

Inspector's Matters, Issues and Questions

Matter 4: The Approach to Site Allocations

Response by Dartford Borough Council

30 September 2022

Contents

Question 47 – Planning Status for the Site Allocations	3
Question 48 – Housing Delivery Rates	9
Question 49 – Site Allocations	10
Question 50 – Policy for Sites to be Delivered	11

Issue

Whether the approach to the site allocations is justified, effective and consistent with national policy

Approach to site allocations

Question 47 – Planning Status for the Site Allocations

Please can the Council confirm the current planning status of each of the site allocations? This should include maps of the areas that show the areas within each that have the benefit of planning permission, the status of those permissions (including whether development has commenced), whether any sites are still subject to negotiation of s106 agreements and any accompanying details of the floorspace by use class.

1. Site allocations in Central Dartford are covered first.
2. A summary of land making up the three Central Dartford allocations, their planning status and constituent SHLAA site references, is set out in the Table A below:

Table A: Central Dartford Allocations Sites and Status

Allocation	Site Reference	Planning Status
D4 Westgate	20	Permitted, extant
D5 E of Lowfield St	14	Permitted, extant
	19	No application yet
	22	Permitted, extant
	84	Permitted, extant
	274	No application yet
D6 Priory Centre	25	Permitted, extant
	33	Permission no longer extant (no new application).
	212	No application yet

3. Figures 1 and 2 below show the maps of the areas within the East of Lowfield Street Allocation under policy D5 and Priory Centre Allocation under policy D6 respectively (pages 69-74 of [COR-1](#)). These are more complex allocations, so further information is set out in Tables B and C, building on the summary in Table A. The reference numbers for each land parcel in Figures 1 and 2 relate to columns of information in Table B.

Figure 1: East of Lowfield Street Allocation Map (Policy D5)

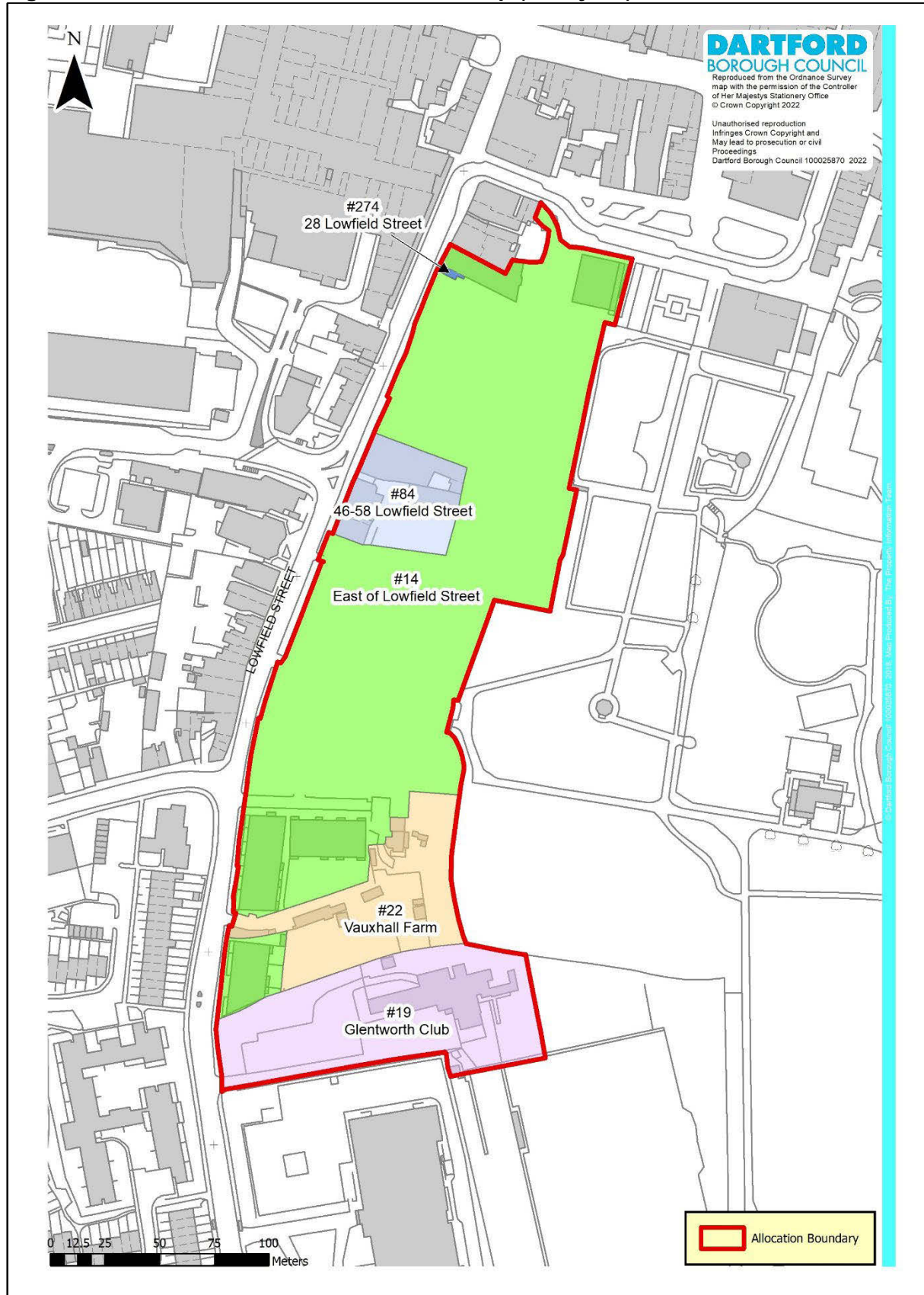


Table B: Policy D5 Lowfield Street Allocation Information

<i>Name of allocation part</i>	<i>Figure 1/ SHLAA reference</i>	<i>Principal PP reference</i>	<i>development permitted</i>	<i>Update</i>
East of Lowfield Street (multi-permission phased development area)	Ref 14	19/00830/REM	88 dwellings	Complete and occupied
		16/01919/FUL (hybrid)		
		16/01919/FUL (hybrid) amended by 18/01557/VCON	188 dwellings 1,712m ² of retail and commercial space	64 dwellings complete, 124 under construction
		19/00600/FUL	280 dwellings	Under construction
48-56 Lowfield St	Ref 84	21/0273/FUL - no section 106 required. (19/01266/COU allowed on appeal, temporary use as a place of worship until July 2023)	71 dwellings	Now in ownership of the allocation's housebuilder. Occupants (church) due to vacate site by end of 2022.
Vauxhall Farm	Ref 22	21/01286/FUL (section 106 fully complete Sept. 2022)	84 dwellings	Site cleared, now in ownership of the allocation's housebuilder.
Glentworth Club	Ref 19	No relevant application.	N/A	No option agreement currently by the allocation's housebuilder.

Figure 2: Priory Centre Allocation Map (Policy D6)

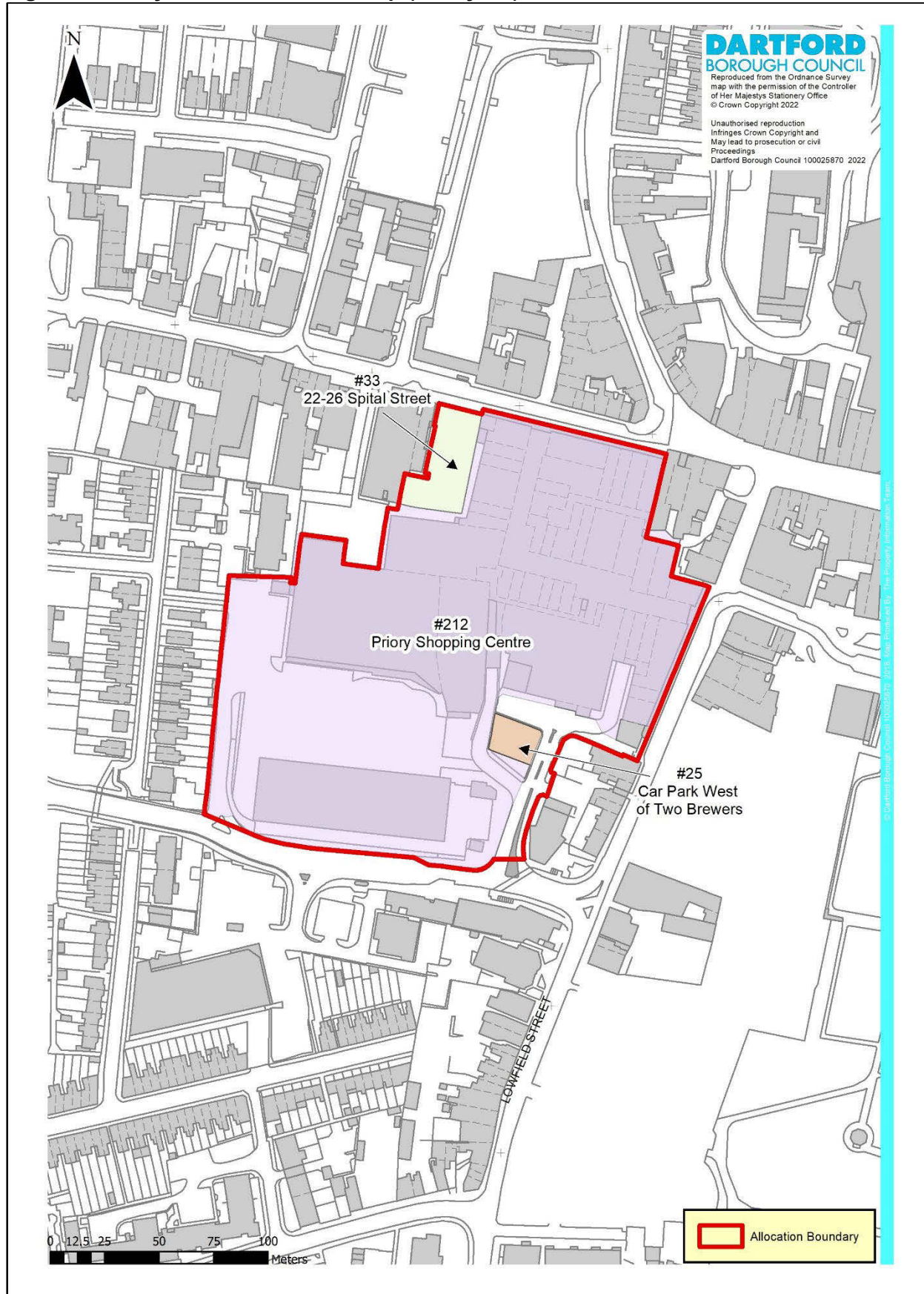
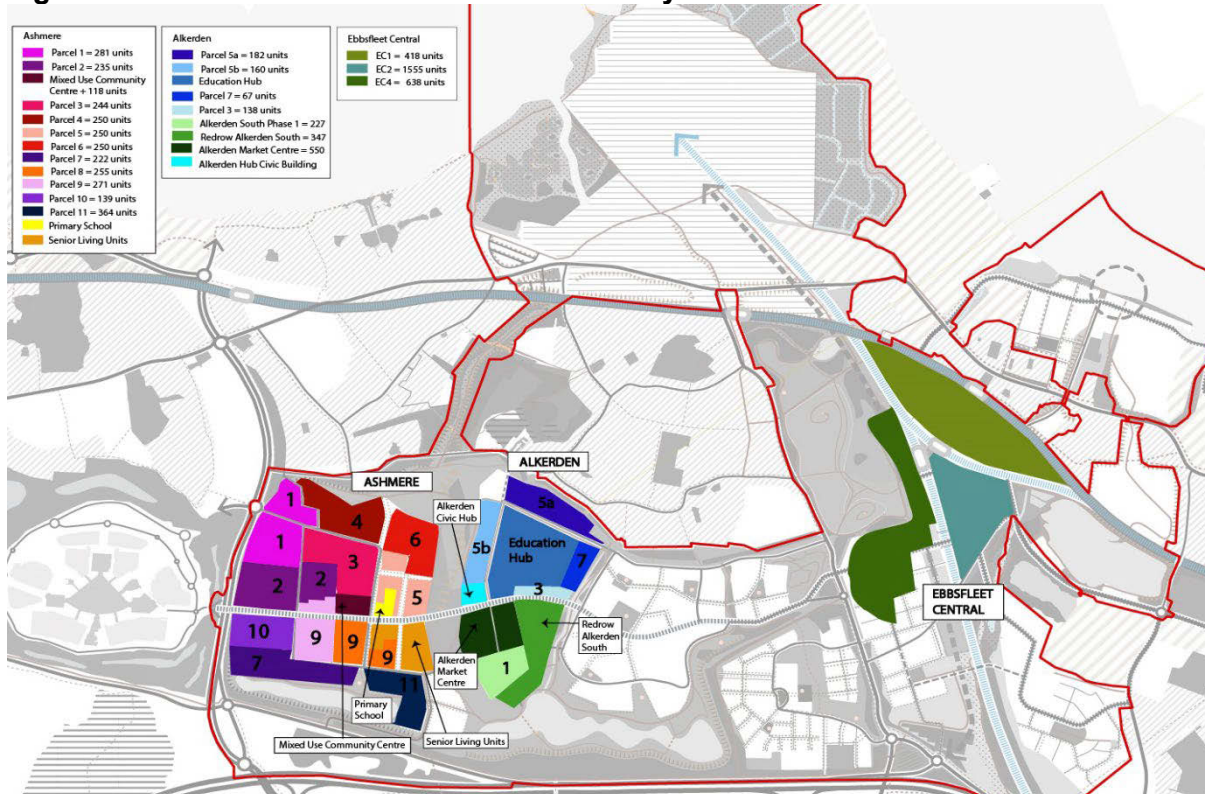


Table C: Policy D6 Priory Centre Allocation Information

Name of allocation part	Figure SHLAA reference	Principal reference	PP	Development permitted	Update
22-26 Spital St	Ref 33	No extant permission.		N/A	Cleared site.
Priory Shopping Centre	Ref 212	No relevant application.		N/A	Landowner remains committed to redevelopment.
Car park west of the Two Brewers	Ref 25	19/00748/FUL		14 dwellings	Associated conditions discharged in 2021.

- Policy D4 (Westgate) site allocation is a single site with a single relevant planning permission covering the whole of the area mapped at Diagram 6 (plan page 68).
- Planning application 20/00409/FUL for this allocation was granted in April 2022 upon signing of the section 106 agreement. This permits development including:
 - 120 residential units;
 - 2,682sqm of flexible commercial floorspace;
 - 85 key hotel.
- Site allocations in the Ebbsfleet area are covered next.
- Figure 3 below shows all of the Ebbsfleet Garden City parcels spatially, covering the two submitted Local Plan allocations. (Note for Figure 3, at Ebbsfleet Central, land and housing in Gravesham Borough is also included).

Figure 3: Ebbsfleet Garden City Allocations Land Parcels



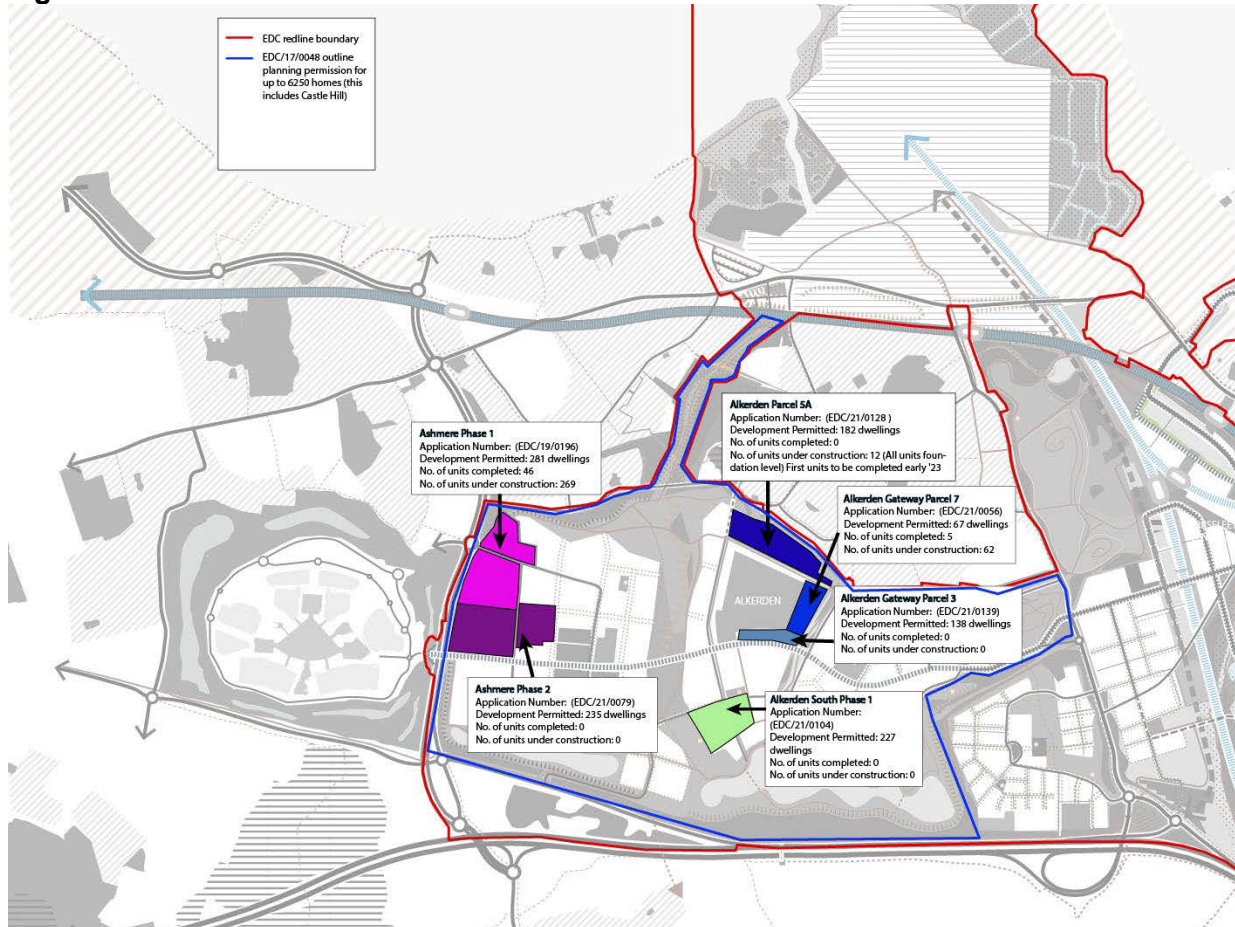
8. A summary of land making up the two Ebbsfleet allocations, their planning status and constituent SHLAA site references, is set out in the Table D below:

Table D: Ebbsfleet Allocations and Status

<i>Allocation</i>	<i>Site Reference</i>	<i>Planning Status</i>
E4 Ebbsfleet Central Allocation	1 (EC1)	Outline permission still currently, new outline permission submitted Sep 2022.
	1 (EC2)	
	1 (EC4)	
E5 Alkerden and Ashmere Allocation	130b - Alkerden Phase 5A	Permitted, completions starting in 2022/23
	130b - Alkerden Phase 5B	Outline permission, completions starting in 2024/25
	130b - Alkerden Gateway Phase 3	Permitted, completions starting in 2023/24
	130b - Alkerden Market Centre	Outline permission, completions starting in 2024/25
	130b - Alkerden South Phase 1	Permitted, completions starting in 2023/24
	130b - Alkerden South Phase 2	Outline permission, completions starting in 2024/25
	130b - Alkerden Gateway Parcel 7	Permitted, completions starting in 2022/23
	130c - Ashmere Phase 1	Permitted, 19 units complete prior to 1/4/2022
	130c - Ashmere Phase 2	Permitted, completions starting in 2023/24
	130c - Ashmere Phase 3	Outline permission, completions starting in 2026/27
	130c - Ashmere Phase 4 Local Centre	Outline permission, completions starting in 2026/27
	130c - Ashmere Phase 4	Outline permission, completions starting in 2027/28
	130c - Ashmere Phase 5	Outline permission, completions starting in 2029/30
	130c - Ashmere Phase 6	Outline permission, completions starting in 2030/31
	130c - Ashmere Phase 7	Outline permission, completions starting in 2031/32
	130c - Ashmere Phase 8	Outline permission, completions starting in 2030/31
	130c - Ashmere Phase 9	Outline permission, completions starting in 2025/26
	130c - Ashmere Phase 10	Outline permission, completions starting in 2025/26
	130c - Ashmere Phase 11	Outline permission, completions starting in 2030/31

9. Figure 4 below shows only the parcels in Ashmere and Alkerden allocation which have detailed planning permission. These sit within the overall Eastern Quarry outline permission (blue boundary).

Figure 4: Ashmere and Alkerden Allocation Permissions



Question 48 – Housing Delivery Rates

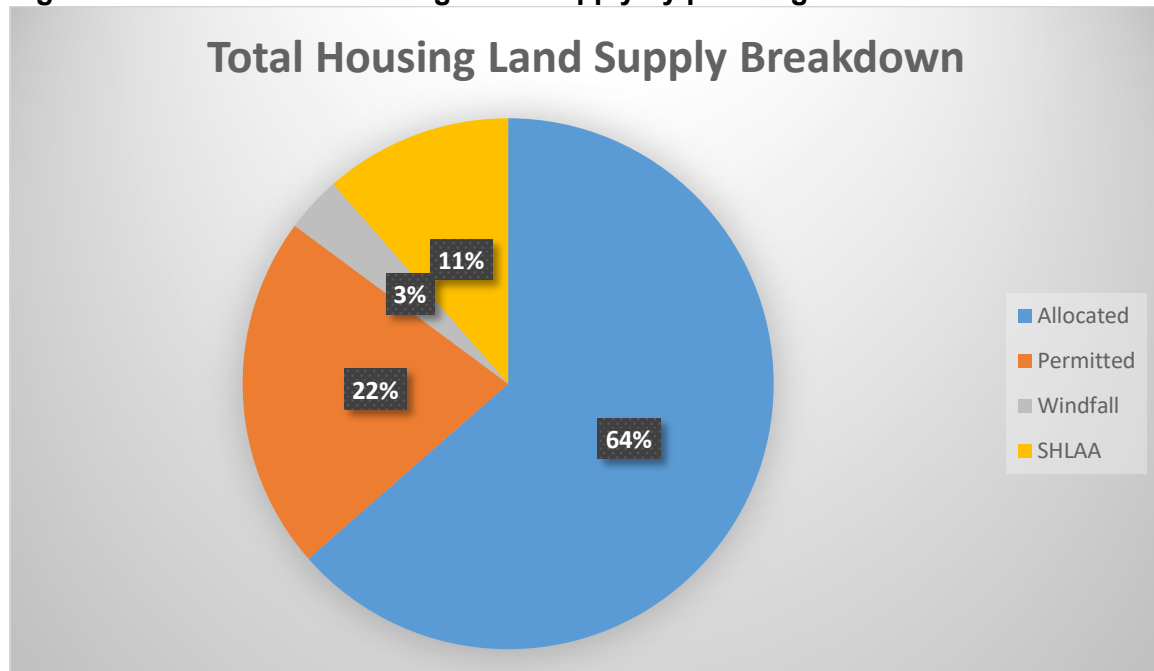
Is there any evidence to support the proposed housing delivery rates that accompany each source of supply?

1. Yes. Further information on allocations is detailed in response to Matters 5 and 6. A comprehensive set of updated data, identifying site-by-site Borough-wide sources of supply, is included in response to Matter 9 questions. Sites have been phased appropriately such that deliverable sites cover the early part of the Plan period, with developable sites covering the remaining years, as per the NPPF.
2. The largest future housing growth area within the Borough is in the Ebbsfleet area. This benefits from a number of planning permissions, and is supported by the Development Corporation. The delivery rate included in the Local Plan has been agreed in conjunction with Ebbsfleet Development Corporation, and the Council is content that delivery will proceed in general conformity with this schedule. Matter 6 explains the delivery context for sites in Ebbsfleet Garden City.
3. Central Dartford has seen recent progress with the delivery of housing, particularly with local market impetus, following the completion of a large development of good quality apartment blocks on currently allocated land immediately north of the railway station. Two of the three allocations in Central Dartford have extant planning permissions (see response to Question 47), one of which completed first delivery phases. Amongst other delivery factors, the Council is landowner and progressing sites itself, so there is

additional assurance on the commitment to bring forward some of the largest sites in this area. Matter 5 explains the delivery context for sites in Central Dartford.

4. Together, the allocated developments within Central Dartford and Ebbsfleet account for 64% of the Plan's housing land supply.

Figure 5 Breakdown of Housing Land Supply by planning status



5. Of the remaining 36% of housing land supply, a total of 22% has an extant planning permission. Where this is the case, sites are forecasted to deliver within the first five years of the plan period, as per the NPPF's definition of a deliverable site, including having had regard to developer's phasing/ delivery plans. In every case, the Council's development management team have been consulted to ascertain "on the ground" timeframes where they are available. 3% is identified as coming forward through windfall.
6. The remaining 11% of capacity is forecast to come forward on sites identified through the SHLAA, but have not, as of September 2022, received planning permission (outline or detailed). These sites are developable, rather than deliverable within the first five years, and hence are not included within the first five years of land supply. Appendix E of the Sep 2022 SHLAA Update sets out the Council's approach to forecasting delivery rates of the Plan's housing land supply.

Question 49 – Site Allocations

How have the proposed site allocations been selected? What methodology was used to select sites? Is it justified?

7. Evidence justifying strategic allocations is set out in submitted evidence, notably the Spatial Strategy Topic Paper ([SPS-1](#)). This includes the rationale for allocations in terms of securing delivery of long-identified sites, public consultation, Sustainability Appraisal outcomes, planning permissions, SHLAA and other evidence for Central Dartford and Ebbsfleet and Swanscombe in the Topic Paper (sections 5 and 6 respectively, pages 20 to 38). All five proposed allocations were sites specifically identified for development in the adopted Core Strategy [POL-1](#) (featured on Diagrams 3 and 6, pages 26 and 41).

8. The submitted Local Plan sets out rationale behind sites with allocations (page 23, paragraph 2.13): "...Strategic allocations in Sections 3 and 4 of the Plan are ... included within Central Dartford and Ebbsfleet Garden City, and are based on where key future on-site infrastructure and strategic mixed use development opportunities need to be secured. Additionally, longer term regeneration areas that are suitable and likely to become available are set out within these two priority areas."
9. The proposed site allocations (policies D4 to D6, and E4 and E5) are therefore based on:
 - Their location within the overriding priority growth locations in policy S1 clause 3 (Central Dartford and Ebbsfleet Garden City),
 - Their ability to provide significant mixed use development along with on-site key infrastructure, and
 - Their positive developability/ deliverability status in the shorter/ medium term.

This approach gives focus and impetus to the planned growth locations and achievement of objectives. Strategic allocations are complemented in Central Dartford and Ebbsfleet Garden City by broader location/ longer-term policies D7 and E6 respectively.

10. The strategic allocations (policies D4 to D6, and E4 and E5) are justified and essential to deliver the Plan, particularly to achieve the Borough-wide spatial strategy policy S1 and Local Plan policies D1 and E1.

Question 50 – Policy for Sites to be Delivered

Is there a policy to accompany each of the sites proposed to be delivered through the submitted plan's strategy?

11. There are a set of specific site allocations (E4-5 and D4-7) which cover the majority of growth within the Plan's principal growth areas within Central Dartford and Ebbsfleet. These set out the development required and other relevant criteria.
12. Policy M9 supports the residential development of all housing sites to be delivered, as included within the housing land supply (incorporating non-allocated SHLAA sites, and sites with planning permission).
13. Policy M21 covers the sites on which commercial growth is planned. There is therefore policy accompanying all the housing and commercial development sites proposed through the strategy.