

# **Dartford Local Plan**

## **Consultation Statement including Main Issues**

**December 2021**



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# 1. Purpose

- 1.1 This consultation statement is intended to set out the consultation which has taken place on the Dartford Local Plan to date in compliance with the Town and Country Planning (Local Planning) Regulations 2012. It has been updated following the second consultation on the Publication Local Plan in September/ October 2021 to set out the number of representations made and a summary of the main issues raised at that stage. The main issues and the Council's response are set out at Appendix 4-2 (page 116).
- 1.2 In accordance with the Regulations, this consultation statement sets out:
- Which bodies and persons the local planning authority invited to make representations under regulation 18;
  - How those bodies and persons were invited to make representations under regulation 18;
  - A summary of the main issues raised by the representations made pursuant to regulation 18; and
  - How any representations made pursuant to regulation 18 have been taken into account;
- As the Council has already published and consulted on the first Publication Local Plan (under Regulation 19), this document also sets out main issues raised at that stage and key changes that have been made to the second Publication Local Plan in response to these.
- 1.3 The Statement of Community Involvement sets out how the Council will involve the public in the Local Plan process. This was adopted in December 2017 and updated in February 2021 to take account of amended procedures in response to the coronavirus pandemic<sup>1</sup>. This consultation statement also demonstrates how the Council has consulted in accordance with the Statement of Community Involvement.
- 1.4 There have been four stages of consultation, each of which was carried out for a period of six weeks:
- Strategic Issues: June – July 2018 (Regulation 18)
  - Preferred Options: 10 January – 21 February 2020 (Regulation 18)
  - First Publication Local Plan: 26 February – 9 April 2021 (Regulation 19)
  - Second Publication Local Plan: 15 September – 27 October 2021 (Regulation 19)
- 1.5 Section 2 and Appendix 1 set out the consultation which took place and the responses received on the Strategic Issues. Section 3 and Appendix 2 provide information in relation to the Preferred Options consultation, the issues raised and the Council's responses to them. Section 4 and Appendix 3 include details of the first Publication Local Plan consultation, the main issues raised by respondents and the key changes which have been made to the second Publication Local Plan in response to these. Section 5 and Appendix 4 set out information on the second Publication Local Plan consultation, the main issues raised by respondents and the Council's responses to the main issues.

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<sup>1</sup> Document available at: <https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/neighbourhood-planning>

## 2. Strategic Issues Consultation June-July 2018

Who was consulted and how did the consultation take place?

- 2.1 The initial consultation under Regulation 18 was the Strategic Issues consultation which took place for six weeks from 8 June 2018 to 20 July 2018<sup>2</sup>. The high level consultation involved a review of the performance of the policies in the adopted Core Strategy 2011, an outline of the existing Local Plan approach, consideration of different topics (housing and economic development, transport and community infrastructure, and environmental matters) and a focus on areas and sites. Each part of the document was accompanied by a series of open questions for response. At the start of the consultation period on 8 June 2018, the Council's planning policy webpages were updated to include information about the Strategic Issues consultation. The Strategic Issues consultation document and response form were made available on the website, at Dartford Central Library and at Dartford Civic Centre (see Appendix 1-1 for Response Form). A user-friendly bulletin was also included on the website (see Appendix 1-2).
- 2.2 The Council maintains a consultation list of those to notify when consultations on the Local Plan are taking place. This includes specific and general bodies in accordance with the Regulations and other individuals and organisations who have requested to be kept informed. Emails or letters were sent to all those on the consultation list notifying them of the Strategic Issues consultation on 8 June 2018. This included information on how to view the consultation document and the response form for submitting comments. A reminder email was sent on 11 July 2018, towards the end of the consultation period.
- 2.3 Council officers attended the following community meetings to explain the purpose of the consultation and how to respond to it:
- Bluewater Community Forum
  - Ebbsfleet Community Partners
  - Tenants and Leaseholders Forum
  - Youth Council
  - Borough Town and Parish Forum
- Flyers were handed out to those who attended the meetings (see Appendix 1-3).
- 2.4 The Council also published three tweets on its Twitter page (@welovedartford) to raise awareness of the consultation.
- 2.5 Table 1 below shows how the consultation on the Strategic Issues complied with the Statement of Community Involvement

**Table 1: Strategic Issues Consultation Compliance with the Statement of Community Involvement**

Commitment	Implemented	Evidence
Set a Local Development Scheme	✓	A Local Development Scheme was published in 2018.

<sup>2</sup> Document available at: <https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/new-local-plan/local-plan-regulation-19-background-page>

<b>Commitment</b>	<b>Implemented</b>	<b>Evidence</b>
Allow representations for a 6 week period	✓	The consultation was held for 6 weeks from 8 June 2018 to 20 July 2018.
Produce user-friendly summaries, glossaries and non-technical studies where possible	✓	A user-friendly bulletin was made available on the website to accompany the consultation document (see Appendix 1-2).
Availability of the document to be online and in libraries	✓	The document was made available on the Council's website and in Dartford Central library.
Those with expressed interest will be notified	✓	The Council maintains a consultation list and all those on the list were notified of the consultation.
Aim to attend and engage with existing consultative sessions	✓	The consultation was discussed at five existing forums (see paragraph 2.3).
Seek to use selective additional activities and awareness rising	✓	The consultation was raised at existing forum meetings as above, and social media was used (see paragraphs 2.3 and 2.4).
Seek to maximise input from parties through aiming to time participation exercises together, or working with other organisations	✓	The consultation was discussed at five existing forums (see paragraph 2.3).
Keep our contacts list of interested people up to date	✓	Interested parties are able to self-enrol onto the Local Plan consultation mailing list by using the online form available at: <a href="https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/current-consultations/lets-stay-connected">https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/current-consultations/lets-stay-connected</a>
Consider specific actions to further raise the profile of public involvement opportunities (social media)	✓	The Council used social media (see paragraph 2.4).
Expect to use additional methods of public participation (exhibitions)	✓	The consultation was brought to existing forums/ networks (see paragraph 2.3).

<b>Commitment</b>	<b>Implemented</b>	<b>Evidence</b>
Ensure we inform a range of key local residents/ businesses, statutory consultees, voluntary bodies, and groups representing religious, ethnic, nationality and disabled interests of Local Plan consultations	✓	The consultation was brought to existing forums/ networks that represent local interests (see paragraph 2.3).
Seek participation across all groups in Dartford society (taking efforts to include those that may be 'hard to reach')	✓	Social media was used to reach new audiences. Existing forums were also consulted. (See paragraphs 2.3 and 2.4)
Conduct a Customer Access Review to consider implications for a range of groups in the borough	✓	Following a screening process, it was considered that a full Customer Access Review was not required for this stage of the Local Plan.
Ensure strategic cross-boundary issues are identified and addressed	✓	The Duty to Cooperate statement indicates the work that was taking place with partners in the lead up to the Strategic Issues consultation. This is available at: <a href="https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/evidence-base2">https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/evidence-base2</a>

What main issues were raised and how have these been taken into account?

- 2.6 Responses were received from 53 respondents. A report on the progress of the Local Plan review was considered by the Council's Cabinet on 6 December 2018. It was agreed that the responses to the Strategic Issues Local Plan consultation be used to inform the next stage in the preparation of the Local Plan. One of the appendices to the report set out the main issues raised in response to the Strategic Issues consultation and this is included as Appendix 1-4.

### **3. Local Plan Preferred Options Consultation January-February 2020**

Who was consulted and how did the consultation take place?

- 3.1 The Local Plan Preferred Options consultation under Regulation 18 was carried out for six weeks from 10 January 2020 to 21 February 2020<sup>3</sup>. This was the main consultation document under Regulation 18 which provided information to enable representations on the Local Plan approach and alternative options.
- 3.2 Section 3 of the Preferred Options document set out proposed vision and strategic objectives. Section 4 presented six strategic themes each with three different options, with the Council's preferred option always being option B. The six strategic themes were:
- Pattern of development/ brownfield/ greenfield
  - Dartford Town Centre
  - Open spaces/ Biodiversity approach
  - Ebbsfleet Central
  - Swanscombe Peninsula
  - Transport network
- 3.3 The Local Plan Preferred Options document further included Section 5 which set out the Preferred Policy approach for the following topic areas:
- Pattern of development and Green Belt in the Borough
  - Development delivery and housing location criteria
  - Infrastructure
  - Town centres and retailing
  - Ebbsfleet Garden City
  - Business Premises and Employment
  - Natural Environment and Open Space
  - Renewable Energy and Water Management
  - Affordable Housing
  - Housing Type and Size
  - Gypsies, Travellers and Travelling Showpeople
- Section 6 included a list of policies from the adopted Dartford Development Policies Plan 2017 which it was proposed to retain. To enable responses, a series of questions were posed in relation to issues set out in Sections 3-6. These are set out in Appendix 2-7.
- 3.4 At the start of the consultation period on 10 January 2020, the Council's planning policy webpages were updated to include information about the consultation. The Preferred Options consultation document, the Sustainability Appraisal and the response form were made available on the website, at Dartford Central Library and at Dartford Civic Centre (see Appendix 2-1 for the response form). A user-friendly bulletin was also included on the website (see Appendix 2-2). Ebbsfleet Development Corporation also updated their website to promote the consultation and linked directly to the bulletin.
- 3.5 As with the Strategic Issues consultation, the Council sent emails or letters to all those on the consultation list notifying them of the Preferred Options consultation on 10 January 2020. As set out above, the consultation list includes specific and general consultation bodies as well as others who have expressed an interest in being kept up to date with progress on the Local Plan. The list of specific consultation bodies who were consulted is

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<sup>3</sup> Document available at: <https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/new-local-plan/local-plan-regulation-19-background-page>



set out in Appendix 2-3. General consultation bodies who were consulted included Age UK, the Council for Voluntary Service, Dartford and Gravesend Muslim Association, North Kent Disabled Foundation, and Thames Gateway Kent Partnership. The email/letter included information on how to view the consultation document, evidence documents and the response form for submitting comments. A reminder email was sent on 14 February 2020, towards the end of the consultation period.

- 3.6 Council officers attended the following community meetings to give presentations or provide verbal updates to explain the purpose of the consultation and how to respond to it:
- Bluewater Community Forum
  - Borough Town and Parish Forum
  - Elders' Forum
  - Town Centre Partnership Board
  - Youth Council
- 3.7 Three drop-in events were held during the consultation period as follows:  
 29<sup>th</sup> January 3-7pm: Dartford Borough Council Civic Centre  
 3<sup>rd</sup> February 3-7pm: Ebbsfleet International Station  
 4<sup>th</sup> February 2-5.30pm: The Orchards Shopping Centre  
 These included a series of display boards (see Appendix 2-4) and staff were on-hand to receive feedback and answer questions.
- 3.8 Response forms and flyers on various topics were made available for the public to take away at the drop-in events, at Dartford Central Library and Dartford Civic Centre, and at the community meetings attended officers of the Council (see Appendices 2-1 and 2-5). They were also offered to the Parish Councils within the Borough. Swanscombe and Greenhithe Town Council requested the flyers and were sent an electronic version.
- 3.9 Adverts were placed in the Dartford Living magazine and the KM Messenger Extra Dartford and Gravesend on three different occasions to let local people know about the drop in events and where to find more information about the Preferred Options Local Plan consultation. The same information was included on posters located in the vicinity of the drop-in event locations prior to and during the events. This is included in Appendix 2-6.
- 3.10 The Council published a series of tweets on its twitter account (@welovedartford) throughout the consultation period. In addition, both Dartford Living (@dartfordliving) and Ebbsfleet Development Corporation (@ebbsfleetdc) promoted the consultation by publishing a number of tweets during this time. The Council also arranged for adverts to be included on Facebook for two different weeks during the consultation period. Facebook analytics shows that the advert was shown 30,975 times with 12,512 being recorded as engaging with the advert.
- 3.11 Table 2 below shows how the consultation on the Strategic Issues complied with the Statement of Community Involvement

**Table 2: Preferred Options Consultation Compliance with the Statement of Community Involvement**

Commitment	Implemented	Evidence
Set a Local Development Scheme	✓	A Local Development Scheme was published in 2018.

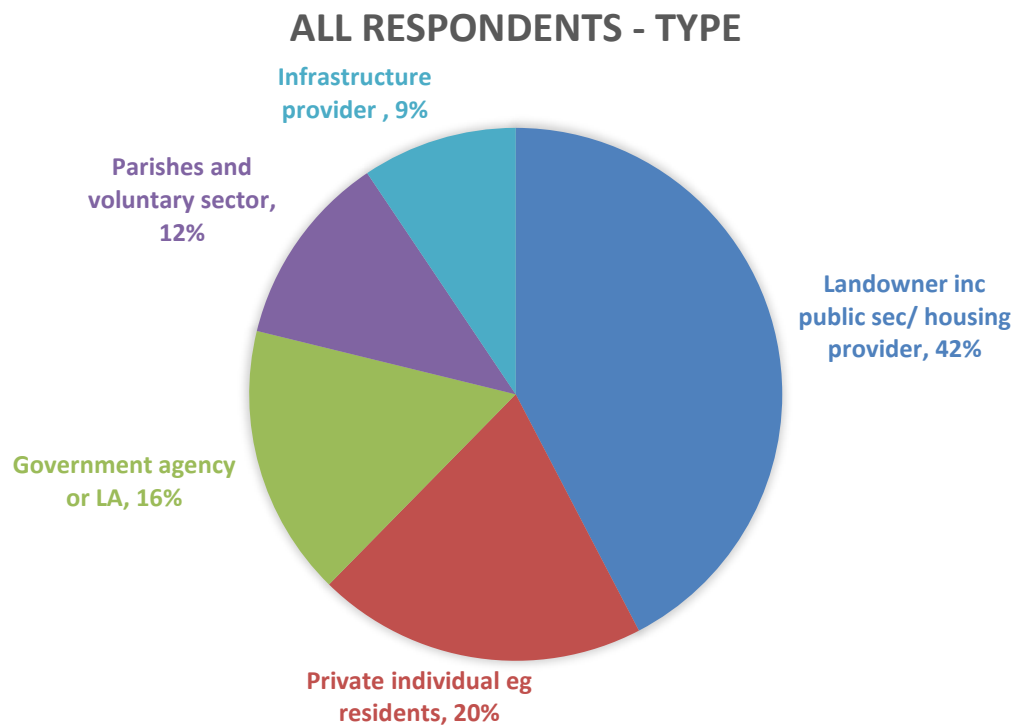
<b>Commitment</b>	<b>Implemented</b>	<b>Evidence</b>
Allow representations for a 6 week period	✓	The consultation was held for 6 weeks from 10 January 2020 to 20 February, 2020.
Produce user-friendly summaries, glossaries and non-technical studies where possible	✓	A user friendly bulletin was made available on the website to accompany the consultation document (see Appendix 2-2),
Availability of the document to be online and in libraries	✓	The document was made available on the Council's website and in Dartford Central library.
Those with expressed interest will be notified	✓	The Council maintains a consultation list and all those on the list were notified of the consultation.
Aim to attend and engage with existing consultative sessions	✓	Officers presented at five existing forums (see paragraph 3.6).
Seek to use selective additional activities and awareness rising	✓	The Council held three drop-in events, placed adverts and posters, and made use of social media (see paragraphs 3.7-3.10).
Seek to maximise input from parties through aiming to time participation exercises together, or working with other organisations	✓	Council officers engaged with a range of existing forums and were on hand to answer questions and listen to points raised at three public drop-in events (see paragraphs 3.6 and 3.7).
Keep our contacts list of interested people up to date	✓	Interested parties are able to self-enrol onto the Local Plan consultation mailing list by using the online form available at: <a href="https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/current-consultations/lets-stay-connected">https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/current-consultations/lets-stay-connected</a>
Consider specific actions to further raise the profile of public involvement opportunities (social media)	✓	The Council used social media (see paragraph 3.10).
Expect to use additional methods of public participation (exhibitions)	✓	Council held three exhibition style drop-in events (see paragraph 3.7).

<b>Commitment</b>	<b>Implemented</b>	<b>Evidence</b>
Ensure we inform a range of key local residents/ businesses, statutory consultees, voluntary bodies, and groups representing religious, ethnic, nationality and disabled interests of Local Plan consultations	✓	A range of general consultation bodies representing different interest groups were notified of the consultation and officers engaged with a range of existing forums (see paragraphs 3.5 and 3.6).
Seek participation across all groups in Dartford society (taking efforts to include those that may be 'hard to reach')	✓	Social media and drop-in events were designed to reach new audiences. Existing forums were also consulted. (See paragraphs 3.6, 3.7 and 3.10).
Conduct a Customer Access Review to consider implications for a range of groups in the borough	✓	A full Customer Access Review was carried out and made available as part of the evidence base on the website.
Ensure strategic cross-boundary issues are identified and addressed	✓	The Duty to Cooperate statement indicates the work that was taking place with partners in the lead up to the Preferred Options consultation. This is available at: <a href="https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/evidence-base2">https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/evidence-base2</a> . Two Statements of Common Ground with neighbouring authorities were also made available as part of the evidence base on the website.

What main issues were raised and how have these been taken into account?

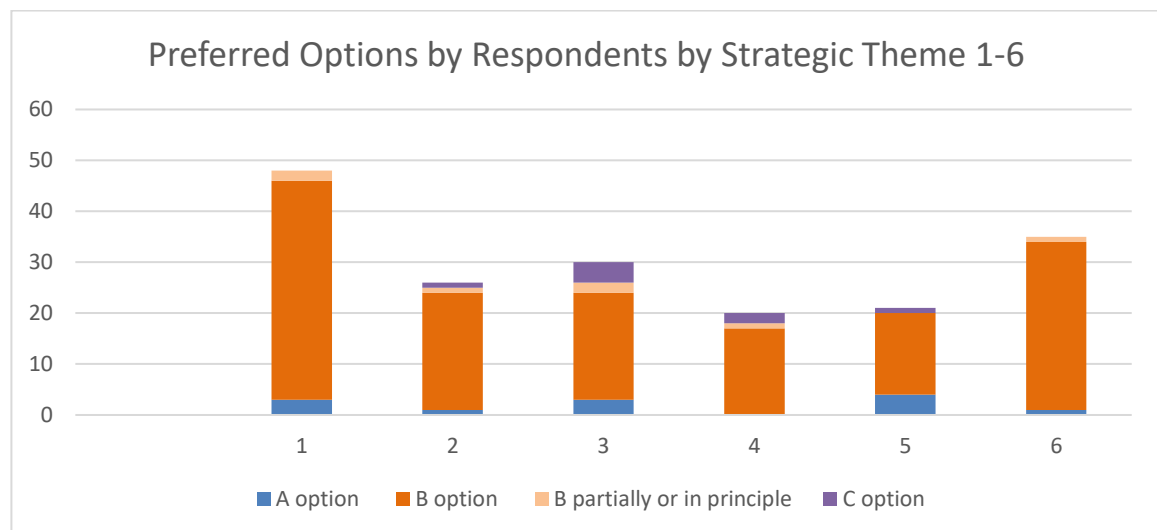
3.12 The consultation resulted in written representations being made by 88 respondents. Figure 1 below shows the type of respondents who made representations. It is clear that responses were made by various types of organisations, as well as individuals.

**Figure 1: Types of Respondents to the Preferred Options Local Plan**



3.13 In relation to the six strategic themes, the options preferred by respondents are set out in figure 2 below. This shows that there was significant support for the preferred option B for each these.

**Figure 2: Responses to Strategic Themes**



3.14 In relation to the preferred policy approaches, table 3 below sets out whether respondents were supporting these, conditionally supporting them or opposing them. It is important to note that each topic received differing numbers of representations, as no questions in the consultation form were compulsory. This means that the topics cannot be compared and the analysis below simply shows the support or objection received for each topic individually.

**Table 3: Preferred Policy Approaches Summary of Responses by Topic**

<b>Topic</b>	<b>% respondents clearly supporting approach</b>	<b>% respondents conditionally supporting approach</b>	<b>% respondents opposing approach</b>
<b>Patterns of development/green belt</b>	39%	37%	24%
<b>Housing target approach</b>	74%	-	26%
<b>Open spaces/ biodiversity approach</b>	46%	46%	7%
<b>Renewable energy, flood and water conservation</b>	70%	25%	5%
<b>Affordable Housing</b>	55%	25%	20%
<b>Town Centre</b>	53%	47%	-
<b>Employment</b>	35%	35%	30%

3.15 The issues respondents raised in response to the questions and the Council's response to them are set out in Appendix 2-7. The responses are grouped according to key topics.

3.16 Following receipt of the responses, the Council carried out the following actions:

- A structured review of the representations made and consideration of if/how to respond to them
- Scoping of policy coverage
- Continued work on evidence gathering
- Preparation of an updated Infrastructure Delivery Plan

## 4. First Publication Local Plan Consultation February-April 2021

Who was consulted and how did the consultation take place?

- 4.1 The six week consultation on the first Pre-Submission (Publication) Dartford Local Plan took place from 26 February 2021 to 9 April 2021. This was in accordance with Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012. Emails or letters were sent to all those on the consultation list (including all relevant specific and general bodies) notifying them of the publication of the Plan on 26 February 2021. This included information on how to view the consultation document, the response form for submitting comments, a guidance note on how to make representations and the statement of representations procedure. The Publication Local Plan, Policies Map Changes, Sustainability Appraisal, Habitats Regulations Assessment, Customer Access Review (Equalities Impact Assessment) and the Statement of Representations Procedure were placed on the New Local Plan page of the Council's website (<https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/new-local-plan>). The supporting evidence base was placed on the Evidence Base page of the Council's website (<https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/evidence-base2>).

What main issues were raised and how have these been taken into account?

- 4.2 The Council received responses from 68 different organisations and individuals. The list of those who responded is included in Appendix 3-1. The main issues raised in response to the consultation on the first Publication Local Plan are set out in Appendix 3-2. The key issue was the notification of the Swanscombe Peninsula Site of Special Scientific Interest (SSSI) by Natural England on 11 March 2021, during the consultation on the Publication Local Plan. The notification of the SSSI subsequently led to objections from Natural England in relation to parts of the plan, in particular a number of policies in the Ebbsfleet Chapter which have the potential to directly impact on the scientific interest of the SSSI. As a result of this, it was considered that the policies in the Ebbsfleet chapter needed to be substantially revised and that it was necessary to publish a second Publication Local Plan for consultation. The Council also took the opportunity to make some other less substantial changes to the Local Plan in response to other comments received on the first Publication Local Plan. The key changes are set out in table 4 below.

**Table 4: Key Changes included in the second Publication Local Plan and Supporting Documents**

Policy	Key Plan Change
S4: Borough Development Levels	<ul style="list-style-type: none"> <li>Now shows annual figures for the provision of commercial and industrial uses over the plan period, based on an uplifted rate, rather than a total figure to 2026/27.</li> </ul>
E1: Ebbsfleet and Swanscombe Strategy	<ul style="list-style-type: none"> <li>Now also covers Swanscombe (as well as Ebbsfleet Garden City) and includes reference to Swanscombe remaining distinctive and access to better public transport, walking and cycling connections (latter was previously within policy E3)</li> </ul>

<b>Policy</b>	<b>Key Plan Change</b>
	<ul style="list-style-type: none"> <li>• Now also covers Bean Triangle and Craylands Gorge (previously within broad location policy E5 Ebbsfleet South and West)</li> <li>• More of an area based policy with key development principles moved to policy E2</li> <li>• Now includes references to the SSSI and the Green Grid network</li> </ul>
E2: Ebbsfleet Garden City Development Principles	<ul style="list-style-type: none"> <li>• Now includes many of the development principles that were previously within policy E1</li> <li>• Now includes reference to the SSSI</li> </ul>
E3: Swanscombe	<ul style="list-style-type: none"> <li>• Previous reference to access to better public transport, walking and cycling connections has been removed (now in policy E1)</li> <li>• Other general principles remain but have been reworded and moved around</li> </ul>
E4: Ebbsfleet Central Allocation	<ul style="list-style-type: none"> <li>• Different boundaries which now exclude the SSSI</li> <li>• Reference to the SSSI</li> <li>• Now includes specific requirement for zero-carbon and energy-positive technology</li> <li>• Now includes specific text for development anticipated in the areas to the east and west of the station</li> </ul>
E5: Alkerden and Ashmere Allocation	<ul style="list-style-type: none"> <li>• Now an allocation rather than a broad location for development and includes details of the amount of development planned on the site</li> <li>• Includes only the part of the site which has extant planning permission and not yet developed – at Alkerden and Ashmere</li> <li>• Now includes provision of specialist accommodation</li> </ul>
E6: Area North of London Road, Swanscombe	<ul style="list-style-type: none"> <li>• Different boundaries to previously to exclude the SSSI and include an employment area</li> <li>• Reference to the SSSI</li> <li>• Constraints amended to exclude those which are no longer relevant</li> </ul>
M9: Sustainable Housing Locations	<ul style="list-style-type: none"> <li>• Now clarifies that the policy does not apply to sites within Central Dartford, Ebbsfleet Garden City and Swanscombe</li> </ul>
Policies Map	<ul style="list-style-type: none"> <li>• Swanscombe Peninsula SSSI to be shown</li> <li>• Borough Open Space designation to be removed for all areas already designated as SSSIs</li> <li>• Sandpit Road to be included in the Burnham Road Employment Area</li> </ul>
Evidence Base	<ul style="list-style-type: none"> <li>• Sustainability Appraisal has been updated</li> <li>• Habitats Regulations Assessment has been updated</li> </ul>

Policy	Key Plan Change
	<ul style="list-style-type: none"> <li>Transport Study results expected to be available as part of the evidence when the second Publication Local Plan is published</li> </ul>



## **5. Second Publication Local Plan Consultation September-October 2021**

Who was consulted and how did the consultation take place?


- 5.1 The six week consultation on the second Pre-Submission (Publication) Dartford Local Plan took place from 15 September 2021 to 27 October 2021. This was in accordance with Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012. Emails or letters were sent to all those on the consultation list (including all relevant specific and general bodies) and to all those who had responded to the first Publication Local Plan, notifying them of the second publication of the Plan, on 15 September 2021. This included information on how to view the consultation document, the response form for submitting comments, a guidance note on how to make representations and the statement of representations procedure. It was made clear on the response form, the guidance note and in all correspondence sent out that those who previously responded on the first publication plan would not automatically have their previous representations carried forward and that they would need to respond again.
- 5.2 The second Publication Local Plan and updated versions of the Policies Map Changes, Sustainability Appraisal, Habitats Regulations Assessment, Customer Access Review (Equalities Impact Assessment) and the Statement of Representations Procedure were placed on the New Local Plan page of the Council's website (<https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/new-local-plan>). Existing, replacement and additional supporting evidence documents were placed on the Evidence Base page of the Council's website (<https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/evidence-base2>).

What main issues were raised and how have these been taken into account?

- 5.3 The Council received 465 responses from 95 different organisations and individuals. The list of those who responded is included in Appendix 4-1. The main issues raised in response to the consultation on the second Publication Local Plan are set out in Appendix 4-2.

## Appendix 1: Strategic Issues Consultation

### Appendix 1-1: Response Form: Hard and Electronic Copy Versions

<b>Dartford New Local Plan – Strategic Issues Consultation 2018</b>							
<p><b><u>REPRESENTATION FORM</u></b></p> <p><b>Dartford New Local Plan Strategic Issues Consultation</b></p> <div style="text-align: center;"></div>	<p><b>DARTFORD</b> BOROUGH COUNCIL</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"><p>For office use only</p><p>Ref No: _____</p></div>						
<p>Dartford Borough Council welcomes your comments on the Strategic Issues Consultation. Please ensure that you complete section A and record your comments to the questions as appropriate.</p> <p>By providing your details to comment on this consultation – held under The Town and Country Planning (Local Planning) (England) Regulations 2012 – you are <b>consenting</b> to us legitimately retaining your contact details for the purposes of Dartford planning policy consultations. Under Regulation 19 we have duties to inform certain consultees again when the Local Plan reaches Publication stage.</p> <p>You may exercise your right under the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003, to unsubscribe from further communication from us by writing to us at the address below. Our Privacy Notice at <a href="http://www.dartford.gov.uk">www.dartford.gov.uk</a> tells you what to expect when we collect personal information and who to contact if you have any concerns or questions about how we look after your personal information.</p> <p>Local Plan representations cannot be kept confidential or be made anonymously, but contact details will not be published. All responses must be received by <b>5pm on Friday 20 July 2018</b>.</p> <p>Completed forms should be sent to:</p> <p style="margin-left: 40px;">Planning Policy Team Dartford Borough Council Civic Centre Home Gardens Dartford, Kent DA1 1DR</p> <p>Alternatively, they can be emailed to: <a href="mailto:LDF@dartford.gov.uk">LDF@dartford.gov.uk</a></p> <p>If you have any queries about this consultation, please contact the Planning Policy Team by emailing <a href="mailto:LDF@dartford.gov.uk">LDF@dartford.gov.uk</a> or by phoning 01322 343213</p>							
<p><b>Your Details</b></p> <table border="1" style="width: 100%;"><tr><td style="width: 30%;">Name</td><td></td></tr><tr><td>Postal address</td><td></td></tr><tr><td>Email address</td><td></td></tr></table>		Name		Postal address		Email address	
Name							
Postal address							
Email address							

**Dartford New Local Plan – Strategic Issues Consultation 2018**

**Question Number**

Response:

**Question Number**

Response:

(please continue on a separate sheet if required)

**Other Comments**

Do you have any other comments on the Strategic Issues or on the Supporting Information produced for this consultation (including the Core Strategy Review: Policy Monitoring and Five Year Deliverable Housing Land Supply 2018 reports)?

(please continue on a separate sheet if required)

Your Signature:		Date:	
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If you or anybody you know requires this or any other Council information in another language, please contact us and we will do our best to provide this for you.

Braille, Audio tape and large print versions of this document are available upon request

Tel: 01322 343434 Fax: 01322 343432

Email: [customer.services@dartford.gov.uk](mailto:customer.services@dartford.gov.uk)

Dartford New Local Plan – Strategic Issues Consultation 2018

## **REPRESENTATION FORM**

### **Dartford New Local Plan Strategic Issues Consultation**

**DARTFORD**  
BOROUGH COUNCIL



For office use only

Ref No:

Dartford Borough Council welcomes your comments on the [Strategic Issues Consultation](#). Please ensure that you complete section A and record your comments against the relevant questions in sections B-E as appropriate.

By providing your details to comment on this consultation – held under The Town and Country Planning (Local Planning) (England) Regulations 2012 – you are **consenting** to us legitimately retaining your contact details for the purposes of Dartford planning policy consultations. Under Regulation 19, we have duties to inform certain consultees again when the Local Plan reaches Publication stage.

You may exercise your right under the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003, to unsubscribe from further communication from us by completing this [electronic form](#) or writing to us at the address below. Our Privacy Notice at [www.dartford.gov.uk](http://www.dartford.gov.uk) tells you what to expect when we collect personal information and who to contact if you have any concerns or questions about how we look after your personal information.

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Alternatively, they can be sent to:  
Planning Policy Team  
Dartford Borough Council  
Civic Centre  
Home Gardens  
Dartford  
Kent DA1 1DR

If you have any queries about this consultation, please contact the Planning Policy Team by emailing [LDF@dartford.gov.uk](mailto:LDF@dartford.gov.uk) or by phoning 01322 343213.

## **Section A: Your Details**

Name	
Job Title (if applicable)	
Company/organisation name (if applicable)	
Client's name (if applicable)	

**Dartford New Local Plan – Strategic Issues Consultation 2018**

Postal address	
Email address	

Dartford New Local Plan – Strategic Issues Consultation 2018

## Section B: Dartford's Strategic Development Objectives and Issues

### NATIONAL POLICY AND SCOPE OF THE PLAN

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

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

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

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

### STRATEGIC PLANNING, INFRASTRUCTURE AND THE DUTY TO COOPERATE

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

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

**Dartford New Local Plan – Strategic Issues Consultation 2018**

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

## **Section C: Features of the Development Strategy for the Borough**

### **EXISTING STRATEGIC ISSUES**

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

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

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

### **HOMES**

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

**Dartford New Local Plan – Strategic Issues Consultation 2018**

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

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

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

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

**WORKPLACES**

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

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



**Dartford New Local Plan – Strategic Issues Consultation 2018**

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

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

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

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

**TRANSPORT AND COMMUNITY INFRASTRUCTURE**

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

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

**Dartford New Local Plan – Strategic Issues Consultation 2018**

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

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

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

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

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

- 14a. To what extent will transport and community infrastructure planned in the Infrastructure Delivery Plan meet the range of needs arising from new development

**Dartford New Local Plan – Strategic Issues Consultation 2018**

in the Borough? Are there other types of infrastructure that will be required by development?

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

**NATURAL ENVIRONMENT**

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

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

**CLIMATE CHANGE, ENERGY AND AIR QUALITY**

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

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

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

**DESIGN AND CONSERVATION**

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

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

## **Section D: Main Areas and Types of Future Development**

**PATTERN OF DEVELOPMENT**

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

**STONE, GREENHITHE, SWANSCOMBE AND THAMES RIVERSIDE**

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

**Dartford New Local Plan – Strategic Issues Consultation 2018**

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

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

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

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

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

**EBBSFLEET DEVELOPMENT CORPORATION AREA**

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

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

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

**BROWNFIELD LAND AND FUTURE RESIDENTIAL POTENTIAL**

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

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

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

**ENHANCING OPEN SPACE PROVISION**

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

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

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

**MAINTAINING GREEN BELT LAND**

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

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

**LOCAL PRIORITIES**

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

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

**Dartford New Local Plan – Strategic Issues Consultation 2018**

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

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## **Section E: Other Comments**

Do you have any other comments on the Strategic Issues or on the Supporting Information produced for this consultation (including the Core Strategy Review: Policy Monitoring and Five Year Deliverable Housing Land Supply 2018 reports)?

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Your Signature:		Date:	
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If you or anybody you know requires this or any other Council information in another language, please contact us and we will do our best to provide this for you.

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Email: [customer.services@dartford.gov.uk](mailto:customer.services@dartford.gov.uk)



Appendix 1-2: Bulletin

# DARTFORD BOROUGH COUNCIL Planning Policy Bulletin

2018/2019



## INTRODUCTION

Some kinds of development (including many new buildings, engineering operations or changes of use of land) require planning permission. The legal starting point for deciding planning applications is the **Local Plan**.

Local Plans are produced based on national policy, evidence (public consultation and research) and legal documents. They are often supported by further planning policy or monitoring documents.

This Bulletin has been updated by officers of Dartford Borough Council to help explain the Local Plan and other planning policies used in the Borough. It looks at current and future planning policies that may apply to planning applications on your land or in your neighbourhood. Useful web links are provided in boxes.

Frequently Asked Questions and contact details are also set out in this Bulletin. The Bulletin is intended as a non-technical user-friendly guide. It is not a formal document. Please contact the Planning Policy Team with any queries. We would welcome feedback on this Bulletin.

## INSIDE THIS ISSUE

Future Policy — Get Involved...	2
Future Policy — FAQs .....	3
Other News .....	4
Community Involvement .....	5
What's Ahead .....	6
Contact us .....	6

## SPECIAL POINTS OF INTEREST

- We are carrying out an initial consultation on our New Local Plan
- We have adopted the Dartford Development Policies Plan
- We have approved our Statement of Community Involvement

## FUTURE POLICY — GET INVOLVED

We are currently working on updating our **Core Strategy**. The current Dartford Core Strategy sets out the overall development approach for the Borough to 2026, including major development locations, the amount and type of housing, Green Belt protection and the approach to commercial uses.

It was approved in 2011 and now we need to replace it with a **new Local Plan** looking towards the 2030s. This can help to ensure that local priorities remain relevant and up to date as national policy changes.

We are carrying out a public consultation on **Strategic Issues** to guide the scope of the new Local Plan **from 8 June 2018 to 20 July 2018**. The purpose of this consultation is to:

- Consider Dartford's current planning priorities and seek comments on future priorities
- Seek views on how Dartford can continue to develop in a way which supports vibrant communities, contributes to a strong economy, and protects the natural and built environment
- Focus on the big picture longer-term development matters

The consultation document poses a series of questions, including a number where local input will be vital. Section C of the document is thematic — covering the state of play on key environmental, economic and social issues. Section D looks at the pattern of development, the broad areas of the Borough on which current strategy is based. The final part of the document asks about local community development priorities.

You can view the consultation document at:

[www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

It is produced to be read online, particularly as a number of hyperlinks are included to link through to further information. Hard copies are also available to view at Dartford Civic Centre and Dartford Library.

**This is your chance to tell us what you think and help shape the long-term planning strategy for your Borough. Please consider all parts of the document of interest, the range of questions and let us know your views in writing.**

The **FAQs** on page 3 give further information on how you can comment, what will happen next and other documents available to support our work on the Local Plan.



*“We are carrying out a public consultation on Strategic Issues to guide the scope of the new Local Plan from 8 June 2018 to 20 July 2018”*



## FUTURE POLICY — FAQs

### *How can I comment on the Strategic Issues?*

Response forms are available at:

- [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)
- Dartford Civic Centre and Dartford Library
- By emailing us at [LDF@dartford.gov.uk](mailto:LDF@dartford.gov.uk)

The form should be returned to us by 5pm on 20 July 2018 by:

- Emailing it to [LDF@dartford.gov.uk](mailto:LDF@dartford.gov.uk)
- Posting it to Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR

### *What will happen with my comments?*

The responses we receive to this consultation will help us to draw up more specific proposals. There will be further public consultations in future years as the new Local Plan progresses.

### *What other evidence are you working on?*

For the next stage of our Local Plan, we will need to gather a considerable amount of evidence.

We are already starting work on a Strategic Housing Land Availability Assessment (SHLAA). This is required by government to inform choices in preparing our Local Plan.

We have recently consulted on a methodology for our SHLAA. We also carried out a “call for sites” to ask landowners/developers if they have land that they would like us to consider for residential development.

Further information can be found using the following link:

[Strategic Housing Land Availability Assessment](#)

### *Where can I see the Strategic Issues consultation document?*

The document can be viewed online at:

[www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

Hard copy versions can be viewed at Dartford Civic Centre and Dartford Library.

### *What other information have you produced for this consultation?*

We have produced a number of documents to support our Strategic Issues consultation. These include a review of our current Core Strategy policies, a five year housing land supply statement, an economic performance paper and a housing density paper.

We have also produced Area Profiles which set out statistical information on population, economy and housing, together with information on the character and services available in different settlements in the Borough.

### *How will you make sure that sufficient infrastructure is provided?*

We are engaging as much as possible with infrastructure and service providers when developing the future Local Plan for Dartford. In this way, we can make sure that facilities such as schools and health facilities are provided in a timely manner to support new development.

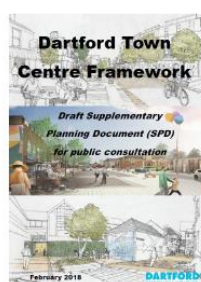




## OTHER NEWS

We adopted our **Development Policies Plan** in July 2017. This followed a number of rounds of public involvement and an Examination by an independent Planning Inspector. This Plan operates alongside the Core Strategy and sets out the main planning policies that we will use to assess planning applications. It is also used by Ebbsfleet Development Corporation in their decision making on planning applications in the Borough.

Our **Statement of Community Involvement** was adopted in December 2017. This sets out how we involve you in Local Plan consultations. More information is given on page 5.



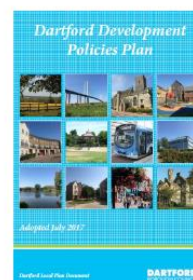
We have recently completed a consultation on a draft Supplementary Planning Document that will provide a Framework for **Dartford Town Centre**. Over 1,400 people visited the exhibitions and we received over 200 responses to the consultation. We are now considering the feedback that you gave us. Once approved, the Framework will help us shape the town centre when we make decisions on planning applications.

We have now produced our **Brownfield Land Register** for 2017/2018 as required by the government. This sets out information on previously-developed (brownfield) sites that we consider to be appropriate for residential development over the next 15 years. The Register will be reviewed each year.

We have calculated Dartford's **Five Year Housing Land Supply 2018**. This shows that we are on target to meet our calculated needs to 2023.



We have prepared an updated **Local Development Scheme**. This sets out the timetable for the different phases of our new Local Plan – see diagram below.



### Useful Links (Click below)

[Development Policies Plan](#)

[Statement of Community Involvement](#)

[Dartford Town Centre](#)

[Brownfield Land Register](#)

[Five Year Housing Land Supply](#)

[Local Development Scheme](#)

Phase	2018			2019				2020				2021
	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1
DBC Evidence gathering and early public participation												
DBC Plan publication and formal consultation												
Submission to Secretary of State, examination of Plan and potential modifications consultation												
DBC Adoption												

## STATEMENT OF COMMUNITY INVOLVEMENT

In our last issue, we asked for your ideas on how you would like us to consult and interact with you on Local Plan consultations. We have listened to what you had to say and adopted our Statement of Community Involvement in December 2017. It sets out a number of principles of Public Involvement in Planning.



### PRINCIPLE A

*Public involvement will be at a timely stage before final decisions are made by the Council.*

### PRINCIPLE B

*Explanatory information supporting proposals, or further contact details, will be provided to inform people responding to proposals.*

### PRINCIPLE C

*Clear deadlines will be provided for public consultations. The time period should be reasonable, but will recognise if there is a fixed timescale in which decisions need to be taken.*

### PRINCIPLE D

*Public comments will be acknowledged, and taken into account, with applicable planning issues appropriately weighed up.*

### PRINCIPLE E

*Notification and publicity will occur as soon as possible; with electronic communication primarily used, and webpages regularly updated.*

### PRINCIPLE F

*Local Plan communication and activities will fit the purpose of the proposed document and the stage of its preparation.*



#### FIND OUT MORE

Every year, Dartford Borough Council publishes an Authority Monitoring Report (AMR). This shows progress with Local Plan preparation and the implementation of policies in the Dartford Local Plan – the Core Strategy and the Development Policies Plan.

The most recent AMR was published in December 2017 for the 2016/17 monitoring year. This includes monitoring information on: Communities and Infrastructure; Jobs, Shops and Leisure; and Environment.

This can be found by clicking the button below.

[Authority  
Monitoring  
Report](#)

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



## WHAT'S AHEAD?

- We have to make sure that our Local Plan complies with national planning policies. The government is due to issue a **revised National Planning Policy Framework** in the summer. There are likely to be a number of changes including the introduction of a standard method for us to use to calculate how many new homes we need to provide in Dartford in the future.
- We will progress with work on our new **Dartford Local Plan**. Our **Local Development Scheme** sets out the various stages for this. Once the current consultation has finished, we will assess the responses and gather the supporting evidence needed to progress to the next stage.
- We will consider the responses we received on the draft **Dartford Town Centre Framework** and formally adopt this as a Supplementary Planning Document which we can use when making decisions on planning applications.
- We will continue to monitor how our existing policies are performing through our **Authority Monitoring Reports** and **Five Year Housing Land Supply** documents.
- We keep up-to-date with what our **neighbouring authorities** are planning as this can affect our area. We will respond to these consultations in the best interests of Dartford's residents and businesses. A number of our neighbours are currently reviewing their plans:
  - ◇ A draft new **London Plan** was published by the Mayor for consultation in December 2017
  - ◇ A draft new **Sevenoaks Local Plan** is expected to be published this summer
  - ◇ There is a current consultation on the **Gravesham Local Plan** Review

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### Contact Us

[www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

[ldf@dartford.gov.uk](mailto:ldf@dartford.gov.uk)

01322 343213

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### The Team

Mark Aplin, Tania Smith, Andrea Wright,  
Andrew Simpson and Katie Gill

Appendix 1-3: Flyer

## Consultation on Dartford's New Local Plan



The current Dartford Core Strategy is part of the Local Plan which is the basis for deciding planning applications. It provides the overall development approach for the Borough to 2026, including major development locations, the amount and type of housing, Green Belt protection and the approach to commercial uses. It was approved in 2011 and now there is a need to update it looking towards the 2030s.

### What are we doing now?

We are carrying out a public consultation on 'Strategic Issues' to guide the scope of the new Local Plan. The purpose of the consultation is to:

- Consider Dartford's current planning priorities and seek comments on future priorities
- Seek views on how Dartford can continue to develop in a way which supports vibrant communities, contributes to a strong economy, and protects the natural and built environment
- Focus on the 'big picture' longer-term development matters

The consultation document poses a series of questions, including a number where local input will be vital.

The consultation is taking place from 8 June 2018 for 6 weeks until 20 July 2018. We have produced a Planning Policy Bulletin which explains what we are doing. Both the consultation document and the bulletin are available online at [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation). They are also available for inspection, free of charge, at the Dartford Civic Centre and Dartford Library.

**This is your chance to tell us what you think and help shape the planning policy for your Borough.**

### What happens next?

The responses we receive to this consultation will help us to draw up more specific proposals. These will be subject to a detailed further public consultation. We aim to adopt the Plan in 2020/2021.

### How do I make comments?

Comments should be made in writing by **5pm on 20 July 2018** by:

- Emailing response forms to [LDF@dartford.gov.uk](mailto:LDF@dartford.gov.uk); or
- Posting response forms to Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR

If you have any queries, please contact the Planning Policy team by emailing [LDF@dartford.gov.uk](mailto:LDF@dartford.gov.uk) or phoning 01322 343213

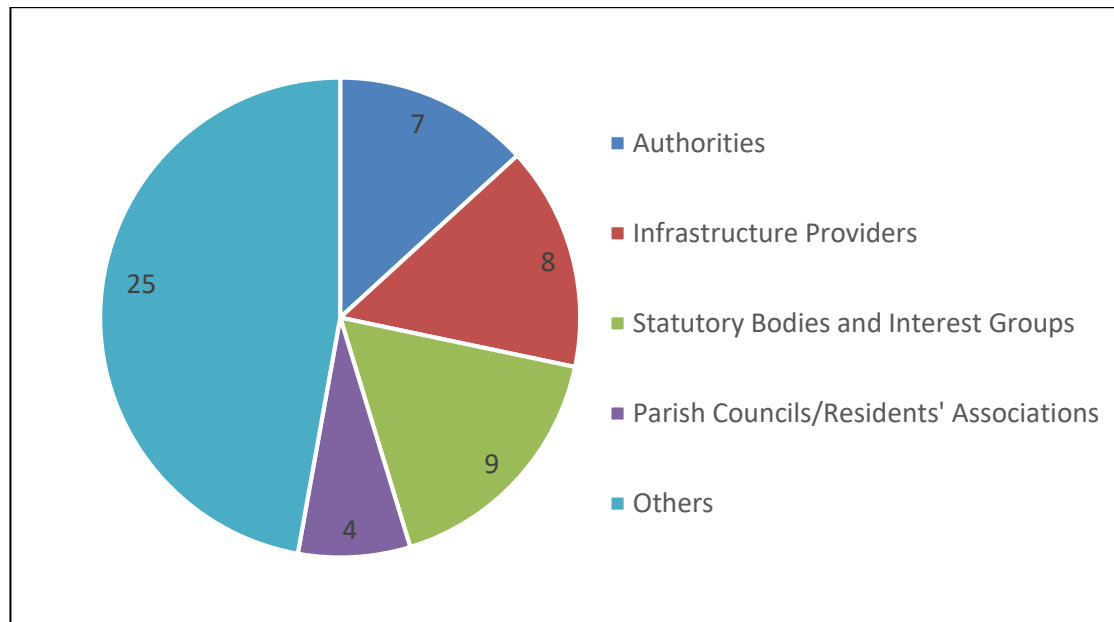
**DARTFORD**  
BOROUGH COUNCIL



## Appendix 1-4: Main Issues Raised

### Introduction

In total, responses were received from 53 different organisations. The diagram below shows the type of organisations who responded.



The Strategic Issues consultation occurred shortly after the SHLAA 'call for sites' period. There is a clear link between developer/interested party land interests and the nature of responses made to the Local Plan consultation. There are a number of tables in the Annex outlining some of the land interests that make up part of the 'other' respondents.

## Section B: Dartford's Strategic Development Objectives and Issues

### Strategy and Scope of the Plan (Questions 1-2c and 4a)

#### Strategy

A number of respondents consider that **the current strategy is appropriate** and that the emphasis should continue to be on the current approach of focussing development on existing brownfield/ underutilised land within settlement confines by making more efficient use of land and optimising the density of development to support regeneration whilst protecting the Green Belt. However, some comment that the strategy needs to take account of **changes to the mix of uses coming forward** on some strategic sites and consider the future role of Bluewater (see relevant sections below).

Some developers comment that the current strategy is appropriate but that it should promote a higher level of housing provision on suitable sites, including non-strategic previously developed sites, and a higher density of development in Dartford Town Centre.

Other developers state that the strategy should be reviewed to allow for more housing in rural villages/Green Belt (including a Green Belt review and the allocation of sites) and that there should be a more even spatial distribution across the Borough rather than relying on key delivery sites in the urban area.



There have been a number of general comments including the need for the Local Plan to:

- reflect **updated policy and legislation**; and
- clarify the **plan period** which should be at least 15/20 years from the date of adoption.

### Scope of the Local Plan

A number of statutory and local bodies support the Local Plan being **focussed on strategic policies** but there are some references to the need to update development management policies to:

- comply with the strategic approach, current legislation and national planning policy;
- strengthen planning controls; and
- reflect the Dartford Town Centre Masterplan.

A number of developers consider that there should be a single new Local Plan which includes strategic policies and development management policies. Some refer to the need to include site allocations.

The EDC suggests that, for proposals on sites that span both Boroughs, and as far as possible, the policies and proposals in DBC should be consistent with those being reviewed in Gravesham to avoid obvious conflicts. The Marine Management Organisation considers that the Local Plan needs to take into account marine planning.

### Important Long-term Topics for Future Strategic Policies

Respondents list a wide variety of important topics for future strategic policies. Statutory and local bodies in particular cite **transport/highways**, including the provision of sustainable transport options and lorry parking, and infrastructure provision, including superfast broadband, water supply and energy supply. There are also references to green belt protection, biodiversity, green infrastructure, environmental net gain, flood mitigation, air quality, design and the historic environment.

A number of developers list **the delivery of new dwellings** as being important, particularly to address needs in the rural area. Reference is also made to facilitating a mix of housing types, including **older persons' accommodation**, and the need for development which creates communities to enable families to stay close.

A statutory body considers that economic development is important. One landowner refers to the importance of repurposing/regenerating Dartford Town Centre in considering future strategic policies for the Borough.

### New Policy Guidance

A large number of policy areas have been listed as needing new or updated local policy/guidance. These relate to strategic sites, other site issues, house types, infrastructure, environmental issues, the built environment, the green belt, and recreation and tourism. These are listed in the table overpage.

## Policy Areas needing New or Updated Local Policy/Guidance

<b>Strategic Sites</b>	Ebbsfleet Garden City Swanscombe Peninsula
<b>Other Site Issues</b>	<ul style="list-style-type: none"> <li>• Windfall sites including former quarries/landfill sites and Borough Open Spaces</li> <li>• Viability assessments</li> <li>• Reinvigorating employment locations</li> </ul>
<b>House Types</b>	<ul style="list-style-type: none"> <li>• Affordable housing for local people</li> <li>• Older persons' accommodation (new and retention of existing housing suitable for older people)</li> <li>• Lifetime homes</li> <li>• Build to rent</li> <li>• Co-living</li> <li>• Student accommodation</li> <li>• HMOs</li> </ul>
<b>Transport Infrastructure</b>	<ul style="list-style-type: none"> <li>• Highways/transport</li> <li>• Traffic management</li> <li>• Use of River Thames for transport</li> <li>• Public rights of way</li> </ul>
<b>Other Infrastructure</b>	<ul style="list-style-type: none"> <li>• Energy generation</li> <li>• Water utilities</li> <li>• Wastewater</li> <li>• Waste management</li> <li>• Education provision including allocating land for schools</li> <li>• Emergency planning and resilience</li> <li>• SUDS</li> <li>• Technology</li> <li>• Green infrastructure</li> </ul>
<b>Environmental issues</b>	<ul style="list-style-type: none"> <li>• Climate change</li> <li>• Energy efficiency, renewable energy and local energy generation</li> <li>• Water efficiency and supply</li> <li>• Environmental net gain</li> <li>• Biodiversity</li> <li>• Electric vehicle connections</li> <li>• Air quality</li> <li>• Dark skies protection</li> <li>• Protecting the best quality agricultural land</li> </ul>
<b>Built environment</b>	<ul style="list-style-type: none"> <li>• Heritage and conservation (including local list of assets)</li> <li>• Design tools to support place-making</li> <li>• Building on sloping sites</li> </ul>
<b>Green Belt</b>	<ul style="list-style-type: none"> <li>• Traveller sites</li> <li>• Housing</li> <li>• Boundaries</li> </ul>
Recreation and Tourism	

## Cross Boundary Issues and Duty to Co-operate (Questions 3a-b)

### **Main Cross Boundary Planning/Infrastructure Issues**

The following key cross boundary issues have been identified, particularly by statutory bodies:

- Housing
- Employment
- Retail/role of Bluewater
- Key development sites including Ebbsfleet Garden City, Swanscombe Peninsula and the Thames Waterfront area
- Green Belt
- Infrastructure including education, health, TE2100, water supply, wastewater management
- Transport infrastructure including Crossrail extension, Fastrack (and possible link to the north Bexley proposed transit scheme), public transport, walking, cycling, traffic management, A2 junction improvements/M25/Dartford Crossing, Lower Thames Crossing, use of and access to the River Thames, modelling
- Green infrastructure

There are also some references to environmental sustainability and resilience, decentralised energy and electric vehicle charging infrastructure, heritage, and air quality in a cross boundary context.

Gravesham BC, Thurrock Council, the GLA and the EDC refer to the potential of producing **joint plans**. Some make reference to the Thames Estuary 2050 Growth Commission report in this respect. A number of statutory bodies also refer to the duty to co-operate, including the preparation of other strategic and local plans in neighbouring areas and the implications and opportunities to engage with these.

### **Protocol for Action and Communication**

Respondents generally offered clear **support for the protocol** and its aims. One comments that this should be reviewed in light of the revised NPPF and PPG guidance on duty to co-operate and the need for statements of common ground. The EDC has already committed to work with DBC through a recent Memorandum of Understanding.

## Section C: Features of the Development Strategy for the Borough

### Homes (Questions 5 part, 6a-c, 7a-b and 25a-c)

#### **Policy Approach/Housing Numbers (see also Strategy section above)**

A significant number of respondents comment that the policy approach should be informed by **updated evidence/assessments including consideration of other housing/ employment scenarios** – SHMA, SHLAA, SA/SEA. The GLA refer to their demographic modelling which provides alternative population and household projections which could be taken into account when applying the government's standard approach to calculating housing need.

**Sevenoaks DC and Gravesham BC refer to the potential difficulties** of meeting their housing needs in their areas and the potential of neighbouring areas to meet some of these needs. A number of developers consider that DBC should accommodate some of the housing shortfalls arising from surrounding areas, deliver its Core Strategy housing target and/or provide an oversupply of housing. However, some local bodies express concerns about increasing housing provision in the borough.

#### **Housing Types**

As already referred to above, some respondents consider that the size, type and tenure of housing needed in the borough should be informed by an updated Strategic Housing Market Assessment. One developer considers that this should take account of local demand factors, site opportunities and constraints.

The EDC states that consideration needs to be given to alternative models of housing, including the private rented sector, self-build and custom build, as well as specialist housing to support specific needs and assist in downsizing. Other respondents also recognise the importance of providing **homes suitable for older and disabled** people, including KCC who refer to the need for extra care housing and residential care homes.

Swanscombe and Greenhithe TC considers that consideration needs to be given to starter homes and live-work units. In addition to private sale and affordable housing, developers suggest that the Local Plan needs to have regard to build to rent, co-living, and rent to buy housing.

There is also reference to the need for a range of house types and locations. One respondent considers that there should be more flexibility in the houses/flats ratio based on site characteristics and market demand. The EDC states that there needs to be clarification of the housing mix ratios in the Thames Waterfront area.

#### **Affordable Housing**

A number of developers consider that Dartford should apply **the national policy approach**, i.e. not seek affordable housing contributions on developments of ten units or less and update the definition of affordable housing in accordance with the NPPF.

Conversely, some local bodies and developers support the current policy approach of seeking affordable housing contributions on smaller sites in the rural area. KCC consider that it may be appropriate to seek an affordable housing contribution from smaller sites if an appropriate level cannot be achieved through larger sites, taking viability into account.

Some local bodies refer to the need to provide affordable homes which genuinely meet the needs of local people.

## Accessible /Adaptable Dwellings

There is a mixed response to the question of whether all dwellings should be accessible/adaptable for all users and ages through national design standards with local bodies in favour and developers generally against such a requirement. One developer suggests a 10% allowance. The EDC considered that there should be an explicit policy setting out this requirement for all new dwellings unless it is not possible due to physical constraints. KCC consider that the requirement for accessible/adaptable homes should apply to all affordable units and to at least 75% of market units (excluding 1-bed units) and that at least 2% of units on sites of more than 50 dwellings should be made wheelchair accessible.

## Windfall Development

### Large/Small Sites

Local bodies consider that windfall development is problematic, particularly on small sites, due to the loss of amenity space and parking issues. One developer refers to the limited availability of small windfall sites in the urban area which are not easily deliverable. Conversely, a local resident considers that windfall development is only an issue in the case of **larger sites**.

A number of developers submit that windfall development is not problematic, contributes to meeting housing needs and should be supported subject to good standard of design, causing no harm and meeting sustainable development objectives.

KCC refer to the fact that infrastructure can be more easily planned for sites identified through the Local Plan process. Whilst both small and large windfall sites lead to a need for additional infrastructure, this is more difficult in the case of larger sites due to the cost of providing land and delivering the facilities.

## Policy DP6: Sustainable Residential Locations

There is **support** for the current policy from local bodies, a local resident and KCC. Some developers state that it needs to comply with national policy while others consider that it should allow for the development of open spaces which do not fulfil that purpose and the redevelopment of previously developed sites.

## Efficiency of Land Use/Brownfield Land

Local and statutory bodies consider that Dartford can best make efficient use of land by **focussing development on brownfield sites but it is recognised that this is a finite resource**. There are references to taking a more flexible approach to housing densities, with KCC suggesting that **higher densities** should be allowed in appropriate locations (e.g. around railway stations).

Developers put forward a range of ways in which Dartford can make efficient use of land, including: bringing forward development on previously developed sites in the urban area and the Green Belt; setting differential CIL rates/not requiring excessive planning obligations for development of brownfield sites; factoring in the cost and timescales for developing brownfield land; allowing a wider range of housing types; and locating development where this supports services within settlements.

Some local bodies and a developer consider that the Local Plan should contain a target of 80% of housing to be on brownfield land. Conversely, developers with an interest in greenfield sites

consider that there should not be such a target as the availability of brownfield land will reduce and it is subject to constraints, both of which may affect the delivery of growth in the long term. Natural England consider that the target should be driven by the available area of low environmental value, possibly using a brownfield audit. KCC supports the focus on brownfield land subject to the provision of infrastructure.

In relation to whether the focus should be on delivering sites in part 1 of Dartford's Brownfield Land Register, some developers point out that: it fails to include all brownfield land (e.g. former quarry and landfill sites, brownfield sites in the Green Belt); it will not support rural communities; and there should be more emphasis on the delivery of greenfield sites. The issue of the diminishing supply of brownfield sites is also raised.

### Employment

A number of statutory bodies comment that the employment policy approach should be informed by **updated evidence/assessments** and consideration of whether the existing strategy is still appropriate – employment needs, employment land assessment. Stone PC consider that there should be some flexibility to allow workplaces to change use. A landowner wants the plan to maintain the approach of protecting successfully operating employment uses at Victoria Industrial Park.

Statutory bodies consider that DBC should consider **land for industry and logistics** and quality commercial space to provide for future economic development in Dartford. Local bodies refer to the need for live-work units, provision for home working and provision for businesses perceived as under threat from the possibility of a London Resort. The owner of the former Littlebrook Power Station suggests that the focus should be on advanced logistics and the storage and distribution employment sector. One landowner considers that the Plan should seek to regenerate land in or with potential for employment use in order to maximise job creation whilst another states that job targets are not transferable to retail need and should not be used to support out of town retail development.

There is support for new economic growth focussed on **locations that are well served by public transport and walking/ cycling**. Some respondents also consider that new economic growth should reflect the local skills and experience of the resident or future workforce. The EDC would like to see the creation of a vibrant commercial destination at Ebbsfleet which maximises access to the public transport, walking and cycling network. KCC seeks policies which encourage development to commit to Local Employment Initiatives.

### Retail and Leisure (Questions 9a and 9b)

#### **Policy Approach**

A number of respondents consider that the retail and leisure policy approach should be informed by **updated evidence/assessments** – retail capacity/need/impact studies, leisure study. A couple of local bodies state that the plan should reflect changes in retail habits, e.g. online shopping.

#### **Dartford Town Centre**

In terms of Dartford Town Centre, KCC considers that the major opportunities have already been identified and that the redevelopment of the Station Mound could have the greatest impact. Some respondents consider that there could be opportunities to increase residential development, e.g. through taller buildings, though a local resident is concerned about the impact of this on infrastructure and open spaces. One landowner considers that there is

potential to maintain/expand civic and community uses. The GLA notes that any significant retail/leisure development would need to consider impacts on London's centres.

## **Bluewater**

A number of neighbouring authorities consider that any policy for Bluewater needs to consider its **future role/status** and impacts on other centres, taking into account updated evidence.

The owners of the site state that the current policy strikes the right balance between protecting existing centres and allowing changes to retail provision at Bluewater but that it should include updated guideline figures. Both the owners and EDC consider that the policy should allow for flexibility of uses to respond to changing needs/demands in the retail sector. The owners refer to the potential for dining, leisure, hotel and residential development.

KCC comment that the Local Plan should support the further expansion of Bluewater so that it can compete with rival shopping locations subject to it complementing the offer at Dartford and Gravesend, not making any further parking provision, improving sustainable forms of transport and the completion of the A2 Bean junction improvement.

A major landowner within Dartford Town Centre considers that future development/expansion of Bluewater should be resisted to allow town centres to benefit from increased expenditure capacity in the leisure/retail sectors. Local bodies state that the parking and opening time conditions need to be clarified and its setting should provide the context for any future change.

## Transport, Infrastructure and Developer Contributions (Questions 3c and 10-14b)

### **Transport General Comments**

A number of respondents consider that there is a need for an updated, robust transport evidence base, including what impact the Lower Thames Crossing will have at Dartford.

Interestingly, Network Rail refer to the issue of narrow platforms on curves at **Dartford station** and the fact that there may be the opportunity to move the station westwards for improved rail operation. [This is a new proposal and is being discussed with them. The relationship with the potential Crossrail extension is uncertain]. They also mention the potential to lengthen trains through Dartford to 12-car.

The GLA/TfL state that DBC could consider extending some of the Mayor's strategic transport policy objectives.

### **Highways/Parking**

Highways England state that the strategy, policies and allocations should support the operation of **a safe and reliable transport network and alternatives to the car**. KCC recognise that severe traffic congestion on the local road network is often a result of incidents at the Dartford crossing. They support improvements at the Dartford Crossing and the new Lower Thames Crossing. There is a need for further investment beyond the planned STIPS schemes and DBC should continue to engage with KCC/Highways England to identify measures to improve the performance of the local road network. Other respondents also raise issues of traffic congestion and support projects/improvements to ease this. Local bodies have suggested the need for: road and parking enforcement; smart traffic lights; separation of local and through traffic; and action on lorry parking. EDC suggest that there should be bespoke parking standards for sites in their area.

### **Buses/Fastrack**

There is general support for improving the Fastrack/ bus network and services and ensuring that destinations are well served by them. Swanscombe and Greenhithe TC considers that they should be made more reliable and affordable and that more efficient use should be made of bus lanes. EDC make the suggestion that developer contributions should be used to fund Fastrack infrastructure and that this should be included on the CIL 123 list. Bexley Council consider that there is the opportunity to link an expanded Fastrack scheme with the proposed transit scheme in north Bexley. A local resident has expressed concerns about the relocation of buses from Market Street to Home Gardens.

## **Cycling/Walking**

Respondents consider that better provision should be made for cyclists/pedestrians, i.e. a network of high quality routes and facilities. EDC suggest that reference should be made to the Ebbsfleet Implementation Framework whilst KCC think that DBC should develop a cycle strategy with the development of traffic free cycle routes set out as a priority.

KCC wish to see policies which: encourage walking and cycling; ensure development provides high quality access infrastructure; address public rights of way issues; improve equestrian access; ensure developments do not adversely impact on non-motorised users of rural lanes; and protect and enhance promoted routes, e.g. England Coast Path National Trail.

A developer suggests that developer contributions could be used to fund cycle paths and cycle parking at railway stations.

## **Railway Services/Stations**

Respondents identify **overcrowding (peak capacity)** as the most important issue facing future rail services in the Borough. Maintaining access to existing **London termini stations and the quality of local stations** are identified as the next most important issues. Reliability and cost of travel and are identified as the other key issues.

In terms of relocating/rebuilding stations on the North Kent line, the issue of funding is raised, i.e. capital funding would need to be met by the private sector. Opportunities should be investigated but any relocation would need to consider the impacts on local facilities.

There is support from EDC and Swanscombe and Greenhithe TC for the relocation/improvement of Swanscombe Station and Network Rail consider that there may be the opportunity to improve it if London Resort goes ahead.

Partners support the **Crossrail extension** to Ebbsfleet, with some making reference to the development opportunities that this would facilitate. One respondent states that the route should continue to be safeguarded.

There are some issues raised over the possibility of linking the London Victoria railway line to the existing underused railway line south of Ebbsfleet International. Statutory bodies question what impact it would have on development at Ebbsfleet Central and the capacity of Ebbsfleet station, how it would be funded, how services would operate, and how the A2 would be crossed. Local bodies and residents are concerned about impacts on residents, businesses, existing train services through Longfield/Farningham Road stations and the road network/parking provision.



## **River Transport**

A number of statutory bodies comment that policies should support river transport, including between North Kent and Essex/London. The PLA specifically refers to the use of the river to transport construction materials, freight and passengers, and the role of operational wharves. Dartford and Crayford Creek Restoration Trust states that Dartford Creek should remain navigable.

## **Other Infrastructure**

Infrastructure providers and statutory and local bodies consider that policies and schemes should take account of the need for:

- wastewater treatment, efficient/sustainable use of wastewater assets and the need to protect sensitive development from odour pollution
- water supply including the protection of groundwater and surface water sources from pollution and the efficient/sustainable use of water resources
- SuDS
- education provision through robust planning and safeguarding land/identifying sites
- health facilities including the potential for the future expansion of Darent Valley Hospital
- sports and leisure facilities – indoor and outdoor
- more facilities for children in villages
- wider service provision which does not just include facilities
- the provision of more community and social uses
- care home provision for older people
- high speed broadband to be provided in new housing

There is a need to provide these at the necessary time to meet the needs arising from new development and ensure that they are accessible by a variety of transport modes.

KCC consider that policies on housing delivery (CS11), community services (CS21) and delivery and implementation (CS26) are important for the delivery of infrastructure and that the Local Plan should allocate land for community facilities.

## **Infrastructure Delivery Plan**

Respondents refer to the need for the IDP to include sufficient provision for infrastructure and provisions for review. Comments have been received from infrastructure providers, statutory and local bodies stating that the IDP should include reference to:

- Community service needs arising from all development including changes to the delivery of services
- Sufficient GP facilities to meet needs arising from new development, to be funded through CIL
- Green infrastructure, including public rights of way, green space and enhancing habitats
- The need for riparian lifesaving equipment and suicide prevention measures to be provided by development on the riverside
- Crossrail
- Use of the River Thames
- Possible support for the Kenex Thames Transit was raised by Bean RA (although no response was received from the organisation directly on this).

## **Infrastructure Funding**

A number of comments have been made on the proposed changes to the system of development contributions. KCC consider that both CIL and S106 obligations could apply,

particularly for larger sites, and they support the ability for authorities to recover the cost of monitoring obligations. EDC consider that the current dual CIL/S106 agreement process adds uncertainty and complication. They support **CIL review**, and particularly the proposals for viability assessment to be carried out at the plan making stage and for CIL to be based on existing land value with links to the residential/commercial index. However, EDC are concerned about the implications of nationally set contributions and the proposed strategic infrastructure tariff which could have a negative impact on securing the infrastructure needed to support development in Dartford and the provision and funding of major infrastructure (notably the proposed Crossrail extension). The CCG consider that the proposals will lead to the need to review Dartford's CIL rates and developers state that viability needs to be taken into account.

KCC are keen to work with DBC if new funding approaches are explored and reference the need to work collaboratively to plan for strategic transport infrastructure beyond the current STIPS programme. A number of statutory bodies refer to the need for developer contributions/CIL to provide sufficient school places, green infrastructure and improvements to railway facilities.

#### Natural Environment (Questions 15 and 16)

Local and statutory bodies consider that planning policies should achieve **environmental net gain** and plan positively for networks of biodiversity and green infrastructure including: protecting SSSIs and ancient woodland; enhancing biodiversity on new developments; considering the role of trees as part of a wider integrated landscape approach; and creating opportunities for greater public understanding and engagement with the local natural environment (e.g. River Darent, Dartford Marshes).

In terms of the approach to mitigating the impacts of large developments on the international habitats and species on the North Kent coast, a number of statutory bodies support the existing approach which should continue. It is considered that DBC will need to consider the implications of the recent judgement on this issue.

#### Open Space (Questions 26a-c)

The question on where the focus of greenspace and outdoor recreation improvements should be elicited a variety of responses. Statutory bodies make reference to the need to focus improvements in deprived areas and where there is a deficiency in provision, as well as increasing requirements for open space provision.

Stone PC and Bean RA have made a number of suggestions for increased/improved open space provision as follows:

- former landfill sites that offer low development potential;
- Bean Triangle, funded by the EDC;
- Beacon Wood Country Park, funded by Tarmac; and
- The Thrift ancient woodland, funded by Highways England.

The Dartford and Crayford Creek Restoration Trust would like the Local Plan to support improvements at Dartford Creek and surrounding areas as a destination and catalyst for outdoor activity, health and wellbeing, as well as making the Darent Valley Path a more visible and inviting green route. A couple of developers state that open space should be provided as part of developments whilst another considers that open space improvements should take place throughout the Borough.

Some statutory bodies refer to the need to: create a green space/ecological network; protect existing sites; and carry out an assessment of needs for open space sport and recreation

facilities. Sport England make particular reference to the protection of playing fields and sports facilities and the need for a Playing Pitch Strategy.

A number of suggestions are made on how open space enhancement should be funded including developer contributions and CIL. One developer suggests that capital receipts generated through the development process should be used.

The EDC are currently investigating options for the long-term stewardship of open spaces in its area. Swanscombe and Greenhithe TC consider that parish councils should fund enhancements through agreements with developers and they also raise the issue of residents of new developments currently being double charged due to development service charges.

Local bodies recognise the need for new open space as part of new development to provide a healthy and safe environment for all ages. Statutory bodies consider that such spaces should be accessible to all users and by sustainable modes of transport, as well as multifunctional. A number of respondents refer to the importance of making adequate provision for long term maintenance. KCC makes reference to the need to integrate with the drainage system whilst the EDC consider that provision should be made for soft landscaping and, in the case of larger spaces, public toilets and refreshment facilities. NE consider that provision should be made for publicly accessible semi-natural habitats.

#### Climate Change, Energy and Air Quality (Questions 17a-c)

##### **Flood Risk**

KCC consider that policies should reflect the government's recent Climate Change Risk Assessment and the forthcoming National Adaptation Plan.

The EA states that Dartford's SFRA should be updated to include their modelling updates. They also consider that there is a need to give greater resilience and protection to existing drainage infrastructure and flood defences, including setting development back from them, and to take account of measures in the TE2100 Plan.

Some statutory bodies recognise that that flood risk can be reduced by working with natural processes, using green infrastructure (including trees) and SUDS. KCC consider that policies should reflect changes that have occurred in respect of the way SUDS are delivered in line with their policy statement. Thames Water also consider that reference should be made to the Dartford Surface Water Management Plan.

##### **Water Resources**

Water companies want policies which promote the efficient and sustainable use of water resources and prevent development which would lead to a deterioration in the quality and yield of ground and surface water. They are also keen to ensure that new development does not result in sensitive receptors being introduced to areas where they may be affected by existing land uses (policy DP5). EDC comment that policies should support water sensitive design and sustainable water management.

##### **Emissions/Air Quality**

Respondents comment that policies should support modal shift by ensuring convenient access to public transport and safe/accessible pedestrian and cycle routes/facilities as well as supporting the use of the River Thames for transport. Natural England suggest that a green infrastructure strategy should be produced. A number of statutory and local bodies consider

that there should also be a requirement for new development to make provision for electric vehicles and charging points,

Some respondents recognise that air pollution is an issue in the Borough and this should be considered when planning for future development in the Borough. KCC specifically refers to the government's Clean Growth Strategy and 'Road to Zero' consultation

The land use strategy can reduce emissions by locating residential close to employment areas and/or public transport.

## **Energy/Technology**

Statutory and local bodies respond that planning policies should support broadband/high speed internet provision and encourage the use of green, brown and blue roofs, solar panels and rain water collection. EDC consider that the references to the Code for Sustainable Homes should be updated to allow the application of future nearest equivalent standards.

### Design and Conservation (Questions 18a-b)

In terms of heritage, Historic England suggest that the Local Plan needs to consider how the historic environment can assist in the delivery of wider objectives as well as how new development can contribute to local distinctiveness and the conservation/enhancement of heritage assets. There is also the suggestion that masterplans or design briefs should be produced and that all documents should refer to the Borough's heritage/character. Local bodies recognise the need for development to reflect local heritage, including the application of existing policies DP12 and DP13. Historic England/KCC and the EDC go further by respectively suggesting that a heritage strategy or SPD should be developed and the Ebbsfleet Character Study should be expanded to cover the Borough. NE refer to the need to address connections between people and places and to integrate new development into the natural, built and historic environment. KCC refer to a project involving volunteers from the Kent Gardens Trust reviewing the heritage significance of gardens.

Statutory bodies have put forward a significant list of suggestions which need to be considered to ensure good design, largely reflecting their areas of focus. These include: green infrastructure; heritage; sustainable drainage systems; and the riverside environment. KCC consider that further design guidance should be produced which uses examples and covers a number of topic areas. The EDC considers that the Plan should consider:

- tall buildings;
- public realm;
- public open space;
- private amenity space; and
- Building for Life 12

## Section D: Main Areas and Types of Future Development

### Pattern of Development (Question 19)

There is significant support for **the locations identified in the Core Strategy** from statutory and local bodies as well as the developers of sites identified within the current plan. Natural England considers that sites with the least environmental impact should be progressed to deliver sustainable development.

Developers with an interest in other sites consider that the plan should: recognise the role of non-strategic previously developed sites; allow for the development of suitable windfall sites that are well related to the priority areas; and/or provide a more even distribution of housing across the Borough including sites at villages south of the A2.

### Stone, Greenhithe, Swanscombe and Thames Riverside (Questions 20-23)

#### **Ebbfleet to Stone Priority Area**

See also the comments set out in the relevant sub-sections below.

Local bodies have made a number of comments. They consider that policies need to recognise that this may no longer be a single area, there should be prioritisation of health services rather than residential development and the early provision of public transport should be required.

#### **Stone and Greenhithe Former Landfill Sites**

In relation to former landfill sites, statutory bodies state that consideration should be given to comprehensive restoration, ecological and landscape value, and opportunities for green infrastructure. Similarly, a number of local bodies refer to their potential for recreational use but safety issues are also raised. A developer submits that they are suitable for residential led redevelopment which can provide housing and bring community benefits.

There is general support from local bodies for these sites to provide public benefits/access though Natural England consider that this should be part of a wider green infrastructure strategy.

There are concerns from local bodies that redevelopment of landfill sites could increase pressures on infrastructure, lead to the loss of green space/gaps, adversely impact on the character of the area and exacerbate poor air quality.

#### **Swanscombe Regeneration**

The EDC considers that the regeneration in Swanscombe could be supported by reinforcing connections between **Swanscombe and Ebbfleet Central**, whilst Natural England recognises the importance of securing the long term management of the Swanscombe Skull Site NNR. The Town Council recognises that there are parking issues and raises the issue of funding availability.

#### **Thames Waterfront Priority Area**

Stone Parish Council considers that any development should be **mixed use**, include facilities and maximise access to public transport. In addition, the appearance of the industrial area should be improved and there should be new links north/south of the railway line.

Some developers state that the policy and diagrams should be **updated** to reflect development undertaken since 2011. One supports existing policies which promote redevelopment on the proviso that they remain flexible given the presence of complex brownfield sites.

A number of respondents consider that the policy should support river transport and the use of the River Thames though Natural England point out that there is a need to ensure that there are no impacts on coastal designated sites. The relationship between the waterfront and Dartford Creek with regard to river use, leisure provision, public realm and amenity needs to be taken into account.

The PLA wants the references to wharves, the need for a study on cargo handling viability where sites are proposed for redevelopment and the encouragement of proposals which incorporate sustainable river transport uses using the wharves in policy CS6 to be retained. The policy should be updated to refer to the Kent Minerals and Waste Local Plan 2016.

In relation to the former Littlebrook Power Station, the future role of the site needs to be clarified. The landowner suggests that the whole of the site should be shown as a key development site suitable for new employment floorspace.

There are references to London Resort/Swanscombe Peninsula which are addressed in the section below.

#### Ebbsfleet Garden City (Questions 24a-c)

The EDC consider that the Ebbsfleet policy approach should support the principles and aspirations set out in the **Ebbsfleet Implementation Framework** and require development to reflect the site's character as set out in the Character Study. GBC consider that the Garden City principles should extend beyond the EDC's area to ensure that existing adjoining communities benefit from the public investment being made.

Thurrock Council comment that Ebbsfleet should contribute as much as possible to meeting development needs. Comments are also made in relation to the importance of a high quality public realm, environmental issues, technology and the potential for a heritage/cultural centre.

#### **Swanscombe Peninsula**

Local bodies have concerns about the impacts of the potential London Resort theme park on the local area, businesses and development of Ebbsfleet Central whilst the GLA require any significant retail/leisure development to consider impacts on London's centres.

A number of statutory bodies recognise the **uncertainties** regarding the potential London Resort theme park and KCC suggest a specific policy for Swanscombe Peninsula which reflects the emerging proposal for London Resort and prospective alternative development if this does not come forward. The EDC consider that a policy could support a mixed use development subject to overcoming constraints (including ecological value), integrating with the surrounding area and maximising the use of river based transport.

The potential developer asserts that London Resort is a fundamental part of growth at Swanscombe Peninsula and the plan should emphasise its importance to the regeneration of the area, its benefits to the local economy/jobs, improvements to roads/infrastructure, and an enhanced green network.

## **Ebbsfleet Central**

There is **uncertainty over what will be delivered**. The EDC recognise that the extant permission has not fully come forward due to viability issues but state that the landowner is exploring options within the parameters of the consent. Policy CS5 provides a strong starting point though reference should be made to the Implementation Framework including the aspiration for a mixed and vibrant community supporting Ebbsfleet as an economic destination and enhancing connectivity including a pedestrian connection between Ebbsfleet and Northfleet stations

KCC consider that policy should allow for **higher density development** and an intensification of uses on the site including a Centre of Excellence for Healthcare, further education provision and/or a major leisure/cultural attraction. The EDC also refer to the potential to provide a medical campus at Ebbsfleet. The CCG make reference to the delivery of high order community/ cultural facilities, residential and major economic development on the site.

The landowner states that the Ebbsfleet permission is still live, could be brought forward and should not be considered for alternative infrastructure use. Whilst they support sustainable, high quality development of the site, they would like a flexible policy position which allows for a residential led development with 4,000 homes anticipated as part of the Garden City.

## **Other Sites**

KCC recognise that other sites are limited by environmental/ecological **constraints** and issues of contaminated land though a number of statutory bodies consider that there may be opportunities for these to be developed for green infrastructure, e.g. former landfill site north west of Ebbsfleet Station, Craylands Gorge, Swanscombe Heritage Park.

KCC consider that there is possible potential for the redevelopment of Manor Way Business Park in conjunction with redevelopment of Northfleet Industrial Estate in Gravesham if an alternative route to relieve the A226 over HS1 were to be delivered

The plan should include a vision for Bean Triangle, which is subject to an environmental improvement scheme commissioned by the EDC. This should recognise the need to protect the ancient woodland. Bean Residents' Association consider that if Ightham Cottages are demolished, these should be rebuilt close to their current location and considered as a rural exception site.

## Green Belt (Questions 27a-b)

There is support for the **protection** of the Green Belt and the current strategy from a number of statutory and local bodies. This is in accordance with national planning policy.

Bean RA want to see the Green Belt protected, with specific reference to Bean Triangle and Beacon Wood Country Park. They also consider that only replacement dwellings should be allowed and that no new traveller sites should be allowed adjacent to villages.

A number of developers state that a Green Belt **review** should be carried out.

## Local Priorities (Questions 28a-c)

### **Area Needs**

Some respondents have referred to the need to protect/improve community facilities and infrastructure e.g. **cycling** links. Stone PC and Bean RA make specific reference to safe

walking/cycling routes for children and others in their areas whilst the Dartford and Crayford Creek Restoration Trust refer to improved mooring provision, navigability and environmental improvements at Dartford Creek.

Some developers refer to the support that housing/employment development in the rural area can give to rural communities and meeting local housing needs. One claims that the employment generating uses in Sutton at Hone, Hawley and South Darenth are greater than shown in the area profiles.

Bean RA comment on the need for the Bean and Darenth Area Profile to separate the statistics for Bean and investigate the reason for lower life expectancy.

### **Small or Brownfield Sites**

Some developers have put forward small or brownfield sites for potential development. The tables in the Annex contain lists of sites in which developers have expressed an interest.

The Dartford and Crayford Creek Restoration Trust has suggested that the Bus Garage or Steam Crane Wharf could be used for employment and community use related to its riverside location.

KCC consider that the level of new housing that could be sustained should be informed by information on schools.

### **Specialist and Alternative Sources of Housing**

KCC consider that developments for vulnerable adults should be located in areas with good transport links and close to community facilities. Swanscombe and Greenhithe TC would like to see specialist and alternative sources of housing located in all locations to create vibrant, mixed communities. Developers put forward options which support the potential development of their sites including: provision on brownfield or other suitable land in sustainable locations with low environmental value; adjacent to transport hubs and within 800/400m of local services; and where the needs arise rather than relying on strategic allocation sites.

Stone PC raise the issue of affordability for aspiring owners in their parish and the fact that housing stock does not often provide effective downsizing opportunities. A degree of parish housing priority would help address this issue.

A few sites have been put forward as suitable for specialist residential needs and alternative sources of housing. These are included in the tables in the Annex. Bean RA suggests that Branton's Brickfield Bean could be treated as a rural exception site suitable for the rebuilding of Ightham Cottages.



**Annex: Land submitted through Local Plan consultations and subsequently**

Land promoted by developers/ interested parties through the Local Plan consultation (not requested for Strategic Housing Land Availability Assessment 'SHLAA' consideration):

<b>Name of site</b>	<b>Nature of submission</b>
Blackshole Farm, Watling Street	Mixed use proposal.
Swanscombe Peninsula, London Resort	Tourism/ leisure led proposal.
Croxton & Garry site, Tiltman Avenue	Existing residential permission- subject S106.
Top Dartford Road	Residential proposal.

Local Plan representations potentially relating to land submitted to the SHLAA:

<b>Name of site</b>	<b>SHLAA ref.</b>
Highfield Farm, Betsham Road	186
Birchwood Park Golf Centre, Wilmington	196
Bluewater*	-
West of Darenth Road*	-
Land surrounding Ebbsfleet Station	1
Edwin Road, Wilmington	201
1-11 Ightham Cottages/Branton's Brickfield, Bean	176
North of Elizabeth Street, Stone	189
Clock House, West of Green Street Green Road	191
Malt House Farm, Green Street Green Road	61
West of Green Street Green Road and North of Gill's Road	192
Lords, Lane End and Manor Farm, North of Green Street Green Road	194
West of Hawley Road and North of Arnolds Lane, Hawley	163
Bybow Farm, south of Highfield Road, Wilmington	72
Former Heathside Nursery, Leyton Cross Road, Wilmington	47
Former Littlebrook Power Station, Dartford	180
Biffa Site, London Road, Greenhithe	34
East of Main Road, South of Keith Avenue, Sutton at Hone	66
West of Main Road, North of Chaplin Court, Sutton at Hone	67
Priory Shopping Centre, Dartford	212
North Kent College, Oakfield Lane, Wilmington	46
Park Corner Road, Betsham	115
Warrigal Farm, Sandbanks Hill, Green Street Green	188
School Lane, Bean	181
Ship Lane, Sutton at Hone	174
Rear of South Darenth Primary School, North of St Margaret's Road	193
St Margaret's Farm, St Margaret's Road, Darenth	59
North of Shellbank House, Shellbank Lane, Bean	187
North of Steele Avenue, Greenhithe*	-
The Whitings, Longfield	179
Westwood Farm, West of Westwood Road, East of Highcross Road	195

\* Late sites may be resubmitted at the next Local Plan consultation and may necessitate further SHLAA work after that stage.

Other land submitted late to the SHLAA (post Local Plan consultation):

<b>Name of site</b>
Barton Road, Sutton at Hone*
North of Main Road, Longfield*

\* Late sites may be resubmitted at the next Local Plan consultation and may necessitate further SHLAA work after that stage.

## Appendix 2: Preferred Options Consultation

### Appendix 2-1: Response Form: Hard and Electronic Copy Versions

#### Dartford Local Plan – Preferred Options Consultation 2020

## RESPONSE FORM

For office use only

Ref No:



Dartford Borough Council welcomes your comments on the Local Plan Preferred Options Consultation. Please ensure that you complete the Your Details section below and record your comments in the Your Response section overpage. If you wish to answer more than one question, please copy the Your Response section for this purpose.

By providing your details to comment on this consultation – held under The Town and Country Planning (Local Planning) (England) Regulations 2012 – you are **consenting** to us legitimately retaining your contact details for the purposes of Dartford planning policy consultations. Under Regulation 19, we have duties to inform certain consultees again when the Local Plan reaches Publication stage.

You may exercise your right under the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003 to unsubscribe from further communication from us by completing an electronic form or writing to us at the address below. The Planning Policy Privacy Notice at <https://www.dartford.gov.uk/privacy-statement> tells you what to expect when we collect personal information and who to contact if you have any concerns or questions about how we look after your personal information.

Local Plan representations cannot be kept confidential or be made anonymously, but contact details will not be published. All responses must be received by **midday on Friday 21 February 2020**.

Completed forms should be emailed to: [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or sent to: Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR

If you have any queries about this consultation, please contact the Planning Policy Team by emailing [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or by phoning 01322 343213.

### Your Details

Name	
Job Title (if applicable)	
Company/organisation name (if applicable)	
Client's name (if applicable)	
Postal address	
Email address	
Date	

**Dartford Local Plan – Preferred Options Consultation 2020**

# RESPONSE FORM

For office use only

Ref No:

## Your Response

Which question number are you responding to?

If it relates to Questions 2-7 (Main Plan Options), please state which option you prefer

If it relates to the other Questions, please state whether you support, conditionally support or object to the proposed approach

Please provide your explanation in the box below. This should include reference to any attachments you are including.

## Dartford Local Plan – Preferred Options Consultation 2020

# RESPONSE FORM

For office use only

Ref No:



Dartford Borough Council welcomes your comments on the Local Plan Preferred Options Consultation. Please ensure that you complete the Your Details section below and record your comments in the Your Response section overpage.

By providing your details to comment on this consultation – held under The Town and Country Planning (Local Planning) (England) Regulations 2012 – you are **consenting** to us legitimately retaining your contact details for the purposes of Dartford planning policy consultations. Under Regulation 19, we have duties to inform certain consultees again when the Local Plan reaches Publication stage.

You may exercise your right under the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003 to unsubscribe from further communication from us by completing this [electronic form](#) or writing to us at the address below. The Planning Policy Privacy Notice at <https://www.dartford.gov.uk/privacy-statement> tells you what to expect when we collect personal information and who to contact if you have any concerns or questions about how we look after your personal information.

Local Plan representations cannot be kept confidential or be made anonymously, but contact details will not be published. All responses must be received by **midday on Friday 21 February 2020**.

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If you have any queries about this consultation, please contact the Planning Policy Team by emailing [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or by phoning 01322 343213.

### Your Details

Name	
Job Title (if applicable)	
Company/organisation name (if applicable)	
Client's name (if applicable)	
Postal address	
Email address	
Date	

## Dartford Local Plan – Preferred Options Consultation 2020

# RESPONSE FORM

For office use only

Ref No:

## Your Response

**Question 1 – Do you support the proposed Vision and Strategic Objectives? If not, how do they need refining and why?**

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

**Question 2 – For Main Plan Options 1, which option do you prefer, and why?**

Option 1A	<input type="checkbox"/>	Option 1B	<input type="checkbox"/>	Option 1C	<input type="checkbox"/>
-----------	--------------------------	-----------	--------------------------	-----------	--------------------------

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

**Question 3 – For Main Plan Options 2, which option do you prefer, and why?**

Option 2A	<input type="checkbox"/>	Option 2B	<input type="checkbox"/>	Option 2C	<input type="checkbox"/>
-----------	--------------------------	-----------	--------------------------	-----------	--------------------------

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

**Question 4 – For Main Plan Options 3, which option do you prefer, and why?**

Option 3A	<input type="checkbox"/>	Option 3B	<input type="checkbox"/>	Option 3C	<input type="checkbox"/>
-----------	--------------------------	-----------	--------------------------	-----------	--------------------------

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

**Question 5 – For Main Plan Options 4, which option do you prefer, and why?**

Option 4A	<input type="checkbox"/>	Option 4B	<input type="checkbox"/>	Option 4C	<input type="checkbox"/>
-----------	--------------------------	-----------	--------------------------	-----------	--------------------------

## Dartford Local Plan – Preferred Options Consultation 2020

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

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**Question 6 – For Main Plan Options 5, which option do you prefer, and why?**

Option 5A		Option 5B		Option 5C	
-----------	--	-----------	--	-----------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

**Question 7 – For Main Plan Options 6, which option do you prefer, and why?**

Option 6A		Option 6B		Option 6C	
-----------	--	-----------	--	-----------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

**Question 8 - Do you support the approach of:**

- focusing development on the two Priority Regeneration Centres of Dartford Town Centre and Ebbsfleet Garden City
- some brownfield development at sustainable locations in the rest of the urban area (where very well served by public transport) especially for community uses
- small scale brownfield development in the villages
- no strategic release of Green Belt land?

If not, what are the reasonable alternative options for the distribution of development and what evidence do you have to support this?

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

**Question 9 - Is the approach of planning for the provision of 797-865 homes per year appropriate or should an alternative upper figure be used? What evidence do you have to support the use of an alternative upper figure?**

797-865 homes		Alternative upper figure	
---------------	--	--------------------------	--

## Dartford Local Plan – Preferred Options Consultation 2020

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

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**Question 10 - Should any other major sites/broad location options (in addition to Ebbsfleet Central and Dartford Town) be shown as suitable for mixed use development? If so, why?**

Yes		No	
-----	--	----	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

**Question 11 - What are your views on the preferred approach to unplanned windfall housing proposals and why?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below.

--

**Question 12 - Do you have any comments on Dartford's continued involvement in exploring the potential of the Crossrail (Elizabeth Line) extension to the Borough, and what this may mean for broadening the public transport options and supporting further regeneration in the Borough?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

**Question 13 - What infrastructure (in addition to that set out in the current Infrastructure Delivery Plan) is necessary to support the delivery of development in the new Local Plan and how can land needed for this be secured? What evidence do you have to support this?**

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

## Dartford Local Plan – Preferred Options Consultation 2020

**Question 14 - Do you support the preferred policy approach and key development sites for Dartford Town Priority Regeneration Centre? If not, what are the reasonable alternative options and what evidence do you have to support this?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

**Question 15 - Do you support the preferred approach for retail and commercial leisure development, including for Bluewater and Dartford Town Centre? If not, what are the reasonable alternative options and what evidence do you have to support this?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

**Question 16 - Do you support the preferred approach to business premises and employment sites in the Borough, including the proposed strategic employment allocation and criteria for development at the former Littlebrook Power Station? If not, what are the reasonable alternative options at Littlebrook and elsewhere, and what evidence do you have to support this?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

**Question 17 - Do you support the preferred approach to protecting, enhancing and providing new public open spaces, the provision of private space, biodiversity and landscape? If not, what changes should be made and why?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.



## Dartford Local Plan – Preferred Options Consultation 2020

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**Question 18 - Do you support the preferred approach to renewable energy, water conservation and flood risk? If not, what alternative approach should be adopted and what evidence do you have to support this?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

**Question 19 - Do you support the preferred approach for thresholds, percentages and tenures of affordable housing provision? If not, please set out an alternative option and explain your reasons.**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

**Question 20 - Do you support the preferred approach to accessible/adaptable and wheelchair user homes and minimum space standards in Dartford? If not, what reasonable alternative option should be adopted and what evidence do you have to support this?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

**Question 21 - Do you support Dartford's preferred approach to the mix of development on sites? If not, what alternative option should be adopted and what evidence do you have to support this?**

Support		Conditionally Support		Object	
---------	--	-----------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

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## Dartford Local Plan – Preferred Options Consultation 2020

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**Question 22 - What do you think Dartford's preferred approach should be to the density of development on sites and what evidence do you have to support this?**

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

**Question 23 - In terms of gypsies, travellers and travelling show-people:**

- Do you support the preferred approach towards identifying deliverable sites to meet needs over the next 5 years? If not, please set out an alternative way that this could be carried out.
- What are your views on the potential sources of sites? Are there any alternative sources or specific sites that we should consider as an option?
- Do you have any views on the proposed changes to the existing criteria based policy?

Support		Conditionally Support		Object	
---------	--	--------------------------	--	--------	--

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

**Question 24 - Do any of these current policies need significant updating? If so, how and why should they be updated?**

Please provide an explanation for your response in the box below. This should include reference to any attachments you are including.

--

Appendix 2-2: Bulletin

# DARTFORD BOROUGH COUNCIL Planning Policy Bulletin

2019/2020



## INTRODUCTION

**We are in the key central phase of the series of public consultations that lead to a new Dartford Local Plan. The news is Dartford is after your views in January/ February 2020, consulting on our 'Preferred Options' ideas.**

This Bulletin by officers of Dartford Borough Council explaining what the Local Plan consultation is all about and how you can respond to this consultation. It includes some Frequently Asked Questions as well as information about the timetable and stages in the Local Plan process.

We have also included some updates on the Strategic Issues consultation which we carried out last year and some other documents that have been completed, updated or approved since our last Bulletin was published last year.

The Bulletin is intended as a non-technical user-friendly guide. It is not a formal document. Please contact the Planning Policy Team with any queries. Our contact details can be found on page 4. We would welcome feedback on this Bulletin.

### INSIDE THIS ISSUE

Introduction .....	1
Future Policy – Get Involved ...	2
Future Policy – FAQs .....	3
Updates .....	4
Contact us.....	4

### SPECIAL POINTS OF INTEREST

- We are about to carry out a Preferred Options consultation on our New Local Plan
- We have produced a draft Strategic Housing Land Availability Assessment
- There is funding to develop the business case for improving transport links from Abbey Wood to Ebbsfleet



## GET INVOLVED IN 'PREFERRED OPTIONS'

We are working on our **new Local Plan**. This will set out the overall approach to development in the Borough to 2036, including major development locations, the amount and type of housing, Green Belt protection and the approach to jobs and shops. It can help to ensure that local priorities remain relevant and up to date as national policy changes.

The new Local Plan will **replace our existing Core Strategy 2011 and Development Policies Plan 2017**. It will include a mix of new policies and retained approaches from the current Plans.

We received a number of comments on the **Strategic Issues** consultation that we carried out in June/July 2018. Most respondents supported continuing to focus new development in the north of the Borough to protect the Green Belt and support the regeneration of the urban area, including Dartford Town Centre. The need to plan for a range of transport improvements (highways, public transport, walking/cycling) was also highlighted as an issue that needs to be addressed.

We will be carrying out a public consultation on a 'Preferred Options' stage document from 10 January 2020 to 21 February 2020.

The purpose of this consultation will be to:

- Consider preferred option for strategic issues and sites against the alternative approaches (including Dartford Town Centre, Ebbsfleet Central and Swanscombe Peninsula).
- Outline preferred approaches for policies on topic areas including the pattern of development, housing, retail and employment.
- Set out whether existing policies will be retained or replaced.

**We look forward to seeing you for a chat at our explanatory 'drop in' events:**

- **Wednesday 29 January** 3-7pm, Dartford Civic Centre
- **Monday 3 February** 3-7pm at Ebbsfleet International Station
- **Tuesday 4 February** 2-5.30pm, Orchards Shopping Centre

Formal comments should be made in writing. See:

[www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

A hard copy will be available for inspection at Dartford Civic Centre and Dartford Library.

**This will be your chance to tell us what you think and help shape the long-term planning strategy for your Borough. Please consider all parts of the document of interest and let us know your views in writing.**

The **FAQs** on page 3 give further information on how you will be able to comment, what will happen next and other documents that will be available to support our work on the Local Plan.



*We are carrying out a public consultation from 10 January 2020 to 21 February 2020. Come and find out more at one of our 'drop in' events*



## HOW TO HAVE YOUR SAY— ‘FAQS’

### *How will I be able to comment on the Preferred Options document?*

Response forms will be available at:

- [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)
- Dartford Civic Centre and Dartford Library
- By emailing us at [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk)

**The form should be returned to us by midday on 21 February 2020 by:**

- Emailing it to [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk)
- Posting it to Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR

### *What will happen with my comments?*

The responses we receive to this consultation will help us to prepare our publication Local Plan. There will be a consultation on this in mid 2020 before our proposed new Local Plan is submitted for examination by an independent inspector in late 2020. We will need to produce a consultation statement which shows how we have consulted on our Plan and how we have taken account of the responses received. Further information on the Local Plan stages can be found on page 4.

### *How have you taken into account my previous comments?*

Yes. Key points from the last consultation are summarised within the current Preferred Options document. The local evidence includes the responses received on the Strategic Issues consultation.

### *Where will I be able to see the Preferred Options document?*

You will be able to view the document online at: [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

Hard copy versions will be available to view at Dartford Civic Centre and Dartford Library.

### *What other documents have you produced to support the Preferred Options document?*

Evidence documents support our Preferred Options consultation. These include an overall (Sustainability) Appraisal, plus a draft Strategic Housing Land Availability Assessment, a Gypsy and Traveller Accommodation Assessment, a Residential Needs Assessment, and information on other topics e.g. commercial development.

These documents will be available to view online at:

[www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

### *Will you be producing any further evidence?*

Technical evidence required for the Plan is extensive: covering environmental, economic and social aspect of sustainable development. Further documents will be available when we consult on our publication Local Plan in mid 2020, including, a Transport Assessment, a Strategic Flood Risk Assessment and a Viability Study.

## PROGRESS UPDATES

Following the **Thames Estuary 2050 Growth Commission** report, the government made a number of commitments for the Thames Estuary in March 2019. This included an announcement of £4.85 million to support local partners in developing the business case for enhancing transport links through the urban part of the Borough (to Ebbsfleet). Visit: <https://www.e2ecampaign.com/>

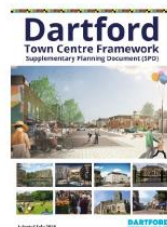
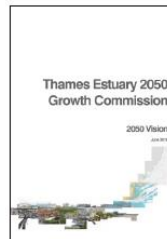
The government issued a new **National Planning Policy Framework** and the latest version was published in February 2019. A key change was the introduction of a standard method to use to calculate how many new homes we need to provide in Dartford in the future.

Dartford has published its new **Five Year Housing Land Supply** statement of sites that will be built, required under national policies. This is essential to keeping decision taking at a local level when planning applications are received: ensuring that our Local Plan policies can be fully applied. Many other councils in Kent struggle to retain an effective Five Year supply.

The **Dartford Town Centre Framework** was adopted as a Supplementary Planning Document in July 2018. This is helping us shape the town centre when making decisions on planning applications.

We have produced a **draft Strategic Housing Land Availability Assessment**. The document indicates land that does and does not meet tests to suitably come forward for housing five new houses or more in the next 5 years (deliverable) and longer term (developable). This will be refined after consultation.

Also see updates of the **Brownfield Land Register** (avoiding greenfield housing sites), and **Authority Monitoring Report** reviewing Local Plan performance for a range of topics.



### Local Plan Stages

Strategic Issues Consultation  
Summer 2018

Preferred Options Consultation -  
Current Stage

Publication (Final Consultation)  
Mid 2020

Submit to Secretary of State  
Late 2020

Examination by Independent Inspector

Potential Modifications

Adoption Expected 2021

### Contact Us

[www.dartford.gov.uk/  
policyconsultation](http://www.dartford.gov.uk/policyconsultation)

[localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk)

Appendix 2-3: Specific Consultees

Coal Authority  
Environment Agency  
Historic England  
Highways England  
Natural England  
Marine Management Organisation  
Network Rail

Ebbsfleet Development Corporation  
Kent County Council  
Kent Police  
Gravesham Borough Council  
Greater London Authority/ Mayor of London/ Transport for London  
London Borough of Bexley  
Sevenoaks District Council  
Thurrock Council

Bean Parish Council  
Darenth Parish Council  
Longfield and New Barn Parish Council  
Southfleet Parish Council  
Stone Parish Council  
Sutton at Hone and Hawley Parish Council  
Swanscombe and Greenhithe Town Council  
Wilmington Parish Council

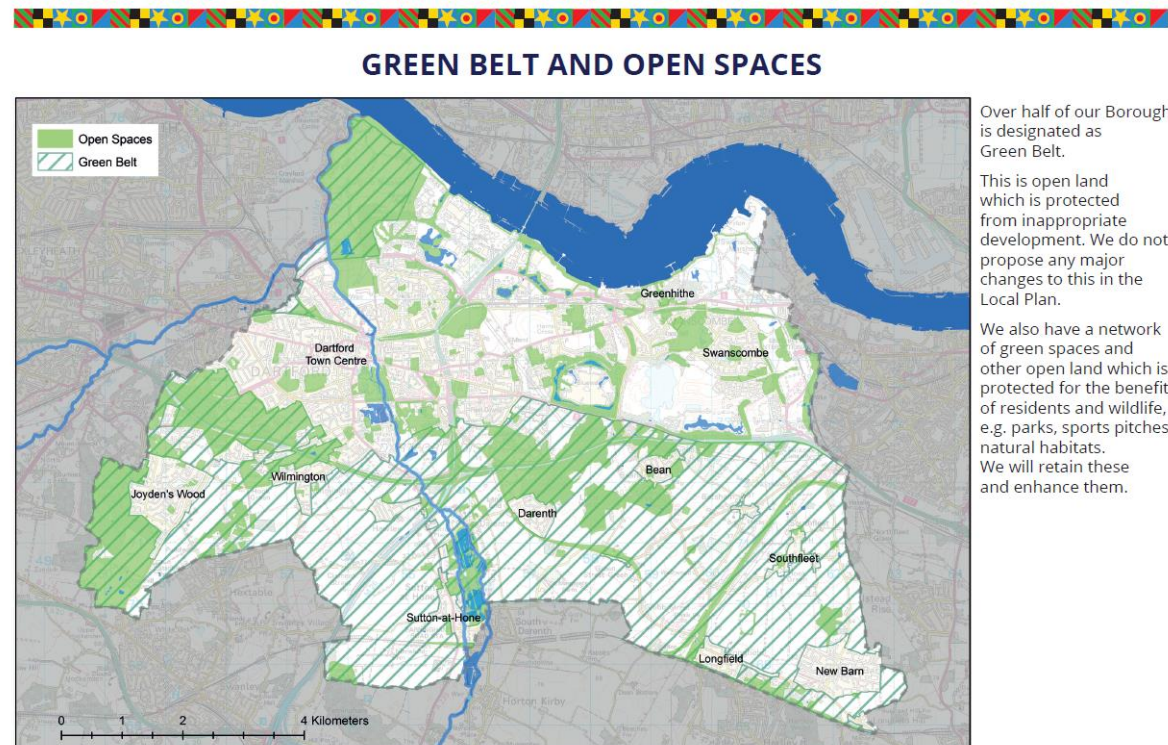
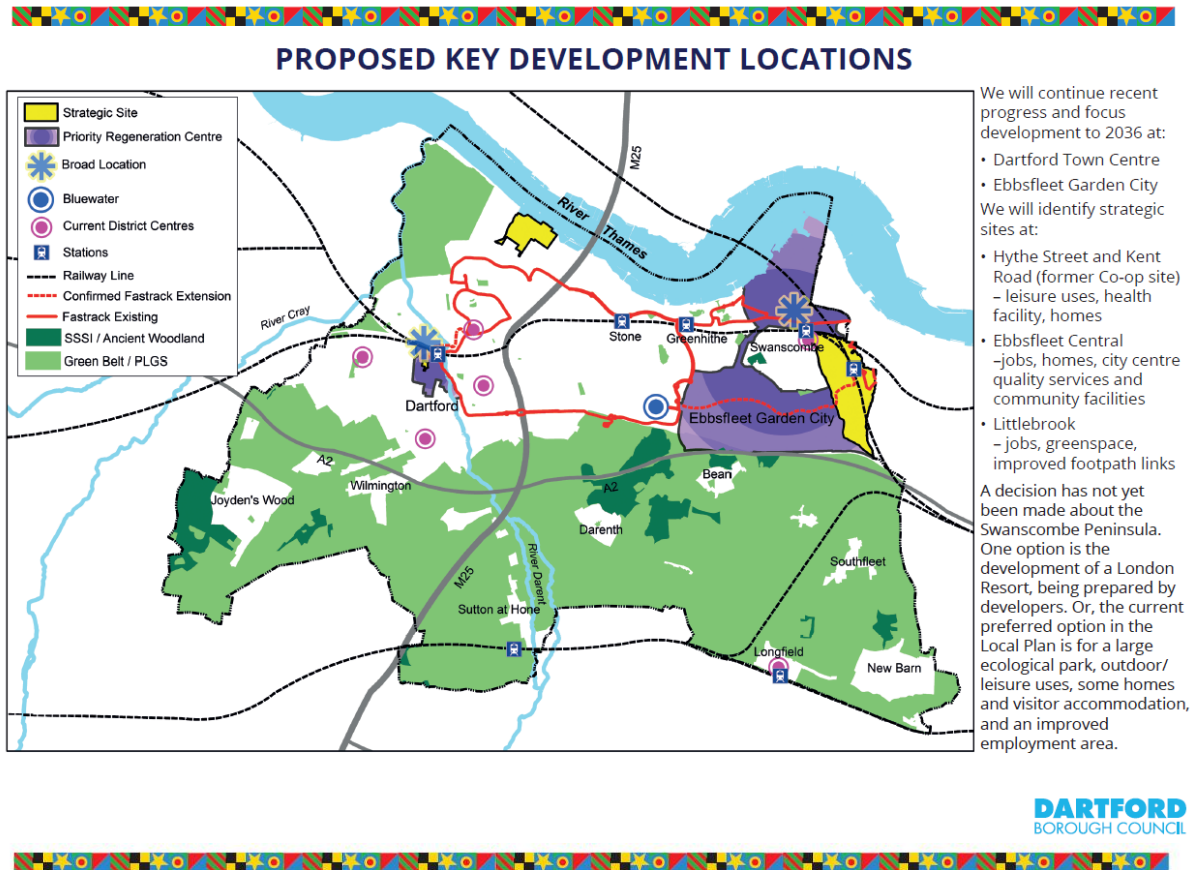
Fawkham Parish Council  
Hartley Parish Council  
Horton Kirby and South Darenth Parish Council  
Meopham Parish Council  
Swanley Town Council

South East Water  
Southern Water  
Thames Water

Mobile UK  
National Grid  
UK Power Networks  
BT  
Dartford, Gravesham and Swanley Clinical Commissioning Group  
NHS West Kent CCG Primary Care  
Scotia Gas Network  
Scottish Power  
Southern Electric

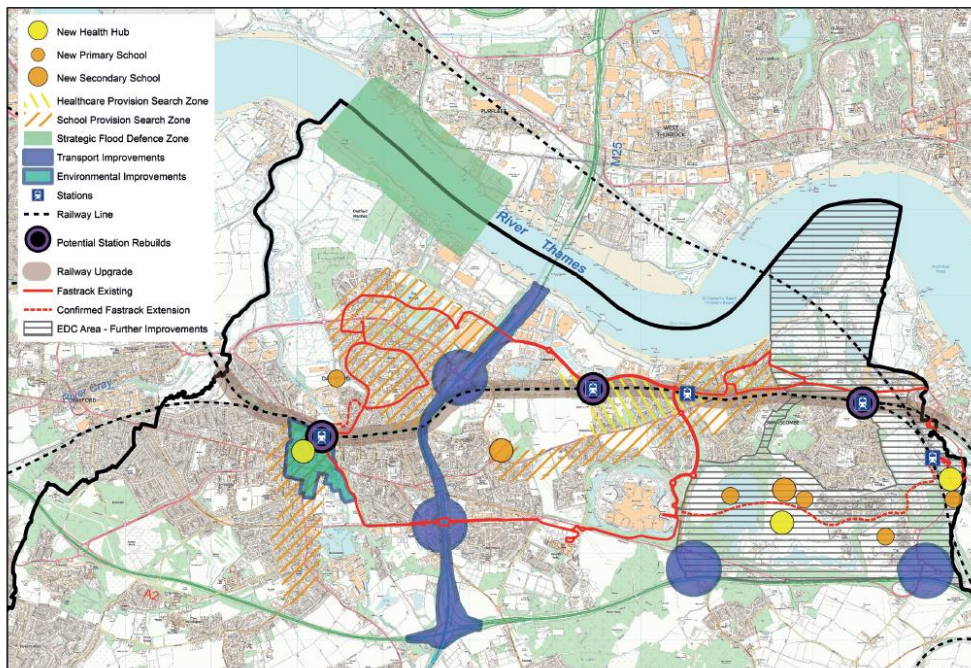


## Appendix 2-4: Display Boards





## PLANNED INFRASTRUCTURE



It is important that new development is supported by new and improved infrastructure for residents.

Some new schools have already been built but we know that there is a need for more schools.

There are also some new health hubs in the pipeline – in Dartford Town Centre, at Stone/ Greenhithe and Ebbsfleet Garden City.

We support plans to extend the Fastrack bus service and to improve road junctions.

We also seek to improve walking and cycling routes. In the longer term, there may be an opportunity to improve some of our railway stations and rail services.

**DARTFORD**  
BOROUGH COUNCIL

## HAVE YOUR SAY ON DARTFORD'S LOCAL PLAN?

The Council wants as many people as possible to have their say on a new Local Plan.

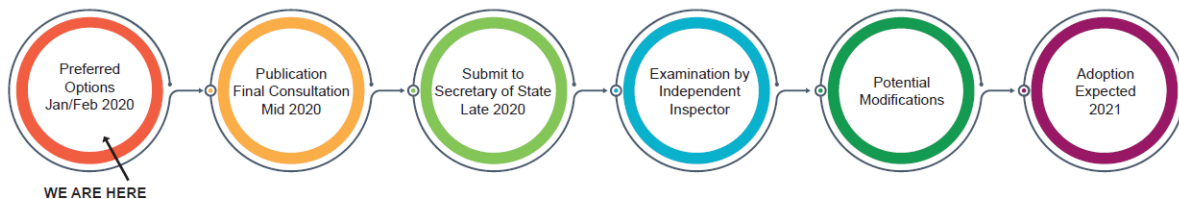
The Local Plan will decide where we target future investment in the borough and manage the growth pressures on our communities.

Your views will help guide key planning and infrastructure decisions until 2036.

Our plans are about creating a Dartford where people are proud to live, work and call home. Our plans need to meet the challenge posed by a growth community while ensuring our open spaces and green belt are preserved.

We will take your views into account before preparing the final Plan

**Please do let us know what you think and speak with our Planning Officers if you have any questions.**



## HOW CAN I GET INVOLVED?

If you wish to comment, please complete a form and return this to [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR. Please return the form by **Midday on Friday 21<sup>st</sup> February 2020**.

**DARTFORD**  
BOROUGH COUNCIL

## Appendix 2-5: Flyers



### Where growth should happen (and where it shouldn't)

To safeguard the wider community, the Local Plan proposes a renewed focus on regeneration at Dartford Town Centre and Ebbsfleet Garden City.

Most development will take place in these 'Priority Regeneration Centres' where much development has already been approved and will continue to be built out over the lifetime of the new Plan. There is no Green Belt release planned for new housing.

In other parts of the urban area, the focus will be on consolidating improvements to social infrastructure. Some limited development of brownfield sites in these areas may be allowed where they are well served by public transport and particularly where they support improvements to infrastructure and the local environment.

The Plan details proposals for three specific major 'strategic sites':

- Ebbsfleet Central - mixed uses
- Dartford Town Centre (Hythe Street/Kent Road) - mixed uses
- Littlebrook Power Station - employment

This land would be allocated for major new facilities, jobs or homes; and development and infrastructure to improve the local environment.

Please respond by midday on 21 February 2020 using the online form on the Local Plan Review link at [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

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BOROUGH COUNCIL

Dartford's New Local Plan – Consultation



### Transport

Fastrack provides high frequency bus services alongside traditional bus routes. We support improvements to both to ensure the services are not disrupted by local congestion. The extension of Fastrack is planned to expand its coverage, for instance by constructing a direct tunnel link between Bluewater's bus station and Ebbsfleet Garden City.

To produce an attractive new way of travelling, a local partnership is exploring the long-term, potential of an extension of Crossrail (the Elizabeth Line) from its current terminus at Abbey Wood. This has the potential to improve the frequency and capacity of train services and to support further regeneration.

We are keen to encourage more walking, cycling and environmentally responsible transport in the borough. Our proposal is to work closely with stakeholders and user groups to create safer networks.

We have to be realistic about local car use and how we manage our local road network. Improvements will therefore occur to main roads in the Borough. There are planned upgrades to the A2 junctions at Bean and Ebbsfleet but there are further opportunities for improvements to junctions on the M25/ A282 tunnel approach road.

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Dartford's New Local Plan – Consultation



### Schools, Health and other supporting Infrastructure

We know that residents are concerned to ensure that schools, GP surgeries and other community facilities are provided alongside new housing development. That is why it is a core principle of our current Local Plan.

A number of new primary and secondary schools have recently opened, including River Mill and Cherry Orchard Primary Schools and Stone Lodge Secondary School. Many school extensions have also been provided in the Borough.

We have worked closely with the organisations which provide these new facilities, including the NHS and Kent County Council, by helping to plan for future requirements, identifying sites and providing funding assistance through our development contributions.

We propose to keep a focus on providing new infrastructure in good time to meet the demands from new development. We are already planning a new primary school in Stone and further schools in Ebbsfleet Garden City. New GP surgeries are being planned in Dartford Town Centre (at Hythe Street/ Kent Road site), Stone/Greenhithe and at Ebbsfleet Garden City. In future there may be a need for new schools to serve Dartford Town Centre, north Dartford and the Greenhithe area.

The new Local Plan identifies sites for the schools and health facilities we will need to help provide certainty for their delivery. We will make best use of the developer contributions we receive to bring forward these facilities at the right time.

Please respond by midday on 21 February 2020 using the online form on the Local Plan Review link at [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

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BOROUGH COUNCIL

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We fought hard to secure the delivery of a new Lower Thames Crossing, east of the Borough, and this will provide additional capacity and an alternative to the highly congested Dartford Crossing/ M25.

We are preparing an assessment to model the impacts of new development on the highway and to guide proposals for further improvements to the road network, including local improvements.

Please respond by midday on 21 February 2020 using the online form on the Local Plan Review link at [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

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BOROUGH COUNCIL

Dartford's New Local Plan – Consultation





### Green Space

We already have a huge commitment to a Borough-wide network of parks, playspaces, sports grounds, allotments, nature conservation areas and other open places. We now propose to strengthen the role of green spaces in the local environment by:

- Identifying opportunities for tree planting, helping to address climate change
- Encouraging the implementation of the England coast path along the River Thames
- Identifying new open spaces within major development sites
- Encouraging environmental improvement projects, for example in the Darent Valley.

We will continue to protect and enhance all key ecological sites, features, habitats and species. We propose to update our policy to require new developments to result in a net improvement to biodiversity. There will be a particular focus on this in Biodiversity Opportunity Areas where there are good opportunities for enhancement of wildlife and plants.

We already require new development to provide public and private green space as part of the development. We propose to strengthen the policy to make sure that the open space provided is of a good quality and useable.

Please respond by midday on 21 February 2020 using the online form on the Local Plan Review link at [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

**DARTFORD**  
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Dartford's New Local Plan – Consultation



### Housing

Dartford is building a sufficient amount of housing to provide for local needs. Our study looked at the type of homes that are needed for the future population.

To provide the right balance of homes that local people could afford, new developments should deliver 20% of homes as social or affordable rented homes and 15% as subsidised owner-occupied homes such as shared ownership. We are carrying out further work to test if this is achievable financially.

People are living longer and with more complex health and accommodation needs. We propose that all new homes will be built to accessible/ adaptable standards, with flexibility and space. We also wish to encourage the provision of wheelchair user homes within new developments.

Our study also specifically identified a need for 3 and 4 bedroom family homes and homes suitable for older people. We propose that some of these are provided in all larger developments.

The government demands that we build a minimum of 707 homes per year. To prevent inappropriate sprawl, we are focusing developments on major sites such as Ebbsfleet Garden City. To put this in context, 413 homes were built there last year which represents a huge part of our total target.

There is already much approved development, which may be built out faster than we expect.

Please respond by midday on 21 February 2020 using the online form on the Local Plan Review link at [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

**DARTFORD**  
BOROUGH COUNCIL

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### Dartford Town Centre

Work to improve Dartford Town Centre is now well underway. The Lowfield Street development is progressing, along with a micro-brewery and major enhancements to Market Street, other restaurants, shops and homes are also coming forward.

The Local Plan proposes the continued transformation of the town, encouraging sensitive development, particularly where this can add to the range of activities and convert underused shops and spaces for other purposes. New residential development as part of a wider mix of uses will increase expenditure, supporting local facilities and services.

New development will be expected to reflect the town's unique historic character. The scale of new buildings should be sensitive and complementary to adjoining existing buildings.

Plans will support new public spaces connected by green pedestrian routes, and linked with residential areas. This will create a high class environment which is attractive and safe for pedestrians, and which is easy to move around and enjoy. Regeneration is proposed at Hythe Street/ Kent Road (Former Co-op and Westgate car park site). The proposal is for:

- Leisure uses – cinema, food and drink, hotel
- Primary care health hub
- Homes
- Car parking

Opportunities for other brownfield redevelopment, which could enable the town centre to adapt to the nationally changing High Street context, will be explored for the Local Plan. For example, renewal of the Priory and/or Orchards Shopping Centre could bring a wider range of uses responding to local demands, providing better walking links and a higher quality environment.

Please respond by midday on 21 February 2020 using the online form on the Local Plan Review link at [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

**DARTFORD**  
BOROUGH COUNCIL

Dartford's New Local Plan – Consultation



### Swanscombe Peninsula

The Peninsula is a largely open area of low-lying marsh land located between Swanscombe and the River Thames on the eastern boundary of the Borough.

Parts of the site are heavily contaminated by previous industry and there are current employment uses centred around Manor Way and Lower Road. It is within the Ebbsfleet Garden City area boundary.

We are aware of proposals for an internationally important entertainment resort but we have a responsibility in our Local Plan to consider alternative uses. The creation of a resort at Swanscombe Peninsula would have many advantages, particularly for jobs, skills and local leisure provision, but we must ensure that the local transport infrastructure is protected and that any proposal benefits the wider community.

Whilst we wait for these proposals we have given consideration to other alternatives and our preferred option is for an extensive ecological park combined with a sensitively integrated, lower density mixed use development to the south of the site near existing commercial uses. This would include outdoor/ leisure uses with retention of local jobs and some development on previously developed parts of the site.

A further alternative is to not specify potential uses but to include a criteria based policy to deal with any proposals that may come forward.

Please respond by midday on 21 February 2020 using the online form on the Local Plan Review link at [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

**DARTFORD**  
BOROUGH COUNCIL

Dartford's New Local Plan – Consultation



### Ebbsfleet Central

Ebbsfleet Central is the area of land around Ebbsfleet International Station. This has long been agreed for large scale development and can meet a significant amount of Dartford's housing targets, focusing on the good public transport connections.

As the Ebbsfleet Central area grows, land uses will be reconfigured to balance the needs of the new community, including car parking.

We considered three options for the future use of the site:

- Option A: High Density Business District plus other uses, including residential
- Option B: Mixed, lively Urban Heart comprising employment, health, leisure, education, residential, restaurants/ bars and retail, potential for a centre of excellence for medical and education purposes.
- Option C: Residential-led Development

Our preferred option is Option B. It would provide: a focal centre of activity at the heart of the Garden City to complement Dartford and Gravesend Town Centres and Bluewater, major new public open spaces/ parks, and a transport hub (interchange between at Ebbsfleet International and Northfleet railway stations), Fastrack, buses, and enhanced walking and cycling connections.

Dartford's New Local Plan – Consultation



Local Plan Consultation

Options A and C have less of a range of uses. Under Option B, development would include:

- Over 3,000 dwellings, a sizeable chunk of our housing targets
- Approximately 30,000sq m of community uses
- Approximately 12,500sq m of retail space
- Approximately 100,000sq m of business space, mainly offices

Please respond by midday on 21 February 2020 using the online form on the Local Plan Review link at [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

Dartford's New Local Plan – Consultation



Appendix 2-6: Advert and Poster



# HAVE YOUR SAY ON DARTFORD'S NEW LOCAL PLAN

The Council wants as many people as possible to have their say on a new Local Plan.

The Local Plan will decide where we target future investment in the borough and manage the growth pressures on our communities. Your views will help guide key planning and infrastructure decisions until 2036.

## How can I get involved?

Find out more at our drop in events:

- **Wednesday 29 January 3-7pm:** Dartford Borough Council Civic Centre
- **Monday 3 February 3-7pm:** Ebbsfleet International Station
- **Tuesday 4 February 2-5.30pm:** The Orchards Shopping Centre

Alternatively, you can view our Preferred Options Local Plan consultation document at [www.dartford.gov.uk/policyconsultation](http://www.dartford.gov.uk/policyconsultation)

To share your comments please email [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or write to: Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, DA1 1DR by **midday on Friday 21 February 2020**.

If you have any queries about this consultation, please email [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or phone 01322 343213.

**DARTFORD**  
BOROUGH COUNCIL

## Appendix 2-7: Consultation Questions, Issues Raised and Council's Response

### Consultation Questions

Question 1. Do you support the proposed Vision and Strategic Objectives? If not, how do they need refining and why?

Questions 2. Which option do you prefer, and why? (relates to Pattern of development/ brownfield/ greenfield)

Question 3. Which option do you prefer, and why? (relates to Dartford Town Centre)

Question 4. Which option do you prefer, and why? (relates to Open Space/ Biodiversity Approach)

Question 5. Which option do you prefer, and why? (relates to Ebbsfleet Central)

Question 6. Which option do you prefer, and why? (relates to Swanscombe Peninsula)

Question 7. Which option do you prefer, and why? (relates to Transport Network)

Question 8. Do you support the approach of:

- focusing development on the two Priority Regeneration Centres of Dartford Town Centre and Ebbsfleet Garden City
- some brownfield development at sustainable locations in the rest of the urban area (where very well served by public transport) especially for community uses
- small scale brownfield development in the villages
- no strategic release of Green Belt land?

If not, what are the reasonable alternative options for the distribution of development and what evidence do you have to support this?

Question 9. Is the approach of planning for the provision of 797 – 865 homes per year appropriate or should an alternative upper figure be used? What evidence do you have to support the use of an alternative upper figure?

Question 10. Should any other major sites/broad location options (in addition to Ebbsfleet Central and Dartford Town) be shown as suitable for mixed use development? If so, why?

Question 11. What are your views on the preferred approach to unplanned windfall housing proposals and why?



Question 12. Do you have any comments on Dartford's continued involvement in exploring the potential of the Crossrail (Elizabeth Line) extension to the Borough, and what this may mean for broadening the public transport options and supporting further regeneration in the Borough?

Question 13. What infrastructure (in addition to that set out in the current Infrastructure Delivery Plan) is necessary to support the delivery of development in the new Local Plan and how can land needed for this be secured? What evidence do you have to support this?

Question 14. Do you support the preferred policy approach and key development sites for Dartford Town Priority Regeneration Centre? If not, what are the reasonable alternative options and what evidence do you have to support this?

Question 15. Do you support the preferred approach for retail and commercial leisure development, including for Bluewater and Dartford Town Centre? If not, what are the reasonable alternative options and what evidence do you have to support this?

Question 16. Do you support the preferred approach to business premises and employment sites in the Borough, including the proposed strategic employment allocation and criteria for development at the former Littlebrook Power Station? If not, what are the reasonable alternative options at Littlebrook and elsewhere, and what evidence do you have to support this?

Question 17: Do you support the preferred approach to protecting, enhancing and providing new public open spaces, the provision of private space, biodiversity and landscape? If not, what changes should be made and why?

Question 18: Do you support the preferred approach to renewable energy, water conservation and flood risk? If not, what alternative approach should be adopted and what evidence do you have to support this?

Question 19: Do you support the preferred approach for thresholds, percentages and tenures of affordable housing provision? If not, please set out an alternative option and explain your reasons.

Question 20: Do you support the preferred approach to accessible/adaptable and wheelchair user homes and minimum space standards in Dartford? If not, what reasonable alternative option should be adopted and what evidence do you have to support this?

Question 21: Do you support Dartford's preferred approach to the mix of development on sites? If not, what alternative option should be adopted and what evidence do you have to support this?

Question 22: What do you think Dartford's preferred approach should be to the density of development on sites and what evidence do you have to support this?

Question 23: In terms of gypsies, travellers and travelling showpeople:

- Do you support the preferred approach towards identifying deliverable sites to meet needs over the next 5 years? If not, please set out an alternative way that this could be carried out.
- What are your views on the potential sources of sites? Are there any alternative sources or specific sites that we should consider as an option?
- Do you have any views on the proposed changes to the existing criteria based policy?

Question 24. Do any of these current policies need significant updating? If so, how and why should they be updated?

**Pattern and Delivery of Development/ Housing Sites Questions 2, 8, 9, 10 and 11**

<b>Issue Raised</b>	<b>Council's Response</b>	<b>Respondent Name</b>
Brownfield land may not meet the Borough's housing target	The council has a track record of delivery on brownfield land. The housing trajectory shows sufficient sites to meet both the Borough's five and ten year supply. 88% of units in the trajectory, over the trajectory period, are on brownfield sites. The SHLAA sites have been reviewed to confirm that Dartford's housing target can be met.	Diocese of Rochester Burhill Developments Countryside Properties & Colyer Greenhithe Trust
Brownfield land is not defined and/or should include despoiled land e.g. Swanscombe peninsula	A definition has been inserted into the Local Plan glossary.  The potential for development within Swanscombe Peninsula has been considered and addressed through the SHLAA and the area chapter within the Local Plan.	National Grid Environment Agency Swanscombe Development LLP
Brownfield focus will restrict provision of necessary range of housing .e.g. too many flats due to viability issues of brownfield being able to deliver family homes. The Residential Needs Assessment demonstrates a need for 4+bed homes.	The focus on brownfield redevelopment follows national planning policy. Large developments are providing large volumes of family homes, e.g. at Ebbsfleet.  The Viability study has assessed a broad range of housing typologies and land types to demonstrate that mix of homes provided on brownfield land generally are viable.  Dartford has carefully reviewed policy M8 on housing mix, taking evidence findings into account, to ensure that a sufficient mix of housing types come forward.	South Darenth Farms and Cold Store Company Ltd Burhill Developments Ltd
Need to consider sustainably located greenfield sites.	The focus on brownfield redevelopment follows national planning policy and the Council can meet its housing needs largely on brownfield sites within the existing urban area. Greenfield land has not been precluded	Imperial Corporate Capital Plc Wrenbridge Land Ltd



Issue Raised	Council's Response	Respondent Name
	in criteria informing the identification of sustainable residential sites, as demonstrated in the current SHLAA methodology and update.	
Need to plan positively to redevelop brownfield sites in the Green Belt	The Council can meet its development needs primarily on brownfield sites in the urban area which is the most sustainable location. There is no need to release any strategic housing sites in the Green Belt to meet needs.	Hawley Garden Centre Bellway Homes Kitewood J Clubb Ltd
There is not provision for sustainable development of the southern part of the Borough including how housing needs such as for the ageing population, or affordable housing, will be addressed.	Dartford has carefully reviewed policy M8 on housing mix to ensure that a sufficient mix of housing types comes forward. Policy M7 seeks to ensure that affordable housing is provided to meet needs. The first policy (S1) identifies the principle of proportionate residential (or other) development within the villages, on non Green Belt land.	Bean Residents Association Cooper Estates Strategic Land Ltd Gravesham Borough Council Sutton at Hone & Hawley Parish Council William Chaplain Ltd Kitewood
More development in the south of the Borough is needed to support its shops and services	There is no evidence that development in the south of the Borough would ensure future service or shop provision and using this as a means to justify development would be contrary to national policy which seeks to direct development to more sustainable, urban locations and protect the Green Belt, and likely require very large scale urban development to have any impact.  Policies M18 (Community Uses) and M23 (District and Local Centres) should ensure that services and shops are protected.	Bean Residents Association Cooper Estates Strategic Land Ltd
Some Green Belt boundaries are inappropriately drawn against the purposes of the Green Belt	There is no clear evidence to suggest that the Green Belt boundaries are inappropriate and there are no exceptional circumstances to justify altering the Green Belt boundaries for residential development (NPPF paragraph 136)	Countryside Properties & Colyer Greenhithe Trust Berkeley Homes Kitewood CODE Development Planners Ltd
A more mixed portfolio of sites is needed for a steady, reliable, housing supply	There is a mix of size and types of sites proposed, with the focus being on sites in central Dartford and Ebbsfleet Garden City. The trajectory includes a broad range of sites including small sites. Policies seek a steady housing supply for example, which relates to the design and tenure mix of housing within sites, not just land availability.	Private Individual Kent County Council Countryside Properties & Colyer Greenhithe Trust

Issue Raised	Council's Response	Respondent Name
	Policy S4 (Borough Development Levels) should ensure a steady supply of deliverable sites for housing. Dartford has carefully reviewed policy M8 (Housing Mix) to ensure a sufficient mix of housing types come forward.	
Plan should not just rely on brownfield or urban land for employment delivery/ flexibility of economic strategy.	There is a healthy supply of employment land in the pipeline including some sustainable greenfield locations. Several of the identified employment areas are outside the urban area.	Wrenbridge Land Ltd William Chaplain Ltd CODE Development Planners Ltd
Allow all development land where it facilitates new public transport services	The Plan is focussed on ensuring that infrastructure can be unlocked and that a shift towards more sustainable travel can be realised over the plan period. It also does seek to ensure that development is located close to facilities and well served by public transport. Policy S2 (Infrastructure Planning Strategy) aims to facilitate upgrades to the public transport network and requires large and trip generating development to support public transport and facilitate new infrastructure.	Berkeley Homes Swanscombe Development LLP
Sustainability Appraisal does not consider potential growth options in the south of the Borough	Appropriate alternative options are considered. In accordance with national planning policy, the plan focusses development on brownfield land in the urban area to provide a sustainable pattern of development to continue regeneration. Development in the south of the Borough would require large scale release of Green Belt land and there are no exceptional circumstances to justify this.	Cooper Estates Strategic Land Ltd South Darenth Farms and Cold Store Company Ltd
Under provision of housing from other Boroughs should be directly considered. Proposed housing target is insufficient in meeting need from elsewhere	Dartford's housing target has been determined based on the standard methodology and national guidance on higher residential levels, regeneration capacity and objectives, the amount of deliverable and developable identified land informed by SHLAA, and consideration of national policy/guidance on meeting overall needs. Issue of unmet need in the wider area have been considered.  Dartford has participated extensively and directly in Duty to Cooperate discussions with local authorities and in the process set up by the Mayor London in relation to the London Plan.	National Grid Hawley Garden Centre Gravesham Borough Council Home Builders Federation Imperial Corporate Capital Plc Muse Developments Ltd PMG Regeneration Ltd Diocese of Rochester Countryside Properties & Colyer Greenhithe Trust

Issue Raised	Council's Response	Respondent Name
	<p>Dartford has carefully reviewed and updated the SHLAA and housing trajectory to continue to plan for regeneration and meet needs.</p> <p>Gravesham made a historic formal request for Dartford to absorb some of its need but a firm evidenced figure is not yet confirmed. A statement with Sevenoaks was signed without Dartford being expected to take its need, and its position is currently being clarified. No request for Dartford to take housing needs has been received from Greater London, but discussions are considering potential redistribution options with applicable parties. The agreement with Bexley is being updated and expanded. Dartford continues to progress with Statements of Common Grounds with neighbouring authorities and the Ebbsfleet Development Corporation.</p>	
The housing target should be a minimum above (with a buffer beyond) 797pa to ensure consistent delivery of at least that figure and competition, choice etc.	<p>The Local Housing Need has been calculated following the government's Standard Methodology. Together with further considerations, this has been used.</p> <p>A 10% buffer is built into the 5yr supply for these reasons. Sufficient development sites have been identified to show that Dartford can meet slightly more than the current Local Housing Need in line with the Dartford housing requirement.</p>	Home Builders Federation Burhill Developments Ltd Countryside Properties & Colyer Greenhithe Trust Kitewood
Expressing housing target as a range would be inappropriate	The housing target is not expressed as a range. Policy S4 (Borough Development Levels) sets out that new homes are required to be delivered at a rate of 790 per annum (on average), equating to 15,800 dwellings over the plan period.	Home Builders Federation J Clubb Ltd
The housing target must not limit delivery in sustainable areas (e.g. the town centre)	There are policies that allow flexibility for potential additional regeneration including housing at locations such as central Dartford. The total level of high quality and well served housing growth is not arbitrarily limited at highly sustainable locations.	Tristan Capital Partners Swanscombe Development LLP
Proposed housing target should be less than 797 per annum due infrastructure etc.	The Council would need exceptional circumstances to use and justify a figure lower than that derived from the standard method. Housing supply, including extant planning permissions, shows the Borough can achieve the current standard method figure in accordance with national	Bean Residents Association Swanscombe & Greenhithe Town Council

Issue Raised	Council's Response	Respondent Name
	policy. CIL will be collected and infrastructure is planned as set out in the Infrastructure Development Plan.	
A clear and positive policy for the London Resort is needed to ensure the regeneration of Swanscombe Peninsula and beyond	The Council has been closely monitoring the progress of the London Resort. Currently there is still uncertainty as to when/ whether/ how the development will come forward. The policy approach was drafted based on available evidence, and has provisions for changing circumstances.	Swanscombe Development LLP London Resort Company Holdings
Sites are needed for a Plan period to at least 2037	The plan period is from 2016/17 to 2036/37. Long-term and deliverable short term housing supply is in place to meet needs over the plan period.	Burhill Developments Ltd
Windfall policy should be more flexible south of the A2. Windfall proposed approach is not fully clear or well worded	This is not in accordance with the plan strategy. Policy M9 (Sustainable Housing Locations) applies to unidentified sites equally regardless of location with respect to the A2 and is intended to ensure all development can be delivered sustainably. It brings together two previous policies in the Core Strategy and Development Policies Plan and provides clarity of approach.	Sutton at Hone & Hawley Parish Council William Chaplain Ltd Simply Planning

### Town Centre and Retail Questions 3, 14 and 15

Issue Raised	Council's Response	Respondent Name
The right approach is necessary to high density development in the town centre	The approach set out in policy M1 (Good Design in Dartford) is design led and does not prescribe densities.  Sites within the Central Dartford have been reviewed to understand their indicative capacities, taking viability considerations into account, and the Central Dartford section of the plan reflects this.	Bean Parish Council Tristan Capital Partners British Land J Clubb Ltd
Infrastructure needs to be in place for town centre redevelopment, including with the proposed growth in residential	Policy S2 (Infrastructure Planning Policy) seeks to ensure the co-ordinated delivery of new infrastructure. Policies D1 (Central Dartford Strategy) and D2 (Central Dartford Development Principles) place a strong emphasis on the provision of infrastructure in Central Dartford.  The Council works closely with service providers to identify infrastructure necessary to support development, as set out in the	Sevenoaks District Council Bellway Homes Kent County Council Private Individual Kent County Council Education

Issue Raised	Council's Response	Respondent Name
	Infrastructure Delivery Plan. The Council is also progressing public realm improvements within the town centre.	
There should continue to be a careful focus on the environment and success of Dartford High Street within the plans for the town centre as a whole.	The Core Frontage has been slightly amended and now focusses on the High Street. A key focus of the Central Dartford chapter is improving connectivity of the Town Centre specifically from both the north and the south of the High Street. In addition, the importance of the heritage environment and character of the area has been put forward within the chapter.	Darenth and Wilmington Parish Councils
The River Darent needs to be ecologically restored as parts of it are running dry in periods of drought. This could be through using clean surface water run-off from adjoining development but care is needed so that development does not adversely impact on the health of the river. The River Darent could also be used for recreation.	Policy D7 (Station Surrounds/ River Darent Area) includes provision to improve the River Darent for ecology and recreation purposes.	Private Individuals Kent County Council Emergency Planning Port of London Authority
Plan needs to justify and clarify proposals for a city centre and retailing at Ebbsfleet Central	Policy E4 (Ebbsfleet Central Allocation) sets out the approach to uses that are the focus of the urban hub and retail development. This refers to the provision of a District Centre. The plan does not seek a typical/ traditional city centre scale of retailing in this location.	Darenth Parish Council Ebbsfleet Development Corporation Gravesham Borough Council
Further information is needed on the future of Bluewater	Policy M22, its supporting text and table 7 set out the policy for Bluewater and its role within the overall retail hierarchy.	Bean Residents Association Thurrock Council London Borough of Bexley
Outputs from the Retail Study need to be confirmed/consulted on – is a cinema in the town centre justifiable? Other leisure facilities may be better given cinema at Bluewater is close.	The Dartford and Ebbsfleet Retail and Leisure Study has been published. Local authorities/ the GLA were invited to a briefing and a chance to input to the study. The study has informed the plan and confirms that a cinema would be an appropriate use in the town centre.	CPRE Kent Greater London Authority Private Individual

Issue Raised	Council's Response	Respondent Name
Heritage needs consideration of town centre regeneration / character	Heritage has a strong focus throughout the Central Dartford chapter and the rest of the Local Plan. The heritage environment and assets were a key consideration when drafting the Central Dartford chapter and policy reflects this.	Historic England Bean and Darenth Parish Councils Kent County Council J Clubb Ltd
Needs more emphasis on environmental improvements to town centre	The Central Dartford section has strong emphasis on this. The council is continuing to take forward more projects for improvements to delivery.	Private Individual
Regeneration of Town Centre and Bluewater raises cross-boundary strategic issues	It has not been demonstrated that the regeneration of Dartford town centre raises significant strategic matters of cross-boundary significance. Bluewater is a regional facility.  The Council has engaged extensively with neighbouring authorities on retail and other matters, including a town centre focused session with partners in 2020. Policy for Bluewater has been informed by points raised by local authorities.	Gravesham Borough Council London Borough of Bexley
Sites in Dartford Town Centre for additional development need to be reviewed in order to have a complete audit of available land in line with the NPPF	All sites with potential for development have been reviewed in the SHLAA. In terms of housing, those deemed developable/ deliverable are included in the trajectory in line with the NPPF and PPG guidance.	Gravesham Borough Council
High density, as option 2A, is also supported in suitable places	The density is not prescribed in policy and a design-led approach has been put forward, without a narrow focus on prescribing high density to all sites in the area.	Kent County Council Tristan Capital Partners British Land Muse Developments Ltd
Traffic needs to be addressed, comprehensive active travel network needed.  There needs to be additional requirement to address exacerbation of traffic congestion	The proposed approach seeks to enhance public transport and active travel options. The Transport study considers locations which will be negatively impacted by new development identified in the Local Plan, after taking into account an uplift in active and sustainable travel. The Plan and Infrastructure Delivery Plan identify schemes that will support increased active and sustainable travel and that particularly mitigate	Private Individuals

Issue Raised	Council's Response	Respondent Name
caused by new housing in town centre on immediately neighbouring residential areas as most of this traffic uses Burnham Road/St Vincent's Road.	identified impacts, including within the town centre and neighbouring areas.  Travel needs and opportunities were a key consideration when drafting the Central Dartford chapter, in particular Policy D7 (Station Surrounds/ River Darent Area) which seeks to improve connectivity of the Town Centre across the Ring Road. Policies M16 and M15 require developments to make provision to minimise and manage arising transport impacts, including promotion of active travel.	
Policy criteria must allow for flexibility – adaptability,	Policy has been designed to achieve borough strategies whilst also allow for flexibility. The wording has been reviewed in light of the need for flexibility and changing needs.	Ebbsfleet Development Corporation Property
Retail opportunities of rural areas have been overlooked	The retail study is Borough-wide, however throughout the country the scope for low density population areas to viably support new retail is low.	William Chaplain Ltd

### Infrastructure and Transport Questions 7, 12 and 13

Issue Raised	Council's Response	Respondent Name
Third river crossing is an important consideration for transport policy/strategy. Lower Thames Crossing needs to be carefully managed as to not disrupt the current network	The Transport Study considers the effect of Local Plan development on the current network with or without delivery of the proposed Lower Thames Crossing. Its findings have informed policy and identification of infrastructure projects. The Council will continue to monitor the progress of the Lower Thames Crossing proposal and work with partners to reduce impacts on Dartford's road network.	Darenth Parish Council Swanscombe & Greenhithe Town Council Transport for London
Impact of Crossrail needs to be considered. Is Crossrail deliverable within the plan period? Current infrastructure should not be jeopardised and the benefits have not yet been quantified. Crossrail has potential to impact on: flood risk, environment, homes, business, current passenger	It is understood that the introduction of Crossrail within the Borough would potentially represent a major change in infrastructure provision and could have other impacts. However there is substantial uncertainty over the form, prospects and timing of any intervention.  The Local Plan monitoring framework identifies factors that may trigger the need for a review of the Plan. The approval for Crossrail extending into Dartford is one such identified trigger.	Darenth Parish Council Environment Agency Private Individual CPRE Kent Transport for London

Issue Raised	Council's Response	Respondent Name
journeys/ passenger congestion, car use into the borough to get on train.		
Accessibility of train stations needs addressing	Policies S2 (Infrastructure Planning Strategy) and M16 (Travel Management) support upgrades to train stations.	Private Individual
Partnership with health providers needed for delivery of health infrastructure / Health provision needed (Darent Valley Hospital) Definition of 'Health Hub' needed	The Council works with the NHS Clinical Commissioning Group, Kent County Council Social Care and Darent Valley Hospital Trust as service providers for health and well-being facilities and will continue to do so. Through this partnership approach, infrastructure necessary to support development for improved health provision is identified within the Council's Infrastructure Delivery Plan which is regularly reviewed.  Health Hub defined in the glossary.	Ebbsfleet Development Corporation Bean Residents Association Private Individual Fawkham Parish Council
Education provision – clear need to be identified and articulated. No capacity for school expansions therefore need must be delivered by provision of new schools, funding to be considered	The Council works with Kent County Council Education, the local education authority, on the provision of schools to meet the demand generated by planned development.  Policy S2 supports large development sites retaining land for essential infrastructure and elsewhere land being safeguarded when necessary.  New and expanded school provision is identified within Kent County Council's Commissioning Plan for Education in Kent which is reviewed annually. The Council's Infrastructure Delivery Plan reflects this document.	Kent County Council Education Department for Education
Concerns around CIL, clarity on review and funding gaps	The 2021 Local Development Scheme recognises the potential need to review the CIL charging schedule and outlines a potential programme. The Infrastructure Delivery Plan will continue to be updated, in conjunction with infrastructure delivery partners, and the programme of CIL funding to support delivery will continue. The IDP seeks to identify funding requirements and gaps.	Kent County Council Education Bean Residents Association Ebbsfleet Development Corporation Property Kent County Council
Cycleways needed, parking over-spill is an issue	Policy M17 (Active Travel, Access and Parking) requires development to make provision for safe and convenient access to footpaths and cycle routes and supporting facilities for cyclists. It also requires development to provide an appropriate level and form of vehicle parking	Bean Residents Association CPRE Kent Private Individual



Issue Raised	Council's Response	Respondent Name
	provision in accordance with the Parking Standards SPD. It is likely that the SPD will be reviewed after the adoption of the Local Plan. Ebbsfleet Development Corporation are bringing forward parking guidance for the Garden City.	
Infrastructure to be delivered on site first to mould new residents' behaviour. Temporary uses should be supported	Policy S2 (Infrastructure Planning Strategy) encourages major sites to be masterplanned to ensure that infrastructure can be delivered when it is needed.  Meanwhile uses supported at Ebbsfleet Development Corporation where most opportunity exists	CPRE Kent Swanscombe & Greenhithe Town Council J Clubb Ltd
Plan should safeguard tram route	Strategic Objective I2 aims to facilitate public transport links. At the present time however there is a lack of evidence regarding the viability and deliverability of a tram within the Plan period.	CPRE Kent Private Individuals
Green Grid/ Open Space needs to be addressed	Policy S2 (Infrastructure Planning Strategy) ensures that the Green Grid network will continue to be upgraded and expanded.  Policy M14 (Green and Blue Infrastructure and Open Space Provision) will ensure that sufficient open space is delivered through new development and that existing open spaces are protected.	Bean Residents Association Private Individual
Transport infrastructure south of the borough needed	The Transport study has considered the impact on the road network of Local Plan proposed development. Whilst forecast development is concentrated in the north of the Borough, the study has considered if issues may arise in the south of the Borough. It is not envisaged that major new transport infrastructure will be required as a result of the Local Plan.  The Council will continue to work with Kent Highways to monitor and review the need for new transport infrastructure in the south of the Borough, as part of regular programme reviews.	South Darenth Farms and Cold Store Company Ltd
Digital infrastructure to be addressed	Policy S2 (Infrastructure Planning Strategy) proposes that new high quality and advanced communications infrastructure developments will occur in line with national policy and Borough needs.	Kent County Council
Waste to be addressed	Kent County Council has an adopted Minerals and Waste Local Plan. It does not identify any new waste sites in Dartford Borough.	Kent County Council

Issue Raised	Council's Response	Respondent Name
	Residential design provisions are set out to account for waste. The Council has worked with Kent County Council with regard to land opportunities for waste facilities and will continue to do so.	
Strategic Flood Defence Zone should be extended. Will land for new barrier be protected by green belt policy and if so what would this mean for a new barrier being built on green belt land? What area is Long Reach?	<p>Agree that the Strategic Flood Defence Zone should be extended to include all the areas alongside existing/ potential Thames flood defences and this is shown in the Infrastructure Diagram.</p> <p>There has not yet been a decision on whether a new flood barrier would be located at Long Reach or the extent of land required for this. This land will remain in the Green Belt. The Council has been working with the Environment Agency in relation to these issues.</p>	Environment Agency Thurrock Council Greater London Authority
Highway improvement	<p>The Council works with Kent County Council, as the local highway authority, and Highways England, responsible for the strategic road network, in identifying and bringing forward highway improvements.</p> <p>Improvements to the A2 Bean and Ebbsfleet junctions are underway and work is progressing on bringing forward improvements to the M25 (A282) Junction 1A.</p> <p>The Council has carried out a comprehensive Transport Study of the planned development set out in the Local Plan and any further highway improvements identified will be included in the Infrastructure Delivery Plan.</p>	Bericote Properties
Poor air quality should be considered in decision making (102d – NPPF) Concern is held around Air Quality and the boroughs 4 air quality monitoring areas - no assessment appears to have been prepared that considers possible effect of the scale of the new development on the air quality and whether these	<p>Policy M2 (Environmental and Amenity Protection) will apply to all development. This includes reference to impacts on air quality, in particular impacts within or immediately adjacent to Air Quality Management Areas (AQMAS).</p> <p>The Air Quality Management Areas are currently subject to review and the Action Plans are being updated.</p>	Wilmington Parish Council Kent County Council Emergency Planning CPRE Kent

Issue Raised	Council's Response	Respondent Name
areas need to be adjusted / or new ones adopted.		
Should maximise use of the Thames (102d – NPPF) and consider riverside infrastructure.	Policies M4 (Flood Risk and Riverside Design) and M16 (Travel Management) support the enhancement to riverside areas and use of the river.	Swanscombe & Greenhithe Town Council Gravesham Borough Council Dartford & Crayford Creek Restoration Trust Port of London Authority
Need to consider the impact on existing residents and/or road network – road network is already strained (102a – NPPF) Should also address impact on local residential roads that provide access (for example, Burnham Road)	Policies M16 (Travel Management) and M17 (Active Travel, Access and Parking) set out the requirements that development will need to meet including any potential impact on the local road network.  Outputs from the Transport Study will inform the Council's Infrastructure Delivery Plan regarding the need for localised highway improvements.	Bean Residents Association Swanscombe & Greenhithe Town Council Private Individuals London Borough of Bexley Sutton at Hone & Hawley Parish Council
Should consider promoting sustainable travel network to reduce car use / Healthy Streets principles / GI for promoting sustainable travel (102c / 104d – NPPF) including rights of way and infrastructure provision	Policies S1 (Borough Spatial Strategy), S2 (Infrastructure Planning Strategy) and S3 (Climate Change Strategy) set out broad principles for development. These place a strong emphasis on development being located where it has access to sustainable forms of transport and promoting a modal shift away from the use of private vehicles. These are taken forward in policies relating to Central Dartford and Ebbsfleet Central.  Policies M16 (Travel Management) and M17 (Active Travel, Access and Parking) set out requirements for development in relation to travel management and sustainable forms of transport.	Transport for London Ebbsfleet Development Corporation Private Individuals Natural England Gravesham Borough Council Sevenoaks District Council Tristan Capital Partners Kent County Council Bericote Properties Ltd Kent County Council Emergency Planning J Clubb Ltd Medway Council Southfleet Parish Council Greater London Authority

<b>Issue Raised</b>	<b>Council's Response</b>	<b>Respondent Name</b>
Areas in the south that are, or can be made, sustainable should be considered (103 – NPPF)	Sites (including those in the south of Borough) are assessed within the SHLAA following the set methodology and are reviewed in line with national policy.	Cooper Estates Strategic Land Ltd South Darenth Farms and Cold Store Company Ltd Burhill Developments Ltd Kent County Council Countryside Properties & Colyer Greenhithe Trust
Duty to Cooperate – must not impact cross boundary road networks	<p>The Council has worked closely with neighbouring authorities and other partners since 2017 and Statements of Common Ground will be completed in relation to cross boundary, strategic matters.</p> <p>The Transport Study will be made publicly available and shared with neighbouring authorities, Kent County Council and Highways England to reach agreement on any impacts and improvements required to the cross-boundary road network.</p>	Medway Council

#### **Ebbsfleet Garden City Questions 5 and 15A**

<b>Issue Raised</b>	<b>Council's Response</b>	<b>Respondent Name</b>
Consider what development can be achieved in light of market signals	The draft Local Plan sets expectations in terms of employment, retail and community floorspace and is based on the commissioned evidence. The Ebbsfleet Central Masterplan is currently being drafted by the Ebbsfleet Development Corporation with close regard to delivery and market requirements.	Tarmac Trading Ltd Private Individual
Focus more on higher density residential development	Housing numbers for Ebbsfleet Garden City have been determined based on current permissions and pending applications as well as robust masterplanning using design, character, heritage and infrastructure to set parameters.	Berkeley Homes
Allocation should be flexible to allow a high-quality mixed-use development of residential and employment uses	Ebbsfleet Central has been allocated for mixed use development with a broad criteria to encourage development to come forward as intended. The Council has worked closely with the Ebbsfleet Development Corporation in the development of the Ebbsfleet Chapter and the policy remains flexible to the changing needs of the area.	Ebbsfleet Development Corporation Property

<b>Issue Raised</b>	<b>Council's Response</b>	<b>Respondent Name</b>
Avoid damaging existing communities/ town centres and be integrated with the wider community	The applicable chapter has taken Swanscombe town into consideration for this reason, and close regard has been given to links and impacts.	Wilmington Parish Council Private Individual
Provide cultural/ leisure/ sports facilities	Policies require good provision of land for recreation. The Ebbsfleet Central Allocation (Policy E3) highlights the expectation for education, health and community facilities to be delivered on site.	Southfleet Parish Council Land Securities Private Individual
Evidence of transport impacts needed and take account of London Resort access	Close consideration of transport impacts is occurring. The monitoring framework within the Local Plan identifies factors that may trigger the need for a review of this Local Plan. The first stage of significant construction, should the London Resort gain approval, will trigger a review of the Local Plan to ensure all impacts can be addressed.	Bean Residents Association Gravesham Borough Council
Need to understand the role of function of the centre relative to the wider network of centres, including Bluewater; should be underpinned by evidence	The Dartford and Ebbsfleet Retail and Leisure Study considers this.	Gravesham Borough Council
Protect habitats, species and designated sites of importance for biodiversity – acknowledge the biodiversity and importance of brownfield sites also. Black Duck Marsh is nationally significant. the vertical planned development should be shifted further east away from Black Duck Marsh	A significant area of Swanscombe Peninsula has been identified as Borough Open Space due to the variety of habitats and importance to biodiversity within this area, this includes Black Duck Marsh. Policies M14 (Green and Blue Infrastructure and Open Space Provision) and M15 (Biodiversity and Landscape) will apply to development proposals in this area to protect biodiversity value and ensure mitigation where necessary.	Natural England Kent County Council Kent County Council Emergency Planning Private Individual
Retain and enhance the landscape and use it for flood attenuation	Policy M15 (Biodiversity and Landscape) requires landscaping to incorporate sustainable drainage measures.	Kent County Council Emergency Planning
Enhance green space, also create new ones	Policy M14 (Green and Blue Infrastructure and Open Space Provision) will ensure that open space is delivered through development and that existing green space is protected.	Kent County Council

<b>Issue Raised</b>	<b>Council's Response</b>	<b>Respondent Name</b>
Impacts on all heritage assets, including scheduled monuments and archaeology, should be assessed and included in the masterplan	The masterplan for Ebbsfleet Central is being developed by the Ebbsfleet Development Corporation.	Historic England Kent County Council
Protect riparian heritage	Policies M4 (Flood Risk and Riverside Design), M5 (Designated Heritage Assets) and M6 (Historic Environment Strategy) address these issues.	Simply Planning
Terms need to be clearly defined	The plan includes a Glossary of terms in Appendix B.	Private Individual
Proposed development would result in the direct loss of open mosaic habitat (a priority habitat) which supports significant amounts of invertebrates and other species. Contrary to para 174 of the NPPF which requires them to be safeguarded. Need to consider alternative development scenarios.	Policy E6 (Area North of London Road, Swanscombe) clarifies the area deemed suitable for regeneration and makes reference to the need to protect and enhance important ecological habitats.  Additionally the majority of priority habitats on the Peninsula have been designated as Borough Open Space due to their biodiversity function and will be protected under policy M14 (Green and Blue Infrastructure and Open Space Provision).	Natural England
Clarity needed on uses, form and amount of development proposed and its impacts, approach is unclear given the SHLAA results	The section in the Plan on Ebbsfleet and Swanscombe provides clarity and detail on this.	Gravesham Borough Council Thurrock Council
Entertainment resort must be the preferred option for the delivery of regeneration on the peninsula	The Local Plan does not assume that the London Resort will be implemented and this is currently subject to a Development Consent Order application. Policy E6 (Area North of London Road, Swanscombe) sets out a criteria based policy for any future development of the area and indicates that a Local Plan Review will be carried out if construction of the resort takes place.	Swanscombe Development LLP London Resort Company Holdings
Policy should not preclude higher density development	It has not been demonstrated that the Peninsula is suitable for higher density development. Policy E6 (Area North of London Road, Swanscombe) highlights design constraints. Policy M1 (Good Design for Dartford) sets expectation for design based density and does not set maximum levels.	Swanscombe Development LLP

<b>Issue Raised</b>	<b>Council's Response</b>	<b>Respondent Name</b>
Enabling development will be needed to deliver an ecological park	An ecological park is a suitable and reasonable aspiration in this location. Land is protected in the plan for open space to secure its status and enable implementation proposals to be formulated.	Swanscombe Development LLP
Should identify opportunities for smaller scale development sites to come forward independently	Policy is consistent with this.	Swanscombe Development LLP
Protect existing businesses	The existing employment areas within Swanscombe will be retained.	Bean Residents Association Private Individual
Alternative development would involve retaining the employment uses in the south east, residential development in the south west, retaining the marshes, a marina/ Visitor centre and residential in the north	Policy criteria have been included that may allow a number of aspects of this.	Private Individual
Cross boundary strategic approach required, development should be subject to a comprehensive masterplan for the whole peninsula	The Ebbsfleet Implementation Framework covers/plans for the whole Garden City, which has been subject to regular formal discussions for several years. The approach draws from the Framework's proposals.	Gravesham Borough Council Thurrock Council
Consider how proposals would integrate with and impact on the surrounding area; need for investment in Swanscombe	Policy E3 (Swanscombe) sets out the approach, including benefits which should derive from development in Ebbsfleet Garden City.	Ebbsfleet Development Corporation Bean Parish Council Land Securities Private Individual
Amount of retail and leisure development should be ancillary so that it does not harm the vitality and viability of Bluewater	The Dartford and Ebbsfleet Retail and Leisure Study takes into consideration both the permitted floorspace additions at Bluewater and the planned floorspace within Ebbsfleet Garden City. The study has informed Plan drafting.	Land Securities
Need to consider transport (and air quality) impacts, road network improvements required	The Council is working in partnership with the Ebbsfleet Development Corporation, Kent County Council and Highways England regarding transport provision within the Ebbsfleet Garden City. A Transport Study has also been commissioned to assess the impact of the planned level of development.	Bean Parish Council Gravesham Borough Council Kent County Council Land Securities

Issue Raised	Council's Response	Respondent Name
	<p>Improvements to the transport network within Ebbsfleet Garden City are coming forward through the Ebbsfleet Development Corporation's Investment Programme and the Strategic Transport Infrastructure Programme (STIP) managed by Kent County Council. These are then incorporated into the Council's Infrastructure Delivery Plan.</p> <p>Highways England has started work on improvements to the A2 Bean and Ebbsfleet Junctions.</p> <p>Any requirements for further highway improvements identified through the Transport Study will be discussed with partners and neighbouring authorities.</p>	
Safeguarded minerals area due to sub-alluvial river terrace deposits which are high quality potential sand and gravel resources	Kent Minerals and Waste Local Plan policies will apply.	Kent County Council
Need for more waste facilities	The recently adopted Kent Minerals and Waste Local Plan does not show any new sites for waste facilities within Dartford Borough, but discussions are ongoing with Kent County Council.	Kent County Council
Assess and retain areas of ecological importance, consider need for biodiversity net gain	Policies S2 (Infrastructure Strategy) and M15 (Biodiversity and Landscape) ensure that areas of ecological importance are protected and that new development will result in biodiversity net gain.	<p>Wilmington Parish Council</p> <p>Kent County Council</p> <p>Environment Agency</p> <p>Kent County Council Emergency Planning</p> <p>Private Individual</p>
Restore the landscape to provide flood attenuation and climate change resilience	Policies S2 (Infrastructure Strategy) and M14 (Green and Blue Infrastructure and Open Space Provision) aim to upgrade and expand the Green Grid/ Green and Blue Infrastructure network. Policy M4 (Flood Risk and Riverside Design) requires major new developments to include multifunctional Sustainable Drainage Systems where appropriate. These policy requirements will lead to greater opportunities for flood attenuation.	Kent County Council Emergency Planning
Need to define what 'high-class 21st Century Garden City' and 'quality' neighbourhoods mean	Policies E1 (Ebbsfleet and Swanscombe Strategy) and E2 (Ebbsfleet Garden City Development principles) and the supporting text provide further detail in this regard.	Private Individual



Issue Raised	Council's Response	Respondent Name
Need to define what 'efficiently designed' means	This wording has not been used in the Plan itself, instead the concept has been expanded upon in the Ebbsfleet chapter	Private Individual
Need to reference what Garden City 'principles' are	Applicable Garden City Principles have been included in the Ebbsfleet chapter	Private Individual
Impacts on archaeology should be assessed and included in the development proposals	Archaeological impacts of development will be assessed on a site by site basis in accordance with policies M5 (Designated Heritage Assets) and M6 (Historic Environment Strategy).	Historic England Kent County Council

### Natural Environment, Energy and Flooding Questions 4, 17 and 18

Issue Raised	Council's Response	Respondent Name
Plan should address improvements to existing green spaces or Council created open space/green grid provision. Green space should also be designated for protection. Greater amount of open space may be needed given flatted development. Green Infrastructure should be strategically planned. Historic Landscape Characterisation will assist develop a coherent green grid (NPPF 170)	Policy M14 (previously Core Strategy Policy CS14) continues to ensure open space is delivered through development and that existing Borough Open Space is protected.	Bean Residents Association Bean Parish Council Private Individual Kent County Council Kent County Council Emergency Planning CPRE Kent Natural England
Accessibility to woodlands/ open spaces needs to be improved	Several policies address this.	Kent County Council Emergency Planning Private Individual
Allotments important especially if flats developed	There are plans for allotments at Ebbsfleet Central. Existing allotments in the Borough are protected, many as protected local greenspaces or Borough Open Spaces under policy M14 (Green and Blue Infrastructure and Open Space Provision).	Private Individual
Edible landscaping should be promoted	This is a key component of the garden city. Policy M10 (Residential Amenity Space) refers to the need for private and communal amenity spaces to provide opportunities for food growing where possible.	Private Individual

Issue Raised	Council's Response	Respondent Name
Environmental survey should be carried out. No disruption to green spaces should be made unless for ecological reasons	Policy M14 (Green and Blue Infrastructure and Open Space Provision) will ensure that new development makes provision for new open space and that existing open spaces are protected.	Swanscombe & Greenhithe Town Council
Policy around green spaces should also ensure biodiversity/wildlife does not deteriorate (NPPF 174)	Policy M14 (Green Infrastructure and Open Space Provision) addresses this.	Environment Agency
The Strategic Habitats Regulations Assessment may affect the plan – climate change may impact estuary habitats and therefore impacts of development	The Habitats Regulations Assessment (HRA) has not found any adverse impacts on internationally important biodiversity sites as a result of the policies and allocations in the Plan. Additional supporting text to policy M15 has been included to reflect the recommendation in the HRA.	CPRE Kent
Green infrastructure policies should reduce flood risk of the Darent River. Opportunity to improve public realm along rivers exists and should be enabled.	The River Darent is highlighted as a key opportunity/ asset in Central Dartford Chapter, Enhancement of river is part of Central Dartford vision and policy D1, river regeneration key aspect of broad location allocation policy D6. Also referenced in DC policy re open space. River included in green grid definition.	Sevenoaks District Council Environment Agency Kent County Council Emergency Planning Port of London Authority
Is there a need for sport centres? If so how will they be funded? (NPPF 96) Playing Pitch strategy 2016 Does the playing pitch strategy include the needs of employers in the Borough?	The Ebbsfleet Central Allocation policy ensures that sufficient health, education and community use provision will be delivered. The Fairfield Leisure Centre was recently upgraded. Sports pitches have been provided at Ebbsfleet Green.	CPRE Kent
Stronger policy on protecting gardens from development needed	Policy M11 (Extensions, New Dwellings, and Garden Land) seeks to protect gardens.	Private Individual
G9 is too inflexible and needs to consider site constraints/opportunities (30% site delivered as green space).	This requirement is set out in existing policy CS14 and there has been good delivery of open space in accordance with this. This is an important policy for the borough to be able to achieve its environmental ambitions and it is not intended that the provision be reduced.  Where communal open space is delivered on site, this will now be permitted to be included in the 20/30% calculation to provide some flexibility and promote land use efficiency.	PMG Regeneration Ltd Swanscombe Development LLP Berkeley Homes Department for Transport

Issue Raised	Council's Response	Respondent Name
Development should provide its own open space. Quality expected from developer is critical. Definition of 'good quality' needed, Minimum size for balcony/garden provision and communal amenity size requested	<p>Policy M14 (Green and Blue Infrastructure and Open Space Provision) will ensure that new developments provide open space.</p> <p>Policy M10 (Residential Amenity Space) sets out guidance in relation to good quality amenity space and what is expected of developments. Minimum size for communal space has not been provided due to the inconsistency of site sizes/ constraints. Communal space will be supported but private amenity space is preferred.</p>	J Clubb Ltd Private Individual Ebbsfleet Development Corporation
<p>Inclusion of water efficiency conditions on any planning permissions would be beneficial</p> <p>Water efficiency could also be promoted to existing buildings, and not limited to new buildings, either residential or non-residential across the Council.</p>	BREEAM excellent required for large non-residential and 110 litres/day required for residential conversions and new builds. Grey-water recycling also encouraged for large scale residential development in policy M3 (Sustainable Technology, Construction and Performance).	Thames Water
Kent Design Guide to be referenced	The Kent Design Guide has referred to in the Good Design for Dartford Policy (M1).	Kent County Council
Electric vehicle charging points needed, policy should stick to national guidelines for consistency, if not wording needs to be clear. EVC strategy may be useful. Consideration of negative impact of electric vehicles also to be considered	Electric Vehicle charging points are required for new residential properties with dedicated/ allocated parking spaces, and for a proportion of parking spaces provided as part of new employment, leisure and retail development under policy M17 (Active Travel, Access and Parking). Additionally all shared parking spaces must provide charging points or enable future provision.	CPRE Kent Home Builders Federation Kent County Council Kent County Council Emergency Planning
How credible is it to reduce car use by 2036 from 2020 levels	The Transport Study will compare 2037 forecast traffic levels, taking into account planned development, with 2019 levels. The assessment will also compare 2037 levels with forecasts that assume a higher proportion of people will travel by sustainable modes. These findings will indicate the degree of change to vehicle levels during this period that can be expected. Taking into account planned development	Private Individual

Issue Raised	Council's Response	Respondent Name
	growth, a number of Local Plan policies provide the potential for higher levels of sustainable travel to be achieved.	
Solar should be required	Policy M3 (Sustainable Technology, Construction and Performance) encourages use of renewable and/or low carbon technologies.	CPRE Kent
Future Homes Standard/ net zero policies should be introduced, especially at Ebbsfleet	Government policy is due to change but has not been confirmed, though an approach is set out to this end. 19% beyond Part L of the building regulations required ahead of Future Homes Standard under a new sustainable construction policy (M3). 19% is the maximum that a Local Authority can prescribe in a Local Plan in line with latest PPG.	CPRE Kent Kent County Council Private Individual
More detail should be provided on SuDS – should achieve Greenfield run-off rates, Surface water and waterways should be included within the policy, water recycling should be required (NPPF 165 for major dev)	Importantly policy secures land for SuDS. Policy M4 (Flood Risk and Riverside Design) requires major new developments to include multifunctional Sustainable Drainage Systems where appropriate. Further information is set out in the Strategic Flood Risk Assessment.  Policies S3 (Climate Change Strategy) and M3 (Sustainable Technology, Construction and Performance) require developments to incorporate water efficiency measures.	Thames Water Kent County Council Private Individual
SFRA needed, more than 100 year period should be considered	A Strategic Flood Risk Assessment has been carried out. This considers different climate change scenarios and epochs, including 2120. This approach was agreed with the Environment Agency.	CPRE Kent Kent County Council Environment Agency
Policies should also do more to increase resilience – particularly flood and drought. The latest UK climate projections (CP18), indicate that Dartford will be increasingly vulnerable to climate change impacts, so it is important policies consider future risks, not just the weather extremes currently experienced.	Policy S3 (Climate Change) requires development to be well located, innovatively designed and constructed to mitigate and adapt to the effects of climate change. It sets out the roles of Green Infrastructure, Flood Risk Management and Sustainable Design and Technology in this, all of which are subject to more detailed development management policies (M3, M4 and M14)	Kent County Council
Waste management should be included in policy (for climate change goals)	The Plan includes a policy on Sustainable Technology, Construction and Performance (M3).	Kent County Council

Issue Raised	Council's Response	Respondent Name
Duty to cooperate – green grid is a cross boundary issue that needs attention	The Green Grid in north Kent has been discussed with partners. The Strategic Green Grid Diagram shows the strategic links such as the England Coast Path and NCR1.	Gravesham Borough Council
Duty to Cooperate - Barrier at long reach needs decision, safeguarding site important and has cross-boundary impact (Thurrock)	The supporting text to Policy M4 (Flood Risk and Riverside Design) refers to a potential flood defence barrier at Long Reach and its indicative location is shown in the Infrastructure Diagram. Policy M4 refers to the need to take into account future flood defences.	Bean Residents Association Thurrock Council
Public rights of way should be addressed within the policy (98 – NPPF). Policy for new developments must see that dev positively accommodates existing public rights of way and contributes towards the delivery of network improvements.	Public Rights of Way have been identified and included within the Green Grid policy (M14). Public Rights of Way are included in the definition of Green Infrastructure. Public Rights of Way will be addressed on a site by site basis at the development management stage	Kent County Council
Add tree protection alongside tree provision and specify preferred types. The approach to protecting residential gardens from development needs to be strengthened not continued. Need to add improvement of country parks/SSSI/Ancient Woodland/heath/marshes.	The development management policy on Biodiversity and Landscape (M15) relates to tree protection and provision. Country Parks referenced in supporting text.  Policy M11 (Extensions, New Dwellings, and Garden Land) seeks to protect existing garden space.	Private Individual
Ecological benefits of green space should not be lost from developments - maintenance	Policy M14 will ensure that open space is delivered through development and that existing open spaces are protected.	Darenth Parish Council
Green infrastructure and flooding should be referenced for Ebbsfleet Central – link to flood policies. Different types of defences provide	Policy M4 (Flood Risk and Riverside Design) applies borough wide.	Environment Agency

Issue Raised	Council's Response	Respondent Name
protection from tidal flood risk in this location		

**Employment Question 16**

Issue Raised	Council's Response	Respondent Name
<p>What evidence is there on traffic generation of Littlebrook? Concern on the ability of the road network to cope with Littlebrook development. Travel plan is essential as Crossways and Watling Street are already under pressure when the Dartford Crossing slows. Development should depend on improvements at J1A and needs to consider the Lower Thames Crossing, including possible delay to development until improvements are made.</p>	<p>Previous planning permissions for the site have included conditions and a S106 agreement relating to delivery and servicing, traffic management and travel plans and improvement to the A282 junction 1A. The Council is working with Highways England and Kent County Council regarding the longer term improvements to A282 Junction 1A. This work will be informed by outputs from the Local Plan Transport Study which will assess the impact of planned development with and without the Lower Thames Crossing.</p>	<p>Darenth Parish Council Bean Residents Association Swanscombe &amp; Greenhithe Town Council CPRE Kent Kent County Council</p>
<p>Concerns over odour arising to the Littlebrook site given its proximity to the waste water treatment works.</p>	<p>This relates to the planning application, on which Thames Water's comments were taken into account.</p>	<p>Thames Water</p>
<p>Policy approach should contain aims, indication of scale, mix and quantum, and the criteria including design and place requirements plus a commitment to an Area Action Plan/ masterplan. Objection to Swanscombe Peninsula concept – ecology</p>	<p>The Plan provides further detail than the Preferred Options consultation paper.</p> <p>Dartford has been closely monitoring the progress of the London Resort. At the current point in time, there is uncertainty whether London Resort will come forward.</p>	<p>Thurrock Council Natural England</p>

Issue Raised	Council's Response	Respondent Name
	<p>The Ebbsfleet area chapter has been drafted based on best available evidence at the time and in line with the Councils intention for protecting important green and open spaces.</p> <p>The Swanscombe policy within the Ebbsfleet Development Corporation chapter clarifies the area deemed suitable for regeneration.</p> <p>Additionally the majority of priority habitats on the Peninsula have been identified for Borough Open Space designation due to their biodiversity function and will be protected and managed by policy M14.</p>	
<p>Employment figures are unclear at the moment. Lack of certainty around Ebbsfleet Central and Swanscombe Peninsula. Further evidence should cover this and cover transport impacts of cross-boundary travel to work.</p>	<p>The Council has carried out further work in identifying the employment areas and indicative floorspace area; the topics are also addressed within policies E4 and E6. Employment land has been considered in transport study.</p>	<p>CPRE Kent Gravesham Borough Council</p>
<p>Policy fails to recognise economic contribution of the rural areas</p>	<p>Identified employment areas are provided for Borough-wide in policy M21. A greater focus is not in accordance with the Local Plan strategy.</p>	<p>William Chaplain Ltd</p>
<p>Intensification should exclude Bean Triangle</p>	<p>Bean Triangle is within the Green Belt. Policy E1 recognises this and applies national policy which offers protection to Green Belt sites.</p>	<p>Bean Residents Association</p>
<p>Provision is needed for employment uses not neatly defined – open yard, storage etc. Bean Triangle should be designated for this</p>	<p>Bean Triangle is within the Green Belt. Policy recognises this and complies with national policy which offers protection to Green Belt sites.</p>	<p>W T Investments</p>
<p>Green Belt review could find suitable locations for mixed-use development in the south NPPF 83</p>	<p>Development needs can be met in sustainable locations in the urban part of the Borough and there are no exceptional circumstances to justify a Green Belt review.</p>	<p>Kitewood</p>

**Affordable Housing Question 19**

<b>Issue Raised</b>	<b>Council's Response</b>	<b>Respondent Name</b>
Impact of the requirements on the viability of development needs to be understood	A viability study has been produced and the policies reflect the outputs from this.	Kent County Council
Should retain a sufficient amount of flexibility (i.e. amount of provision, tenure mix) to ensure viability, 35% unlikely to be realistic for urban redevelopment schemes	Viability study has been produced and the Affordable Housing Policy (M7) has been refined accordingly	Tristan Capital Partners Berkeley Homes Muse Development Ltd
Is the uplift in affordable housing and change of tenure achievable in the light of the large proportion of the housing land supply being made up of previously permitted sites?	The requirements in policy M7 (Affordable Housing) reflect the results of the Viability Study which found that 35% affordable housing provision is viable in developments in all parts of the Borough except Central Dartford where 20% is a more realistic figure.	Gravesham Borough Council
There needs to be reference to site sizes that the threshold will apply to, not just numbers of dwellings	Affordable Housing Policy M7 sets out the site size thresholds for which the policy will apply.	Bean Residents Association
The proposed strategy reduces the ability to provide any meaningful amount of affordable housing	The strategy of focusing development on brownfield sites in the urban area to promote regeneration complies with national policy and is the most sustainable approach. The Residential Needs Assessment and Viability Study indicate that affordable housing to meet needs can be provided.	Kitewood
There is no indication of whether the targets and thresholds can deliver the amount of affordable housing required	This is addressed in the Residential Needs Assessment. However, the proposed targets and thresholds reflect the outcome of the viability study.	CPRE Kent
Affordable home ownership should not focus on shared ownership but should allow for flexibility of products including rent to buy	Policy M7 (Affordable Housing) allows for a flexibility of affordable housing products, in accordance with national planning policy. The supporting text refers to rent to buy as one of these products.	Rentplus UK Ltd



Issue Raised	Council's Response	Respondent Name
Question whether there should be a minimum percentage of social housing	For developments where affordable housing provision is required, the supporting text to policy M7 (Affordable Housing) refers to 20% of the total housing being provided as social/ affordable rented tenures. This is in accordance with the recommendation in the Residential Needs Assessment.	Sutton at Hone & Hawley Parish Council
New affordable social housing should be safeguarded and retained in perpetuity	Social/ affordable rented housing is subject to right to acquire and right to buy legislation.	CPRE Kent
Question of meeting the affordable housing needs of people living in the area to the south of the A2, given the strategy, the proposed thresholds and the lack of allocations	The Residential Needs Assessment considers the affordable housing needs of those living in the Borough as a whole. In terms of the Local Plan strategy, it is not considered that there is clear evidence of a distinct rural housing market operating independently of the rest of the Borough. However the dwelling threshold for when affordable housing is required is smaller for developments south of the A2 than elsewhere, and appropriate wholly affordable housing is supported in policy for all the Borough.	Cooper Estates Strategic Land Ltd Gravesham Borough Council
Boundary should be whole rural area not just south of A2	The key diagram identifies the urban area. The rural area is the remainder of the Borough and includes some land to the north of the A2.	Bean Residents Association
Question if the approach meets the requirements of para 57 of the NPPF which places the emphasis for viability testing on the Local Plan rather than on negotiations between LPAs and developers at the planning application stage. The assumption is that all development that is fully policy compliant is viable. Viability assessment must take into account all relevant policies, and local and national standards. AH target	The requirements in policy M7 (Affordable Housing) reflect the results of the viability study which found that 35% affordable housing provision is viable in developments in all parts of the Borough except Central Dartford where 20% is a more realistic figure.	Home Builders Federation

Issue Raised	Council's Response	Respondent Name
should be prescriptive and not up for		

### Housing Type and Design Questions 20, 21 and 22

Issue Raised	Council's Response	Respondent Name
The policy should set out the expected number of M4(3) wheelchair user dwellings to be provided within new development.	Policy M8 (Housing Mix) requires the provision of a limited proportion of wheelchair user dwellings (M4(3)) on developments of 100 or more dwellings. The Residential Needs Assessment did not include sufficient evidence to justify a policy requirement setting out a specific proportion of units to meet this dwelling standard.	Ebbsfleet Development Corporation Habinteg Housing Association
In relation to the provision of M4(2) accessible and adaptable dwellings, a standardised, national approach rather than a local approach should be used). Evidence is not sufficient to support approach – it does not include number of homes that have already been adapted. Concern that it is not practical/viable, viability testing should be done	Policy M8 (Housing Mix) requires all new build dwellings to meet the M4(2) accessible and adaptable dwelling standard unless it can be robustly demonstrated that this is not possible. This is in accordance with the recommendations in the Residential Needs Assessment and has been shown to be viable in the viability study.	Home Builders Federation South Darenth Farms and Cold Store Company Ltd Tristan Capital Partners M Scott Properties Ltd and Lifelong Homes
The wording in relation to the provision of Category M4(2) accessible and adaptable dwellings should be stronger to ensure that development cannot demonstrate constraints and therefore avoid the application of the policy.	Policy M8 (Housing Mix) requires all new build dwellings to meet the M4(2) accessible and adaptable dwelling standard unless it can be robustly demonstrated that this is not possible. There are valid circumstances which mean that 100% provision cannot always be achieved, including site topography and raising floor levels to mitigate flood risk. These are referred to in the supporting text.	Habinteg Housing Association
Sites should be found for housing for older people	The Residential Needs Assessment identifies some needs for specialist dwellings for older persons and nursing/ residential care home spaces. New care homes are now coming forward in the Borough, and with the relatively young demographic characteristics of Dartford it has not been possible to confirm the allocation further sites for the provision of these.	Home Builders Federation M Scott Properties Ltd and Lifelong Homes

Issue Raised	Council's Response	Respondent Name
	There are currently two care homes under construction within Dartford. One at The Bridge and another at West Hill.	
Trend of multigenerational families living together means larger but fewer houses	The Housing Mix Policy M8 ensures a good range of house sizes will be delivered.	CPRE Kent
Policy should consider minimum number of flats of 1 bedroom to be provided in large developments. The approach places too much strain on town centre/Ebbsfleet Central development to provide family homes so policy should omit town centre sites or allow a different mix to be acceptable – i.e. less larger units, Mix should be determined on a site by site basis	The Residential Needs Assessment considered the sizes of dwellings required to meet the needs of the Borough's population over the plan period. It found that the greatest need is for 3 bedroom homes, but with significant need for 2 and 4 bedroom homes (see figure in the supporting text to policy M8 Housing Mix). Policy M8 (Housing Mix) reflects this. Policy also recognises that the different nature of development in Central Dartford means that smaller scale developments will not need to make provision for larger family sized homes.	Tristan Capital Partners Kent County Council Darenth Parish Council Berkeley Homes Muse Development Ltd
Reliance on brownfield sites will minimise delivery of family homes	Brownfield sites have provided or will provide large volumes of family homes, including at Ebbsfleet.  The Local Plan Viability study has tested a variety of development and site types. After taking into account associated costs, the results indicate that the delivery on brownfield sites of the mix of housing types required by policy M8 will be viable and achievable.  Housing Mix Policy M8 applies to all residential development regardless of land type.	Burhill Developments Ltd J Clubb Ltd
Temporary residential uses should be supported (meanwhile use)	Supported in the Ebbsfleet chapter where opportunity exists	Modomo
Mix should not be strictly prescribed by Council	The Housing Mix Policy (M8) provides flexibility to ensure site delivery.	Home Builders Federation
Design-led approach is too vague,	New residential amenity space policy (M10) has been introduced to ensure that all occupants have access to high quality amenity space.	Bean Residents Association Private Individual

Issue Raised	Council's Response	Respondent Name
health and wellbeing of occupiers is important – access to open space etc.,		Kent County Council Emergency Planning
Criteria approach should be sympathetic to character, design criteria should be ambitious, should favour sustainable transport uptake, should apply to non-residential uses too, should be site specific and allow low-density if housing typology requires it (elderly homes), guidance on existing density levels for areas in the borough would be useful for applicants	<p>The Council has reviewed the Design Policy (M1). This policy addresses density and details a design-led process to ensure high quality development is delivered.</p> <p>The policy will be reviewed at the development management stage on a case by case basis.</p>	<p>Ebbsfleet Development Corporation</p> <p>Swanscombe &amp; Greenhithe Town Council</p> <p>CPRE Kent</p> <p>Tristan Capital Partners</p> <p>M Scott Properties Ltd and Lifelong Homes</p> <p>Kent County Council</p> <p>Swanscombe Development LLP</p>
The approach of not adopting minimum densities could conflict with paragraph 123 of the NPPF which requires optimising the use of land and applying minimum densities in areas well served by public transport and elsewhere.	A rigid approach is not set to density outcomes. The NPPF states that minimum densities should be considered if “there is an existing or anticipated shortage of land...” This is not the case in Dartford.	Gravesham Borough Council

### Gypsies, Travellers and Travelling Showpeople Question 23

Issue Raised	Council's Response	Respondent Name
There is a need for well-appointed and sustainably located, resilient and affordable Gypsy and Traveller sites	Policy M12 (Gypsy, Traveller and Travelling Showpeople Accommodation) seeks to ensure that a sufficient number of sites are provided in appropriate locations to meet needs.	Kent County Council Emergency Planning
Focus on the intensification and expansion of existing sites will lead to an overconcentration of sites in a single part of the Borough; these	In accordance with national planning policy, the Council needs to find sites that are deliverable to meet five year needs. Most of the needs arise from existing sites so it is logical to consider whether these sites can be intensified or expanded to meet those needs.	Darenth and Bean Parish Councils

Issue Raised	Council's Response	Respondent Name
should be subject to the same criteria as the identification of new sites	Policy M12 (Gypsy, Traveller and Travelling Showpeople Accommodation) sets out the approach and it is not considered that it would promote an over concentration in the growth of sites.	
Focus should be on brownfield sites and those within Ebbsfleet Development Corporation's control	<p>Consideration has been given to whether there are any suitable sites available in the urban area, including those within Ebbsfleet Garden City.</p> <p>Policies E1 (Ebbsfleet and Swanscombe Strategy) and M12 (Gypsy, Traveller and Travelling Showpeople Accommodation) refer to actively seeking to identify deliverable sites in Ebbsfleet Garden City to help meet the needs of the Borough.</p>	Darenth and Bean Parish Councils
Sufficient sites need to be identified to protect the Green Belt	Policy M12 (Gypsy, Traveller and Travelling Showpeople Accommodation) sets out the Council's strategy for achieving a five year supply of deliverable sites, with the aim of promoting planned provision with adverse impacts minimised. .	Darenth, Wilmington, Bean and Sutton at Hone & Hawley Parish Councils
Ebbsfleet Central would not be an appropriate location for sites and it is unclear which sites in Ebbsfleet Garden City would be suitable	<p>It is considered that large scale, strategic developments normally can incorporate provision for gypsies and travellers and it has not been demonstrated this is not possible.</p> <p>Policies E1 (Ebbsfleet and Swanscombe Strategy) and M12 (Gypsy, Traveller and Travelling Showpeople Accommodation) seek to explore opportunities for provision of sites in the Garden City to help meet the needs of the Borough.</p>	Ebbsfleet Development Corporation
The study does not consider the needs of travelling showpeople arising as a result of the illegal occupation of Drudgeon Farm	Drudgeon Farm was occupied after the Gypsy and Traveller Accommodation Assessment was undertaken. It is subject to ongoing enforcement action and planning/ enforcement appeals.	Bean Residents Association
Questions over the sites identified in terms of their private ownership, capacity and location south of the A2	The sites referred to in the Preferred Options document are all known gypsy, traveller and travelling showpeople sites. Some have since been granted planning permission.	Sutton at Hone & Hawley Parish Council

Issue Raised	Council's Response	Respondent Name
	Work is ongoing including with site owners/ occupiers where five year needs arise to establish whether there is capacity to intensify/ extend their sites to meet their needs.	
Hillside Farm is a suitable site	Hillside Farm now has planning permission for an increased number of pitches within the existing site.	Private Individual
How will the needs of those who do not meet the definition be met?	The focus is on meeting the needs of those who meet the definition.	Thurrock Council
Will neighbouring authorities only be approached if insufficient sites can be found in Dartford?	This will be done as soon as sufficient clarity; options within the Borough including within Ebbsfleet Garden City are continuing to be explored.	London Borough of Bexley

## Appendix 3: First Publication Local Plan Consultation

### Appendix 3-1: List of Respondents

Arnold P	Kitewood Estates Limited
Baker G	Landsec Bluewater
Bean Residents Association	London Borough of Bexley
Bellway Homes	London Resort Company Holdings Ltd
Bericote Properties Ltd	M Scott Properties Ltd
Berkeley Group	Marine Management Organisation
British Land on behalf of Hercules Unit Trust	McCarthy and Stone & Churchill Retirement Living
Chambers	Medway Council
Cooper Estates Strategic Land	Milestone Autos
Countryside Properties	National Grid
CPRE Kent	Natural England
Dartford and Gravesham NHS Trust	PMG Regeneration Ltd
Diocese of Rochester	Port of London Authority
Drudgeon Farm Bean Showpeople Group	Priory Centre
Ebbsfleet Development Corporation Planning	Redrow Homes
Ebbsfleet Development Corporation Property	Regent Land & Developments Ltd
Environment Agency	Sevenoaks District Council
Esquire Developments	Showmens Guild of GB London & SE section
Forestry Commission	South Darenth Farms and Cold Stores Ltd
Goodman Logistics Development (UK) Ltd	South East Water
Graham Simpkin Planning Ltd	Southern Gas Networks
Gravesham Borough Council	Southern Water
Greater London Authority	Southfleet Parish Council
Grimston P	Sport England
Henley Camland LLP	Stone Parish Council
Highways England	Storefast Solutions Ltd
Historic England	Swanscombe and Greenhithe Town Council
Home Builders Federation	Swanscombe Development LLP
Imperial Corporate Capital	Tarmac Trading Ltd
Jabar Properties Ltd	Taylor Wimpey Strategic
Kent County Council Planning	Thames Water Utilities Ltd
Kent County Council Property	Transport for London
Kent SME Developers Network	Woodland Trust
Kent Wildlife Trust	Wrenbridge Land Ltd

## Appendix 3-2: Main Issues Raised

### **Vision and Objectives**

- Could address the proposed London Resort

### **Spatial Strategy: Policy S1**

- the policy is inflexible which will affect the delivery of residential development
- development should be allowed to come forward on sustainable greenfield sites within the urban area
- a Green Belt review should be carried out and sustainable Green Belt sites released
- wording of policy could be clearer on residential delivery measures
- Some consider that the economic development strategy should be widened, e.g. to include Littlebrook/ The Bridge and the London Resort

### **Infrastructure Planning: Policy S2**

- Concern about infrastructure planning matters including schools and waste disposal provision, Fastrack routes and safe walking/cycling links.
- Potential There should be more recognition of the potential for a future Thames Barrier at Long Reach – also relates to policy M4

### **Climate Change: Policy S3**

- No significant issues raised, some minor phrasing amendments suggested.

### **Development Levels: Policy S4**

- The housing figure should be increased, particularly in order to:
  - take account of unmet need from neighbouring authorities/London;
  - ensure that affordable housing needs are fully met (the evidence base does not currently clearly show this); and
  - allow for contingency given the reliance on brownfield sites which may not be delivered as expected.
- More provision should be made for development on small sites
- Plan period should begin at 2019/20 not 2017/19
- The policy should include contingency in the employment land supply to ensure that adequate employment floorspace is planned and delivered over the plan period

### **Central Dartford: Policies D1-D7**

- The plan should include commitments to prioritise improved bus infrastructure and routeing in any redevelopment within the town centre
- Priory Centre: more residential development could be accommodated on this site
- Issue of school capacity
- Likely need to upgrade water supply network infrastructure

### **Ebbsfleet: Policies E1-E6**

- Swanscombe Peninsula SSSI: Policies and allocations need to take this newly notified SSSI into account
- London Resort: the policies and text should be more positive
- Swanscombe Policy E3: Clarify the area covered, needs to relate better to general policies E1 and E2
- Ebbsfleet Central Policy E4: high density residential development could be achieved around the station, policy should be flexible to allow development in the Central Park area
- Ebbsfleet South and West Policy E5: policy should support older persons residential provision, site can accommodate more dwellings, show as an allocation



- Land North of Swanscombe Area Policy E6: commit to a comprehensive masterplan approach, clarify area covered by policy, safeguard open views

### **Development Management: Policies M1-M24**

Design and Amenity policies M1 and M2:

- Additional issues should be covered
- Policies should take account of planning permissions
- Landfill site requirements are overly prescriptive
- Need to protect dark landscapes

Climate Change and Flood Risk policies M3 and M4:

- Introduce higher carbon reduction requirements

Historic Environment policies M5 and M6:

- No significant issues raised

Affordable Housing policy M7:

- Concerns about viability and should refer to potential for reduced provision
- Policy should refer to tenure split
- Sizes of dwellings should relate to the needs assessment

Housing Mix policy M8:

- Should be flexibility to enable more provision of smaller homes
- Evidence does not justify all homes meeting M4(2) standard
- M4(3) dwellings should be provided on all major development

Sustainable Housing Locations policy M9:

- Distance to services should be clarified in the policy
- 400m distance to public transport is overly restrictive
- Should be more positive in relation to windfall sites in line with the NPPF

Amenity Space and Extensions policies M10 and M11:

- Some are seeking flexibility in the provision of private amenity space

Gypsy and Traveller policy M12:

- Challenging to find a suitable site within Ebbsfleet Garden City
- Objections from some occupants on the basis that the Gypsy and Traveller Accommodation Assessment has not been carried out properly and no provision is made to accommodate their needs

Green Belt policy M13:

- Concern that it repeats national policy, remove hospital and land at Hawley Road from the Green Belt

Green Infrastructure and Biodiversity policies M14 and M15:

- Objections to Borough Open Space at Swanscombe Peninsula and Little Hithe
- Need stronger protection of non-statutory wildlife sites
- Need stronger biodiversity net gain policy

Travel policies M16 and M17:

- Should support better provision for cyclists and electric vehicles/bikes, dedicated bus lanes and reduced car ownership

Community Use policy M18:

- Should refer to healthcare facilities
- Include supporting text similar to current policy DP21

Employment policies M19, M20 and M21:

- Land at Sandpit Road should be included in the Burnham Road employment area
- Questions over when the requirements for local training/ apprenticeships, small units and affordable premises should apply

Bluewater policy M22:

- Issue of whether the sequential test should apply to retail and indoor leisure uses
- Development should not undermine the role of neighbouring centres
- Refer to the potential for residential development in this location

Retail policies M23 and M24:

- No significant issues raised

**Evidence Base**

Duty to Cooperate:

- There is a need for Statements of Common Ground with all neighbouring authorities which should consider the issue of wider unmet housing needs

Employment Land Report:

- The results for the Littlebrook Power Station site should be more positive in relation to access to sustainable transport

Habitats Regulations Assessment:

- This needs to consider the impact of the Swanscombe Peninsula Site of Special Scientific Interest

Strategic Housing Land Availability Assessment:

- Some developers challenge the outputs in relation to the sites in which they have a land interest

Sustainability Appraisal:

- This needs to consider the impact of the Swanscombe Peninsula Site of Special Scientific Interest

Transport Study:

- There is a need to see the full results of the transport study

## Appendix 4: Second Publication Local Plan Consultation

### Appendix 4-1: List of Respondents

Allen Linda	Meek Liz
Bach Alisdair	Muse Developments
Beale Joseph	National Grid Land and Property
Bean Residents Associatin	National Grid Statutory Undertaken
Bedwell Carolyn	National Highways
Bericote Properties Ltd	Natural England
Berkeley Group	Nelson Josh
British Land Hercules Unit Trust	NHS Property Services
Brown Steve	Oliver Stephen
Buglife	Parfitt Alice
Chambers K	Persimmon Homes South East
Clarke Lois	PMG Regeneration Ltd
Cooper Estates Strategic Land Ltd	Port of London Authority
Countryside Properties	Redrow Homes
CPRE Kent	Regent Land and Development Ltd
Dartford and Gravesham NHS Trust	Robinson Francis
De St Croix Judith	Rose Chris 1
Drudgeon Farm Bean Showpeople Group	Rose Chris 2
Ebbsfleet Development Corporation Landowner	Rutledge Linda
Ebbsfleet Development Corporation Planning	Rutledge Steve
Elverson Kaitlyn	Sandell Claire
Environment Agency	Sevenoaks District Council
Esquire Developments Ltd	Showmen's Guild of Great Britain
Forrest Joshua	Smith David
Goodman Logistics Development UK Ltd	South Darenth Farms and Cold Stores Ltd
Grant Fiona	Southern Gas Networks
Gravesham Borough Council	Southern Water
Grimston Paul	Southfleet Parish Council
Historic England	Stanley Peter
Home Builders Federation	Steuns Rene
Hood Kerry	Storefast Ltd
Hulme Tracey	Storefield Group Ltd
Imperial Corporate Capital plc	Swanley Town Council
J Clubb Holdings Ltd	Swanscombe and Greenhithe Town Council
Jones Kate	Swanscombe Development LLP
Kent and Medway Clinical Commissioning Group	Tarmac Trading Ltd
Kent County Council Planning	Taylor Wimpey Strategic
Kent County Council Property	Thames Water Utilities Ltd Landowner
Kent SME Developers Network	Thames Water Utilities Ltd Statutory Undertaker
Kent Wildlife Trust	Thomson Tom
Kitewood Estates	Transport for London
Kolan Allyson	Tristan Capital Partners Priory Centre
Landsec for Bluewater	Warnett Mark
London Borough of Bexley	Watkin Jones Group plc
London Resort Company Holdings Ltd	Williams Jennifer
M Scott Properties Ltd	Williams Maria
Marine Management Organisation	Wilson Sarah
Medway Council	

## Appendix 4-2: Main Issues and the Council's Responses

**Development Distribution**

Main issues	<p>The Local Plan does not provide a clear, deliverable spatial strategy in terms of meeting development needs.</p> <p>The Green Belt should be reviewed and there may be a case to amend the boundaries. There are potential housing sites in the south of the Borough in close proximity to existing settlements (currently within the Green Belt).</p> <p>The housing strategy is overly reliant on large brownfield sites and should be amended to allow other residential development, including available land within the wider urban area.</p>
Most relevant policies	S1
DBC summary response	<p>The spatial approach in the Submission Local Plan is largely a continuation of the approach set out in the Core Strategy which has led to high levels of economic development, residential delivery and population growth. Over the last five years, Dartford Borough has had the second highest population growth rate - 10% - of any English district level council. The strategy continues to support development at sustainable locations in the urban area (the north of the Borough), and protects the Metropolitan Green Belt, in line with national policy. This approach also ensures that a pattern of development comes forward in the Borough which reduces the need to travel by car and supports public transport viability in order to offer a genuine choice of transport modes.</p> <p>The Plan has a clear focus on Central Dartford and Ebbsfleet in the urban area, as they offer very well served locations for brownfield land reuse, good public transport accessibility and provision of a wide range of large scale uses and facilities to continue sustainable regeneration. This is outlined in the Spatial Strategy Topic Paper. These areas have progressed under the Core Strategy but substantial housing and economic development opportunities remain.</p> <p>The strategy is wholly consistent with the emphasis in the NPPF on making effective use of land. The supply of land for residential and economic development is deliverable, with a variety of brownfield sites and some greenfield sites, many of which have planning permission and are moving towards delivery.</p> <p>The spatial strategy identifies several employment and retail locations in the south of the Borough, and allows developments within villages which are inset from the Green Belt, where these are proportionate. The Plan does not include any strategic release of Green Belt land for new dwellings or jobs, maintaining the openness and</p>

	<p>permanence of the Green Belt found in the south of the Borough and at Dartford Marshes. However to meet needs, some small areas are required to deliver gypsy and traveller pitches</p> <p>Policies Map changes in the Core Strategy confirmed significant removal of land (largely former areas of quarrying) in Dartford from the Metropolitan Green Belt for strategic development; principally at Ebbsfleet.</p> <p>The Council has not needed to carry out a Green Belt review for the new Local Plan as it can meet all of its housing and commercial development needs within the urban area without further recourse to the Metropolitan Green Belt. The Sustainability Appraisal sets out that the option of a more dispersed pattern of development (including locations within the Green Belt) would not comply with the NPPF which requires exceptional circumstances to be fully evidenced and justified before Green Belt boundaries can be altered; and no such exceptional circumstances have been identified for the Borough.</p>
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## Housing Requirement

Main issues	<p>The housing requirement figure should be changed. Most respondents commenting on this considered it should be higher, stating various reasons including:</p> <ul style="list-style-type: none"> <li>• To positively plan for housing need</li> <li>• To fully reflect wider unmet housing needs (including from Greater London/ Sevenoaks/ Gravesham,)</li> <li>• To meet affordable housing needs</li> <li>• To allow flexibility, particularly in the early part of the plan period</li> <li>• It should be a minimum figure</li> </ul> <p>Some respondents comment that there is little evidence/ testing to justify the target for 80% of new homes to be located on brownfield land.</p>
Most relevant policies	S4
DBC summary response	<p>The housing requirement optimises the developable regeneration potential of the Borough consistent with national policy. Dartford Borough has applied the standard method in full, which is 750 dwellings per annum, considered government policy and guidance, and set a requirement in excess of it.</p> <p>The requirement (applicable over the plan period) of an average of 790p.a. dwellings equates to a 32% boost over the long-term trend residential delivery rate in the Borough of approximately 600 dwellings per annum (Dartford Borough's housing delivery has been within the narrow band of +/- 10% of 600 homes a year, a total of 10 times in the last 20 years. Mean average annual delivery over this period - since 2001/2 - has been 601 homes). From this</p>

	<p>base, the proposed residential requirement is ambitious when continuously maintained in future, including over national economic fluctuations, but it is achievable.</p> <p>National planning guidance, giving advice on reasons to increase the housing requirement - including unmet need elsewhere - has been considered. Dartford Borough has taken a positive approach and addressed uncertainties in the area, going above the standard method level to make a contribution towards wider unmet needs. Further details, including the rationale for an average annual housing requirement based on the regeneration potential of Dartford (and constant through the plan period) are incorporated within submitted documents, including the Housing Policies Topic Paper and the Residential Requirement Report.</p> <p>Affordable housing requirements will be met through the housing requirement and proposed affordable housing development management policy (M7), and have been justified through specific evidence, notably the Dartford and Ebbsfleet Residential Needs Assessment (DERNA) and Local Plan Viability Assessment.</p> <p>The requirement is considered positive, clear and sound, surpassing the standard method and meeting needs. Similarly the brownfield land criterion on performance over the plan soundly reflects the aims of national policy.</p> <p>Placing the requirement in context of the size of the Borough, with its housing stock of 47,849 dwellings (year 2020), 7,900 extra homes over 10 years would increase Dartford's housing stock by a total of 16.5%.</p>
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## Housing Supply

Main issues	<p>The strategy for housing supply is insufficient, inflexible and unreliable. It will not provide a range and type of sites to maintain a housing land supply. DBC has not allocated sufficient sites to meet its housing requirements.</p> <p>Comments on the composition of the proposed housing land sources include:</p> <ul style="list-style-type: none"> <li>• The delivery anticipated on few large brownfield sites is optimistic and additional sites should be identified</li> <li>• The plan should bring forward more despoiled, degraded, contaminated and unstable land, including former landfill sites</li> <li>• Policy in relation to windfall proposals is too restrictive and acts as a restraint, not a positive strategy</li> <li>• The trajectory includes provision for 400 dwellings on unplanned windfall sites and there is no evidence that this can be achieved</li> </ul>
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	<ul style="list-style-type: none"> <li>The plan does not support small sites or delivery by small and medium sized housebuilders in line with national policy.</li> </ul> <p>Comments on the time periods for housing supply include:</p> <ul style="list-style-type: none"> <li>The plan has not been shown to continue to support a deliverable five year supply in future</li> <li>The trajectory/ SHLAA show a shortfall by the final year</li> <li>A sufficient lapse rate to outstanding planning permissions and a greater lapse rate for those without permission has not been applied</li> <li>The trajectory start date is not consistent with planning practice guidance</li> <li>The plan period and housing supply trajectory should be extended a year</li> </ul>
Most relevant policies	S4, M9
DBC summary response	<p>Dartford Borough has a proven and strong track record of recent housing supply, based on urban brownfield land identified in the Core Strategy, and has satisfied the Housing Delivery Test since its introduction.</p> <p>The Borough has a robust long-term housing land supply, including approximately 10,000 dwellings with planning permission (of which c. 3,000 have full or reserved matters consent). This total includes large scale outline permissions within Ebbsfleet.</p> <p>Dartford Borough has a Five Year Deliverable Supply, with sites fully applying the NPPF definition of deliverable. This will continue through the additional and updated strategic allocations, the wide range of brownfield and other sites in the new, expanded, identified housing land supply (SHLAA and Brownfield Land Register). Additionally the planned supply is sensitive to deliverability and achievability. This means that there is the prospect of flexibility through additional/ faster residential development. For instance, two broad location policies (D7 and E6) feature land that is suitable for redevelopment through large and small sites that may become available, providing further market responsiveness.</p> <p>The housing trajectory (Plan Appendix C) shows projected annual delivery - blue bars - currently increasing, and then reaching very high levels (previously seen in the mid/ late 2010s). Phased delivery reduces again before reaching good levels again in the 2030s. The final years of the plan would have some of the lowest rates of projected dwelling completions, but aggregate supply exceeds the cumulative requirement until the very last year; providing a supply in excess of 15 years (meeting the NPPF's provisions on developable supply).</p> <p>For the appropriate period, this includes a windfall allowance of 25 dwellings a year. As set out in the SHLAA Appendix E, this is a conservative estimate based on the past achievement of sites too small (gain 1-4 dwellings)</p>

	<p>to be pre-identified. Similarly, for those selected deliverable sites counted in the trajectory (but identified through the SHLAA), a non-implementation allowance of 10% is applied.</p> <p>The start of the housing trajectory is when the government proposed the new standard method for housing and the work on the new Local Plan started, and is also when the first Brownfield Land Registers were introduced. The period to 2037 allows for 15 years from the anticipated date of Plan adoption, as sought by national policy for strategic policies. Further information is provided in the Housing Policies Topic Paper, SHLAA and the Residential Requirement Report.</p>
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## Infrastructure

Main issues	<p>Clarification/ expanded provisions are required in relation to:</p> <ul style="list-style-type: none"> <li>ensuring the needs of new development are met with new infrastructure delivery</li> <li>the role of planning obligations and CIL in delivering infrastructure to support growth</li> <li>the need for and delivery of key infrastructure projects/ categories e.g. education, flood defences</li> </ul> <p>Some respondents stated that further information is required from the strategic transport modelling.</p> <p>There was a mix of views of those responding on electric vehicle charging points:</p> <ul style="list-style-type: none"> <li>Some state that speedy charging should be fully enabled, and/ or policy should include greater provision of active provision for communal parking/ flats</li> <li>Others are concerned they do not compromise the viability of development, and that should align with forthcoming changes to the building regulations.</li> </ul> <p>One respondent sought further content/ a specific policy on waste management.</p>
Most relevant policies	S2, M17
DBC summary response	<p>The Council understands the infrastructure delivery challenges which arise with high proportionate growth rates, especially in a two-tier council system. Therefore, the strategy emphasises the importance of a plan-led approach. Development should be delivered and co-ordinated with infrastructure; and policy S2 recognises that this includes community/ transport/ green infrastructure and other physical infrastructure. A cohesive approach to infrastructure planning is put forward through the integrated strategic policy.</p>



	<p>It is particularly important that the patterns of growth and the provision of new facilities are very carefully managed given recent and continued growth in Dartford Borough. This is especially the case given the Borough's location at a pressure point on the national strategic road network, the impact of a longstanding lack of any new primary care facilities and continued pressure for education provision. Development located within easy walking distance of services and genuinely good public transport together with improved sustainable travel options, are vital to reducing travel by private vehicle. This principle is reflected in many plan policies in order to achieve both infrastructure and sustainable development national and local objectives.</p> <p>With the growth agenda planned in the Core Strategy, and subsequent detailed transport evidence and mitigations established through resulting planning permissions for developments, there is a clear foundation of data and proposed interventions that Local Plan is building on. The Infrastructure Topic Paper outlines the documentary evidence in this respect. Sustainable infrastructure expectations are increased with the proposed policies (for example to support active travel), but project delivery will continue. The Local Plan sets a sound basis for securing new infrastructure including facilities such as schools, and improvements to rail stations and flood defences; albeit it is for infrastructure planning documents to identify full details/ funding solutions/timescales for delivery. These are regularly reviewed with infrastructure/ service providers to ensure that the provision of new facilities responds to the progress of development.</p> <p>The CIL regime adopted in Dartford will benefit from new evidence with the new Local Plan, and expanded local strategy in relation to matters such as the walking/ cycling network; all of which will support the delivery of sustainable development identified in the Local Plan.</p> <p>The requirements for electric vehicle charging points to be provided for all new residential properties with dedicated/ allocated parking spaces and for some provision within employment, leisure and retail developments is in line with the proposed changes to the building regulations which was subject to consultation in October 2019. The requirements for cabling or charging infrastructure for shared parking spaces goes beyond this but is included as a requirement in order to future proof new development; there is no evidence of adverse impact on future development viability.</p> <p>Further content on the issue of waste issues has been added to the plan where relevant, although Kent County Council is the minerals and waste planning authority.</p>
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## Gypsies, Travellers and Travelling Showpeople

Main issues	<p>The policy fails to consider/meet the needs arising from:</p> <ul style="list-style-type: none"> <li>• travelling showpeople on the Drudgeon Farm site given its planning history</li> <li>• gypsies and travellers on the Eebs Stables site</li> <li>• the wider area through duty to cooperate</li> </ul>
Most relevant policies	M12
DBC summary response	<p>The Meeting the Needs of Gypsies, Travellers and Travelling Showpeople Report sets out the latest position in relation to the Drudgeon Farm and Eebs Stables sites which are unauthorised sites. At the time that the Gypsy and Traveller Accommodation Assessment (GTAA) was undertaken, Drudgeon Farm was not occupied so needs arising from this site have not been taken into account. The Eebs Stables site was occupied and the GTAA takes the needs arising from this site on board. Policy M12 sets out the actions being taken by the Council to meet the identified needs arising for gypsies, travellers and travelling showpeople.</p>

## Green Infrastructure

Main issues	<p>In terms of biodiversity net gain, there are concerns that:</p> <ul style="list-style-type: none"> <li>• There is no mechanism for the delivery of off-site biodiversity net gain improvements</li> <li>• The plan is not seeking 20% biodiversity net gain, taking into account Kent Nature Partnership's (KNP) work</li> <li>• There is not a dedicated policy setting out clear principles for delivery and a strategy for implementation which contributes to wider ecological networks</li> <li>• Further clarification is needed in relation to national requirements.</li> </ul> <p>The Biodiversity Opportunity Area (BOAs) designation should be removed as there is no evidence to justify them and they are outdated in light of biodiversity net gain.</p> <p>There should be a specific policy/ commitment to a masterplan for the Swanscombe Peninsula Site of Special Scientific Interest (SSSI) to clarify how it will be managed and how the different issues will be balanced.</p>
Most relevant policies	M15, E1, E2, E4, E6

<p>DBC summary response</p>	<p>Given that national policy and full legislative requirements are still emerging, the plan policy is only intended to set out the overarching approach towards biodiversity net gain. A more detailed approach in accordance with this can be developed in due course. Whilst the KNP's work on biodiversity net gain is recognised, there is not yet viability evidence to justify a requirement for 20% biodiversity net gain and it is considered that there needs to be time for the establishment of the new national system before seeking to go above and beyond this. The Council does not have evidence to justify the requirement for 20% biodiversity net gain.</p> <p>BOAs are long established and are intended to show areas of opportunity for biodiversity enhancement. They are still considered to be relevant, especially as a focus of where off-site biodiversity net gain would be appropriate.</p> <p>Policies E1, E2 and E6 of the Dartford Local Plan and the Ebbsfleet Implementation Framework provide an overall approach for Swanscombe Peninsula. With proposals for the London Resort having been submitted and the SSSI recently confirmed, it has not been appropriate to focus on fresh masterplanning for the Swanscombe Peninsula. The Local Plan focusses on areas where development is possible and improvements to green infrastructure can be achieved as a result of that and policies E1, E2, E4 and E6 are particularly relevant in respect of the Swanscombe Peninsula SSSI. The recent confirmation of this SSSI places a legal responsibility on the landowners to ensure that this land is managed to conserve the special features of the site.</p>
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## Business, Retail and Leisure Developments

<p>Main issues</p>	<p>The Plan should place greater emphasis on the strategic role that London Resort or The Bridge/ Littlebrook employment area will play in relation to economic development.</p> <p>Responses for and against the London Resort are made. In terms of the case for the proposed London Resort, it is stated the Plan does not, amongst other things:</p> <ul style="list-style-type: none"> <li>• positively embrace the significant economic, environmental and social opportunities, including the potential to transform the local and regional economy</li> <li>• take account of the proposals given that the Development Consent Order (DCO) application has been accepted for examination</li> <li>• reflect the timescales of a potential decision on the DCO which could trigger an almost instantaneous review of the Plan</li> </ul> <p>With regard to Bluewater, some contrasting comments are made. Responses seek changes to its status, and additional or reduced development management requirements.</p>
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	Clarity is needed on whether guideline development rates in policy S4:6b and 6c apply to the end of the plan period. Policy premises/ land for local businesses should be clarified.
Most relevant policies	S1, S4, E6, M20, M22
DBC summary response	<p>The proposal now known as the London Resort was put forward and accepted in 2014 to be a project considered under the NSIP regime. For a number of years within the subsequent period there was limited indication of consistent progress, albeit the DCO application was finally submitted at the end of 2020. There has been limited engagement with the Council over much of this time, and the developer did not enter into dialogue with the Council at the outset of or throughout the Local Plan process to put the case for its inclusion as a strategic allocation. Evidence to consider what the development consisted of, and to review its potential merits/ implications, was not available.</p> <p>Bluewater is a purpose built, distinct and high quality regional shopping centre that was originally permitted (and is still contributing) as part of the regeneration of the Thames Gateway. It has been open 22 years, has become a central part of the economy, and consistently regarded by Dartford Borough as an integral part of the retail network/ hierarchy and offer. Its status has been discussed in detail in past Local Plan examinations, and the outcome has been to provide an appropriate bespoke policy that enables it to evolve suitably and maintain its regional position. The development management criteria have now been reviewed and updated (see Business and Retail Topic Paper).</p> <p>Guideline rates of town centre, community and employment development are intended to endure for the whole plan period, consistent with the evidence (Economic Land Report). These quantitative guidelines apply in the context of clear Policies Map designations and supportive development management criteria. Locational policies for economic development uses (policy M19 onwards) will meet needs and be particularly important to decision taking.</p>

## Site Allocations

Main issues	<p>The Ebbsfleet Central policy attracted a range of comments. Some sought amendments to certain provisions, including:</p> <ul style="list-style-type: none"> <li>• The allocation boundary should be amended/ expanded, particularly to accurately reflect the amended SSSI boundary</li> <li>• Further detail is required in the policy in relation to transport, infrastructure and mix/ scale of specific uses</li> <li>• Provisions must be flexible and viable, supporting sufficient residential and high density development.</li> </ul> <p>Few comments were received on other allocations, although a refinement was sought to one part of each of the two Dartford town centre allocations (Westgate, Priory Centre).</p>
Most relevant policies	E4, E5, D4, D5,D6
DBC summary response	<p>Strategic allocations represent key development opportunities within the two growth locations in the plan's spatial strategy (policy S1). Within these growth areas, strategic allocations are proposed for the most substantial sites, particularly where offering a mix of essential commercial and residential uses and on-site infrastructure. The Plan includes five strategic site allocations, which are all developable and available, and have had planning applications or significant masterplanning.</p> <p>Ebbsfleet Central is vital to the sustainable delivery of a Garden City at Ebbsfleet, and to the infrastructure and diversified economic development of the Borough. The site, by Ebbsfleet International Station, has been long-identified for development, and had permission at the time of Core Strategy adoption. The subsequent creation of the Ebbsfleet Development Corporation (EDC) led to it acquiring the site in late 2019, as the private landowner did not progress the key part of the development. There has been recent challenges of bringing forward specific proposals for the site in the face changing circumstances, notably the London Resort proposals (which if progressed would feature a dual carriageway access road running along the western side of the existing HS1 rail line with a transport interchange by Ebbsfleet International Station) and the recent designation of the Swanscombe Peninsula SSSI. In this context, a strategic allocation with clear principles and appropriate flexibility is proposed to ensure the huge potential of this land is realised in a sustainable, achievable way. The EDC is now progressing refined proposals, and launched public consultation in November 2021. The EDC state a planning application is expected in 2022.</p>

## Residential Development Management Provisions

Main issues	<p>The housing density/ mix criteria were considered by most (but not all) commenting as needing to be more flexible. Particularly in respect of the mix of housing types and sizes, policy is not a sound responsive approach and limits the provision of smaller homes.</p> <p>Affordable housing policy needs to provide greater flexibility and not inhibit housing delivery.</p> <p>In relation to the requirements for M4(2) dwellings, this should not apply to all new homes/ market housing. It needs to be flexible and justified to ensure that the requirements do not affect the deliverability of sites.</p> <p>Further provisions/ allocations are required to support specialist accommodation.</p> <p>A respondent commented across a number of new housing policies that they should take into account sites with existing permissions. Other comments state the Plan does not positively support redevelopment of despoiled, degraded, contaminated or unstable land, including former landfill sites.</p> <p>The omission of policies devoted to Build to Rent, and small sites is noted.</p>
Most relevant policies	M1, M2, M7, M8
DBC summary response	<p>The Council has reduced previous policy on housing mix so that it is more targeted, and removed the approach of considering residential density through dwelling per hectare requirements (design-led criteria are now included). This is considered in line with national policy and the housing evidence for Dartford.</p> <p>Similarly, the affordable housing policy is regarded as flexible (for example by providing guidance rather than undue prescription on the future tenure mix), and justified against need and viability evidence (see Housing Policies Topic Paper). The proportion of affordable housing sought is significantly less in one of the two priority growth locations – Central Dartford – reflecting relative residential development cost. There is no evidence to justify the need for a specific policy on Build to Rent.</p> <p>Development for specialist residential accommodation is supported in development management policy and promoted at the priority growth locations, including as a part of a very large residential led strategic allocation at Ebbsfleet.</p>

	<p>A positive framework exists for small residential developments that are suitably located, with only limited applicability of development management policies for sites: often falling under size thresholds. A wide range of accommodation is expected to be developed in Central Dartford, including from small sites, and specialist residential development.</p> <p>Dartford Borough's focus on brownfield land will support applicable and available land. However the prospect of extensive contamination of some former landfill sites in the Borough should be recognised. In particular, this is in the context of an ample supply of previously developed land that is available to develop now, and does not have any presence of (or uncertainty over) contamination- which is a crucial environmental, health and financial factor that impacts on the delivery of housing and necessary infrastructure.</p> <p>There are a number of large past planning permissions still extant in the Borough. It is appropriate for the new policy requirements to apply to them given the long timescales for their implementation. The extent to which these will apply will depend on the nature of the permissions and subsequent applications which come forward for the affected sites</p>
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