
EXAMINATION STATEMENT

Matter 5 – Strategy for Central Dartford

Dartford Local Plan

Representations on behalf of
Storefield Group Ltd

September 2022

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MATTER 5 – Strategy for Central Dartford

DARTFORD LOCAL PLAN

**REPRESENTATIONS ON BEHALF OF:
STOREFIELD GROUP LTD**

SEPTEMBER 2022

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Barton Willmore, now Stantec



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1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Barton Willmore, now Stantec on behalf of Storefield Group Ltd. We are acting on behalf of Storefield Group regarding its land interest at "Stone Pit 9" – presently an omission site as part of the emerging Local Plan.
- 1.2 This Statement is prepared in response to the Matters, Issues and Questions raised by the Inspector in respect of Matter 5 relating to the strategy for Central Dartford. This Matter Statement is inter-related with the Matter 4 statement (prepared separately) which considers the approach to allocating sites.
- 1.3 Notwithstanding our Client's specific land interests, this Matter Statement has been prepared in objective terms in line with the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).
- 1.4 These representations have been considered in the context of the tests of 'Soundness' as set out at Para 35 of the NPPF. These required that a Plan is:
- Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;
 - Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.0 RESPONSE TO MATTER 5: STRATEGY FOR CENTRAL DARTFORD

Whether the strategy for Central Dartford is justified, effective and consistent with national policy

Westgate Allocation

Q.61. Taking each criterion in turn, are these justified and supported by evidence?

Q.62 What is the anticipated timing of the development expected to be?

- 2.1 The Westgate site is a parcel which has been supported by the Council for redevelopment through the Core Strategy (2011), identified as a Key Sites 2 (Kent Road, former Westgate Car Park) and 3 (Hythe Street, former Co-op Site). The site is comprised of 2no. parcels of land to the east and west of Orchard Street. The land to the west was historically a multi-storey car park, since demolished (circa 2010) and is now used as a ground-level car park. Land to the east is predominately unused, with the former retail buildings being demolished in 2013 / 2014.
- 2.2 The Core Strategy did not include site specific trajectories, however the SHLAA 2010, which formed part of its evidence base, indicated 'the Co-Op site' as being available within the first 5-years of that Plan period (2010/11 – 2014/15). No indication of trajectory or expectation of housing was provided for the Westgate Car Park site.
- 2.3 The Co-Op site previously benefited from Full planning permission for redevelopment of that parcel for 176No dwellings and retail uses consented 02 September 2008 (LPA Ref: DA/07/00687/FUL). The consent lapsed in September 2011.
- 2.4 A subsequent Full application for the entirety of the Westgate allocation was submitted in March 2020 and approved in April 2022 for a mixed-use development inc commercial uses, cinema, hotel, health/wellbeing and residential uses (Ref. 20/00409/FUL). The consented scheme includes 120No 1 and 2-bed homes, of which 20No units are 'intermediate' affordable homes.

- 2.5 The Phased Housing Land Supply of the Strategic Housing Land Availability Assessment Findings (September 2021, HOU-2) identifies these homes to be delivered in years 2024/25 and 2025/26 of the Plan (60 homes per year). In the absence of evidence, i.e. a signed delivery statement between the developer and Council, it is not clear whether these delivery estimates are based on the Council's assumptions or provided by the developers themselves.
- 2.6 Further, the redacted Viability Assessment (March 2020) and Revised Affordable Housing Statement (September 2020) submitted with the 2020 application indicate a significant financial deficit (of circa. £1.6million) would result from the consented development, with no 'Developer's Return'.
- 2.7 The Reg 19 consultation response from Muse Developments (dated 27 October 2021), the developers of the consented scheme, indicates the difficulties of COVID-19 are creating "greater uncertainty on the futures of cinemas and the viability of the construction of new facilities, including in the Dartford area". There are therefore clear viability issues with the proposals as currently consented and the allocation policy as drafted.

Priory Centre Allocation

Q.68. What is the anticipated timing of the development expected to be?

- 2.8 The Priory Centre is an existing post-war shopping centre located centrally within the Town Centre, which fronts the main routes of Spital Street, Lowfield Street and Instone Road. The shopping centre is a significant retail destination within the town centre, including a Sainsbury's supermarket, Wilko and Poundland, amongst others.
- 2.9 The allocation site was identified within the Core Strategy (2011) as a Key Site, but as a location for 'refurbishment, extension or redevelopment... to provide enhanced and/or increased shopping and/or leisure facilities'.
- 2.10 The Plan now identifies it to provide a 'genuine mix of town centre and other uses' including retail and houses / flats, with an expectation for 400 homes or more to be delivered. The Phased Housing Land Supply indicates 390 homes to be delivered on the site in the Plan period 2028/29 – 2031/32.
- 2.11 Whilst the SHLAA identifies the site to be 'available' there is no clear information provided within the Local Plan evidence base which indicates the owner of the Priory Centre's intention and whether this includes its redevelopment.