

## DARTFORD LOCAL PLAN

### **Inspector's Initial Questions 30-31, Economic Development: DBC Response (Paper G)**

March 2022

**30. Does the Economic Land Report September 2021 [BAR-6] provide robust projections of employment needs for the full plan period to 2037 and is this justified? What is the relationship between the scale of economic development proposed and the supply of labour over the plan period? Is there any assessment of the potential effect on commuting?**

Economic land projections to 2037

- 1.1 The Economic Land Report (BAR-6) informs the submitted Local Plan (COR-1) policy S4 (criterion 6). This policy sets guidelines for economic development quantities based on a per annum rate. The method behind the rate is summarised in the Business and Retail Topic Paper (BAR-1) paragraph 5.6. Paragraph 5.6's penultimate bullet point (regarding BAR-6 the Employment Land Report's Appendix C column e) confirms the rate is intended to apply to the end of the plan period.
- 1.2 This annual rate of need is appropriate for projecting further forward and forming quantitative guidance to the end of the plan period (derived from a to 2031/2 basis, which is supported in paragraph C4 of BAR-6 Appendix C). The approach is regarded as robust and justified as set out in paragraphs 4.7 and 4.8 of Economic Land Report (BAR-6).
- 1.3 The underlying evaluation and method is considered consistent with PPG guidance<sup>1</sup>. The Employment Land Report (BAR-6, see paragraphs 1.2 to 1.8) also has a strong foundation in other detailed local analysis and national policy objectives, notably documents BAR-7, but also BAR-8 and the Authority Monitoring Reports (MON-1 to MON-4).
- 1.4 The outcome in Local Plan policy S4 (and supported by delivery policies M19 and M21) is considered positive and well aligned with the national aim of 'building a strong, competitive economy' (NPPF chapter 6). This is not least through continuing to further boost high local levels of economic development in an aspirational but deliverable way, guided by policy S4.
- 1.5 As noted in the Topic Paper (BAR-1 paragraph 5.2) this significant economic uplift can be seen as an approximate 25% increase in floorspace on the (large-scale) employment growth level set in the Core Strategy (POL-1, policy CS11 criterion 1).
- 1.6 The compliance of the plan with paragraphs 81 to 83 of the NPPF is outlined on page 3 of the submitted evidence document COR-18.
- 1.7 To confirm, no terminal date is set for annual average economic delivery rates in policy S4; the intention in the submitted plan (COR-1) is for the annual rate to apply over the whole plan period.

Economic development scale and labour supply

- 1.8 There is a broad alignment between the overall scale of labour force growth and projected job generation estimates in the Local Plan. A general balance between jobs and population is noted in Plan paragraph 2.51 (final bullet point). The degree of

---

<sup>1</sup> Paragraph: 026 Reference ID: 2a-026-20190220 Revision date: 20 02 2019

relevance and implications of this in the DBC context is noted in paragraphs 1.14 to 1.25 below on commuting and transport movements.

- 1.9 On labour supply levels, Appendix C of the Employment Land Report (BAR-6) provides calculations of floorspace projections (for two broad categories of business/ associated uses). Paragraphs C7 to C9 of this report (BAR-6) relate the floorspace rates calculated to estimated job level ranges, using standard national job densities. There are varying job density levels that can be applied, and when applied over large floorspace levels, the resulting quantities of jobs can vary substantially. Accordingly for sensitivity, final job estimates are presented as a range, based on different overall job density levels, for each of the two broad economic development categories in policy S4 (criterion 6) of the Submission Local Plan (COR-1).
- 1.10 The resulting total job estimates in Employment Land Report (BAR-6) for the time period in Appendix C are 8,248 and 16,441 (lower and higher job estimates). This can be extrapolated as calculated in Table 1 below.

**Table 1: Plan period jobs estimates**

<b>Sensitivity</b>	<b>2031/32 Total job estimates (BAR-6 Appendix C)</b>	<b>Annualised (BAR-6 totals divided by 15, rounded)</b>	<b>2036/37 Projected rounded (annualised multiplied by 20)</b>
Lower employment densities	8,248	550	10,997
Higher employment densities	16,441	1,096	21,921

- 1.11 Therefore applying the floorspace figures from BAR-6 in Table 1 means the 2036/37 totals are an estimated range of:
- From 10,997 jobs (lower employment densities)
  - To 21,921 jobs (higher employment densities).
- 1.12 This can be related to demographic and labour supply information. Growth in the key working age population group is estimated at approximately 15,000 in the Borough, as indicated from housing need work (14,965 to 2036, derived from HOU-7, Table 4.1, page 53). This basis can be seen as a reasonable proxy for the likely scale of labour supply increase.
- 1.13 In conclusion, an approximate 15,000 labour supply/ working age increase falls within, and reasonably centrally to, the c.11,000 to 22,000 job estimate range derived from the economic development floorspace (in paragraph 1.12 above).

#### Approach to commuting

- 1.14 DBC has undertaken a number of strands of work on assessing and mitigating the potential effect that economic development may have on commuting. This is particularly though the various infrastructure evidence documents and transport modelling (notably INF-1 to INF-13).
- 1.15 Firstly, the Borough's population growth and work patterns in the context of surrounding areas warrants evaluation. Submitted evidence shows that overall – although there are some very large employers in the Borough including as outlined in Employment Needs Review BAR-7 - Dartford is defined within the 'London' Travel to Work Area (see Figure 1.1, page 11 of the residential needs assessment HOU-7).

- 1.16 The Dartford and Ebbsfleet Residential Needs Assessment (HOU-7) reviewed existing information on commuting flows, based on the Census. This found significant flows of people entering/ leaving the Borough for work in 2011, and states (paragraph 1.11):  
“The data indicates that around a third of employed residents in Dartford remained in the Borough to work and that people leaving the Borough for work most commonly went to a neighbouring authority or into central London. [...] 70.1% of people working in Dartford commuted from outside the Borough and that these people commuting into Dartford for work were most likely to live in a neighbouring authority or elsewhere in Kent.”
- 1.17 The balance of growth in the Borough will inevitably therefore be impacted by the high levels of cross-boundary mobility within southeast England. There is the current wider backdrop of existing substantial daily flows *through* the Borough (not originating from/ heading to Dartford i.e. additional to those outlined in paragraph 1.16 above) on the performance of the Borough's transport system and local travel patterns. This is due to the Borough hosting/ being impacted by the M25, A2, High Speed 1 rail and other train routes, connecting the rest of Kent, London, Essex, and other national and international destinations; plus noting the specific issues with the resilience of the Dartford Crossing (on this see INF-5 paragraphs 2.10 to 2.11 for instance).
- 1.18 DBC's transport and economic evidence has not been able to change its assumptions on the basis of potential switches in behaviour as a result of the pandemic, but DBC would acknowledge the potential for increased rates of home working (for some occupations) to be maintained or enhanced, with possible implications on the need to commute.
- 1.19 Economic development (and housing) growth locations have been comprehensively modelled in the Strategic Transport Modelling for the Dartford Local Plan (INF-6 to INF-13). The Local Plan Strategic Transport Modelling deals with the issue of commuting through its methodology for the distribution of trips generated by development covered in Transport Modelling Stage 2b Ref Case Methodology report (INF-8) and Transport Modelling Stage 3a Local Plan Option Testing Modelling report (INF-9). After considering results of the strategic transport modelling, the conclusion section of the Stage 4 report on mitigations (INF-12) culminates with a proposed focus on future sustainable travel measures.
- 1.20 Of note to employment-related travel in particular, themes for action in the key section 5 of the Sustainable Transport Strategy (INF-5) suggest a focus on supporting new sustainable transport measures at economic development clusters/ commuting locations. Most notably:
- At Local Plan priority/ regeneration locations: Dartford Town Centre and Ebbsfleet (INF-5 rows B-1 and B-2, pages 30-35)
  - Through effective Transport Statements/ Assessment and Travel Plans at trip generating developments (INF-5 rows C-1 and C-2, pages 35-37)
  - Improvements to train stations at Swanscombe, Stone Crossing and Dartford (INF-5 rows G-1, G-2 and G-3, pages 42-44)
  - New and enhanced public transport interchanges at rail stations, Bluewater and Ebbsfleet (INF-5 rows G-1, G-2 and G-3, pages 45-46).
  - Active travel links for major current trip generators at Schools, Crossways Business Park and Darent Valley Hospital (INF-5 rows I-1, I-2 and I-3, pages 50-51).
- 1.21 Regarding cycling, the existing Cycle Network Study (INF-14) will be complemented by Dartford's Local Cycling and Walking Infrastructure Plan (LCWIP) currently in

production by DBC, working with Kent County Council and others. This will include analysis of the Borough's large employment centres as trip generators. LCWIP production follows NPPF paragraph 106d.

- 1.22 On Local Plan strategy and policy requirements, DBC does accommodate sustainable development needs and address transport issues through a consistent focus on locating new employment, housing and other development in close proximity/ where well served by public transport. This is to create better transport facilities and active travel options for all residents and local employees. These principles are outlined in policy S2:3 (for example).
- 1.23 Achieving improvements in traffic conditions are proposed to be a requirement of development at the identified employment locations (see policy M21 criteria 2b and 3a).
- 1.24 In summary, it is evident that the strategic approach to sustainable transport underpinning the Local Plan, and the resulting framework for infrastructure delivery and transport management, has a strong focus on addressing the transport implications of major employment locations, especially through railway infrastructure and cycling upgrades.
- 1.25 This will complement the Local Plan's focus on development at sustainable locations by good public transport, and its policies for reducing trip generation rates of major developments at identified employment areas.

**31. Has any assessment of the potential capacity within the existing identified employment areas to accommodate additional floorspace or the intensification of employment density been carried out?**

- 2.1 Yes, this is one of the matters associated with the recent investment in employment sites and the future economic strategy of the Borough explored in the Employment Needs Review (BAR-7) and its findings in Section 5. In short though, the total physical (and market) potential for substantial new floorspace that could be identified may be comparatively low within the Borough's identified employment areas as a whole. This may reflect the current good occupancy in Dartford's employment areas, and the economic attraction of other new floorspace options.
- 2.2 Section 3 of BAR-7 on business development in Dartford depicts major growth in employment premises and job density within the Borough's employment centres. In the conclusions at the end of this section (BAR-7, page 5) it is noted this has meant: "The level of vacant premises is low across identified employment areas."
- 2.3 Employment site intensification was a direct consideration within the Employment Needs Review (BAR-7). It includes a Technical Appendix incorporating evaluation of employment site intensification potential. Paragraphs (B) in the Technical Appendix (BAR-7, pages 29 and 30) discuss how key locations for intensification were explored and modelled. However it was shown this would likely be less significant in scale (and, it should be noted here, potentially less readily achievable) than the very large other sources of employment growth in Dartford, namely deliverable new employment land proposals/ extensions, and future economic development site options (including Ebbsfleet Central).
- 2.4 Accordingly, the subsequent evidence in the Employment Land Review (BAR-6) focuses largely on extensions/ adjustments to the existing employment sites. As a result, DBC have proposed to show on the Policies Map expansions to four of the existing identified employment areas in order to ensure delivery of significant additional commercial land (see COR-2, pages 17 and 21 to 23).
- 2.5 Nevertheless if employment intensification proposals emerge, it is contended that an appropriate policy framework is in place in the Submission Local Plan (COR-1). In particular, policy S1:8a includes additional floorspace within the identified employment areas as part of the overall economic strategy, and policy M21 (criterion 3) explicitly addresses the sustainable intensification of employment sites for service-based development.