

Inspector's Matters, Issues and Questions

Matter 5 Central Dartford Strategy

Response by Dartford Borough Council

30 September 2022

Matter 5: Strategy for Central Dartford

Contents

Question 51 – Policy D1 Scale of Development.....	3
Question 52 – Policy D1 New Railway Station.....	4
Question 53 – Policy D1 relationship with Dartford Town Centre Framework SPD	4
Question 54 – Policy D2 General.....	5
Question 55 – Policy D2 Relationship with Diagram 5	5
Question 56 – Policy D2 Small Sites Cluster	6
Question 57 – Policy D3 Core Frontage	6
Question 58 – Policy D3 Marketing.....	6
Question 59 – Policy D3 Residential Redevelopment.....	7
Question 60 – Policy D3 Housing Land Supply.....	7
Question 61 – Policy D4 General.....	7
Question 62 – Policy D4 Development Timing.....	8
Question 63 – Policy D4 Flexibility.....	9
Question 64 – Policy D5 Development Timing.....	9
Question 65 – Policy D5 Heritage.....	9
Question 66 – Policy D5 Criteria 3.....	10
Question 67 – Policy D5 Remaining Criteria.....	10
Question 68 – Policy D6 Criteria 3.....	11
Question 69 – Policy D6 Development Timing.....	12
Question 70 – Policy D6 Retail Floorspace.....	12
Question 71 – Policy D6 Retail Units	12
Question 72 – Policy D7 Forms of Development	13
Question 73 – Policy D7 General.....	13
Question 74 – Policy D7 Developable Sites and Delivery	14
Question 75 – Policy D7 Longer Term Opportunity Sites.....	14

Issue

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

Relevant policies – D1, D2, D3, D4, D5, D6, D7

Policy D1 – Central Dartford Strategy

Question 51 – Policy D1 Scale of Development

Is policy D1 sufficiently clear as to the overall scale of development expected in Central Dartford? Will it be effective?

1. Policy D1 outlines the overall spatial framework for Central Dartford area, addressing strategy and the approach to delivering regeneration and environmental aims. It seeks to outline strategic principles for transformation, supplemented by other policies and the wider activities of DBC and partners. It sets out the intent and scale of ambition, and how the vision for the future can be addressed.
2. The policy tackles qualitative factors fundamental to meeting defined aims, including repurposing buildings and brownfield land, expanding the range of activities, securing economic vitality and choice, enhancing connectivity and environmental quality. To get policy criteria met and strategy delivered, there has to be appropriate flexibility on market uptake, total land use outcomes, and the associated development quantities across the area as a whole.
3. Policy D1's relatively strategic content is regarded as appropriate, given it will be supported by both provisions within the rest of the Central Dartford section and other policies that more suitably identify Borough-wide quanta e.g. policy S4, and the clear spatial strategy policy S1. Paragraph 3.22 of page 57 within the submitted Local Plan elaborates on the nature of development, new neighbourhoods, and diversification and flexibility for business growth; this also highlights the promotion of town centre uses supported by Plan Table 7 (page 186), adding clarity.
4. The policy is clear that a transformation is expected through development, and that the resident community will grow. Clause 1a) highlights the renewal of Lowfield Street, and redevelopment at Westgate and Priory Centre sites. These all have their scale of development set out in policies D4 to D6. Additionally, Submitted Local Plan pages 53 to 54 (paragraph 3.16/ Table 3) features data available on the development pipeline
5. As well as the three strategic allocations, policy D1 is complemented by policies D2, D3 and D7. Policy D7, flowing from policy D1 clause 1b, is clear on the scale of opportunities in this particular area, including the "significant future potential for creating new neighbourhoods". Guidance influencing the scale of redevelopment, and indicating the aggregate additional residential potential, is featured in submitted Plan Table 4 and paragraphs 3.56 to 3.61 (pages 75 to 79).
6. It is also pertinent to note that submitted Local Plan paragraph 3.21 (page 56) states that certainty is increased through the range of currently readily available land options and infrastructure progress that can accommodate change in Central Dartford;

supporting plans for transformational growth. This leads to an effective and achievable strategy.

7. Given this, Local Plan objectives, and Central Dartford's needs (summarised in paragraph 3.17, page 54 and elsewhere), the approach in policy D1's criteria and other provisions are regarded as sufficient by DBC, and effective, in setting a development framework for fulfilling aims, and introducing specific strategy addressed in the six following policies.

Question 52 – Policy D1 New Railway Station

Where is the new railway station referred to in policy D1 to be located? Is it justified by evidence and would it be deliverable within the plan period?

8. The relocation of Dartford Station, mentioned in Policy D1, is covered in more detail under Policy D7 (Station Surrounds/River Darent Area). Diagram 9, found within Policy D7, shows a potential location which is a short distance to the west of its current position. However, the delivery of sites for this area of Central Dartford are not dependent on the relocation of the station.
9. The Council has the aspiration to improve facilities at and access to Dartford station which is reflected in Policy D7(2)(b). Station relocation could be one way of achieving this. Paragraph 3.58 of [COR-1](#), identifies Prospect Place as a potential long-term development opportunity (but currently outside the scope of the Local Plan's housing supply). Development opportunities for Prospect Place are again not dependent on the relocation of Dartford station, but if and when proposals for redevelopment of Prospect Place come forward, the scope for relocating the station could then be considered.
10. Paragraph 3.56 of the Local Plan ([COR-1](#)) refers to Network Rail giving consideration to the potential need for railway services at Dartford station to be increased with a replacement railway station/ public transport interchange. The Future Infrastructure Statement ([INF-3](#)) refers to Network Rail's Southern Strategic Plan 2019 and Kent Area Route Study 2018 being the principal strategic rail documents covering the Borough. The relocation of Dartford station is not currently included within either of these documents but discussions with Network Rail regarding future station improvements are on-going.
11. The potential for railway station upgrades, which would include Dartford station, is also covered in paragraph 5.147 and Policy M16(4) in relation to the possible extension of Elizabeth Line (Crossrail) services. This is discussed further in response to Question 132.

Question 53 – Policy D1 relationship with Dartford Town Centre Framework SPD

What is the relationship with the Dartford Town Centre Framework Supplementary Planning Document (SPD) which predates the submission plan?

12. The Town Centre Framework ([POL-6](#)) document was finalised after the adoption of the 2017 Development Policies Local Plan, in the early days of work on the submitted Local Plan. This SPD was subject to extensive and proactive public engagement. Due to this,

and slower economic activity in the intervening period, it is considered that its content remains generally relevant evidence to refer to.

13. The Framework does not conflict with the submitted Local Plan but includes context that may continue to be useful, on themes such as character, innovation, town centre gateways and existing public spaces.

Policy D2 – Central Dartford Development Principles

Question 54 – Policy D2 General

Is policy D2 justified, effective and consistent with national policy?

14. DBC considers that policy D2 is appropriate and justified, and will be effective and deliverable. Positive delivery prospects through existing action and further opportunities are detailed at pages 58 to 59 (paragraphs 3.26 to 3.32) of the submitted Local Plan. Progress and delivery have been reviewed through the Retail & Leisure Study (leading to findings in [BAR-3](#) pages 8 to 14, paragraphs 12.46 to 12.64) which lend substantial support to the policy objectives.
15. The development context and rationale for D2 (including the outcome of public consultation) are set out in the Topic Paper [SPS-1](#) section 5, pages 20 to 29. Appendix 1, page 43 of the document shows findings from the sustainability appraisal for D2, indicating significant positive outcomes (and no negatives found) against the range of sustainability criteria. Themes addressed in the content of D2 draw suitably from the detailed analysis in the chapter of the Retail & Leisure Study [BAR-2](#) on Dartford Town Centre, as well as its sub sections/ themes on markets and attractions (pages 45 to 46, paragraphs 5.21 to 5.24), and environment, parking and safety (pages 50 to 54, paragraphs 5.42 to 5.59).
16. There is good justification for the policy, and DBC also views it as wholly consistent with national policy for a positive approach to the adaptation to town centres; promoting Dartford town centre's own character, retaining its markets, allocating a range of suitable sites, and promoting residential development (NPPF paragraph 86, [NAT-1](#) page 25).

Question 55 – Policy D2 Relationship with Diagram 5

Does the policy text fully reflect the development expectations shown in Diagram 5 that the policy requires development to accord with?

17. Diagram 5 is sufficiently highlighted in policy D2 in DBC's view. In particular, D2's clauses d and f (i) relate to the pedestrian links, public realm, gateway areas and new open spaces shown in Diagram 5. Moreover, clause e) provides the policy framework for the Conservation Area shown.

There are options to insert additional cross references in policies/ text; for instance possible reference in policy D1 if this adds clarity.

18. The potential small sites cluster depiction on Diagram 5 is addressed in the next question.

Question 56 – Policy D2 Small Sites Cluster

What is the intention of the 'potential small sites cluster'? Is it justified?

19. The intention is for smaller developments to benefit from, and contribute to a compatible approach to delivery. These are areas with regeneration potential (e.g. SHLAA sites) and the intention is that they are promoted, but should also come forward in a way that benefits wider town centre objectives, notably the public realm at that these relatively prominent locations (see Diagram 5 and submitted Local Plan page 58 paragraph 3.28 on the clusters).
20. The Town Centre contains a number of small scale sites additional to large ones (those directly featured in Central Dartford policies) in the core of the town centre, and the future of these will be a key determinant of how the town centre is perceived. Noting these is therefore considered justified as an appropriate strategic approach.

Policy D3 – Mix of uses in Dartford Town Centre

Question 57 – Policy D3 Core Frontage

How has the Core Frontage been defined and is it justified?

21. Submitted Local Plan page 65 paragraph 3.35 states:
“The Core Frontage identified on the Policies Map and Appendix D comprises an area which is particularly important for shops, cafés and financial services, as well as hosting the street markets. This area, focussed around Dartford High Street, is expected to continue to be the heart of the town centre, with high levels of footfall, especially during the daytime. It forms the primary shopping area required to be identified by national policy...”
22. This reflects the recommendation in the Retail & Leisure Study [BAR-3](#) page 22, paragraph 12.116, that the primary shopping area “should be a relatively compact area, to include the core part of the high street, and should not be extended to areas where policy flexibility is needed for substantial redevelopment and/or repurposing of vacant shops and buildings”.
23. To confirm, the Core Frontage addresses – 2 to 64 and 9 to 51 High Street - are listed in Appendix D (page 219) of the submitted Local Plan.

Question 58 – Policy D3 Marketing

Is the policy requirement in criterion D3(1) b) for marketing likely to be effective? How would it be implemented?

24. The marketing required is set out in the glossary definition for “Sufficient Effective Marketing” in the submitted Local Plan (Appendix B, page 217). This sets out how it will be implemented.
25. The role for marketing is considered a reasonable approach, providing a well-used test that balances the need for units not to remain vacant in the long-term and requiring an appropriate mix of uses.

Question 59 – Policy D3 Residential Redevelopment

Is the approach to residential development set out in policy D3(2) c) likely to be effective in managing redevelopment opportunities?

26. In DBC's view, it is beneficial to identify the overall potential sources of residential growth in the town centre.
27. Policy D3, clauses 2a) and 2b), identify a focus on strategic allocations and developments such as upper floor conversions that are significant potential residential resources to be found in the town centre.
28. Sub-clause c) is intended to support housing delivery by noting that there are a number of forms of residential opportunities that may occur in line with policy. For example, there are small/ medium sized new-build housing sites expected in the Central Dartford housing land supply. Under policy D7, there are likely to be additional larger-scale opportunities (see pages 77 to 78, paragraph 3.59) that may come forward and will be acceptable. Finally, other residential sites that may emerge in the future as windfalls are promoted under policy D2. Policy D3 clause 2 brings together effectively a range of options to increase housing in Dartford Town Centre.

Question 60 – Policy D3 Housing Land Supply

Is the identification of residential developments in the 5 year housing land supply positively prepared and soundly based?

29. Yes, residential land within Central Dartford is available in both the short and longer term. The Council is taking an active role, including as the landowner of town centre sites, to ensure the timely delivery of new homes.
30. A full list of 5-year sites in the town centre are included in the response to Matter 9. These meet the definition of a 'deliverable site'.

Policy D4 – Westgate Allocation

Question 61 – Policy D4 General

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

31. The Retail and Leisure Study [BAR-2](#) summarises the recent planning history to this DBC and Homes England-owned site at pages 15 to 16 (paragraphs 2.44 to 2.46). The proximity of the Orchards Theatre, which evidence demonstrates has a strong catchment (Local Plan page 52, paragraph 3.13), is also relevant to policy D4's justification.
32. Criteria 1 and 3 are supported by evidence on Dartford town centre's needs, gathered throughout the Retail and Leisure Study. This leads to the endorsement of the delivery of the site and leisure uses in the policy at [BAR-3](#) page 12, paragraph 12.59. The range

of uses aligns well with the needs of the town centre (see submitted Local Plan page 54, paragraph 3.17).

33. This is a town centre site with frontages on to three principal roads, two of which have active town centre ground floors uses. It is, therefore, considered that a mixed use is appropriate. This site is considered appropriate for the leisure, visitor and mid-evening economy as it is only 200m from the sub-regional Orchards theatre. The purpose of these specific uses on this site is to create a leisure/ cultural quarter in this part of the town. In addition, this allocated site is the closest to the railway station and the main bus stop hub, and so is appropriate for visitors and leisure-related trips. The potential health and well-being offer is included because as public sector land, it is more likely to be able to deliver health related uses.
34. Criterion 2 is evidenced by the town centre's needs and the site's specific context, as set out in page 67, paragraphs 3.40 to 3.41 and page 62, Diagram 5 of the Local Plan. It is also an approach justified in the government's [National Design Guide](#) (for example page 31, paragraphs 104 to 105 on "P2 Provide well-designed spaces that are safe").
35. With respect to 2a), the co-op closed some years ago and buildings on site were demolished. However, the façade to the building on Spital Street has been retained due to its contribution to the character of the Conservation Area and the history of the town centre. This feature is noted at page 4-5 paragraph 4.22 of the [Dartford Town Centre Conservation Area Appraisal and Management Plan](#).
36. Context and identity are key characteristics informing criterion 2 (see [National Design Guide](#) page 1 to 18). Detailed analysis was undertaken as part of the work to develop the Framework SPD ([POL-6](#)) and the need for an east-west route to break up this sizeable site was identified. This route aligns with the existing Essex Road to the west of the site and Suffolk Road to the east of the site. Therefore, integrating the site into the urban grain and also providing routes through the town centre is justified.
37. As the site has been identified as providing an opportunity to support the mid-evening economy, the provision of an area of public realm enables the creation of an external space linked to the leisure and food and drink uses in order to optimise benefits to town centre vitality. Soft landscaping which would include trees is likely to be limited due to the archaeological significance in this part of the town centre and the presence of groundwater close to the surface. A more "urban" area of public space is therefore considered appropriate, better described as a public square (criterion 2d).

Question 62 – Policy D4 Development Timing

What is the anticipated timing of the development expected to be?

38. DBC is seeking purchase all of the land in order to bring forward the development as soon as possible. The redevelopment of this site is considered to be critical to the regeneration and rejuvenation of the town centre and DBC are therefore keen to bring this forward as soon as feasible.
39. The site benefited from formally gaining full planning permission in early 2022, on completion of the section 106 legal agreement, and is 'deliverable' in this respect. The September 2021 SHLAA Update document (see Matter 9) sets out homes that are

anticipated to be complete in year 2027/28, as it was considered prudent to allow for the possibility of a new planning permission to come forward.

Question 63 – Policy D4 Flexibility

Is the balance of requirements in criterion 3(a)-(c) sufficiently flexible to deal with changing circumstances?

40. Overall, there is flexibility built into policy D4 criterion 3, with a wide range of potential uses permissible and quantum expressed as minimum.
41. In respect of sub-clause (a), this is regarded as relatively flexible by DBC. Based on best available current information, it is considered that this is likely to be achievable; however (b) is perhaps less so. Whilst a mixed-use development is appropriate and sought, the quantum set out just for class E may, at present, be seen as potentially limiting depending on changing circumstances. Regarding (c), residential, DBC is confident that as a minimum it is sufficiently flexible. In conclusion, modification may be appropriate to set a more modest “or more” amount in (b), for instance 2,500sqm.

Policy D5 - East of Lowfield Street Allocation

Question 64 – Policy D5 Development Timing

What is the anticipated timing of the development expected to be?

42. This is a phased site that is in delivery, with some dwellings occupied. The September 2021 SHLAA Update document (see Matter 9) The updated housing land supply data, , sets out the remainder of new homes with planning permission are anticipated to continue to be developed until year 2025/26.
43. The final part of the allocation, land at the southern end furthest from the town centre, known as the Glentworth Club (SHLAA reference 19), is anticipated to complete in 2034/35. It should be noted that the overall regeneration project is not contingent on this land parcel. See paragraph 47 below for further detail.

Question 65 – Policy D5 Heritage

Is the approach to the adjacent Listed Buildings and Conservation Area appropriate and consistent with paragraphs 194 and 200 of the Framework?

44. Yes, policy M5 would be considered alongside criteria in policy D5 2(g). Consideration would also be given to the NPPF [NAT-1](#), including paragraphs 194 and 200 (pages 56 to 57), and indeed planning applications on the site for which permission has been granted have taken these considerations into account). The part of this linear development that is in the proximity of the Conservation Area and setting of the Listed Buildings is nearly complete, therefore it is not considered appropriate to set out detailed heritage considerations for other land within this allocation policy.

Question 66 – Policy D5 Criteria 3

Is the balance of requirements in criterion 3(a)-(c) justified? Are they sufficiently flexible to deal with changing circumstances?

45. Yes. DBC considers that with progress on the implementation of development continuing and proceeding as anticipated, there is sufficient certainty that the requirements of policy D5 will be achieved.
46. As can be seen from data provided in answer to question 47, the development quantum included in the policy (criteria 3a) and 3b)) can be delivered through existing permissions. Planning permission 16/01919/FUL revised by 18/01557/VCON grants planning permission for 1,268sqm of Class E floorspace. This is either constructed (and used as a temporary sales centre) or is under construction and due for completion in 2023. Bellway have been active in seeking commercial occupiers. The remaining Class E use is likely to come forward with the development of the southern part of the site, the Glentworth club, associated with the community premises proposed.
47. In respect of 3c: this part of the site is occupied by an ex-servicemen's club. Discussion for the replacement of this club as a community facility would form part of any planning discussions on this site. Evidence cannot be provided as any discussions are at a pre-application stage and therefore confidential. The land owned by the ex-servicemen's club includes a football pitch (outside of the site allocation), which could also be associated with further community facilities or may have synergy with adjacent community facilities. Directly to the south is DBC's Fairfield leisure centre and swimming. The criteria for community premises therefore provides flexibility which could enable a number of community uses to come forward, including potential for a primary school. The site falls within the Primary School Search Zone shown on submitted Local Plan page 29, diagram 2.

Question 67 – Policy D5 Remaining Criteria

Taking each of the remaining criteria in turn, are these justified and supported by evidence?

48. The remaining criteria are justified and support can be derived from the planning permissions that have been granted for the site:
 - a) the overall site provides 3 east-west pedestrian/cycle routes to Central Park;
 - b) The planning permissions granted are considered to provide good quality residential development;
 - c) active ground floor uses are provided for at the northern end of the site as discussed above. The southern end is referred to in the previous question (Q66): and a community facility is already in place;
 - d) the planning permission includes requirements to give land to the local highways authority to improve the footway. Buildings have also been set back with land reserved should a cycle/footway be provided along this street. Good pedestrian and cycle routes are provided through the site, east-west to the park and north-south through the park. A raised table is to be provided at the southern end of the site, at the junctions with Vauxhall Place. This is to enable linkages with pedestrian and cycle routes to the west along Heath Street to secondary schools and to the east across the park to Darent Road and the residential areas beyond;
 - e) all vehicular accesses to the development, with the exception of refuse access, are provided as part of the layout to the south of Instone Road, where Lowfield Street

becomes 2-way to reduce the need for vehicles to pass through Market Street. A temporary vehicular access has been provided to the north to enable the build out of the site and serve early occupations in the north. However, planning conditions require the removal of this as the site is built out;

- f) the planning permission provides for wide pedestrian routes into the park, approximately 20m wide in many places. This allows for landscaping, seating and informal play. The planning permission also provides for the provision of railings along the boundary of the park;
- g) the impact of the development on the Listed Buildings and Conservation Area was considered for each of the planning applications submitted where relevant.

Policy D6 – Priory Centre Allocation

Question 68 – Policy D6 Criteria 3

Are the expectations for the development requirements in criterion 3(a)-(c) justified?

- 49. The specific context for the site is set out in the Retail & Leisure Study ([BAR-2](#)) page 40, paragraph 5.6: "Priory Shopping Centre: opened in 1975 and comprises a total retail floorspace of circa 13,470 sqm gross), anchored by Sainsbury's. The centre was sold to Curzon Capital in 2015 for £33m. They subsequently invested in refurbishment and new signage. The centre also has a market style hall with a number of permanent and temporary independent retail and food units. It is now owned by Ellandi, who have plans for the further redevelopment and reconfiguration of the centre."
- 50. The September 2021 SHLAA Update document (see Matter 9) confirms 400 homes are anticipated. This quantum, in criterion 3b), is anticipated to ensure that a genuinely mixed-use development occurs at this large town centre site.
- 51. Concerning criterion 3b (also discussed further below) the conclusions of the Retail & Leisure Study ([BAR-3](#)) recommends (page 12 to 13, paragraph 12.63) the town centre's competitive points of advantage are built on. This includes the objective to "...repurpose and redevelop the town's shopping centres, where the opportunities exist, to provide a more diverse and flexible mix of viable uses; including the potential for new residential and employment uses above ground floor commercial uses. The "refresh" of the shopping centres will better meet the needs of modern-day customers and businesses, and better reflect market trends. In particular, the "older generation" shopping centres, such as The Priory, have the potential for renewal and redevelopment, to improve place-making and provide higher quality mixed-use environments that are better integrated and connected to the wider town centre. However, it is important that, where feasible, any redevelopment maintains active ground floor commercial uses and frontages to support the town's pedestrian circuit and strengthen its overall vitality and viability."
- 52. Dartford Town Centre has zero presence of national/ international hotel chains. This site presents a central and flexible prime opportunity for a redevelopment featuring a new-build hotel to the specification required by a major hotel chain, or failing this, an alternative main town centre facility (criterion 3c).
- 53. It is clear from reasoned justification for D6 (submitted Local Plan page 72, paragraphs 3.47 to 3.50), that there is a strong environmental and regeneration rationale for site redevelopment, whilst sufficient main town centre uses will need to be included for Dartford's future vitality. In particular, DBC seeks pedestrian connections across this

largely impermeable site and active streets with occupied premises. The site has already been subject to masterplanning to explore how this can be secured, and this has directly informed policy D6.

Question 69 – Policy D6 Development Timing

What is the anticipated timing of the development expected to be?

54. The September 2021 SHLAA Update document (see Matter 9) states new homes are anticipated to be achieved at the Priory redevelopment in the years 2028/29 to 2031/32 onwards, consistent with discussions with the landowner.

Question 70 – Policy D6 Retail Floorspace

Is policy D6 sufficiently clear about the net gain/ loss in retail floorspace envisaged by the redevelopment of the shopping centre?

55. Policy D6 includes a class E (minimum) quantum of development, this amount is less than the level of retail that exists currently at the Priory Centre (see Question 68 paragraph 49 above).
56. DBC regards the minimum level as generally consistent with evidence, but also the value and function of the shopping centre. Primary research for the Retail & Leisure Study confirmed the particular significance of shops in the Priory Centre to Dartford Town Centre – in terms of shops and services visited – three (Sainsbury's, Wilko and Poundland) of the top four shops are hosted by the Priory Centre (see [BAR-2](#) page 40 paragraph 5.6). However, the quantitative need modelling for the study led to the conclusion that there was no retail capacity for new floorspace in the Borough over the next ten years ([BAR-3](#) page 3 paragraph 12.14). It has not been identified an overall increase in retail floorspace is necessary, and the level of Class E development is not set out in the policy as a net gain from the current Class E amount.
57. A reduction in the total quantity of retail may arise, but rather than focusing on stipulating the scale of retail floorspace change, the policy as proposed is viewed as more appropriate, given potential market demand, and planning development amounts on the basis of Class E rather than retail alone.

Question 71 – Policy D6 Retail Units

Should policy D6 be clearer on what it considers large and small retail units might be?

58. Suitable alternative phrasing may be clearer. However the requirement in any modification needs to remain sufficiently flexible.
59. DBC considers that if amended, the objective should remain for redevelopment to feature anchor stores and a variety of store sizes to meet retailer needs (including the retention of existing popular stores listed above) where feasible. This would include a selection of small/ independent retailers, to provide a sufficient range and quantum of shops to meet the borough's needs.

Policy D7 – Station surrounds/ River Darent Area

Question 72 – Policy D7 Forms of Development

Is policy D7 sufficiently clear on the forms of development that would be acceptable within the area? Is the expectation that sites A-E will be supported for residential development having regard to paragraph 3.59 of the supporting text?

60. Overall, DBC considers policy D7 to provide a relatively good level of clarity, given its role as a wider area development given the longer-term infrastructure and environmental aims over the plan period. Its criteria are based on building upon the principles set out in policy D1, clauses 1b and 2; as an important area for seeking investment, sufficient flexibility and responsiveness to changing circumstances as necessary.
61. Guidance on the overall nature of commercial and housing development is featured in D7 criteria 2c) and 2d), and elsewhere (for example Table 4, pages 75 to 76 of the submitted Local Plan). Planning applications will also be informed by other policies, including development management policies and also (notably) the requirements of policy D2.
62. Land indicated at A-E of diagram 9 varies in character but may provide PDL opportunity sites that would be supported, assuming compliance with policy D7. This is consistent with policy M9 (criterion 1). This land is discussed further in answer to Question 75 below.

Question 73 – Policy D7 General

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

63. The criteria area supported by the strategy detailed in policy D1, particularly its criterion 2). Submitted Local Plan page 51, paragraph 3.10, notes how past development has cut-off the River, and the ring road and railway embankment creates severance in Central Dartford, generating a need for new and improved connections. This is relevant to E7's criteria including 2a), b), and e).
64. Criterion 2a) addresses the River Darent, a central feature of how this policy is conceived and intended to contribute to the transformation of Central Dartford, its environment and how it operates and is perceived. The opportunity is recognised in Town Centre Framework ([POL-6](#)) page 10, paragraph 3.26. The River, especially this particular stretch of river, is a focus of DBC's infrastructure planning. As a corridor, it is subject to current bids for active travel enhancement (strategic needs outlined in [INF-5](#) pages 52 to 54, references O-1 and O-2), and a project for the investigation of upgrades to the riverside environment/flood defences. It is essential that this is co-ordinated with riparian development opportunities that arise.
65. Criterion 2b) concerns Dartford station and transport interchange. There is the prospect of major redevelopment adjacent to the station, or if the station is relocated in the vicinity (See answer to Question 52 above). Railway station renewal and private development need to be planned collectively, as noted in the E7 reasoned justification (pages 76 to 77 paragraphs 3.56 to 3.58). Dartford station upgrade is a key component of the Sustainable Travel Strategy [INF-5](#) (pages 43 to 46, references G-3 and I-1).

66. As set out in answer to previous questions, the submitted Local Plan (see pages 57 to 58, paragraphs 3.22 to 3.25) is considered by DBC to be justified in seeking modern/ flexible commercial facilities, appropriate redevelopment of large footprint buildings, complementing the leisure/ cultural offer, and additional forms of residential development and community facilities, as outlined in D7 Criteria 2c) and 2d). This is sufficiently evidenced, including through the Retail & Leisure Study [BAR-2](#) / [BAR-3](#) and Town Centre Framework [POL-6](#).
67. The Town Centre Framework ([POL-6](#)) document page 12 paragraph 3.36 to 3.37 notes: "Dartford's town centre is compact and therefore, within the ring road, provides an excellent environment for a walkable and cycleable town centre. However, the inactive frontages on the current pedestrian network, poor quality public realm and the lack of an integrated cycle network have led to poor legibility in the town centre. The Ring Road is a barrier to movement, and has limited provision for cycling. Crossing at radial roads is difficult. The car dominates the town centre and restricts movement for pedestrians and cyclists." This supports criterion 2 e). Moreover, there are major actions underway and interventions planned to address this ([INF-5](#) page 30 to 33 reference B-1), which should be supported by applicable developments.
68. Concerning criterion 2f), Central Dartford, and particularly the river, are an integral part of the Local Plan's Green Grid (see submitted Plan page 38 Diagram 3) and strategy for a more sustainable Dartford. However it is apparent from information such as the Polices Map ([COR-4](#), [COR-5](#)), that whilst green and open space is concentrated at and around central park, they are not found in the northern part of Central Dartford covered by policy D7.
69. Requiring well designed sensitive development, criterion 2g) is justified and evidenced by the town's historic and environmental assets as well documented, including in the [Dartford Town Centre Conservation Area Appraisal and Management Plan](#) and Town Centre Framework [POL-6](#).

Question 74 – Policy D7 Developable Sites and Delivery

Is the extent of the three developable sites within the wider allocation sufficiently clear? What is the anticipated timeframe for their delivery?

70. The three developable sites 1 to 3 in Diagram 9 are further outlined in Table 4 (submitted Local Plan page 75 to 76). If necessary to provide more information in the Local Plan on their physical extent, there is the option for maps to be added as an Appendix.
71. The September 2021 SHLAA Update document (see Matter 9) states homes are anticipated to be delivered in:
- Orchards Shopping centre – 2033/34-2035/36 (Diagram 9: site 1)
 - Station Approach – 2034/35-2036/37 (Diagram 9: site 2)
 - Land at Lower Hythe St – 2033/34-2035/36 (Diagram 9: site 3)

Question 75 – Policy D7 Longer Term Opportunity Sites

Is there a reasonable prospect that the longer term opportunity sites (A-E) would be likely to come forward for development within the plan period?

72. The prospects for sites A to E to come forward within the plan period may now fairly be described as 'reasonable'. This is accounting for:
- very high levels of growth achieved in the Borough,
 - progress in the regeneration of Central Dartford,
 - the positive framework sought through the submitted Local Plan,
 - the nature of existing uses and buildings on the site ,and finally,
 - the highly accessible and prominent nature of the area covered by policy D7.
73. The SHLAA [HOU-2](#) was unable, with certainty, to clarify that each of these sites could be demonstrated to be fully available. It was however able to confirm suitable sites for residential redevelopment in the area. The Housing Topic Paper [HOU-1](#) pages 16 to 17 (paragraph 4.28), outlines that whilst a relatively conservative approach can be seen to have been applied in confirming individual site availability, over time factors such as market forces may change circumstances and landowner positions, especially in regeneration areas.
74. Submitted Local Plan page 45, paragraph 2.65, notes these locations under policy D7 are not certain/ available at present but could come potentially forward suitably within the plan period - depending on market conditions - and in that event would expand housing supply.
75. It is appropriate to include broad requirements for these locations in the Local Plan, with new homes that may materialise acting as further contingency.