

DARTFORD LOCAL PLAN

**Inspector's Initial
Questions 8 – 13,
Approach to Allocations:
DBC Response (Paper B)**

March 2022

8. The Council's overall approach to identifying sufficient land to meet its housing need identifies a number of regeneration opportunity areas and Policy M9 indicates that sites will be permitted in accordance with central Dartford, Ebbsfleet and Swanscombe policies.

9. Policy M9 states that sites located in accordance with the identified housing land supply will be permitted for residential development. However, the SHLAA/ 5 year housing supply are not part of the Development Plan for the area, and as such, where sites within those documents do not have planning permission. As such, it appears as though a considerable number of these sites have not been subject to public consultation through a plan-making process or subsequent examination. Is that the case? And what implications does this have for their delivery?

DBC's SHLAA, planning permissions and public consultations

- 1.1 DBC considers that the sites in the housing land supply have been identified and consulted on with the production of the Local Plan (via the SHLAA). In addition, a large portion of the supply will come forward on land allocated in the Plan, and furthermore, a predominance of sites have been subject to public consultation through the planning application process.
- 1.2 Paragraph 2.61 of the Submission Local Plan (page 44 of COR-1) states that "The identified housing land supply is almost exclusively made up of existing developable permissions plus sites found deliverable or developable in the SHLAA." To demonstrate, the supply is broken down in the Appendix (B1) and the next two paragraphs using published SHLAA documentation.
- 1.3 Appendix D of the SHLAA Findings Report sets out the planning status of the sites in the Housing Land Supply that are yet to be delivered (pages 52-63 of HOU-2 and page 1 of HOU-3). Given the scale of strategic allocations, and planning permissions in the Borough, Appendix B1 attached at the end of this document re-presents these with additional information shown for convenience:
 - Site name, dwelling numbers and planning status using information from Appendix D of the SHLAA Findings Report and updated to take account of the errata (pages 52-63 of HOU-2 and page 1 of HOU-3);
 - Highlighting to clearly show site status, which sites are located within the strategic allocations (for example) – see tables 5 and 8 of the Spatial Strategy Topic Paper (pages 25-26 and 37 of SPS-1).
- 1.4 SHLAA findings as illustrated in Appendix B1 indicate that out of a total of 12,455 future dwellings in the Housing Land Supply:
 - 7,935 dwellings are within strategic allocated sites - highlighted in green in the Appendix - and have been subject to public consultation as part of the Local Plan process (N.B. 7,407 of these already have outline or full planning permission or a resolution to grant planning permission so have already been subject to consultation through the planning application process as well);
 - A further 2,834 dwellings have outline or full planning permission or a resolution to grant planning permission - shown blue in the Appendix - and therefore have already been subject to consultation through the planning application process;
 - A further 123 dwellings are the subject of pending current planning applications - shown yellow in the Appendix - and have also been subject to consultation, albeit that decisions on those applications have not yet been made;
 - 325 dwellings are from the small windfall allowance (penultimate row of the Appendix) that, as non-identified, are not able to be subject to consultation.

This leaves a total of only 1,238 applicable dwellings (9.9% of a 12,455 total) which have not been subject to public consultation as part of a strategic allocation in the Local Plan or through a planning application.

- 1.5 It must also be noted that the Draft SHLAA findings report and sites summary compendium were made available when public consultation on the Preferred Options Local Plan (CON-4) took place in January 2020. A final SHLAA findings report and site summary compendium were published alongside the first Publication Local Plan in February 2021 and updated to accompany the second Publication Local Plan in September 2021 (HOU-2 and HOU-4). The clear majority of the sites in the submitted SHLAA September 2021 were included in the draft version in January 2020 and all of them were included in the February 2021 version.
- 1.6 Therefore, there have been previous opportunities for comments to be made prior to the second Publication period on the Local Plan (COR-1) in September 2021.

Delivery prospects and DBC track record

- 1.7 DBC considers that there is a very good delivery prospect of sites identified in the housing land supply. This is because planning permission or a resolution to grant planning permission is already in place for a large number of dwellings (see paragraph 1.4 above). At other sites, the consideration of availability and achievability in the SHLAA for developable sites is highly relevant (see HOU-5, pages 15 to 17 and 26 to 31). Moreover, DBC has a successful track record of delivery using the same focussed approach on key strategic scale allocations supported by a SHLAA.
- 1.8 The Submission Local Plan follows the same approach taken forward in the adopted Dartford Core Strategy 2011 (POL-1). A comparison between the overall strategic approach and policies in the two plans is set out in paragraphs 4.1-4.3 of the Spatial Strategy Topic Paper (pages 11-14 of SPS-1) and paragraphs 4.1-4.2 of the Housing Policies Topic Paper (pages 9-10 of HOU-1). The Core Strategy only has two strategic site allocations, identified in the Key Diagram and subject to policies CS3 and CS5 (see pages 21, 29-34 and 39-43 of POL-1) and shown on the Policies Map (COR-3 and COR-4). Core Strategy policy CS10 makes reference to the SHLAA 2010 (see page 57 of POL-1).
- 1.9 The previous SHLAA 2010 identified a total of 58 developable and deliverable sites. To date, 46 of these sites have been granted planning permission, of which 33 are now complete and 6 have commenced development, with a further four years of the Core Strategy period to 2026 remaining.
- 1.10 The focussed approach of the Core Strategy has boosted rates of residential delivery significantly and supported very high population growth rates (see HOU-6 Residential Requirements Report paragraphs 2.17-2.20 for national and county comparisons).
- 1.11 Therefore, it is clear that the majority of sites identified in the SHLAA 2010 have come forward for development despite them not being directly identified in the Development Plan, and this has been successful in providing a flexible and sufficient supply of new housing land. DBC has no reason to believe that this approach will not continue to successfully bring forward the delivery of housing sites.

10. Other than the site allocations that include elements of residential development as set out at Policies D4, D5, D6, E4 and E5 it appears that no further residential allocations have been included in the submitted plan. How will the Council ensure housing needs will be met over the full plan period?

- 2.1 It is correct that the Local Plan site allocations are focussed on the strategic allocations under policies D4, D5, D6, E4 and E5. Tables 5 and 8 of the Spatial Strategy Topic Paper list the various sites included within these allocations (pages 25-26 and 37 of SPS-1) and this information is also included in Appendix B1 of this document.
- 2.2 DBC consider focusing allocations in the new Local Plan and housing delivery on the two priority growth locations (Local Plan sections/ chapters 3 and 4, and policy S1 criteria 2a and 2b,) is important in reinforcing the Borough's continuing spatial strategy, in achieving a sustainable development pattern allowing growth to continue, and meeting transport aims (outlined in Local Plan paragraph 2.13). This clarity and consistency of strategy and Local Plan focus supports delivery, providing certainty and confidence for landowners and investment in enabling infrastructure.
- 2.3 As set out in paragraph 1.3 above, a total of 7,935 dwellings are expected on these allocated sites over the plan period, this is a large portion of the overall housing land supply. It should be noted that this is a conservative estimate of the total number of dwellings expected to come forward on these sites and it is highlighted that the figures are expressed as a minimum in the relevant parts of policies D4: 3c, D5: 3a, D6: 3a and E5: 3a. The exception is Ebbsfleet Central where criterion 5a of policy E4 sets out an approximate figure.
- 2.4 Ensuring needs are met, a further 2,834 dwellings are expected to be provided on other sites which already have planning permission during the plan period, as set out in paragraph 1.3 above.
- 2.5 DBC considers that the Submission Local Plan outlines a strong policy framework to support housing delivery for sites within the strategic allocations and other sites identified in the housing land supply. The five strategic allocations complement the following strategic and development management policies:
- Policy S1 which sets out clear growth locations (criterion 3), the location of development at strategic allocations and in the identified housing land supply (criterion 2), residential development in the urban area (criterion 6a), and residential development of a proportionate scale within the villages and on non-Green Belt land; (pages 26-27 of COR-1);
 - Policy S4 which contains commitments to residential delivery including: planning application decisions to meet assessed housing needs (criterion 1); the delivery of large developments at a phased rate (criterion 2); and maintaining a rolling five year deliverable supply of housing land (criterion 5) (page 46 of COR-1); and
 - Policies D7 and E6 which identify areas that DBC supports for regeneration including residential development (pages 80 and 105 of COR-1). Some sites within these areas have been found to be suitable for residential development in the SHLAA, but were assessed as not yet available and do not currently form part of the housing land supply. However, overall it is anticipated some significant additional residential development will occur within the regeneration areas in the plan period (other than at sites confirmed as already available). These present opportunities for a number of extra residential sites to suitably materialise.
 - Policy M9 which directly supports permitting residential developments in Central Dartford, Ebbsfleet and Swanscombe, and in the identified housing

land supply (where the proposed number of dwellings is broadly in line with the projected site capacity) (page 143 of COR-1).

- 2.6 DBC considers that this strategic approach to allocation, complemented by the SHLAA and brownfield land register, helps to produce a relatively succinct and usable Local Plan that remains more up-to-date, aspirational and deliverable. This is consistent with paragraphs 15 and 16 of the NPPF (page 8 of NAT-1).

11. What is the scale of growth envisaged in other smaller settlements in the Borough? Is this set out anywhere in the submission plan? Is any growth in other locations to be managed through a settlement hierarchy or other policy mechanism to guide the scale and location of residential development?

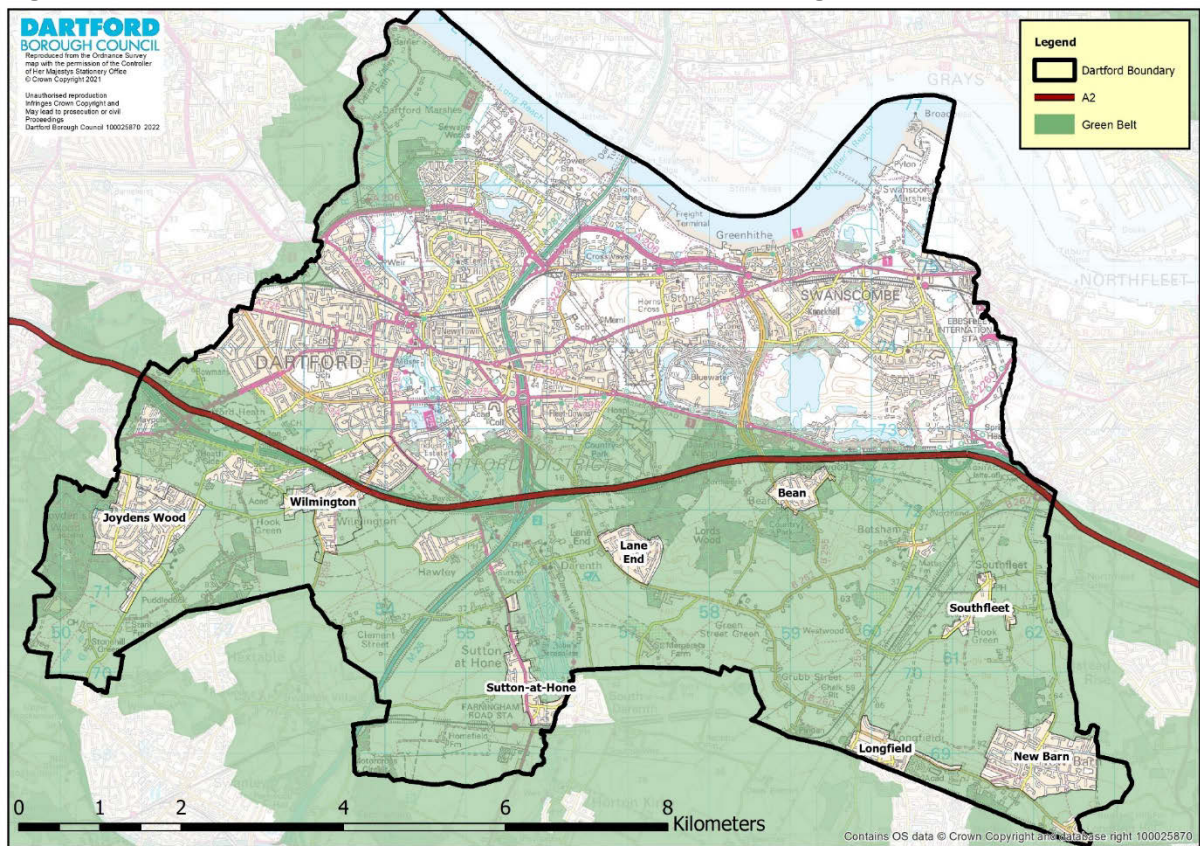
Tiered spatial policy approach

- 3.1 Criterion 1 of policy S1 (Borough Spatial Strategy) in the Submission Local Plan sets out principles for new development across the Borough (page 26 of COR-1). The third criterion (Policy S1:3) identifies Central Dartford and Ebbsfleet Garden City as the growth locations with the overriding priority for development. These are part of the urban area: defined in S1:6 as the area to the north of the A2 and outside the Green Belt and on Diagram 1: Key Diagram (pages 25-26 of COR-1).
- 3.2 Policy S1:6 makes clear that within the urban area, complementary to strategic growth at Central Dartford and Ebbsfleet Garden City, developments with permission and additional development will occur at the Urban Area neighbourhoods of Dartford, Stone, Greenhithe and Swanscombe. This includes development as set out in points (a) to (e) of criterion 6. In this respect, point (a) refers to residential development at sites in the identified housing land supply and point (d) refers to the protection of shops and services at identified District and Local Centres and improvement of the quality of their environment where opportunities arise.
- 3.3 Policy S1:9 and 10 (page 27, COR-1) outline the principles for development in the non-urban area. Criterion 9 seeks to maintain the openness and permanence of the Green Belt and criterion 10 sets out that any residential or other development within the Borough's villages will be of proportionate scale and on non-Green Belt land. The Green Belt and villages are shown indicatively on Diagram 1: Key Diagram (page 25 of COR-1). The Policies Maps East and West show the current areas covered by Green Belt (COR-3 and COR-4), although it should be noted that the Policies Map Changes document indicates some minor changes to the Green Belt for the provision of gypsy and traveller pitches (see pages 10-11 of COR-2).
- 3.4 Therefore, policy S1 adopts a tiered approach towards identifying priorities for the location of development in the Borough:
- firstly focusing on Central Dartford and Ebbsfleet Garden City as areas with overriding priority for development (S1:3), then
 - promoting development in the rest of the Urban Area (S1:6), then
 - setting out the approach towards development in the Non-Urban Area (S1:9/10).
- 3.5 Table 3 of the Spatial Strategy Topic Paper (pages 11-13 of SPS-1) shows the connections between the provisions of policy S1 and existing policies in the adopted Local Plan. Paragraphs 4.1 to 4.3 of this Topic Paper notes the continuity in the approach from the adopted Core Strategy 2011 and the refinements made to this, for example accounting for the presence of some significant extant planning permissions.
- 3.6 There is no settlement hierarchy set out in the Submission Local Plan and neither was there a settlement hierarchy in the Dartford Core Strategy (POL-1). DBC considers that Diagram 1: Key Diagram and policy S1 (Borough Spatial Strategy) suitably illustrate the spatial pattern of development and main development opportunities in the Borough.

Summary approach towards smaller settlements

- 3.7 To help achieve the overall spatial strategy set out in policy S1 referred to above, the Submission Local Plan features a number of policies which support appropriate residential and commercial development in the Borough, both within the Urban Area and the Non-Urban Area. This includes:
- S4 Borough Development Levels
 - M9 Sustainable Housing Locations; and
 - M23 District and Local Centres
- Further information is set out in paragraphs 3.9 to 3.21 below.
- 3.8 As shown in figure 1 below, there are villages and clusters of development outside the Urban Area that are not within the green belt. Policy S1:10 applies to these areas.

Figure 1: Smaller Settlements and Green Belt in the Borough



Housing (policies S1, S4 and M9)

- 3.9 Policies S1 (criteria 2 and 6(a)), S4 (criterion 3) and M9 (criterion 1) of the Submission Local Plan refer to residential development taking place on sites in the identified housing land supply. The Plan glossary identifies the housing land supply as being deliverable and developable sites capable of accommodating five or more new dwellings, identified in the SHLAA and expanded/ updated via the Brownfield Land Register (pages 214-215 of COR-1).
- 3.10 Section 3 (Results Outline) of the SHLAA Findings (pages 9-28 of HOU-2) includes data on the location and capacity of all sites of five or more dwellings found to be developable or deliverable. Table 3 lists 48 developable/ deliverable housing sites in 'Other Urban' locations (pages 16-20 of HOU-2). These are located at Dartford (except Central Dartford which is listed in a different table), Stone, Greenhithe and Swanscombe and have an aggregate capacity of 1,853 dwellings over the rest of the plan period.

- 3.11 Table 4 of the SHLAA Findings (page 20 of HOU-2) lists four deliverable/ developable sites south of the A2 which are also included on the Brownfield Land Register (pages 2 and 5 of HOU-9). These are all in smaller settlements outside the Urban Area. The list of sites is replicated in Table 1 below. Further information on the assessment of these sites is available in the SHLAA Site Summary Compendium (pages 31, 173, 176 and 189 of HOU-4).

Table 1: SHLAA sites south of the A2

<i>Ref</i>	<i>Name</i>	<i>Capacity Estimate</i>
31	Rear of 67-97 Station Road, Longfield	5
214	Depot, Broad Lane, Wilmington	6
218	Rear of 21 Albert Road, Wilmington	5
232	North East of Collier Crescent, Darenth	5
	Total Dwellings	21

- 3.12 However there is the prospect of other sites occurring i.e. non-identified 'windfall' sites. Policy M9 (criterion 2) of the Submission Local Plan sets out the factors that will be taken into account in determining planning applications for windfall sites for residential development (page 143 of COR-1). DBC would expect windfall sites to deliver a relatively greater proportion of housing in villages compared to the urban area. This is because small sites of 1 to 4 new dwellings in the Borough are not counted in the SHLAA and will therefore be windfalls. The contribution which small windfall sites make towards development in smaller settlements is set out in further detail below.
- 3.13 Table 2 shows the number of dwellings that have come forward on small (1 to 4 extra dwellings) windfall sites, in the last four years. It differentiates between those in the urban area to the north of the A2 and those to the south of the A2.

Table 2: Number of small site windfall dwellings north and south of the A2

<i>Area</i>	<i>2017/18</i>	<i>2018/19</i>	<i>2019/20</i>	<i>2020/21</i>	<i>Total</i>	<i>Average</i>
North of A2	12	14	21	15	62	15.5
South of A2	14	10	11	8	43	10.75

- 3.14 Looking at future estimates across the Borough, Appendix E of the SHLAA Findings (pages 66-70 of HOU-2) sets out a robust and cautious approach to relying on small windfall sites only as part of Dartford's housing land supply calculations. On the basis of small windfall site completions since 2014/15, the total windfall allowance in table 1 of the Submission Local Plan is calculated on the basis of an average of 25 dwellings a year in the Borough (page 45 of COR-1). Table 2 suggests the trend is for 41% of the Borough's windfalls are south of the A2.
- 3.15 For the purposes of looking ahead to answer this Inspector's Initial question, table 3 below sets out anticipated delivery from small windfall sites for locations south of the A2 only.

Table 3: Housing delivery south of the A2 – small sites only

<i>Category of small sites south of the A2</i>	<i>Number of dwellings</i>
A. Small site delivery in plan period so far (4 years: see Table 2)	43
B. Extant small sites planning permissions (27 dwellings in total) with a 10% reduction to allow for some non-implementation	24
C. Annual average small site delivery over past 4 years (see Table 2)	10.75

<i>Category of small sites south of the A2</i>	<i>Number of dwellings</i>
D. Projected delivery from small sites windfalls in the south of the Borough over the remaining plan period (Row C x 13) ¹	140
Plan period projected small sites total dwellings (Rows A+B+D)	207

- 3.16 Table 3 shows that a projected estimate of 207 dwellings will be delivered on small sites south of the A2. If this figure is added to the 21 dwellings expected to come forward from identified (larger) SHLAA sites set out in table 1 above, it is estimated that a total of 228 dwellings will come forward in the area south of the A2 over the remaining part of the plan period. Given the Green Belt designation of much of this area and the policies which apply, this is considered realistic (and as to location, it is likely that these dwellings will come forward in the smaller settlements which are inset from the Green Belt).
- 3.17 The Submission Local Plan is not reliant on any large windfall sites of 5 or more residential units over the plan period, either north or south of the A2. This is consistent with the approach set out in Appendix E of the SHLAA Findings (pages 66-70 of HOU-2). Any development of 5 or more new dwellings delivered as a windfall i.e. any site not one of the four shown in Table 1 will add to the projected estimate of 228 dwellings for the area south of the A2.

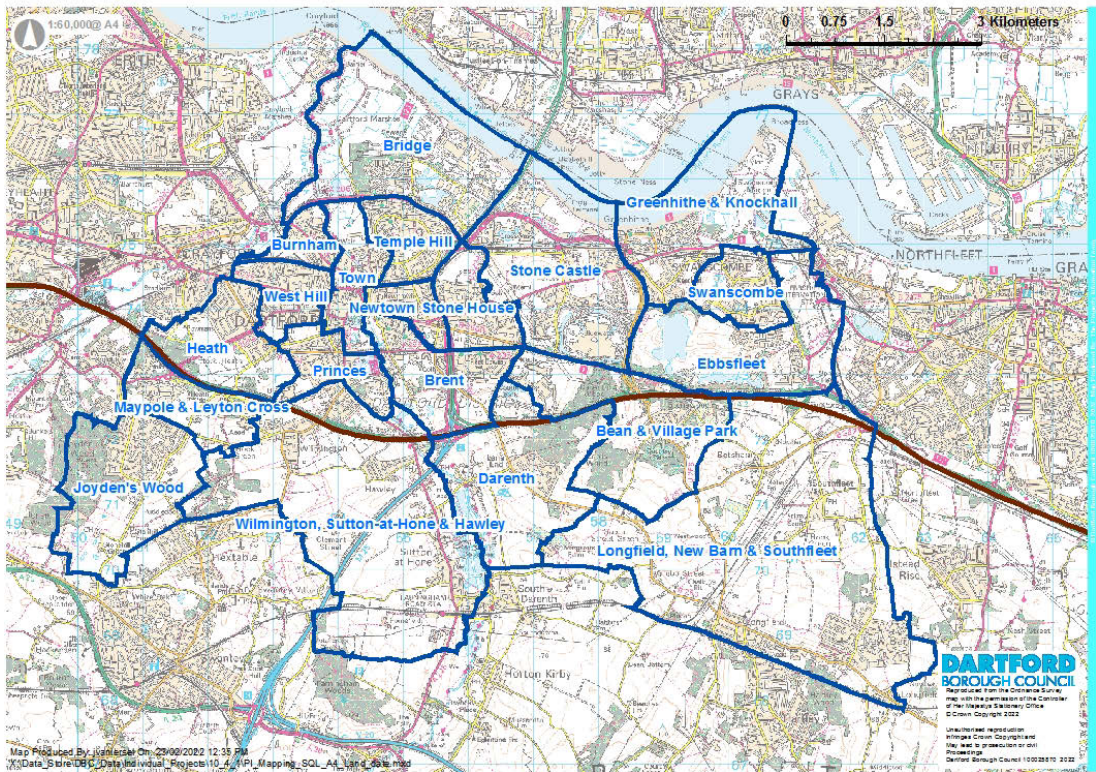
Centres, Residential and Jobs (policies S1 and M23)

- 3.18 Policy S1:7 and 8 in the Submission Local Plan (page 27 of COR-1) set out the economic strategy for the Borough. Criterion 8(iv) indicates there will be redevelopment at Local Centres in the urban area and at villages.
- 3.19 Appendix D of the Submission Local Plan lists the District and Local Centres within the Borough (pages 219-220 of COR-1). These are also shown on the East and West Policies Maps (COR-3 and COR-4). A number of the centres are located in the smaller settlements to the south of the A2 as follows:
- Longfield: District Centre
 - Sutton at Hone South: Local Centre
 - Sutton at Hone North: Local Centre
 - Lane End: Local Centre
 - Birchwood Parade, Joydens Wood: Local Centre
 - Summerhouse Drive, Joydens Wood: Local Centre
 - Bexley Park: Local Centre
- 3.20 Policy M23:1 gives further guidance on the type of development which will be acceptable in District and Local Centres (page 200 of COR-1). In this respect, it allows for mixed use development where: suitable active uses which are proportionate to the viability and purpose of the centre are provided at ground floor level; and it improves the local environment. Paragraph 5.209 of the Submission Local Plan (COR-1) recognises the importance of allowing these centres to evolve and diversify whilst retaining their function. In this respect, it recognises the role that changes of use and mixed use partial redevelopment will play in this. Paragraph 5.210 (COR-1) sets out some of the considerations which will be taken into account in considering residential use above and behind ground floor units.

¹ Row A accounts for the first 4 years, Row B accounts for the next 3 years, therefore Row D uses a figure of 13 years to cover the remaining Local Plan period.

3.21 Policy S1:8(a) states that economic development will be delivered principally via planned strategic expansions at, or additional floorspace within, the identified employment areas. There are not any identified employment areas within the smaller settlements though there are a number of dispersed and small scale identified employment areas located in the Green Belt (see Policies Maps East and West COR-3 and COR-4).

Figure 2: Map of the Current Ward Boundaries



3.22 Data from the NOMIS Business Register and Employment Survey 2020 provides information on the numbers of jobs by ward area. Table 4 uses this data show the proportion of jobs in the wards south of the A2 as a proportion of those in the Borough as a whole. A map showing the boundaries of the wards is included as Figure 2.

Table 4: Proportion of Borough’s Jobs in Wards South of A2

Ward	Proportion of Borough’s Jobs
Bean and Village Park ²	7%
Darenth	1%
Joyden’s Wood	4%
Longfield, New Barn and Southfleet	5%
Maypole and Leyton Cross	1%
Wilmington, Sutton-at-Hone and Hawley	5%

Source: NOMIS 2020 Survey³

² The high proportion of jobs in this small ward can be attributed to Darent Valley Hospital which lies to the north of the A2.
³

<https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=189>

- 3.23 Taking Bean and Village Park ward out due to the high number of jobs accommodated at Darent Valley Hospital to the north of the A2, the table shows that wards predominantly south of A2 accommodate only 16% of the Borough's jobs, with limited ability to sustainably support significant additional development.

Local characteristics and population

- 3.24 It is important to note the key existing physical and population characteristics across Dartford Borough, in order to understand the approach that DBC has taken towards smaller settlements in the Submission Local Plan and the derivation of appropriate local policies
- 3.25 Dartford Borough as a whole is a small Borough with a total area of around 7,631 hectares. This is the smallest of the 13 local authorities in Kent. The area to the south of the A2, in which the smaller settlements are located, accounts for around 3,842 hectares (50%) of the Borough.
- 3.26 The distance between the westernmost settlement (Joydens Wood) and easternmost settlement (New Barn) is approximately 15km (9 miles) by road. The smaller settlements are all within close proximity to the A2, and the urban area, i.e. within 6km (4 miles) by road with some located much closer than this, which may mean limited prospects for settlement self-containment south of the A2.
- 3.27 With the exception of the four sites set out in table 1 above, the SHLAA results for sites south of the A2 illustrate the poor performance of many locations in this area against objective location/ access suitability criteria (see Appendix C of SHLAA Findings on pages 36-51 of HOU-2).
- 3.28 As indicated in Figure 1, a large proportion (88%) of the area south of the A2 is designated as Green Belt. The boundaries of the Green Belt can only be altered where there are exceptional circumstances in accordance with paragraphs 140-142 of the NPPF (pages 41-42 of NAT-1) and restrictive policies apply in relation to development in the Green Belt (pages 41-44 of NAT-1).
- 3.29 Turning to existing scale and character, the populations of the areas to the south of the A2 are small in comparison to the urban settlements of Dartford, Swanscombe, Greenhithe and Stone. For the purposes of the smaller more rural settlements, it is helpful to use parish data from the 2011 census to show the relative sizes in terms of population. The population data is set out in table 5 below and a map showing the boundaries of the parishes is included as Figure 3.

Table 5: Population by Parish 2011

Area	2011 Population
South of A2:	
Bean*	1,643
Darent*	4,851
Longfield and New Barn	4,919
Southfleet	1,327
Sutton at Hone and Hawley*	4,230
Wilmington*	7,178
Total South of A2	24,148
North of A2:	
Stone	10,778
Swanscombe and Greenhithe	14,128

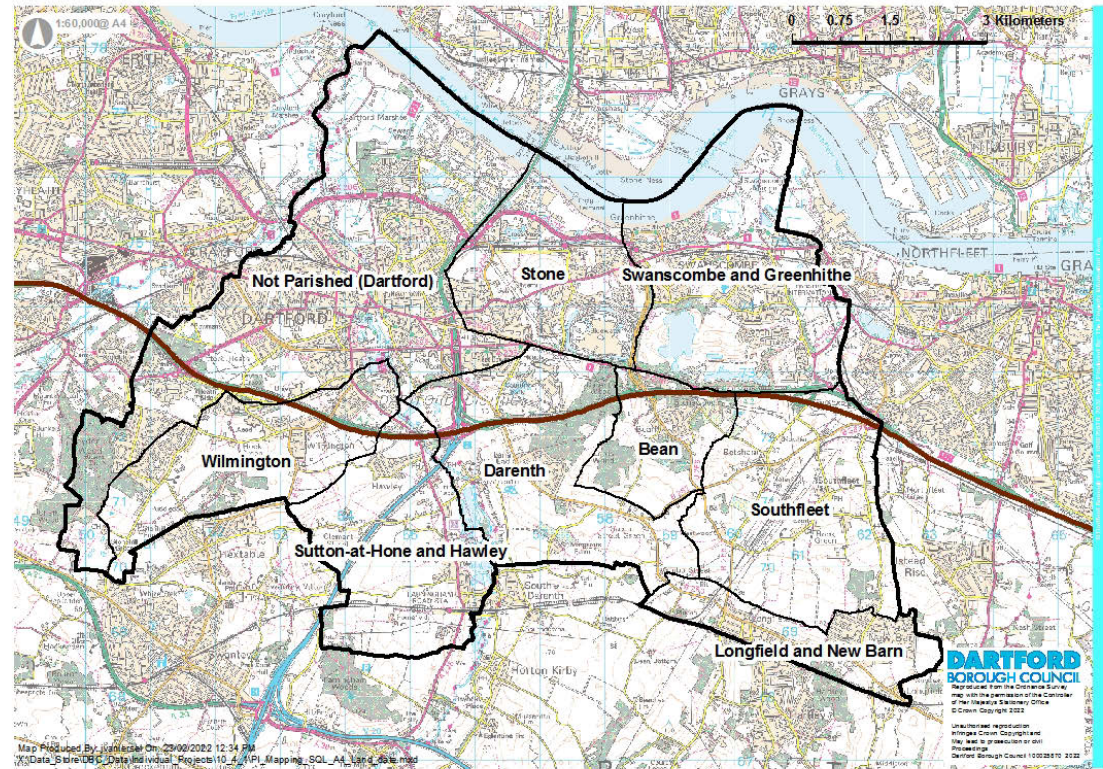
Area	2011 Population
Non-parished<	48,311
Total North of A2	73,217
Total for Dartford Borough	97,365

Source: Kent County Council Parish Population Bulletin⁴

* Small parts of these parishes extend to the north of the A2

< A small part of the unparished area extends to the south of the A2 in the west of the Borough

Figure 3: Map of the Parish Boundaries in 2011



- 3.30 It is clear from table 5 that the predominance of people in Dartford Borough live in the urban parishes and non-parished areas which mainly lie to the north of the A2. This population supports the predominance of key major services lying in the urban area.
- 3.31 Furthermore, five of the six parishes lying wholly or mainly south of the A2 had fewer than 5,000 residents in 2011, with two having few then 2,000 (Southfleet and Bean). In comparison, the areas covered by Stone Town Council and Swanscombe and Greenhithe Town Council had over 10,000 and 14,000 residents respectively.
- 3.32 Many settlements south of the A2 can be characterised as mostly interspersed residential areas/ estates largely developed in the 20th century, plus some generally small villages. It is noted that new significant residential-led development in such locations is very likely to lead to functional dependency on regular travel to the urban area or frequent longer distance trips.

Conclusions

⁴ Page 8 of https://www.kent.gov.uk/data/assets/pdf_file/0016/8125/2011-Census-parish-population-bulletin.pdf

- 3.33 Policy S1 of the Submission Local Plan (COR-1) sets out a tiered approach towards the prioritisation of locations for development rather than a specific settlement hierarchy.
- 3.34 Policies S1, S4, M9 and M23 of the Plan allow development to take place in the smaller settlements located south of the A2. Sites are identified in the SHLAA which are deliverable or developable for housing over the plan period, including some south of the A2. In addition, it is expected that small windfall residential developments will come forward in the smaller settlements south of the A2, as has happened previously. There are also potentially opportunities for mixed use development in the district centres, seven of which are located in the Borough's villages. Whilst there are a number of dispersed and small scale identified employment areas to the south of the A2, none of these are located within the settlements. The proportion of jobs hosted in areas south of the A2 is relatively small compared to those in the Borough as a whole.
- 3.35 The Borough is small in size, and none of the smaller settlements to the south of the A2 are far enough from the strategic road network and urban area in the north to be considered to offer good prospects of any reasonable claim to self-containment. The SHLAA has found that many sites in the area to the south of the A2 perform poorly in terms of the suitability of their location/ access. The population of the parishes to the south is typically much lower than the area to the north of the A2.
- 3.36 Furthermore, a very significant proportion of land in the southern part of the Borough is designated as Green Belt which restricts the amount of development which could take place in this location unless the Local Plan could demonstrate exceptional circumstances to change the boundaries.
- 3.37 In light of these characteristics, DBC considers that the Local Plan policy approach towards smaller settlements is appropriate and in compliance with national planning policy.

12. What forms of development might be acceptable on the land North of London Road Area, Swanscombe outside the identified Employment Area (policy E6)? Is the site intended for further employment development? Or is residential or mixed use development envisaged for this site?

- 4.1 Policy E6 of the Submission Local Plan (page 105 of document COR-1) and its supporting text do not directly specify the type of development that may come forward in this area. This reflects the changeable and unusual recent circumstances facing the land, and Local Plan preparation. It forms part of the wider site put forward for the proposed London Resort so there is currently significant uncertainty in relation to the future of wider area. The policy serves the purpose of promoting development within a suitable part of the Ebbsfleet Garden City area, providing criteria to inform the preparation of acceptable proposals and thereby increasing clarity.
- 4.2 Previously, DBC's Local Plan Preferred Options January 2020 included a specific section in relation to the wider Swanscombe Peninsula (pages 65-66 of CON-4). In reference to potential uses for the wider Swanscombe Peninsula area, paragraph E11 (page 65 of CON-4) indicated the following:
"Potential suitable development could be for environmental upgrades to the employment area (and/or to provide less environmentally harmful new industrial premises), outdoor / leisure uses and possible low key visitor accommodation, plus local scale neighbourhood uses facilitated by limited residential development."
This was prior to the notification and subsequent designation of the Swanscombe Peninsula SSSI.
- 4.3 By way of further background, the Ebbsfleet Implementation Framework 2017 (EIF) (pages 124 to 129 of SPS-2) provides background for the wider Swanscombe Peninsula area. It should be noted that this was published by the Ebbsfleet Development Corporation well before the Swanscombe Peninsula Site of Special Scientific Interest (SSSI) was designated in November 2021. The SSSI substantially affects the amount of land which would be available for development in the event that the London Resort does not come forward, resulting in significantly less land than envisaged in the EIF. Policy E6 addresses this.
- 4.4 The EIF (SPS-2) outlined a range of information including opportunities and constraints as assessed in 2017. The Vision for the wider area on page 129 shows a number of uses across the wider peninsula. This shows a large area subject to the London Resort NSIP (Nationally Significant Infrastructure Project) application. It identifies Northfleet Industrial Estate for potential enhancement of the employment area. Part of this is within the area covered by policy E6 and is within the Identified Employment Area (see paragraph 4.2 above).
- 4.5 Looking at DBC's Local Plan evidence, Table 7 Non-Deliverable/ Developable sites of the Strategic Housing Land Availability Assessment findings (SHLAA 2021, HOU-2 page 139), see site reference 139, found this site to be unavailable for residential development, attributable to the current London Resort proposals. Further information on suitability is set out on page 121 of the SHLAA Site Summary Compendium (HOU-4) which finds that the site qualifies for assessment, is well served by public transport and has the following physical suitability issues which can be overcome:
"The site is suitable for development subject to overcoming a number of constraints. It would need to ensure that it does not adversely impact on the adjacent Site of Special Scientific Interest. There would also be a need to address contaminated land and road traffic implications. Flood risk may mean no residential development at ground floor level. A minerals assessment may be required depending on the extent and location of built development. Need to take into account land safeguarded for High Speed 1 which runs along the

east of the site. Also consider impacts on the operation of existing minerals/waste sites as well as air quality, groundwater, noise and heritage issues. A public right of way runs through the site."

The area covered by policy E6 and assessed in the SHLAA avoids the SSSI as first notified by Natural England. The land was assessed as unavailable for development as within the area proposed for the London Resort. Although potentially suitable for some housing, the area therefore could not be counted as developable. There is no reliance on it in the identified housing land supply for that reason, i.e. its contribution in terms of confirmed developable land is currently quantified as zero dwellings.

- 4.6 The principal active land use across the policy area, in addition to open land, is currently industry. Diagram 13 in the Submission Local Plan (page 104, COR-1) shows the eastern part of it is an existing identified employment area, and therefore the Submission Local Plan confirms this would be suitable for uses and the types of development set out in policies M19 (criterion 1) and M21 of the Submission Local Plan (pages 187 and 193, document COR-1).
- 4.7 To conclude, the evidence indicates that residential, employment, or a mix of these and associated uses, might be acceptable in the part of the land North of London Road outside the identified employment area, if land were to become available (for instance in the event that the London Resort project is not approved and/ or implemented). However, whilst the policy recognises the opportunity for regeneration (and constraints to be addressed) it is not considered appropriate given uncertainty to limit investigation of sustainable development options through the policy, for instance to housing or industrial uses.

13. Other than the table on page 11 of the Sequential Approach paper [ECC-7], is there a document that sets out in relation to flood risk, the sequential and exceptions test results for each of the site allocations in the plan? The current document does not appear to set out on a site by site basis the respective justification for the exceptions test for those sites where this is required by national policy.

Introduction

5.1 The sequential and exceptions tests results for the site allocations is not currently explicitly set out in any one part of the evidence base. However, the information is available in different parts of the evidence base. The below text pulls together information from different parts of the existing evidence base to more explicitly outline these results.

SFRA Assessment of Sites

5.2 A level 2 Strategic Flood Risk Assessment (SFRA) was carried out for a number of sites, including relevant site allocations in the plan. Overarching information on this can be found in section 14 pages 91-95 of the SFRA February 2021 (ECC-3). Table 14-1 on page 92 of this document lists the assessed sites and provides a justification for their inclusion in the level 2 assessment. This includes Priory Shopping Centre (allocation policy D6), Glentworth Club (within the East of Lowfield Street allocation policy D5) and Ebbsfleet Central (allocation policy E4). It does not include the Westgate (policy D4) and remainder of the East of Lowfield Street (policy D5) allocations as these already have planning permission or a resolution to grant planning permission (as indicated in table 5 on page 25 of the Spatial Strategy Topic Paper SPS-01) and the flood risk issues have previously been addressed via the planning application process.

5.3 The results of the level 2 assessment for these sites are in the site summary sheets and site summary sheet mapping in Appendices M and N of the SFRA respectively (ECC-5). It appears that combining/ accessibility checking of the Appendices previously resulted in some loss of information from them so submission document ECC-5 has been updated to rectify this. In Appendix N, it should be noted that the maps of modelled breach extents (0.5% AEP Present Day) have some of the site boundaries missing but these are clear from the other maps on the same page and all of the flood risk information is still included. The following pages of the documents are relevant:

- Priory Centre – Appendix M pages 10-18 and Appendix N pages 4-6
- Glentworth Club – Appendix M pages 36-43 and Appendix N pages 13-15
- Ebbsfleet Central – Appendix M pages 57-65 and Appendix N pages 22-24

5.4 The site summary sheets in Appendix M do not carry out the sequential and exceptions tests but do set out the proportion of each site which is within each flood zone as shown in table 6 below.

Table 6: Proportion of Each Sites within Different Flood Zones

Site	Flood Zone 1	Flood Zone 2	Flood Zone 3a	Flood Zone 3b
Priory Centre	3%	97%	0%	0%
Glentworth Club (within East of Lowfield Street site allocation)	38%	62%	0%	0%
Ebbsfleet Central*	90%	2%	5%	3%

* Please note that the outputs for the Ebbsfleet Central site reflect different site boundaries to the one now contained in the Submission Local Plan

National Policy

- 5.5 Section 2 pages 5-6 of the Flood Risk Sequential Approach Paper September 2021 (ECC-7) briefly sets out the national policy in relation to the sequential and exceptions tests. This is outlined in full in paragraphs 159-165 of the National Planning Policy Framework (NAT-1).

Allocated Sites: Application of the Sequential and Exceptions Tests

- 5.6 As can be seen from table 6 above, the majority of the areas of the allocated sites which do not currently benefit from planning permission or a resolution to grant planning permission are within flood zones 1 and 2. The sequential approach means that development should preferably be located in flood zone 1 (areas at the lowest risk of flooding). However, the flood zone maps in Appendix D of the SFRA (see pages 16-22 of document ECC-4) indicate that a significant amount of the Borough is within flood zones 2, 3a and 3b. Flood defences provide protection to many of these areas as indicated in the maps in Appendix I.3 of the SFRA (see pages 65-70 of document ECC-4).

Priory Centre and East of Lowfield Street

- 5.7 As shown on page 18 of document ECC-4, large parts of Central Dartford are within flood zones 2 and 3a. As set out in table 6 above, parts of the Priory Centre and East of Lowfield Street site allocations are within flood zone 2. Submission Local Plan policy S1 (criterion 3) identifies Central Dartford as an area for regeneration and policy D1 seeks the high quality transformation of the area, including the renewal of Lowfield Street and the redevelopment of the Priory Centre site (see pages 26 and 60 of document COR-1). It is considered that this overall ambition to regenerate and transform the area provides justification for the allocation of sites within flood zone 2. Furthermore, according to the national planning practice guidance (summarised in paragraphs 2.3 and 2.4 of the Flood Risk Sequential Approach Paper ECC-7), dwellings are an appropriate type of development in these zones.

Ebbsfleet Central

- 5.8 Page 19 of document ECC-4 shows the parts of Ebbsfleet Central which are within flood zones 2, 3a and 3b. The areas of highest risk, flood zone 3b, run along the River Ebbsfleet. Diagram 10 and policy E4:3 of the Submission Local Plan (pages 90 and 98 of document COR-1) make clear that the areas along the river are expected to be part of the strategic green grid/ a public park so are not proposed for built development.
- 5.9 The area immediately north east of Ebbsfleet International Station is within flood zones 2 and 3a. Ebbsfleet Garden City has been identified as an area of regeneration in policy S1 (criterion 3) with the strategy being set out in more detail in criterion 2 of policy E1 (pages 26 and 88 of the Submission Local Plan document COR-1).
- 5.10 In terms of development in flood zone 2, the same justification applies to that set out for Central Dartford in paragraph 5.7 above.
- 5.11 For development in flood zone 3a, residential development must also meet the exception test (see paragraphs 2.3 and 2.4 of the Flood Risk Sequential Approach Paper ECC-7). As set out in paragraph 2.1 of document ECC-7, this means that it must be demonstrated that the development would provide wider sustainability benefits to the community that outweigh the flood risk and the development must be safe for its lifetime without increasing flood risk elsewhere. It is clear from the overall strategy for Ebbsfleet Garden City (policies E1 (criteria 1 and 2) and E4 of the Submission Plan COR-1) and table 5.15 of the Sustainability Appraisal (page 148 of

document COR-8) that the development of Ebbsfleet Central, including land to the east of the railway station, will have significant sustainability benefits to the community. Pages 64-65 of Appendix M of the SFRA sets out the recommendations for requirements of site specific flood risk assessment, including guidance for developers of the Ebbsfleet Central site (see pages 64-65 of the document attached). Meeting these requirements should ensure that development of the site will be safe for its lifetime without increasing flood risk elsewhere. It should also be noted that the Ebbsfleet Central site covers a much wider area than the part subject to flood risk. Therefore, it should be possible for more vulnerable development to be planned to avoid the areas at greatest risk of flooding (previously set out in paragraph 4.10 of the Flood Risk Sequential Approach Paper ECC-7).

APPENDIX B1: Housing Land Supply, SHLAA sites and Strategic Allocations**Key**

Sites within Strategic Allocations
Other sites with planning permission or a resolution to grant planning permission
Remaining sites with pending current planning applications

Ref	SITE	Status^	Plan Period Total	SHLAA Developable/ Deliverable Site	Within Strategic Allocation
1	Ebbsfleet Central A (EC1)	O	505	Yes	Yes – E4
1	Ebbsfleet Central B (EC2)	O	1302	Yes	Yes – E4
1	Ebbsfleet Central C (EC4)	O	168	Yes	Yes – E4
2	Greenwood	Y	5	Yes	
3	Knockhall Road	Y	61	Yes	
4	Two Brewers Public House	Y	11	Yes	
5	St Marys Church Hall, Church Hill	Y / P	6	Yes	
10	Steam Crane Wharf	N	78	Yes	
12	St James Lane Pit (Stone Pit 2)	O / Pr	700	Yes	

Ref	SITE	Status^	Plan Period Total	SHLAA Developable/ Deliverable Site	Within Strategic Allocation
14	Lowfield Street re-development site	Y	556	Yes	Yes – D5
15	Croxtan Garry Site (E of Ingress Park)	Y / P	233	Yes	
16	Land At Highfield House 2 - 4 West Hill And 74-76	Y	23	Yes	
17	Station Approach, Home Gardens	N	253	Yes	
19	Glentworth Club Site, 154 Lowfield Street	N	52	Yes	Yes – D5
20	Co-op Site	Y	120	Yes	Yes – D4
21	Stone Lodge	O	117	Yes	
22	Vauxhall Farm, Land East of 110-114 Lowfield St	Y / P	89	Yes	Yes – D5
23	Builders Yard, 1 Spring Vale, Knockhall Road, Greenhithe	P	30	Yes	
25	Car park west of Two Brewers Public House	Y	14	Yes	Yes – D6
27	Questor Riverside	N	8	Yes	
30	14-18 Lowfield Street	Y	5	Yes	
31	Land to the Rear of 67-97 Station Road, Longfield DA3 7QA	N	5	Yes	

Ref	SITE	Status^	Plan Period Total	SHLAA Developable/ Deliverable Site	Within Strategic Allocation
32	52 Spital Street	Y	14	Yes	
33	22 - 26 Spital St (the Courts Furniture)	Pr	10	Yes	Yes – D6
35	SWCS Car Sales Craylands Lane Swanscombe Kent	O	5	Yes	
39	The Pits St Vincents Road	N	14	Yes	
42	Land Rear Of 150-160 Milton Road	Y	7	Yes	
44	Land South Of St Marys Road	Y	76	Yes	
49	59-69 High Street	N	5	Yes	
53	Chastilian Road Workshop	Y	9	Yes	
56	Powdermill Lane	Y	36	Yes	
57	152-154 London Road, Stone	N	5	Yes	
62	125 St Vincents Road	N	18	Yes	
65	47-49 High Street, Swanscombe	N	5	Yes	
77	British Gas Holder Site And Surrounding Land, Victoria Road,	N	66	Yes	

Ref	SITE	Status^	Plan Period Total	SHLAA Developable/ Deliverable Site	Within Strategic Allocation
82	52 - 62 West Hill / C Pearson E Bates Storage Yard And Workshops, West Hill	Pr	34	Yes	
84	Former DA1 Club, 46-58 Lowfield St	P	71	Yes	Yes – D5
85	127-129 Dartford Road,	N	14	Yes	
89	Block of 35 Lock-Up Garages, Rear of 47-53 Farnol Road	N	6	Yes	
90	Block of 50 Lock-Up Garages, Rear of 36-46 Attlee Drive	N	13	Yes	
91	First & Second Floors, 8- 10 High Street	N	8	Yes	
97	Community Centre and 63-67 Alamein Gardens	N	6	Yes	
99	Brentfield Lane	Y	6	Yes	
102	Village Heights, Station Road, Greenhithe	P	47	Yes	
106	Block Of Lock-Up Garages Rear Of Keary Road Swanscombe	Y	6	Yes	
108	West Hill House	N	33	Yes	
111	Temple Hill Club, Temple Hill Square	N	14	Yes	

Ref	SITE	Status^	Plan Period Total	SHLAA Developable/ Deliverable Site	Within Strategic Allocation
114	Land West of Darenth Road (Clubbs Pit) Phase 2*	Y	45	No	
117	Greenhithe Car Park, South of Steele Avenue	Pr	10	Yes	
118	53 Watling Street	Y	8	Yes	
119	Land to the rear of 62-66 Spital Street	N	28	Yes	
120	Upper Floors Iceland, 47-49 High Street	P	14	Yes	
124	Dartford Magistrates Court	Pr	25	Yes	
129	Craylands Lane	Y	84	Yes	
130a	Castle Hill 2A	Y	4	Yes	
130a	Castle Hill B&C	Y	332	Yes	
130a	Castle Hill GHJK	Y	164	Yes	
130a	Castle Hill Neighbourhood Area	Y	46	Yes	
130b	Alkerden 5	O / P	182	Yes	Yes – E5
130b	Alkerden 3	O / P	138	Yes	Yes – E5
130b	Alkerden Market Centre	O / Pr	523	Yes	Yes – E5

Ref	SITE	Status^	Plan Period Total	SHLAA Developable/ Deliverable Site	Within Strategic Allocation
130b	Alkerden South Phase 1	O / P	230	Yes	Yes – E5
130b	Alkerden South	O / Pr	410	Yes	Yes – E5
130b	Alkerden Gateway Parcel 7	Y	67	Yes	Yes – E5
130c	Ashmere Phase 1	O / Y	281	Yes	Yes – E5
130c	Ashmere Phase 2	O / Y	235	Yes	Yes – E5
130c	Ashmere Option IX	O	190	Yes	Yes – E5
130c	Ashmere (Phase 4) Local Centre	O	118	Yes	Yes – E5
130c	Ashmere Phase 3	O	450	Yes	Yes – E5
130c	Ashmere Phase 4	O	400	Yes	Yes – E5
130c	Ashmere Phase 5	O	450	Yes	Yes – E5
130c	Ashmere Phase 6	O	247	Yes	Yes – E5
130c	Ashmere Phase 7	O	110	Yes	Yes – E5
130c	Ashmere Phase 8	O	150	Yes	Yes – E5
130c	Ashmere Phase 9	O	150	Yes	Yes – E5

Ref	SITE	Status^	Plan Period Total	SHLAA Developable/ Deliverable Site	Within Strategic Allocation
130c	Ashmere Phase 10	O	122	Yes	Yes – E5
130c	Ashmere Phase 11	O	100	Yes	Yes – E5
130c	Ashmere Phase 12	O	100	Yes	Yes – E5
132	16A The Bridge (Care Home)*	Y	39	No	
137	104 Lower Hythe Street Dartford, Reeves Garage	Y	11	Yes	
144	Ebbsfleet Green Phase 3	Y	82	Yes	
144	Ebbsfleet Green Phase 2A	Y	13	Yes	
144	Ebbsfleet Green Phase 2C	Y	126	Yes	
144	Ebbsfleet Green Phase 4	Y	133	Yes	
148	Land North of Cotton Lane	Y	16	Yes	
167	Orchards Shopping Centre	N	269	Yes	
169	Northgate Van Hire, 301 Lowfield Street	N	6	Yes	
170	Land north of St Mary's Road Stone	Y	258	Yes	
177	Swanscombe Auto Centre, 38-48 Milton Road	N	6	Yes	

Ref	SITE	Status^	Plan Period Total	SHLAA Developable/ Deliverable Site	Within Strategic Allocation
190	J Clubb Ltd, Church Hill, Wilmington	N	30	Yes	
197	Land at Lower Hythe Street	N	86	Yes	
209	26 - 28 Westgate Road	Y	8	Yes	
212	The Priory Shopping Centre	Pr	390	Yes	Yes – D6
214	County Estate Department Depot, Broad Lane, Wilmington	N	6	Yes	
216	35 Myrtle Road Oakfield Lane	O	9	Yes	
218	Block Of 29 Lock-Up Garages Rear Of 21 Albert Road	N	5	Yes	
219	Block Of 23 Lock-Up Garages East Of Craylands Square,	N	6	Yes	
220	Block Of Lock-Up Garages And Land At Gilbert Close Swanscombe	Y	16	Yes	
222	Block Of 26 Lock-Up Garages Rear Of 44 Keary Road	N	5	Yes	
224	Angels Garage, 149 Church Road, Swanscombe	N	9	Yes	

Ref	SITE	Status^	Plan Period Total	SHLAA Developable/ Deliverable Site	Within Strategic Allocation
225	Land At Birch Place, Horns Cross	N	5	Yes	
226	6-12 Lowfield Street and 11 Market Street (Argos)	N	15	Yes	
232	Block Of 25 Lock-Up Garages Northeast Of Coller Crescent	N	5	Yes	
236	Land Adjacent 33 St Marys Road Stone	Y	12	Yes	
245	Bluewater Chestnut Avenue East (Site C)	N	114	Yes	
248	1-6 Market Place, 1 Market St And 37 High St	P	14	Yes	
249	The Foresters	Y	6	Yes	
254	Twistleton Court	Y	6	Yes	
261	Milestone Garage North of Victoria road	Pr	6	Yes	
262	Milestone Garage South of Victoria Road	Pr	5	Yes	
267	Ashirwad, Bean Road	Pr	5	Yes	
268	36 - 40 Heath Street	P	6	Yes	
269	Northern Gateway Block E Oldfield Mill Pond	Y	14	Yes	

Ref	SITE	Status^	Plan Period Total	SHLAA Developable/ Deliverable Site	Within Strategic Allocation
270	114 - 130 Lower Hythe Street	P	7	Yes	
271	Eastern End of St Marys Road	P	5	Yes	
274	First, Second And Third Floors 26 Lowfield Street	P	5	Yes	Yes – D5
276	Land rear of Rehoboth House, Brent Way	Pr	7	Yes	
252	North End Farm*	Y	5	No	
W	Small sites- Consents	Y	77	N/A	
W	Small Windfalls - Allowance	N	325	N/A	
TOTAL			12,455		

- ^
- Y Full Permission/ resolution to grant, including those still subject to completing S106 agreements
 - N No Permission
 - O Outline permission
 - P Pending current application, yet to be determined
 - Pr Pre-application engagement

* Sites with extant planning permission but not shown as deliverable/ developable in the SHLAA (including the application of a non-implementation reduction of 10%)