

DARTFORD BOROUGH COUNCIL - LOCAL PLAN REVIEW: RESPONSE TO INSPECTOR'S STAGE 2 MATTERS, ISSUES AND QUESTIONS (MIQs)

MATTER 05 – STRATEGY FOR CENTRAL DARTFORD

Client: Tristan Capital Partners

Prepared by: DHA Planning Ltd

Date: September 2022

1.1 Purpose of this Statement

- 1.1.1 This Statement has been prepared by DHA Planning on behalf of Tristan Capital Partners, in response to the Inspector's Stage 2 Matters, Issues and Questions (MIQs) ahead of the Dartford Local Plan Review Stage 2 Examination Hearings.
- 1.1.2 Tristan Capital Partners control the Priory Shopping Centre (draft submission allocation: Policy D6) and have been promoting the site for mixed-use allocation comprising residential, retail and leisure uses through the various stages of the Plan Review. The site is included as a proposed allocation within the submission version of the Dartford Local Plan and our client is continuing to support the allocation as part of the Local Plan examination.
- 1.1.3 Development of the Priory Centre is expected to deliver 400 dwellings (or more), 10,000sqm or more of Class E retail/leisure/office floorspace including large and small retail units and a hotel (Class C1) and/or 4,000sqm or more town centre attraction.
- 1.1.4 Tristan Capital Partners are supportive of the allocation and so the purpose of this Statement is to assist the Inspector in the context of the questions outlined within Matter 5, with a specific emphasis on answering questions relating to policy D6 'Priory Centre Allocation'.

Matter 5 Issue - Whether the strategy for Central Dartford is justified, effective and consistent with national policy.

1.2 Response to 'Policy D6 – Priory Centre Allocation' Question

- 1.2.1 For completeness, the wording of Policy D6 as included within the Submission Dartford Local Plan is as follows:
 - 1. *"Development at the Priory Centre and adjoining land should provide a genuine mix of town centre and other uses; and create new open streets, public spaces and attractive pedestrian linkages from Spital Street to and along Instone Road and Lowfield Street."*
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2. *Proposals should demonstrate through integrated masterplanning, appropriate layout, form, design, massing and use that they:*

- a) achieve the co-ordinated and integrated redevelopment of the Priory Centre/ Instone Road and adjoining land, and one or more feature town centre square(s), complement adjoining and adjacent listed buildings, and enhance the High Street/ Spital Street part of the Dartford Town Centre Conservation Area;*
- b) provide significant active ground floor uses animating Spital Street and Lowfield Street as well as Instone Road and routes through the site; with viable new retail and leisure premises, including retention of large retailing anchors and space for independent traders;*
- c) include visitor accommodation or a new activity forming a major town centre attraction;*
- d) deliver a mix of good quality new houses and flatted development, and necessary land/ facilities/ contributions towards community service needs that arise from the development;*
- e) provide high quality public realm/ spaces, well landscaped with a variety of open functions and ensure that all public and private spaces and routes are safe and overlooked;*
- f) make use of existing levels and ensure that the development works with adjacent levels and land given over to the car park; and*
- g) respect neighbouring houses.*

3. *Development is expected to deliver:*

- a) 400 dwellings (or more);*
- b) 10,000sqm or more of retail/leisure/office floorspace (use class E), including large and small retail units; and*
- c) A hotel (within use class C1) and/ or 4,000sqm or more town centre attraction."*

1.3 Question (68)

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

1.3.1 The Council's vision for central Dartford Town Centre is as follows:

"Retaining a clear sense of its history, Dartford Town Centre's streets, open spaces and riverside, will be engaging and elegant; creating a place that is easy and enjoyable to use, walk around and experience. The vibrancy of the Town Centre will be supported by a diversified economy, new premises and more residents living in the town. Dartford will be the community heart of the Borough with a thriving, creative and innovative ambience, with the mix of its activities and its high quality environment giving many reasons to visit."

1.3.2 Reflecting the core strategic vision of Dartford as a vibrant place in which to live, work and visit, the expectations of the Priory Centre allocation have accordingly been carefully set out to reflect and contribute to the delivery of the Council's central Dartford vision within the emerging Plan period.

1.3.3 The maximisation of available town centre sites such as the Priory Centre for mixed-use re-development is wholly consistent with the borough spatial strategy

(Policy S1) which confirms that the overriding priority for development in the borough will be within central Dartford and Ebbsfleet Garden City (criterion 3). The criterion additionally states that these growth locations will be regenerated with the provision of new and improved infrastructure and strategic mixed use development.

- 1.3.4 The borough's development levels are set out at policy S4, which confirms that the emerging Plan must be capable of accommodating the borough's annual housing need of 790 new homes per annum and 11,900 new homes by 2032. 80% of this delivery is targeted for delivery on brownfield land.
- 1.3.5 Accordingly, the re-development of the Priory Centre represents a core strategic opportunity site for the delivery of a minimum of 400 new homes and brownfield regeneration in Central Dartford. The optimisation of available brownfield town centre sites for housing will yield further benefits typically afforded by increased permanent residents within town centre, including higher levels of daytime and night-time footfall within the town centre, increasing opportunities for a wider mix of retail and leisure growth and reduced car-dependency with the excellent public transport credentials of central Dartford providing viable alternatives conducive to lower vehicle ownerships and car-free residency.
- 1.3.6 Moreover, the delivery of strategic residential growth at the Priory Centre is necessary to facilitate the wider re-development of the site to provide a high-quality retail and leisure offer that will be attractive not just within the borough of Dartford, but regionally in North Kent. The re-development will also enable opportunities for wider regeneration and public realm improvements in the site vicinity including new open streets, public space and improved attractive pedestrian linkages from Spital Street to and along Instone Road and Lowfield Street.
- 1.3.7 With regard to retail and provision of local services, the Plan is required to deliver an estimated gross need of approximately 20,000sqm of floorspace by 2027. This will primarily be delivered via the renewal of Dartford town centre, including existing shopping centres.
- 1.3.8 On this basis, the re-development of the Priory Centre is expected to deliver at least 10,000sqm of flexible retail, leisure and office floorspace (criterion 3(b)) and a hotel and/or 4,000sqm or more town centre attraction (criterion 3(c)) in the heart of central Dartford, consistent with the aims of policy D3 which seeks to provide a diverse and active mix of uses in Dartford town centre and high daytime pedestrian activity.
- 1.3.9 The expected mixed-use development at the Priory Centre will provide a range of high-quality town centre uses which will be attractive beyond the borough boundaries and be complemented by public realm and open space improvements and a minimum of 400 new homes, increasing the number of permanent residents within the town centre. The challenges faced by town centres are well documented and in this regard, the policy criteria sets out an ambitious but flexible expectation of the site's delivery which will provide high levels of modern and centrally located floorspace conducive to a range of existing key anchor retailers, independent traders and wider occupants to support a diverse, vibrant and thriving town centre.

- 1.3.10 Crucially, the inherent flexibility built into the policy allows greater scope to respond quickly to changing market conditions, minimise vacancy and deliberately does not seek to constrain the delivery of a greater quantum of dwellings should market conditions permit.
- 1.3.11 Without prejudice to our client's support of the emerging allocation, having regard to current economic conditions it is important that the final quantum of housing is at a level that maximises the use of the land and represents a viable scheme. Accordingly, the site could provide a greater number of dwellings than is presently stated.
- 1.3.12 Dialogue with the Council's Planning Policy Manager confirms that 400 dwellings should be seen as an minimum number of dwellings. We concur and consider that the site is capable of delivering *circa* 700+ dwellings, similar to the scheme submitted under pre-application reference: 19/00868/PREAPP. The benefits of such approach would be that it would still achieve the retention of key retail operators and wider mixed use floorspace. In current market conditions, 400 residential units (albeit as a minimum) has the potential to underestimate the residential capacity of the site which can be sensibly achieved and is needed to ensure viability.
- 1.3.13 In addition, we note that the policy does not at this stage set out specific parking requirements for the proposed allocation. We submit that in maximising the effective use and ensuring the viability of a highly sustainable town centre location, a flexible approach to parking provision should be included within the allocation policy criteria. This should take into account the wealth of day-to-day services, amenities, employment and public transport infrastructure available within active travel distance of the Priory Centre and the corresponding opportunities for car-free and reduced (<1:1) parking provision in the town centre.
- 1.3.14 Notwithstanding our support of the emerging allocation, criterion 3(a) could be amended to more accurately reflect the residential capacity of the site and maximise the benefits of a highly sustainable, available and logically located town centre site. We submit that a range figure of 500 to 700 homes with flexible parking requirements, including some car-free development may be appropriate following the initial detailed design and feasibility work undertaken by the project team and the subsequent pre-application engagement with planning officers.
- 1.3.15 Notwithstanding our suggested modifications in respect of criterion 3(a), our client is of the view that the expectations for the development requirements as set out in criterion 3(a)-(c) are otherwise justified and remains committed to commencing delivery of the proposed allocation within the first five years of the emerging Plan period.

1.4 Question (69)

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

- 1.4.1 Our client can confirm that subject to the formal adoption of the Dartford Local Plan, development is expected to commence delivery within the first five years of the Plan period. Given the scale of development proposed, it is anticipated that delivery will be phased to continue into the middle phase of the Plan period, thus providing a steady source of housing, retail and leisure development within the town centre across the majority of the Plan period.

1.5 Question (70)

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

- 1.5.1 The criterion set out at '3(b)' is informed by the Council's evidence base and in specifying a minimum threshold of 10,000sqm of flexible Class E floorspace, takes into account both the existing retail occupancy of the Priory Centre as well as existing and future retail trends.
- 1.5.2 By extension of the deliberate flexibility included within the policy, it is not possible to provide an accurate assessment of net changes in retail floorspace at the time of writing. Nevertheless, it is anticipated that the Council will exercise reasonable judgement on determination of a future planning application, in which any changes in retail floorspace will be appropriately assessed against both the site allocation policy and the wider retail and town centre policies included within the Local Plan.
- 1.5.3 It is therefore considered that in light of the requirement to provide adequate flexibility and the demand for wider town centre uses, the proposed policy wording is appropriate with respect to retail floorspace.

1.6 Question (71)

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

- 1.6.1 The policy wording does not explicitly state what the Council constitute 'large' and 'small' retail units, however in the context of the Priority Centre it can be reasonably considered that large retail units will comprises units occupied by retained and future key anchor stores. These units will be complemented by a range of flexible smaller units suitable for occupation by a range of retailers including independent businesses.
- 1.6.2 The focus of the proposed re-development of the Priory Centre is to provide a flagship mixed-use offering in the heart of Dartford town centre that will provide a mix of high-quality retail spaces designed to provide the flexibility to attract a range of potential retailers, with a particular emphasis on providing a space attractive to independent retailers.
- 1.6.3 On account of the allocation's objectives and the wider criteria of policy D6 including criteria 2(b), it is not considered necessary to apply a definitive schedule of expected retail unit sizes. To the contrary, it is anticipated that our client and the Council will engage positively at the time of submission to deliver an appropriate mix of retail units that reflect current retail trends and the demands of existing and prospective retailers. Notwithstanding the above, retail units will be carefully designed with flexibility in mind in order to ensure retailers can respond quickly to changing market conditions and minimise unit vacancies.
- 1.6.4 Accordingly, our client considers that the policy text as worded is appropriate with respect to the provision of large and small retail units and allows sufficient flexibility in order to deliver the objectives of both the allocation itself and the wider Dartford town centre vision. An alternative approach could be to modify criterion 3(b) to read:

'10,000sqm or more of retail/leisure/office floorspace (use class E), including an evidence based mix of retail units'

1.7 Summary

- 1.7.1 This Statement has been prepared by DHA Planning on behalf of Tristan Capital Partners, to respond to the Inspector's Stage 2 questions relating to Matter 5: Strategy for Central Dartford.
- 1.7.2 We trust that our responses are clear and will assist the Inspector in the forthcoming Stage 2 examination hearings of the emerging Dartford Local Plan.
- 1.7.3 On account of the above, and the details included within our previous representations, we are of the view that the Council's allocation of the Priory Centre is a justified component of the Council's strategy for central Dartford. This sets out an appropriate strategy to support the Council's vision for Dartford town centre as the community heart of the borough, the vibrancy of which will be facilitated by a diversified economy, new premises and more residents living in the town.
- 1.7.4 It is our view that the allocation of the Priory Shopping Centre is an appropriate and justified town centre allocation that will deliver the housing, retail, hotel and leisure facilities required to support the Council's town centre vision. The policy wording dictates a minimum threshold of development, whilst allowing sufficient flexibility to deliver a greater quantum of residential units and mixed-use floorspace as required and is capable of delivering across the early and mid-Plan period.