning authority)

- 4.13 The Ebbsfleet Development Corporation (EDC) is the decision making authority for planning applications within its area, which straddles the boundaries of Dartford and Gravesham Boroughs. The parts of Dartford Borough within the EDC's area is shown in Figure 8 in the Publication Local Plan. DBC and, in the case of minerals and waste, KCC remain the plan making authority for this area. As set out in paragraph 3.38 above, the EDC has set out a Vision for Ebbsfleet in 2035, articulated through the Ebbsfleet Implementation Framework 2017.
- 4.14 There have been a large number of meetings between officers of DBC and EDC in relation to the evolution of the Local Plan, the production of some of the evidence base documents, EDC's masterplanning work on Ebbsfleet Central and the regular and formally established Ebbsfleet Planning Liaison Group (which also includes officers from GBC and KCC and has planning policy as a standing item, see paragraphs 3.40-3.41 above). Further information on the purpose of the Ebbsfleet Planning Liaison Group is included in the EDC-DBC and GBC-DBC Statements of Common Ground. The EDC has partly funded and been involved in the commissioning/ preparation of the key evidence to support the Local Plan, including the Dartford and Ebbsfleet Residential Needs Assessment and the Dartford & Ebbsfleet Retail and Leisure Study. Most of the recent Local Plan specific meetings have focussed on the content of the Statement of Common Ground and changes to policies needed as a result of the notification of the Swanscombe Peninsula Site of Special Scientific Interest. The latter affects two strategic development areas identified in the Ebbsfleet Implementation Framework – Ebbsfleet Central and Swanscombe Peninsula. The EDC also chair regular meetings between DBC, GBC and KCC on sustainable travel projects.

- 4.15 Officers from the Ebbsfleet Development Corporation were invited to both Local Plan Duty to Cooperate workshops and to the duty to cooperate workshops in relation to the Dartford and Ebbsfleet Residential Needs Assessment (DERNA), the Retail and Leisure Study and Strategic Transport Modelling. They were able to attend and participate in the workshops relating to the Local Plan Strategic Issues, the DERNA and the transport modelling.
- 4.16 The EDC (as local planning authority) responded positively to the Publication Local Plan consultation, outlining their support for the spatial strategy and general support for the policies in the Ebbsfleet and Swanscombe chapter which they considered to align with the EDC vision. They considered that the plan complies with the legal duty to cooperate. The points made by the EDC are shown in Table 2.
- 4.17 The EDC and DBC signed a SOCG on 18 November 2021. This sets out many areas of agreement and there are no matters on which the two parties disagree. The areas of agreement include those in relation to:
- Collaboration on the evidence base and Ebbsfleet chapter policies, and positive duty to cooperate through meetings, including between the two parties, the Planning Liaison Group, KCC, other infrastructure providers and the Crossrail to Ebbsfleet partnership, all of which will continue;
  - Policies S1-S4, E1, E2, E4 and E5 are appropriate; and
  - Support for changing the Swanscombe Peninsula SSSI boundary to reflect the final approved boundary.

### London Borough of Bexley

- 4.18 The development plan for London Borough of Bexley (LBB) comprises the adopted London Plan 2021, the adopted Core Strategy 2012, and saved policies from the adopted Unitary Development Plan 2004. LBB is preparing a new Local Plan. A Regulation 18 consultation took place in February/ March 2019 and the Regulation 19 Draft Local Plan consultation began in May 2021. The Bexley Local Plan was submitted for Examination on 30 November 2021. This means that the timescales for the new Bexley and Dartford Local Plans are now closely aligned.
- 4.19 Officers of LBB and DBC have met regularly throughout the production of their respective Local Plans. In particular, there have been several meetings held in 2021 to discuss the London Plan, approaches being taken in the publication Local Plans, the evidence base to support this, and the topics to be addressed and points of agreement in the SOCG.
- 4.20 Officers from LBB were invited to both Local Plan Duty to Cooperate workshops and to the duty to cooperate events in relation to the Dartford and Ebbsfleet Residential Needs Assessment (DERNA), the Retail and Leisure Study and Strategic Transport Modelling. They were able to attend and participate in the workshops on the DERNA and the transport modelling.
- 4.21 LBB responded to the Publication Local Plan consultation as set out in Table 2. LBB acknowledged the regular and ongoing duty to cooperate discussions that have taken place between the two parties and considered that the Local Plan complies with the duty to cooperate.

- 4.22 LBB and DBC agreed a first stage SOCG in January 2020 in the lead up to the consultation on the Dartford Local Plan Preferred Options. This has been refined and a formal SOCG was signed on 24 November 2021. This sets out many areas of agreement and there are no matters on which the two parties disagree. The areas of agreement include those in relation to:
- Positive cooperation between each other on Local Plan and strategic matters and with Highways England and Kent County Council on strategic transport issues which will continue;
  - Recognition of clear links between the two housing markets, and potential for any future housing delivery contribution from Dartford to be drawn down first by Bexley if required; and
  - The policy for Bluewater is suitable given its operation as a regional shopping centre and it includes safeguards for local town centres in Bexley and Dartford Boroughs.

### Gravesham Borough Council

- 4.23 The Local Plan for Gravesham Borough consists of the adopted Local Plan Core Strategy 2014 and saved policies from the adopted Gravesham Local Plan First Review 1994. The time horizon for the Gravesham Core Strategy extends to 2028. Gravesham Borough Council (GBC) is working towards a Local Plan Core Strategy Partial Review, Site Allocations and Development Management Policies Document. Regulation 18 consultations were carried out in April 2018 and October 2020 and the latest indication is that a Regulation 19 version is being prepared for consultation in 2022.
- 4.24 Gravesham Borough made a request for Dartford Borough to meet some of its housing needs in 2015, further information on which is set out in paragraph 3.12 above. Following correspondence and extended dialogue, the agreed current position is outlined in paragraph 3.18 above.
- 4.25 There have been and continue to be regular meetings between officers of both Councils throughout the production of the Local Plan, some of which have been jointly attended by officers of SDC and Medway Council. These have addressed updates to the production of evidence (where available) and Local Plan progress. More recent and frequently held meetings have focussed on the areas of agreement and disagreement in the SOCG. There has also been a large number of strategic discussions on complementary development and infrastructure needs involving DBC and GBC, including on the progression of the Ebbsfleet Garden City, transport projects, environmental and other matters. Both DBC and GBC participate in meetings of the Ebbsfleet Planning Liaison Group (see paragraphs 3.40-3.41 above).
- 4.26 Officers from Gravesham Borough Council were invited to both Local Plan Duty to Cooperate workshops/ events and to the duty to cooperate events in relation to the Dartford and Ebbsfleet Residential Needs Assessment, the Retail and Leisure Study and Strategic Transport Modelling. They were able to attend and participate in all of these events.
- 4.27 GBC responded to the Publication Local Plan as set out in Table 2. They did not agree that the requirements in relation to the duty to cooperate had been met.



- 4.28 The SOCG with GBC was signed on 29 November 2021. The areas of agreement include those in relation to:
- The parties will continue to work on planning matters relevant to Ebbsfleet Garden City, including through membership of the Planning Liaison Group, and with KCC and service providers in relation to transport and infrastructure to support new development;
  - 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;
  - 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
  - There are links between the GBC and DBC employment markets but there are differences in the performance and offer of these.
- 4.29 The SOCG with GBC also includes a number of points of disagreement, including in relation to:
- The scale/ presence of GBC's unmet housing needs, sufficiency of information, and whether DBC will meet GBC's housing needs;
  - Employment land supply and provision; and
  - Policy for Bluewater.

### Sevenoaks District Council

- 4.30 The Local Plan for Sevenoaks District comprises the adopted Core Strategy 2011 and the adopted Allocations and Development Management Plan 2015. The Sevenoaks Local Plan was submitted for examination in May 2019 but this failed to meet the legal duty to cooperate requirements, as set out in the Inspector's report in March 2020. Sevenoaks District Council (SDC) is now carrying out evidence base and policy preparation work to inform a Regulation 18 consultation on its new Local Plan planned for April/May 2022.
- 4.31 As part of previous work on their Local Plan, SDC issued a request for DBC to meet some of its housing needs in an email dated 11 April 2019. Further information on this is set out in paragraph 3.13 above.
- 4.32 There have been and continue to be regular meetings between officers of both Councils throughout the production of the Local Plan, some of which have been jointly attended by officers of GBC. These have addressed updates to the production of evidence, Local Plan progress and, more recently, the areas of agreement in the SOCG.
- 4.33 Officers from SDC were also invited to both Local Plan Duty to Cooperate workshops and to the duty to cooperate workshops in relation to the Dartford and Ebbsfleet Residential Needs Assessment (DERNA), the Retail and Leisure Study and Strategic Transport Modelling. They were able to attend and participate in both events on the Local Plan and the ones related to the DERNA and transport modelling.

- 4.34 SDC responded to the Publication Local Plan consultation. The points made by SDC are set out in table 2, they considered that DBC have met the legal requirements in relation to duty to cooperate.
- 4.35 DBC and Sevenoaks District Council (SDC) first signed a SOCG on 20 May 2019 which was related to work on the Sevenoaks Local Plan at that time. The SOCG has been updated and an amended version was signed by both parties on 9 December 2021. This sets out areas of agreement including in relation to:
- Continued joint working and liaison with each other on planning and infrastructure matters;
  - The authorities do not share a housing market but there are some clear relationships between the two areas, the context for DBC to make a contribution to unmet housing needs in the wider area is discussions on SOCGs with LPAs and DBC's identified strong migration and commuting relationship with the LBB, but there could be a case to be made for DBC to assist with some unmet needs from SDC in the future subject to a number of factors; and
  - SDC and DBC do not share the same functional economic market area.

### Thurrock Council

- 4.36 The Local Plan for Thurrock comprises the adopted Core Strategy and Policies for Management of Development (as amended) 2015. Thurrock Council is carrying out work on a new Local Plan. Issues and Options Stage 1 and 2 consultations were carried out in April 2016 and December 2018 respectively. The latest indication is that a draft Regulation 18 version is being prepared for consultation by the end of this year.
- 4.37 There have been a number of meetings between officers of DBC and Thurrock Council throughout the production of the Local Plan. These have covered strategic issues relating to the Lower Thames Crossing, London Plan, Bluewater, Crossrail, TE2100 and London Resort as well as the potential content of a SOCG. At the most recent meeting on 5 February 2021, Thurrock Council confirmed that it is aiming to meet its objectively assessed housing need plus an additional 20%.
- 4.38 Officers from Thurrock Council were invited to both Local Plan Duty to Cooperate workshops and to the duty to cooperate workshops in relation to the Dartford and Ebbsfleet Residential Needs Assessment and the Retail and Leisure Study. They were able to attend and participate in both events on the Local Plan and the one related to the retail study.
- 4.39 Thurrock Council did not respond to the consultation on the Publication Local Plan. However, a SOCG between Thurrock Council and DBC was signed on 31 October 2021. There were no areas of disagreement and a large number of cross boundary issues on which the two parties agreed. The areas of agreement include those which relate to:
- There is relatively little current overlap between the two authorities in terms of the housing market and the travel to work areas/ employment provision; and
  - The proposed policy approach towards retail in the Dartford Local Plan will not have an adverse impact on the Lakeside shopping centre and retail park (in Thurrock).

## Kent County Council

- 4.40 Kent County Council (KCC) has a number of different roles. As the upper tier authority in a two tier area, it is the local planning authority for minerals and waste. It is also responsible for the provision of infrastructure, most notably schools, is the lead local flood authority and Kent Highways has responsibility for public highways within its area (except trunk roads which are the responsibility of National Highways). Duty to cooperate with Kent Highways is dealt with under a separate section below.
- 4.41 The Kent Minerals and Waste Local Plan 2013-030 was adopted in July 2016 (refs POL-3 and POL-4). A number of policies in the plan underwent an Early Partial Review and the amended version was adopted in September 2020. Policies within this affect DBC. The Minerals Sites Plan was adopted in September 2020 but none of the identified sites are within DBC. These plans form part of the development plan for the Borough. DBC has been cognisant of minerals and waste policies and safeguarding in assessing the suitability of sites in the Strategic Housing Land Availability Assessment. It is also recognised that part of the minerals safeguarding areas in particular in carrying out its assessment of the
- 4.42 Meetings with KCC relating to the progress on the Dartford Local Plan have largely taken place via DBC's participation on county-wide or larger scale groups (see Appendix 7) and the Ebbsfleet Planning Liaison Group which also includes the EDC and GBC (see paragraphs 3.40-3.41 above). In addition, discussions have been held with service providers (e.g. education, waste and highways) in relation to joint infrastructure planning arising as a result of growth from development in the Local Plan/ planning permissions. There was also a recent meeting specifically with KCC planning in which DBC set out the key changes that had been made to the plan since it was first published in February 2021. At that meeting, it was agreed that the need for a SOCG would be reviewed following the consultation on the Publication Local Plan, depending on KCC's response. DBC consider that there may be a role for a SOCG with KCC based on infrastructure issues (primarily related to highways and education) as the examination into the Local Plan progresses.
- 4.43 The needs for schools are addressed in detail in the Infrastructure Delivery Plan and the shared transport agenda is reflected in the Sustainable Transport Strategy. DBC considers that the need for additional waste management facilities should be addressed through revisions to the Kent Minerals and Waste Local Plan. As KCC is the lead local flood authority, KCC's Sustainable Drainage Team was involved in both stages of the work on the Strategic Flood Risk Assessment. This included attending stakeholder meetings and being given the opportunity to comment on the draft report before the SFRA was finalised.
- 4.44 Officers from KCC were invited to both Local Plan Duty to Cooperate workshops and to the duty to cooperate workshops in relation to the Dartford and Ebbsfleet Residential Needs Assessment and the Retail and Leisure Study. They were able to attend and participate in all of these events.
- 4.45 KCC submitted a response on the Publication Dartford Local Plan. KCC made a large number of comments, the key ones of which are outlined in Table 2.

## Medway Council

- 4.46 Medway Council does not adjoin Dartford Borough but it is a unitary authority located within north Kent. The Local Plan for the area consists of the adopted Medway Local Plan 2003. Medway Council is carrying out work on a new Local Plan. An Issues and Options consultation was carried out in January 2016 which was followed by a Development Options consultation in January 2017. The latest indication is that Medway Council are currently finalising a draft Local Plan under Regulation 19 for consultation in December 2021 or January 2022.
- 4.47 Officers of DBC have met Medway Council officers a number of times in 2021, including once jointly with GBC officers in February 2021 and also as part of wider duty to cooperate partners on transport. The joint meeting with GBC was an opportunity to update on progress with Local Plans including evidence base work. The issue of SOCGs was discussed and Medway Council introduced the idea of a SOCG with DBC, in particular to address the issues of transport and access to employment. The meeting in October 2021 discussed the key issues that would be addressed in the SOCG including: evidence base; housing needs; transport infrastructure; Lower Thames Crossing; London Resort; and Bluewater.
- 4.48 Officers from Medway Council were invited to the duty to cooperate events in relation to the Dartford and Ebbsfleet Residential Needs Assessment, the Retail and Leisure Study and Strategic Transport Modelling. They were able to attend the ones related to the retail study and transport modelling.
- 4.49 Medway Council responded on the Publication Dartford Local Plan. Table 2 sets out the various points that they made. In terms of the duty to cooperate, they indicated that the requirements had been met with the proviso that this was subject to further discussions.
- 4.50 Medway Council and DBC signed a SOCG on 8 December 2021. It includes agreed current positions in relation to:
- The good working relationship between the two authorities on sharing evidence base and discussion of issues, particularly in relation to transport, with engagement and information sharing continuing on a number of strategic issues; and
  - Both parties taking an appropriate approach and positively tackling development needs, with no redistribution of housing being necessary or appropriate between them.

## Mayor of London/ Greater London Authority

- 4.51 The London Plan was adopted in 2021. DBC is not within the area covered by the London Plan but lies contiguous to the London Borough of Bexley which is within the London Plan area. It should be noted that the London Plan includes policy SD2 Collaboration in the Wider South East which states the following:
- A The Mayor will work with partners across the Wider South East (WSE) to address appropriate regional and sub-regional challenges and opportunities through recently-developed strategic coordination arrangements.

- B To secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE, the Mayor supports joint working with WSE partners to ensure that plan-making is, as far as possible, informed by up-to-date, consistent technical evidence and monitoring.
- C The Mayor will take account of the views of WSE partners in discharging his Duties to Inform and Consult with authorities beyond London and will respond to their Duty to Co-operate requests for views on Development Plans insofar as they bear strategically on London.
- D The Mayor supports recognition of long-term trends in migration in the development of Local Plans outside London.
- E The Mayor will work with WSE partners to find solutions to shared strategic concerns such as: barriers to housing and infrastructure delivery (including 'smart' solutions – see also paragraph 9.6.9); factors that influence economic prosperity; the need to tackle climate change (including water management and flood risk); improvements to the environment (including air quality, biodiversity and green infrastructure), waste management, and the promotion of Circular Economies; wider needs for freight, logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved.

- 4.52 A series of wider South East meetings were held by the GLA in the preparation of the London Plan, in which DBC regularly participated. A bilateral meeting was convened by DBC between officers of the Greater London Authority (GLA) and DBC in July 2020. This provided updates on the Dartford Local Plan (including the evidence base) and the London Plan. It was noted that no change was being proposed to the London Plan's wider south east partnership approach (as set out in policy SD2 above) and that the GLA does not generally wish to commit to having SOCGs with local planning authorities individually. DBC continued communication on the Local Plan, and both parties have worked together on transport and development issues in Dartford and the surrounding areas through the partnership working on the Ebbsfleet- Abbey Wood connectivity Statement of Business Case preparation.
- 4.53 Officers from the GLA (representing the Mayor of London) were invited to both Local Plan Duty to Cooperate workshops and to the duty to cooperate workshops in relation to the Dartford and Ebbsfleet Residential Needs Assessment and the Retail and Leisure Study. They did not attend any of these events.
- 4.54 The GLA did not respond to the consultation on the September 2021 Publication Local Plan though they had previously responded to earlier consultations.
- 4.55 DBC offered further meetings to discuss strategic issues with the GLA on a number of occasions early in 2021 and this culminated in a letter from DBC to the GLA in October 2021. The letter formally asked what, if any, further actions DBC could undertake with the GLA to secure further input by the Mayor in relation to the new Dartford Local Plan. It offered an open discussion on the Local Plan for potential points of agreement on strategic matters, including working with LBB, and DBC's role in assisting meeting unmet housing need in London and the south east. The GLA responded by email in October 2021 stating that they tend not to have SOCGs with local planning authorities outside London and that they would be happy to discuss any potential strategic-scale

issues that may require closer cooperation following the Dartford Local Plan consultation, on which they had no specific comments at that stage. A copy of the correspondence between DBC and the GLA in October is included as Appendix 8. As a consequence of this position by the GLA, no SOCG has been progressed with them.

## Natural England

- 4.56 DBC was notified of the proposed Swanscombe Peninsula Site of Special Scientific Interest (SSSI) by Natural England (NE) on 11 March 2021. This was when the consultation was taking place on the initial Publication Dartford Local Plan. NE objected on the basis that the notified SSSI would affect some of the proposed Ebbsfleet Garden City policies and the Ebbsfleet Central allocation and considered that these would need to be amended to take the SSSI into account.
- 4.57 As a direct result of the SSSI notification, DBC had duty to cooperate meetings with NE in May and October 2021. These specifically discussed changes to the Ebbsfleet chapter of the Local Plan in response to the SSSI notification and there was agreement that a SOCG would be helpful. Subsequent to the May meeting, NE provided feedback on changes to the Plan which DBC took on board.
- 4.58 As indicated in table 2, NE responded positively to the Publication Local Plan September 2021 and specified that the plan meets the duty to cooperate. DBC considers that this support for the approach is as a result of the duty to cooperate discussions and the opportunity given to NE to provide early input into amended policies.
- 4.59 NE and DBC signed a SOCG on 1 December 2021. This sets out a number of areas of agreement including those in relation to:
- The approach towards sites of international biodiversity importance and SSSIs (including the recently designated Swanscombe Peninsula SSSI) being sound and in accordance with national policy and regulations; and
  - The boundaries of the designated Swanscombe Peninsula SSSI are now different to those shown on the Policies Map Changes and the parties agree that these could be changed through modifications to the plan.

## Environment Agency

- 4.60 As one of the key stakeholders, an officer from the Environment Agency (EA) was involved in both stages of the work on the Strategic Flood Risk Assessment. The EA's representative attended the inception meeting with the consultants carrying out the work and a further meeting to discuss the outputs. The EA's comments on the draft report were taken on board in finalising the SFRA.
- 4.61 DBC has met with the EA on a number of occasions since January 2020. These meetings allowed DBC to give an update on the Local Plan and specifically how this addresses TE2100 and flood risk issues, with the EA having the opportunity to set out matters which they wished to be considered. At the last meeting in September 2021, it was agreed not to commence work on a SOCG at the present time unless the EA indicate that this is needed. There has not been any indication that this is required.
- 4.62 The Environment Agency commented on the Publication Local Plan and indicated that it complies with the duty to cooperate.

## National Highways

- 4.63 Officers from National Highways (NH) have been involved in a number of meetings with DBC officers to progress the transport modelling work which is being carried out by consultants Stantec, and originating from a NH Model, to consider the Local Plan. Meetings have usually been jointly attended by representatives from Kent Highways and/or the EDC. These meetings provided updates on the progress of the work, and NH's input has resulted in a series of additional workstreams being undertaken by DBC/Stantec. Discussions enabled assumptions to be agreed, for instance that the modelling would cover scenarios both with and without the Lower Thames Crossing.
- 4.64 There has also been extensive engagement between DBC and National Highways on strategic highway projects and potential junction upgrades, notably junction 1A on the A282/M25).
- 4.65 NH submitted a response on the Publication Dartford Local Plan. They considered that further transport modelling information is needed to allow them to ascertain the impacts of the Local Plan on the strategic road network junctions. They would then be in a position to assess whether mitigation is required for the Local Plan. Subsequent to this and specific data requests, Stantec undertook further technical work for NH, and completed the final stage 4 report of the strategic transport modelling in November 2020.
- 4.66 DBC has not yet entered into a SOCG with National Highways. It is anticipated that work will progress on a SOCG of technical clarification between the two parties.

## Kent Highways (Kent County Council)

- 4.67 Kent Highways and DBC work together as Local Planning Authority and the Highway Authority extensively and at a range of levels, including through a formally constituted Joint Transport Board (DBC and KCC Members committee). Further cooperation occurs including through ongoing DBC/KCC (and sometimes EDC) meetings on Fastrack/ buses, the STIPs scheme and others.
- 4.68 Officers from Kent Highways have been involved at all the different stages of the strategic transport modelling work. They have participated in a series of meetings with DBC, some of which have also involved officers from NH and the EDC, as well as with wider duty to cooperate partners. Strategic modelling meetings agreed the methodology for the transport modelling work and provided updates on its progress. DBC has engaged in several complementary discussions in relation to modal shifts away from travel by private car and changes to the local road network. Officers from Kent Highways were also invited to and attended the duty to cooperate event on Strategic Transport Modelling. There has been growing collaboration on the theme of Local Plan support for walking and cycling, and delivering active travel schemes.
- 4.69 Kent Highways responded on Publication Dartford Local Plan as part of the detailed response provided by Kent County Council.
- 4.70 DBC has not yet entered into a SOCG with KCC. It is anticipated that work will progress on a SOCG of technical clarification between the two parties.

## Kent and Medway Clinical Commissioning Group

- 4.71 There are frequent meetings between officers of DBC and the Kent and Medway Clinical Commissioning Group (CCG) to discuss primary care facilities and the need for improvements in relation to planned development within DBC. The discussions have informed the projects outlined in the Infrastructure Delivery Plan and the allocation of funds from Dartford's Community Infrastructure Levy. Parties have also met to discuss plans for a new medical centre at Steele Avenue, Greenhithe and space within the proposed Health and Wellbeing centre at Ebbsfleet Central.
- 4.72 The Kent and Medway CCG responded on the Publication Dartford Local Plan, stating that DBC had engaged with the CCG through the Local Plan process and they specified that the plan complies with the duty to cooperate.
- 4.73 It is not considered necessary for DBC to enter into a SOCG with the Kent and Medway CCG.

## Conclusion

- 4.74 It is clear that DBC has actively engaged with all the relevant duty to cooperate partners throughout the production of the Local Plan. DBC ran Local Plan devoted duty to cooperate sessions for relevant partners at the key consultation stages on the Plan – the Strategic Issues and Preferred Options stages (see Appendix 3). It has also had regular meetings with individual partners as set out in Appendices 4-6) and brought various partners together for meetings where it was constructive and relevant to do so, for example, for meetings relating to the strategic transport modelling work.
- 4.75 SOCGs with the EDC, LBB, GBC, SDC, Thurrock Council, Medway Council and NE have been signed and agreed. There are many areas of agreement with these partners, including in relation to the approach towards housing, Ebbsfleet Garden City and infrastructure. The SOCG with GBC includes many areas of agreement but also some matters on which the two partners have been unable to agree.



## 5 ONGOING WIDER PARTNERSHIP WORKING

### Overview

- 5.1 DBC has also continued to be involved in a number of regular other meetings with partners. The list of some of the most prominent of these, their purpose and membership is set out in table 7 below. The list of dates that these groups have met since January 2020 is set out in Appendix 7. This is intended to show key ongoing meeting groups and it does not include more ad hoc workshops, briefings and other events which DBC officers have attended/ organised with partners in that time.
- 5.2 It is clear that DBC engages in a number of groups that inform strategic planning. These are separately identified as they are principally concerned with a wider geography than the Local Plan or, as with Crossrail/ Abbey Wood to Ebbsfleet, a longer timescale for delivery.

**Table 7: Ongoing Partnership Meetings (Key Examples)**

Meeting	Purpose and Membership
Crossrail (or Abbey Wood) to Ebbsfleet (C2E) Technical Group	This group is a formal partnership with government on the C2E project, for which there is a MoU. It relates to the potential for a transport enhancement scheme linking Crossrail at Abbey Wood into DBC. It comprises officers from DBC, LBB, GBC, KCC, EDC, TFL, GLA, TGKP, DFT, DCLG and Network Rail. There have also been a number of workshops and other C2E related engagement including others (not included within the dates in Appendix 7).
Ebbsfleet Planning Liaison Group	A Working Group that focusses on planning issues in Ebbsfleet Garden City and meets every two months. Senior Officers from DBC, Gravesham Borough and Ebbsfleet Development Corporation. There is a Service Level Agreement on cooperation.
Ebbsfleet Sustainable Travel Working Group	Meetings particularly about transport modelling in and around the EDC area with KCC, EDC and GBC. The group coordinates cooperation between stakeholders on sustainable travel projects and initiatives within the Ebbsfleet Area.
Fastrack Advisory Group	Meetings with KCC, GBC, EDC and other stakeholders to discuss the implementation, progress and planning of the Fastrack bus service that operates within Dartford. Meetings are on an ad hoc basis.
Gypsy, Traveller & Travelling Showpeople Cross Borough Liaison Group	This group discusses planning policy issues relating to gypsies, travellers and travelling showpeople across Kent. It is attended by a number of LPAs.
Kent and Medway CCG	Regular meetings to discuss primary care facilities and the need for improvements in relation to planned development within DBC.
KCC Education	Regular meetings to discuss education provision in DBC in relation to planned development and progress of plans for new and expanded schools.
Kent Planning Officers' Group (KPOG)	A group for Heads of Planning in Kent that meets monthly. All Kent districts and Medway Council are represented along with KCC Council and EDC. The group discusses joint working opportunities, considers cross-boundary matters and all other sustainable development matters of pan-Kent interest.

Meeting	Purpose and Membership
Kent Planning Policy Forum	A group for Planning Policy Managers in Kent, chaired by the County Council that meets every two months. Other relevant organisations such as the Environment Agency also commonly attend. This is a sub-group of KPOG that discusses and resolves cross-boundary policy issues, shares relevant information and experiences and prepares joint responses to consultations of pan-Kent interest.
Lower Thames Crossing Meetings	Meetings to discuss the progress of and issues relating to the Lower Thames Crossing. Meetings include GBC, KCC and the NH Lower Thames Crossing Team. Medway Council are also often involved.
Network Rail	DBC meets with Network Rail as part of wider partnerships on an ad hoc basis in relation to two studies of relevance to DBC: North and East Kent Connectivity (whole of Kent) and London Adjacent (metro services)
North Kent Environmental Planning Group and Birdwise Steering Group	A group that considers green infrastructure issues and takes forward mitigation strategies for habitats of international importance in the north Kent marshes. It includes representatives from a number of local authorities across north Kent, EDC, KCC, NE, KWT and RSPB. Meetings are held every 6 months.
North Kent Strategic Development and Planning Group	Meetings with Gravesham, Medway, Swale and Maidstone Borough Councils, KCC, EDC, NH and NE to discuss cross-boundary issues and develop ways to collaborate. The priority areas for joint work are transport, health and spatial arrangement of development.
Strategic Transport Infrastructure Plan (STIP) Working and Steering Groups	Meetings of officers and members of KCC, DBC, GBC and EDC to deliver a package of transport improvements at key locations across DBC and GBC to enable the planned level of development to be realised. It complements the Kent Local Transport Plan. N.B. The STIP Steering Group has been subsumed into the Fastrack Advisory Board.
Thames Estuary Growth Board	A high level group developed to spread growth, opportunity and prosperity across the area. This stretches from East London to where the Estuary meets the sea, and includes North Kent, Canterbury and Thanet districts and South Essex. The board includes many local authorities as well as private individuals.
Thames Gateway Kent Partnership	An informal public-private partnership whose purpose was to promote sustainable economic-led growth and regeneration in North Kent. The partnership included GBC, Medway Unitary Council, Swale Borough Council, Maidstone Borough Council, KCC and EDC. The TGKP Board met quarterly with officer-level groups meeting more frequently. Matters on which the Council and the TGKP work together include infrastructure and influencing national government policy.
Transport for the South East	Ad hoc events with planning authorities from the South East region to discuss a regional Transport Strategy for the South East region. Workshops on a series of Area Studies to determine the aims, objectives and priorities for a Strategic Investment Plan.
Wider South East Officer Working Group	A working group established by the GLA in relation to the London Plan and associated strategic planning outside Greater London. The group explores strategic planning issues and examines the mechanisms for ongoing co-ordination and co-operation in light of

Meeting	Purpose and Membership
	<p>London's future growth requirements and the review of the London Plan. The group is attended by Officers from various LPAs in London and the wider South East. DBC was the original LPA representative from Kent but is sometimes substituted by GBC. KCC/ Medway also attend.</p>

## **APPENDIX 1: Duty to Cooperate Statement of Activities**

Included as a separate document.

## APPENDIX 2: Abbreviations

C2E	Crossrail to Ebbsfleet
CCG	Clinical Commissioning Group
CIL	Community Infrastructure Levy
DBC	Dartford Borough Council
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
DFT	Department for Transport
EDC	Ebbsfleet Development Corporation
GBC	Gravesham Borough Council
GLA	Greater London Authority
KCC	Kent County Council
KPOG	Kent Planning Officers Group
KWT	Kent Wildlife Trust
LBB	London Borough of Bexley
LPA	Local planning authority
LTAM	Lower Thames Area Model
MoU	Memorandum of Understanding
NE	Natural England
NH	National Highways (formerly Highways England)
NPPF	National Planning Policy Framework
SDC	Sevenoaks District Council
SFRA	Strategic Flood Risk Assessment
SOCG	Statement of Common Ground
SoS	Secretary of State
SSSI	Site of Special Scientific Interest
STIP	Strategic Transport Infrastructure Programme
TE2100	Thames Estuary 2100
TFL	Transport for London
TGKP	Thames Gateway Kent Partnership

## **APPENDIX 3: Duty to Cooperate Workshops**

Included as a separate document.

## APPENDIX 4: Meeting Dates since 1 January 2020

Ebbsfleet Development Corporation – Local Plan	04/03/2020, 26/06/2020, 01/07/2020, 29/07/2020, 28/09/2020, 30/10/2020, 26/11/2020, 23/03/2021 (joint with KCC, GBC and Medway Council)^, 15/04/2021, 04/06/2021, 08/06/2021, 22/07/2021, 07/09/2021, 08/10/2021
Ebbsfleet Development Corporation – Ebbsfleet Central Masterplanning	10/02/2021, 10/03/2021, 18/05/2021
Environment Agency	13/01/2020, 10/03/2021, 30/09/2021
Gravesham Borough Council	27/01/2020, 30/06/2020 (joint with SDC), 09/02/2021 (joint with Medway Council), 23/03/2021 (joint with KCC, EDC and Medway Council)^, 10/08/2021, 31/08/2021, 01/10/2021, 18/11/2021
Kent and Medway Clinical Commissioning Group*	02/09/2020, 15/10/2020, 26/01/2021, 11/03/2021, 11/05/2021, 01/07/2021, 21/07/2021, 16/09/2021, 15/10/2021
Kent County Council Planning	12/10/2021
Kent County Council Education	22/04/2021, 30/09/2021
Kent County Council Waste	23/07/2020 (also attended by GBC and EDC), 12/10/2020 (also attended by GBC and EDC)
Kent Highways (Kent County Council)^	20/05/2020, 22/07/2020, 14/10/2020 (joint with NH and EDC), 11/02/2021, 15/03/2021 (joint with NH and EDC), 23/03/2021 (joint with EDC, GBC and Medway Council), 02/07/2021 (joint with NH), 05/10/2021 (joint with NH), 11/11/2021
London Borough of Bexley	02/09/2020, 31/03/2021, 24/06/2021, 28/09/2021, 10/11/2021
Mayor of London/ Greater London Authority	02/07/2020
Medway Council	09/02/2021 (joint with GBC), 23/03/2021 (joint with KCC, EDC and GBC)^, 07/10/2021
National Highways (formerly Highways England)	14/10/2020 (joint with Kent Highways and EDC), 07/01/2021, 15/03/2021 (joint with Kent Highways and EDC), 02/07/2021 (joint with Kent Highways), 05/10/2021 (joint with Kent Highways)
Natural England	26/05/2021, 07/10/2021
Sevenoaks District Council	12/02/2020, 30/06/2020 (joint with GBC), 02/11/2020, 04/03/2021, 02/09/2021, 21/10/2021
Thurrock Council	05/02/21

\* No minutes of meetings

^ Relate to Dartford Transport Modelling/ Study

## APPENDIX 5: Local Plan Specific Meetings and Outcomes since 1 January 2020

### Local Planning Authorities

Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
<b>Ebbsfleet Development Corporation – Local Plan</b>	
26/06/2020	<ul style="list-style-type: none"> <li>• Agreement for a series of monthly bilateral meetings to inform preparation of the Publication Local Plan</li> <li>• Agreement on supporting meanwhile uses within the Garden City and embedding this in the Dartford Local Plan</li> <li>• Discussion of policy options for enabling amenity provision</li> <li>• Agreement to continue exploring the potential for a Gypsy and Travellers Pitch within the Garden City</li> <li>• Ebbsfleet Central not likely to be suitable to standard viability assessment (based on public sector financing)</li> </ul>
01/07/2020	<ul style="list-style-type: none"> <li>• Update by the retail consultants and questions/ answers around the Retail and Leisure Study</li> <li>• Agreement that the principal Ebbsfleet retail issue is supporting delivery of viable new centres of vitality, particularly at the Ebbsfleet Central site; and where there are legal restrictions on the land for the amount of retail and types of commercial leisure.</li> </ul>
29/07/2020	<ul style="list-style-type: none"> <li>• Agreement on approach to researching existing amenity space across the Borough and the Garden City to support development of amenity provision policy</li> <li>• The importance of quality of new development for Local Plan policy and regeneration of existing areas was noted</li> <li>• Discussion on recent consents, validated applications and completions</li> <li>• Some delays on Ebbsfleet Central site work, briefings at future meetings</li> <li>• Current wording of development management policies reviewed</li> </ul>
28/09/2020	<ul style="list-style-type: none"> <li>• EDC updated on Ebbsfleet Central work/phasing, and potential Local Plan policy coverage discussed. EDC expect to publish draft masterplan by the end of the year. London Resort would have an adverse impact, e.g. access Road through the site – plans for with and without.</li> </ul>



Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
	<ul style="list-style-type: none"> <li>• Agreed Ebbsfleet Central would maintain a strategic high quality commercial/ business focus to its overall development, levels of retail have legal restriction but are not planned at that level anyway</li> <li>• Discussion on housing numbers in Eastern Quarry and Ebbsfleet Central and agreement on what can be classified as deliverable and included in DBC's 5 year housing land supply, e.g. key parts of Eastern Quarry</li> <li>• Discussion on Ebbsfleet Central and agreed in outline what the diagram for this area in the Plan could show</li> </ul>
30/10/2020	<ul style="list-style-type: none"> <li>• Discussion on housing numbers in Eastern Quarry and Ebbsfleet Central and agreement on what can be classified as deliverable and included in DBC's 5 year housing land supply, and the level of delivery in GBC for the Ebbsfleet Central site</li> <li>• Discussion on policy approach to accessible housing – M4(2) and M4(3)</li> <li>• Agreement that the overall split between houses and flats within the Garden City for the purposes of DBC's transport study can be set at 40/60 accordingly</li> <li>• Discussion on amenity provision policy draft, EDC prefer a minimum space to be set within the policy, especially for balconies for flats</li> <li>• EDC to revert with information on sustainable construction standards for Ebbsfleet Central</li> </ul>
26/11/2020	<ul style="list-style-type: none"> <li>• EDC Board to consider GBC's plan consultation on 16/12/2020</li> <li>• Discussion on Ebbsfleet chapter within the draft Plan. Agreement on some aspects of what should be shown in the diagrams but further work to be done and shared</li> <li>• Agreement that proposed new local centres at the Garden City will be shown on the key diagram</li> <li>• Possible Ebbsfleet Central planning application boundary discussed. Noted that it is expected to achieve 30% open space as required</li> </ul>
23/03/2021 (joint meeting with KCC, GBC and Medway Council)	<ul style="list-style-type: none"> <li>• See under Transport Modelling/Study below.</li> </ul>
15/04/2021	<ul style="list-style-type: none"> <li>• DBC provided feedback on the responses received on its Regulation 19 Local Plan and possible implications for timing</li> <li>• Agreed on major potential impact of SSSI notification.</li> <li>• EDC to revise Ebbsfleet Central masterplanning work and DBC is still considering options for taking the Plan forward.</li> </ul>

Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
	<ul style="list-style-type: none"> <li>Parties will aim towards a SOCG.</li> </ul>
04/06/2021	<ul style="list-style-type: none"> <li>Meeting primarily to discuss Local Plan changes as a result of the notification of the Swanscombe Peninsula SSSI</li> <li>DBC and EDC agree important elements of the Ebbsfleet chapter within the Local Plan that should be changed</li> <li>DBC inform EDC that the current diagrams will be removed and a red line boundary of the Ebbsfleet Central allocation, excluding the SSSI, will be inserted. DBC inform the EDC that a new strategic diagram showing the Garden City as a whole will be developed and that the SSSI will be shown on this</li> <li>DBC and EDC agree that the Ebbsfleet Central policy should retain importance/encouragement for commercial floorspace</li> <li>DBC and EDC agree that the policy covering Eastern Quarry could support housing for the elderly</li> <li>DBC and EDC agree that work on a SOCG should be progressed and signed ahead of submission in September</li> <li>EDC agrees to continue to support DBC in collating evidence on housing supply</li> </ul>
08/06/2021	<ul style="list-style-type: none"> <li>Meeting primarily to discuss the practical options for amending the climate change policies relating to Ebbsfleet in the Local Plan</li> <li>Agreement to increase water related requirements for non-residential development</li> <li>DBC agree to do further work around what frameworks to encourage – RIBA, Building with Nature etc</li> <li>DBC agree to include policy content on passive design</li> <li>Needs careful review so that policies are justified, useable and consistent.</li> </ul>
22/07/2021	<ul style="list-style-type: none"> <li>SSSI notification responses discussed</li> <li>DBC/ EDC have suggested that London Resort preliminary meeting is not until after SSSI confirmation.</li> <li>Benefits of a new Local Plan noted – first Local Plan to reflect EDC strategy, all efforts are ongoing by both parties to ensure all relevant parties are engaged, although it is recognised some cooperate more actively than others</li> <li>Meetings held with NE discussed. Noted that landowners e.g. EDC may prefer no change to Ebbsfleet Central allocations boundary following SSSI notification, however proper planning regard is required of SSSI</li> </ul>

Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
	<p>proposal, although its specific full implications are not yet clear and require further NE dialogue (meeting scheduled).</p> <ul style="list-style-type: none"> <li>• DBC seek SoCG with EDC as planning authority, but prepared to have separate discussions with EDC as landowner</li> <li>• Further ideas for SoCG content agreed</li> <li>• EDC Housing land supply updated</li> <li>• Further separate discussions to be held between EDC and DBC on Ebbsfleet Central infrastructure funding provisions.</li> </ul>
08/10/2021	<ul style="list-style-type: none"> <li>• Consultation on and revisions to the plan were discussed, including how EDC might respond</li> <li>• Agreed that the Statement of Ground would be with EDC in its role as planning authority, that it was close to conclusion and that it could be signed after the EDC had considered how they were going to respond on the Local Plan.</li> </ul>
<b>Ebbsfleet Development Corporation – Ebbsfleet Central Masterplanning</b>	
10/02/2021 (joint meeting with KCC)	<ul style="list-style-type: none"> <li>• Ebbsfleet Central masterplanning by EDC is progressing – commencing wide range of joint discussions, all parties agreed this would lead to public engagement.</li> <li>• Same discussion had with GBC – their area principally residential and open space, links to Northfleet Station.</li> <li>• Discussion on development quantities and locations. Northfleet Landfill site west of the station not considered likely to be included in the application (not in EDC ownership) but still planned as a major park. Ebbsfleet Central proposals within the application boundary will comply with open space requirements.</li> <li>• Proposals shown with and without London Resort (Access road implications), cannot wait for Resort to be resolved before proceeding.</li> </ul>
10/03/2021	<ul style="list-style-type: none"> <li>• Further update on Central Masterplanning.</li> <li>• Engagement timescale towards application in autumn 2021 noted.</li> <li>• Phasing/ housing delivery sequence discussed.</li> <li>• Greenspace, leisure and health provision outlined.</li> </ul>

Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
	<ul style="list-style-type: none"> <li>• Aiming to achieve 10% Biodiversity Net Gain.</li> </ul>
18/05/2021	<ul style="list-style-type: none"> <li>• EDC provided DBC with an update on masterplanning work post SSSI and confirm general housing numbers are still set to be achievable</li> <li>• Links of great importance, including still taking advantage of an existing bridge that has the potential to connect two phases of the masterplan (east and west)</li> </ul>
<b>London Borough of Bexley</b>	
02/09/2020	<ul style="list-style-type: none"> <li>• DBC reviewing changing national policy and considering its programme to produce Reg19 publication Local Plan, may publish mid 2021.</li> <li>• DBC strategy to focus on Dartford town centre and Ebbsfleet. Retail needs decreasing but Bluewater planning permissions remain. More work needed on gypsies and travellers.</li> <li>• LBB planning Reg19 Local Plan publication in November 2020, no major proposals for eastern parts near DBC, have responded to DBC comments from last time.</li> <li>• LBB meeting latest London Plan housing requirements, providing 10 year supply with significant small site allowance.</li> <li>• LBB due to discuss A282/M25 junction 1A in Dartford with Highways England; healthcare is also a sensitive issue in Dartford which is a possible strategic concern.</li> <li>• Both plans may need to address Crossrail work as appropriate</li> <li>• Housing is a strategic matter for further consideration</li> <li>• Agreed the current SOCG can be expanded</li> </ul>
31/03/2021	<ul style="list-style-type: none"> <li>• Confirmation that DBC will not be seeking help from LBB to meet housing land supply</li> <li>• Confirmation that LBB's housing requirement is set from the London Plan which has now been finalised and under this period may not require assistance to meet target</li> <li>• LBB and DBC consider they are meeting their own economic development needs</li> <li>• Further work continuing on meeting gypsy and traveller needs.</li> <li>• Agreement that the existing SOCG between LBB and DBC will need to be fully reviewed, likely once both Regulation 19 Local Plan consultations have closed</li> </ul>

Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
24/06/2021	<ul style="list-style-type: none"> <li>• Agreement to commence work on expanded and revised SOCG, same level sign off – officer or member.</li> <li>• Agreement to look into whether it is appropriate for DBC's housing delivery to potentially support LBB's long-term needs in the future as required</li> <li>• LBB due to meet Mayor of London and will highlight DBC discussions</li> <li>• New London Plan work underway (Industrial Land study)</li> <li>• No spare Gypsy and Traveller capacity in LBB or DBC</li> </ul>
28/09/2021	<ul style="list-style-type: none"> <li>• DBC is consulting on the re-publication of the Local Plan, with most changes being to the Ebbsfleet chapter.</li> <li>• LBB should provide an updated consultation response.</li> <li>• The similar timescales for plan submission and examination were noted.</li> <li>• The housing land supply position was discussed, including the Dartford Local Plan excess of up to 800 dwellings over the plan period above housing need which could contribute towards housing delivery elsewhere.</li> <li>• LBB agreed to update and share the draft SOCG.</li> </ul>
10/11/2021	<ul style="list-style-type: none"> <li>• LBB has received its updated Strategic Housing Market Assessment and has been updating the relevant sections of the SOCG accordingly.</li> <li>• It was agreed that addressing local housing needs via the SOCG remains appropriate and consideration was given to how to express the agreed position on this. Both parties will review the text.</li> <li>• Both parties agreed that gypsies and travellers and employment are not cross boundary issues so do not need to be included in the SOCG.</li> <li>• Agreed that there should be text in the SOCG in relation to Bluewater, infrastructure and green and blue infrastructure. The text has been amended/added in relation to these issues.</li> <li>• LBB agreed to review the text in relation to transport.</li> </ul>
<b>Gravesham Borough Council</b>	
27/01/2020	<ul style="list-style-type: none"> <li>• DBC provided an update on its Preferred Options Local Plan consultation and the evidence base available to support it.</li> <li>• GBC also provided an update on its Local Plan and evidence base work.</li> </ul>

Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
	<ul style="list-style-type: none"> <li>• The issue of unmet housing need was discussed. In this respect, DBC stated that it needed GBC to provide more evidence. GBC sought more information on DBC's land supply.</li> <li>• DBC had provided a draft SOCG to GBC which led to a significant number of additions/ changes from GBC. It was considered preferable for DBC to have separate SOCGs with EDC and GBC.</li> </ul>
30/06/2020 (joint meeting with SDC)	<ul style="list-style-type: none"> <li>• Discussion and updates on communal issues such as Lower Thames Crossing, London Resort, Kent Waste and London Plan</li> <li>• Agreement that a joint approach for consistency regarding Biodiversity Net gain is beneficial</li> <li>• A SOCG at GBC will need Senior Director and Member sign off; and GBC consider it should be discussed with Medway in due course</li> <li>• Information shared by DBC regarding KCC waste proposals/ infrastructure asks</li> </ul>
09/02/2021 (joint meeting with Medway Council)	<ul style="list-style-type: none"> <li>• DBC confirmed EDC masterplan details awaited, school provision remains an issue, plan is not predicated on a set housing: employment ratio (reflecting national policy),</li> <li>• GBC have not identified further sites to meet housing need, not done full urban capacity work, not updating retail study, issues with level of flats.</li> <li>• Agreement that further work will be needed on SOCGs. Medway indicated they would welcome a SOCG with DBC with particular regard to transport and employment, DBC supportive of the idea. Officer/ Chief Planner level appropriate.</li> </ul>
23/03/2021 (joint meeting with KCC, EDC and Medway Council)	<ul style="list-style-type: none"> <li>• See under Transport Modelling/Study below.</li> </ul>
10/08/2021	<ul style="list-style-type: none"> <li>• Discussed a document with potential points of key agreement and disagreement for incorporating into a SOCG</li> <li>• Agreed that GBC would provide an additional point in relation to housing and employment supply/ air quality</li> <li>• Agreed that DBC would draft a SOCG for discussion, including drawing from some of the previous unpublished 2020 draft background text, at the next meeting on 31/08/2021</li> </ul>
31/08/2021	<ul style="list-style-type: none"> <li>• GBC had provided responses on the potential points of agreement and disagreement but these had been superseded by the draft SOCG produced by DBC</li> </ul>

Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
	<ul style="list-style-type: none"> <li>• GBC to provide feedback on the draft SOCG in advance of the next meeting</li> </ul>
01/10/2021	<ul style="list-style-type: none"> <li>• DBC had produced a draft SOCG which reflected previous discussions. GBC had put forward a range of changes, some of which had not reflected the discussions.</li> <li>• In relation to the pattern of development, it was agreed to amend the text on the Green Belt.</li> <li>• It was agreed that the summary of GBC and DBC housing evidence should be included, and that text in relation to GBC's request for DBC to take some of its unmet housing need would be updated.</li> <li>• The wording of the point of agreement on gypsies and travellers would be reviewed.</li> <li>• The points of agreement on employment should reflect the importance of Ebbsfleet Central and the different economic performance in the two Boroughs. DBC will include its position on the point of disagreement.</li> <li>• DBC will review the points of disagreement in relation to retail.</li> <li>• There should be a number of points of agreement in relation to Ebbsfleet Garden City, including the role of Ebbsfleet Central and the approach towards the London Resort.</li> <li>• DBC evidence text on transport will be updated and it was noted that Lower Thames Crossing text should reflect the current position and the fact that it is not a Local Plan proposal.</li> <li>• GBC to provide text in relation to air quality.</li> <li>• Infrastructure text to be revised as it is not an area of disagreement.</li> </ul>
18/11/2021	<ul style="list-style-type: none"> <li>• Following further dialogue and editing by both parties since the last meeting, it was agreed that the SOCG could move towards sign off, subject to minor changes in relation to employment and retail text.</li> </ul>
<b>Sevenoaks District Council</b>	
12/02/2020	<ul style="list-style-type: none"> <li>• DBC gave an updated on its Local Plan Preferred Options which is subject to consultation and the evidence base to support it. Longer term future housing land supply depended on masterplanning work in Dartford Town Centre and EDC's work on Ebbsfleet Central.</li> <li>• SDC were still awaiting the Inspector's report on their Local Plan.</li> <li>• Considered regional perspectives, including implications of the London Plan Inspector's Report.</li> <li>• It was recognised that the SOCG between the two parties may require updating in due course but that the current one was still applicable given that there had been no change in the approach to unmet need.</li> </ul>

Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
	<ul style="list-style-type: none"> <li>• DBC are planning to meet their housing needs in full; SDC's emerging plan includes a portion of unmet need. The issue of unmet need was discussed and it was concluded that DBC is not in a position to confirm it can assist SDC with any unmet need as set out in the SOCG.</li> </ul>
30/06/2020 (joint meeting with GBC)	<ul style="list-style-type: none"> <li>• See under Gravesham Borough Council above</li> </ul>
04/03/2021	<ul style="list-style-type: none"> <li>• Agreed that SDC situation is uncertain pending legal action</li> <li>• Noted that DBC can discuss meeting needs from elsewhere</li> <li>• Agreed that the existing SOCG needs updating</li> </ul>
02/09/2021	<ul style="list-style-type: none"> <li>• SDC is carrying out an update to its evidence base as part of work on a new Local Plan</li> <li>• Prior to the meeting DBC had sent SDC suggested changes to the existing SOCG</li> <li>• SDC will consider the amended SOCG and respond in advance of the next meeting, including consideration of how to deal with the issue of the SDC's previous request for DBC to accommodate some of its housing needs.</li> </ul>
21/10/2021	<ul style="list-style-type: none"> <li>• Both parties gave an update on their Local Plans; the deadline for comments on the refined pre-submission Dartford Local Plan is 27 October 2021.</li> <li>• The Statement of Common Ground was discussed. DBC are keen to get this agreed.</li> <li>• In this respect, the discussion focussed on text relating to sustainable growth, DBC's surplus housing provision and functional linkages, amongst other things.</li> <li>• SDC agreed to draft SOCG wording in particular relating to housing need.</li> </ul>
<b>Greater London Authority</b>	
02/07/2020	<ul style="list-style-type: none"> <li>• Joint working update on strategic matters including Crossrail and wider transport including importance of Junction 1A of the A282/M25 in DBC (design solution needed), GLA encourage ambitious modal shifts and the approach of London's Healthy Streets. DBC agrees that encouraging greater modal shifts is priority</li> <li>• Noted that there are viability issues for development in Dartford town centre, Crossrail assumed likely to help but no current evidence that significant housing uplift would necessarily result</li> </ul>



Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
	<ul style="list-style-type: none"> <li>• DBC is looking to move ahead to update the Local Plan for growth but is grappling with great uncertainty of Ebbsfleet Central progression, and London Resort may be finally accelerating towards a Development Consent Order submission.</li> <li>• GLA have assisted with Compulsory Purchase Orders to assist delivery</li> <li>• London Plan Inspector's Report makes no major change to inter-regional collaboration approach</li> <li>• It is hoped Thames Estuary Growth Board will engage further on housing aspects of strategic development</li> <li>• KCC leading on preparing a potential county 'growth deal' with government</li> <li>• Debate around how to formalise arrangements and continue discussions. The GLA generally do not wish to commit to SOCGs with individual LPAs but it may be different if there are issues arising of a very specific strategic nature which require close cooperation.</li> </ul>
<b>Thurrock Council</b>	
05/02/2021	<ul style="list-style-type: none"> <li>• Discussions on cross boundary issues including Lower Thames Crossing, London Plan and Crossrail, agreed that they have strategic significance but Local Plan impacts variable/ less certain</li> <li>• London Resort: shared the view that issues include waste and transport impacts</li> <li>• Confirmation that Thurrock are aiming to meet their objectively assessed housing need and an additional 20%, DBC will also surpass objectively assessed housing need.</li> <li>• Information shared on TE2100 (Thames Estuary 2100), and care needed about how this is dealt with in current plans</li> <li>• DBC is updating its approach to Bluewater informed by a retail study but overall regional role not anticipated to change substantially</li> <li>• South Essex Growth Deal declined by government, Kent one making very slow progress</li> <li>• Identified likely scope for Agreement on a SOCG that focusses on infrastructure etc, potential to keep it as a live document; officer agreement likely to be appropriate for both authorities</li> </ul>
<b>Kent County Council Planning</b>	
12/10/2021	<ul style="list-style-type: none"> <li>• DBC set out the key changes that had been made to the Plan since the previous February Publication Plan, specifically in relation to the Ebbsfleet and Swanscombe chapter.</li> </ul>

Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
	<ul style="list-style-type: none"> <li>• DBC provided information relating to updated studies to accompany the Publication Plan, in particular the transport modelling work and the sustainable transport strategy.</li> <li>• It was agreed that the need for a SOCG would be reviewed following the Reg 19 consultation, depending on KCC's response.</li> </ul>
<b>Medway Council</b>	
09/02/2021 (joint meeting with GBC)	<ul style="list-style-type: none"> <li>• See under Gravesham Borough Council above.</li> </ul>
23/03/2021 (joint meeting with KCC, GBC and EDC)	<ul style="list-style-type: none"> <li>• See under Transport Modelling/Study below.</li> </ul>
07/10/2021	<ul style="list-style-type: none"> <li>• Both gave updates on their respective Local Plans and latest evidence documents.</li> <li>• The discussion centred around how various issues would be addressed in the SOCG.</li> <li>• Both parties explained how their Local Plan housing requirements had been derived.</li> <li>• It was agreed that DBC would provide text for the SOCG in respect of housing needs, its transport modelling work, and proportionate text in relation to the Lower Thames Crossing (given that it is more of a strategic issue for GBC-Medway).</li> <li>• Medway agreed to reflect DBC's perspective in relation to the proposed London Resort.</li> <li>• Medway would review the second Publication Plan in considering whether to submit representations in relation to Bluewater</li> <li>• It was considered that the SOCG could additionally address Environment and Principles of development/ brownfield approach issues.</li> <li>• Agreed to finalise a more formal draft SOCG by early November 2021.</li> </ul>

### Environmental Partners

Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
<b>Natural England</b>	

Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
26/05/2021	<ul style="list-style-type: none"> <li>• DBC agreed to revise the Ebbsfleet Chapter of the Local Plan in light of the SSSI that was notified at Swanscombe Peninsula and Ebbsfleet Central during the Regulation 19 Local Plan consultation period</li> <li>• NE agreed to review a draft Local Plan and provide timely feedback</li> <li>• NE and DBC agreed to continue working together, and with the EDC, particularly on the Ebbsfleet Central site allocation</li> <li>• NE stated that their preferred approach is for the entirety of the SSSI to be left intact and that avoidance is therefore key. NE agreed in principle that there may be opportunity for green infrastructure delivery, connection delivery and perhaps play space delivery. Where development does happen, NE has stressed that mitigation will be necessary</li> <li>• NE state that the intention is for Ebbsfleet Central to be an exemplar and innovative place with the SSSI forming a key asset and starting point for masterplanning</li> <li>• DBC and NE agree that a SOCG will be useful</li> </ul>
07/10/2021	<ul style="list-style-type: none"> <li>• DBC gave an update on the Dartford Local Plan and the need for a second Publication Local Plan consultation in light of the notification of the Swanscombe Peninsula SSSI. There are significant revisions to the Ebbsfleet and Swanscombe chapter.</li> <li>• NE stated that it appeared that the Local Plan changes addressed their previous concerns.</li> <li>• NE gave an update on the timescales for the ratification of the SSSI and stated that there may be some minor boundary changes.</li> <li>• It was agreed that a SOCG would be helpful and that DBC will draft this for NE's input, though it would not be possible to sign it until after the NE Board meeting on 10 November 2021.</li> </ul>
<b>Environment Agency</b>	
13/01/2020	<ul style="list-style-type: none"> <li>• EA gave an overview of current work on the TE2100 Plan; Long Reach is still its preferred location for a new Thames barrier but consideration is being given to viability and exact locations.</li> <li>• DBC set out how the adopted Local Plan addresses TE2100 issues.</li> <li>• DBC are currently consulting on the Preferred Options Local Plan and prefer to not take an overly detailed approach.</li> </ul>

<b>Duty to Cooperate Partner/ Meeting Date</b>	<b>Headline Outcomes</b>
	<ul style="list-style-type: none"> <li>EA would like the Local Plan to safeguard land for and inland of future flood defences, which can be 40-100m; DBC advised that EA should respond on this basis including evidence and justification for such an approach.</li> <li>DBC will be commissioning a new Strategic Flood Risk Assessment and will liaise with the EA on the brief for this work.</li> </ul>
10/03/2021	<ul style="list-style-type: none"> <li>DBC gave an update on relevant policies and the infrastructure diagram in the Dartford Local Plan which had been published for comment</li> <li>EA made a number of detailed comments including in relation to flood defences, riverside strategy, a potential Thames Barrier and biodiversity net gain. The EA would need to consider how to respond on these issues</li> <li>It was agreed that the EA has been closely involved with and provided input into the SFRA</li> </ul>
30/09/2021	<ul style="list-style-type: none"> <li>DBC gave an update on the Local Plan which has been republished following the notification of the Swanscombe Peninsula SSSI. The main changes are to the Ebbsfleet chapter.</li> <li>EA's responses to the first Publication Plan were discussed and DBC had provided EA with a document outlining how it had taken these on board or, if not, the reasons for this.</li> <li>It was agreed not to commence work on a SOCG at the present time unless the EA indicate that this is needed.</li> </ul>

### Infrastructure Partners

<b>Subject/ Duty to Cooperate Partner/ Meeting Date</b>	<b>Headline Outcomes</b>
<b>Dartford Transport Modelling/ Study</b>	
20/05/2020 (KCC)	<ul style="list-style-type: none"> <li>Transport Study agreement on the methodology approach</li> <li>DBC agreed to apply a 15% mode shift to the base model in favour of sustainable travel modes for one scenario. KCC accepted development transport assessments with a 10% mode shift applied.</li> <li>Agreed to look into general approaches across Kent and England</li> </ul>

Subject/ Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
22/07/2020 (KCC)	<ul style="list-style-type: none"> <li>• Discussion of the transport model and LTAM</li> </ul>
14/10/2020 (KCC, NH, EDC)	<ul style="list-style-type: none"> <li>• Updates on DBC's Local Plan and on the work underway for transport strategic modelling</li> <li>• Potential 15% and 30% mode shifts agreed</li> </ul>
07/01/2021 (NH)	<ul style="list-style-type: none"> <li>• Dartford Transport Study/Model technical discussion</li> <li>• NH state they do not require a fully WebTag compliant study but providing information contained within Table 5 of WebTag would give NH a clearer picture</li> <li>• NH and DBC agreed that the Local Plan transport modelling would cover scenarios with and without the Lower Thames Crossing</li> <li>• LTAM input (from uncertainty log) assumed maximum theoretical build out of the old Ebbsfleet Central permission, but confirmed the overall restriction in the permission means it is not allowed to build that maximum per use level</li> </ul>
11/02/2021 (KCC)	<ul style="list-style-type: none"> <li>• Agreed that strategic modelling is able to move ahead, latest note on it helpful to KCC</li> <li>• Changes to reflect local network have been taken on board</li> <li>• DBC's potential for sustainable travel is as high as anywhere</li> <li>• Insufficient information has been submitted in relation to the London Resort proposals so it is not possible to directly incorporate this in the DBC strategic modelling</li> <li>• As a result of the above, it was agreed that there are several transport cooperation channels in north Kent ongoing.</li> </ul>
15/03/2021 (NH, KCC, EDC)	<ul style="list-style-type: none"> <li>• Briefing by DBC on Regulation 19 Local Plan, provisions for review of Local Plan noted</li> <li>• Progress update noted around the Transport Assessment for the Local Plan</li> <li>• NH noted the DBC Transport Background Paper as evidence to support the Plan; DBC to work up a sustainable transport strategy and share with NH</li> </ul>
23/03/2021 (KCC, GBC, EDC, Medway Council)	<ul style="list-style-type: none"> <li>• DBC provided an overview of the current Local Plan with a focus on transport related themes, emerging strategy, and policies from the Plan, including the fact that the Plan is currently subject to consultation under Regulation 19</li> </ul>

Subject/ Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
	<ul style="list-style-type: none"> <li>• DBC advised that a transport background paper had been published and that technical aspects of the paper had been agreed with NH and KCC. DBC confirmed that work on transport evidence is still ongoing, including a Sustainable Transport Strategy, however the background paper outlines the range of existing data and recent area-specific highway models.</li> <li>• GBC provided an update on their Local Plan including the responses received to their recent Regulation 18 consultation. They stated that they will be updating their transport model and that it is likely that their Local Plan strategy will include Green Belt release</li> <li>• Medway Council confirmed that they are looking to complete their transport work by the end of June and that they are working on new scenarios of the Lower Thames Crossing modelling</li> <li>• EDC advised that work is ongoing on the Green Corridors Project and that the scheme is moving on to scoping Stage 4. This would include the review of improved links into DBC and GBC and further discussions will be held with the LPAs.</li> </ul>
02/07/2021 (NH, KCC)	<ul style="list-style-type: none"> <li>• DBC confirmed another Local Plan Regulation 19 consultation would be held in autumn 2021 due to SSSI etc</li> <li>• Outputs of DBC Local Plan strategic transport modelling discussed</li> </ul>
05/10/2021 (NH, KCC)	<ul style="list-style-type: none"> <li>• Stantec provided KCC and NH with an update on Dartford's Stage 3 transport modelling report and confirmed that the new Reference Case agreed with NH is included. This reference case is now a lower quantum than the Local Plan with lower traffic generation</li> <li>• Technical discussions on each junction on the strategic road network, the performance of local road network junctions and agreement on the focus for further work</li> </ul>
<b>KCC Education</b>	
22/04/2021 (KCC)	<ul style="list-style-type: none"> <li>• Local Plan proposals and education implications noted</li> <li>• Agreed progress on new school provision</li> <li>• Future need likely to identify provision in central Dartford</li> <li>• Both Community Infrastructure Levy and S106 can support delivery, depending on circumstances</li> <li>• Growing needs for special educational needs and early years provision also, KCC to provide further info for DBC to consider for inclusion in the Infrastructure Delivery Plan</li> </ul>

Subject/ Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
	<ul style="list-style-type: none"> <li>Options explored to better deploy currently under-used land</li> </ul> <p>N.B. This meeting was specifically to discuss the Regulation 19 Local Plan as part of regular meetings with KCC Education, full dates for which are provided in table 6 below.</p>
30/09/2021 (KCC)	<ul style="list-style-type: none"> <li>DBC briefed KCC on the current status of the Dartford Local Plan with a focus on particular policies that are of relevance to infrastructure planning and education</li> <li>DBC advised that an Infrastructure Statement was being produced that would have a longer term view beyond the forecasting of KCC's School Commissioning Plan. Input from KCC was confirmed.</li> <li>KCC provided updates to DBC, including: <ul style="list-style-type: none"> <li>Feasibility work on school expansion projects in the Stone area is underway, the Department for Education are looking for a site in the area. A new primary school will provide greater flexibility although expansion plans are set to meet forecast need</li> <li>KCC are examining provision in the EDC area. DBC note that a 2FE primary school is a requirement under the current outline consent</li> <li>There is still a need for a new primary school in the Town Centre area, KCC action to familiarise themselves with Policy D5 and the Glentworth Club site as the Plan supports the provision of community facility in this area</li> <li>There is a regional need for a special educational needs school and Dartford is a logical location for new provision</li> <li>A draft review of the School Commissioning Plan will be shared with DBC in late October</li> </ul> </li> </ul>
<b>Waste</b>	
23/07/2020 (KCC, GBC, EDC)	<ul style="list-style-type: none"> <li>Update on waste site proposals in North Kent</li> <li>Existing site on DBC/ GBC boundary and wider needs discussed, including from growth at Ebbsfleet Garden City</li> <li>Funding situation discussed. The LPAs raised several queries. DBC offered Community Infrastructure Levy specific further dialogue to help</li> <li>Agreed that KCC would research site further and involve the LPAs</li> </ul>

Subject/ Duty to Cooperate Partner/ Meeting Date	Headline Outcomes
12/10/2020 (KCC, GBC, EDC)*	<ul style="list-style-type: none"> <li>• LPAs query why sites now under discussion not considered via the Kent Minerals and Waste Local Plan</li> <li>• KCC to look further into landowners/ availability confirmation, and highways, including engagement with Highways England</li> </ul>



## **APPENDIX 6: Meeting Minutes**

Included as a separate document.

## APPENDIX 7: Other Meetings with Partners Dates since 1 January 2020

Meeting	Meeting Dates
Crossrail Technical Group	11/03/2020, 25/03/2020, 10/09/2020, 03/11/2020, 23/11/2020, 25/01/2021, 27/05/2021, 25/06/2021, 02/09/2021, 07/09/2021, 17/09/2021, 05/10/2021
Ebbsfleet Planning Liaison Group	11/02/2020, 20/04/2020, 08/06/2020, 10/08/2020, 12/10/2020, 01/02/2021, 19/04/2021, 14/06/2021, 09/08/2021, 11/10/2021
Ebbsfleet Sustainable Travel Working Group	21/04/2020, 11/06/2020, 10/09/2020, 20/11/2020, 03/12/2020, 15/01/2021, 04/02/2021, 01/04/2021, 30/4/2021, 06/05/2021, 05/08/2021
Fastrack Advisory Group	08/06/2021
Gypsy, Traveller & Travelling Showpeople Cross Borough Liaison Group	29/07/2020, 23/10/2020
Kent and Medway CCG	02/09/2020, 15/10/20, 26/01/2021, 11/03/2021, 11/05/2021, 01/07/2021, 21/07/2021
KCC Education	15/10/2020, 02/11/2020, 22/04/2021, 08/06/2021, 01/07/2021, 21/07/2021, 30/09/2021
Kent Planning Officers' Group	13/01/2020, 12/03/2020, 03/04/2020, 15/05/2020, 03/07/2020, 02/10/2020, 04/12/2020, 15/01/2021, 12/02/2021, 26/03/2021, 07/05/2021, 18/06/2021, 16/07/2021, 10/09/2021, 22/10/2021
Kent Planning Policy Forum	07/01/2020, 06/03/2020, 24/04/2020, 19/06/2020, 11/09/2020, 20/11/2021, 29/01/2021, 30/04/2021, 25/05/2021, 09/07/2021, 03/09/2021, 08/10/2021
Lower Thames Crossing Meetings	15/09/2020, 06/10/2020, 14/10/2020, 23/11/2020, 25/11/2020, 08/12/2020, 17/02/2021, 12/04/2021, 19/04/2021, 29/04/2021, 10/05/2021, 26/05/2021, 10/06/2021
Network Rail	24/07/2020, 09/10/2020, 13/10/2020, 19/01/2021, 04/10/2021
North Kent Environmental Planning Group and Birdwise Steering Group	07/07/2020, 12/01/2021, 14/07/2021
North Kent Strategic Development and Planning Group	29/04/2020, 24/06/2020, 23/09/2020, 29/01/2021, 07/04/2021
Strategic Transport Infrastructure Plan (STIP) Working and Steering Groups	16/04/2020, 18/05/2020, 16/07/2020, 08/10/2020, 21/01/2021, 08/04/2021, 30/04/2021, 22/07/2021
Thames Estuary Growth Board	05/06/2020
Thames Gateway Kent Partnership	02/04/2020, 12/05/2020, 08/06/2020, 27/07/2020, 11/08/2020
Transport for the South East	03/02/2021

Meeting	Meeting Dates
Wider South East Officer Working Group	08/07/2020

## **APPENDIX 8: Correspondence with the Greater London Authority**

### **Letter DBC to GLA 08/10/2021**

Dear Jorn,

Dartford Borough Council (DBC) emailed you on 15 September 2021 to invite representations on the second publication version of the Pre-Submission (Regulation 19) Dartford Local Plan, September 2021.

I am now contacting you as the appropriate representative of the Mayor of London to formally ask what, if any, are the further actions that DBC can undertake with you to secure further input by the Mayor in relation to the new Dartford Local Plan? Are there any discussions or documentation the Mayor would be prepared to engage in now specifically on the Local Plan and cross boundary strategic cooperation?

Please be advised:

- The Local Plan states of its housing requirement: “[It] Is consistent with potentially supporting delivery of some unmet residential needs in the wider area.” [Paragraph 2.57 (policy S4 supporting text)]
- Productive further duty to cooperate engagement has occurred with our neighbours. Positive discussions are taking place in particular with the London Borough of Bexley to inform a Statement of Common Ground between the two Councils, reflecting Plan content and including matters such as housing and Dartford’s potential contribution towards future potential unmet housing needs.

I would once again like to offer an open discussion with the Mayor’s representatives on the Dartford Local Plan, and potential points of agreement on strategic matters, including Dartford’s role in assisting meeting unmet housing need in London and the South east. This could also cover the London Plan, as contrary to our expectations Dartford is not aware that any meeting of the Wider South East group has been held so far in 2021 nor is planned to be held in the near future.

Our understanding from discussions and extensive communication with you is that the Mayor is not pursuing SOCGs or similar with Local Planning Authorities outside London, including Dartford. For instance agreed minutes of the meeting on duty to cooperate meeting between DBC and the GLA held on 2 July 2020 state:

*“There are practicality issues for the GLA in terms of entering into Statements of Common Ground given the numbers of authorities in the wider SE. At the moment, the GLA does generally not wish to commit to having SOCGs with LPAs individually but may be different if there are issues arising of a very specific strategic nature which require close cooperation.”*

If this has changed and there is now interest in further Local Plan engagement, then rapid confirmation would be appreciated.

I recognise a channel of engagement has continued involving Dartford and the GLA on certain important strategic matters via channels such as the Abbey Wood to Ebbsfleet project.

Following the meeting held on 2 July 2020, we have communicated on the Dartford Local Plan. In response to my offer of a duty to cooperate meeting on the first Reg 19 Dartford Local Plan sent on 18 February 2021, and your reply dated 22 February 2021, the offer was reiterated on 26 February 2021 and 25 March 2021, but unfortunately no response was received.

DBC Planning Policy Team

After this I contacted you on 25 May 2021 to again propose a meeting. You replied with some queries on 7 June and 15 June, to which I responded on 7 June and 21 June. I think that I answered your query about what would be discussed at a further meeting (reproduced below in full):

My email 21 June 2021:

*“Jorn, thank you. To cut to the chase – unmet housing need in London and the South east..... Dartford is clear in setting a housing requirement above the standard method output, it may be able to make a contribution to housing not provided elsewhere. Thanks, and we look forward to your response.”*

Unfortunately, I didn't receive a response.

Unless a clear reply is received to this letter by 1 November 2021, I will have to assume no further engagement is planned by the Mayor specifically in relation to cooperation on the Dartford Local Plan.

Yours sincerely

Mark Aplin

**Email GLA to DBC 20/10/2021**

Dear Mark

Thank you for your letter – attached again.

I do apologise for my very limited responses to your previous e-mails and would like to make clear that – moving forward - we are open to engage with Dartford on strategic-scale issues where mutual benefits can be achieved.

We considered that it would be effective to base engagement on Dartford's latest Local Plan consultation and also your longer-term position related to growth through the C2E partnership work. Future engagement within the Wider South East context is also being considered, and we will keep you informed on this matter.

I apologise once again for not communicating this sooner. As previously stated, we tend not to commit to having Statements of Common Ground with local planning authorities outside London, but we would be happy to discuss with you any potential strategic-scale issues that may require closer cooperation following your Local Plan consultation, on which we have no specific additional comments at this stage.

We will be in touch to arrange a conversation about future collaboration opportunities.

Many thanks

Jorn