

Please contact: Prem Velayutham  
Our ref:  
Your ref:  
Date: 09 April 2021



Mark Aplin  
Planning Policy Team  
Dartford Borough Council  
Civic Centre  
Home Gardens  
Dartford  
Kent DA1 1DR

**Culture and Community**  
Regeneration, Culture & Environment  
Medway Council

## **BY EMAIL ONLY**

Dear Mark

### **Representations to Dartford Local Plan Pre-Submission - Regulation 19**

Thank you for the opportunity to provide representations on the publication of the Dartford Local Plan at Regulation 19. Please see attached a completed Representation Form, and our overarching comments on strategic planning matters set out below. These are captured under the subject titles identified as potential issues for further engagement.

#### **Housing**

The Council acknowledges your growth strategy focusing on urban regeneration facilitated by sustainable transport choices. Medway Council agrees that Dartford BC can provide their identified need and more within the authority without needing to seek provision elsewhere. It is noted in the Strategic Housing Land Availability Assessment Findings 2020/21 at paragraph 4.7 that *'It is apparent that confirmed capacity from the SHLAA, and recent supply, comfortably cover the required minimum level'*. It is queried what consideration has been made in the plan making process to consider the delivery of higher levels of housing, and the potential to contribute to unmet housing needs in the wider area. We are interested in what work has been carried out on Green Belt assessments to support the preparation of the Local Plan.

#### **Employment**

We note that the methodology for identifying employment land needs has sought to acknowledge the current uncertainty in the economic climate and commercial market, the impact of Covid, and changes in the Use Class Order. We note the use of shorter term projections and the use of triggers for Local Plan review to seek to address uncertainty and provide for some flexibility over the plan period.

We note the potential implications of strategic projects, such as the Lower Thames Crossing and the London Resort, on the wider sub-region, and support ongoing collaboration and joint discussions. We recognise the potential displacement of existing

**This information is available in other formats and languages from the Planning Policy team on 01634 331629.**

**If you wish to contact the Council through the Minicom (text) facility please ring 01634 331300.**

businesses at Swanscombe, and note that there may be some resulting demand for employment land in Medway. Medway Council officers have been requested to engage in an officer working group with a view to understand the implications of potential displacement, and to plot a way forward. We welcome such discussions and would like to, at this stage, reiterate that proper engagement is supported and encouraged to continue to foster good working relationships across borders.

## **Retail**

It is acknowledged that the approach taken on retail matters is flexible and supports the definition of centres differently than the norm due to the constantly changing economic climate spurred on by online sales and the impact of Covid. Much of the retail is focussed appropriately in the town centre. Floorspace provision is distributed across the centre to strengthen its offer and remain relevant for use by residents. The appropriate strategy and hierarchy of centres is set out in the strategic policy, however with regards to Bluewater, policy M22 incorrectly sets out under bullet 2 that proposals in Bluewater shouldn't undermine its role. There should be more of an emphasis on proposals not undermining other neighbouring centres roles, which together with 3b. will give neighbouring authorities comfort in such dire economic circumstances that their centres can also achieve ambitions set out.

## **Transport**

The relevant evidence base documents published set out the base year model (the cordoned Lower Thames Area Model for Dartford), a methodology for establishing a Reference Case and Local Plan option testing. The outputs are currently unavailable and therefore we cannot comment on the potential impacts and the need for mitigations. These outputs might be expected in advance of pre-submission. We would welcome a timeline for these outputs to be shared.

It is important to note that the LTAM may not necessarily reflect the full scale of growth that local planning authorities are required to plan for. It is understood that LTAM is based on background traffic growth and respective uncertainty logs submitted to the Lower Thames Crossing team in Spring 2019. Therefore, a comparison between the assumptions in LTAM and the government's assessment of Local Housing Need and the objectively assessed need for employment land for other areas would be prudent.

During a meeting held on 23 March, we discussed the merits of a two-pronged approach in preparing a transport evidence base. The published evidence base reflects Highways England's requirements, but there may be scope to go beyond the need for mitigations towards place-based transport vision statements for strategic growth areas, along with mode share targets, design and layout considerations and the need for managing and monitoring the impact of new development.

Medway Council welcomes the opportunities for further engagement on strategic planning and development matters in the preparation of our respective Local Plans, and to set out any relevant matters in a Statement of Common Ground.

**This information is available in other formats and languages from the Planning Policy team on 01634 331629.**

**If you wish to contact the Council through the Minicom (text) facility please ring 01634 331300.**

Yours sincerely

Catherine Smith  
Planning Manager - Policy  
Planning Service

**This information is available in other formats and languages from the  
Planning Policy team on 01634 331629.  
If you wish to contact the Council through the Minicom (text)  
facility please ring 01634 331300.**