

---

# EXAMINATION STATEMENT

## *Matter 6 – Strategy for Ebbsfleet and Swanscombe*

### Dartford Local Plan

Representations on behalf of  
Storefield Group Ltd

September 2022

## EXAMINATION STATEMENT

### *MATTER 6 – Strategy for Ebbsfleet and Swanscombe*

#### DARTFORD LOCAL PLAN

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

SEPTEMBER 2022

<b>Project Ref:</b>	33391/A5
<b>Status:</b>	Final
<b>Issue/Rev:</b>	01
<b>Date:</b>	September 2022
<b>Prepared by:</b>	JM
<b>Checked by:</b>	HE
<b>Authorised by:</b>	HE

Barton Willmore, now Stantec



Ref: 33391/A5/HE  
Date: September 2022

#### COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore, now Stantec.

All our stationery is produced using recycled or FSC paper and vegetable oil based inks.

**CONTENTS**

	<b>PAGE NO</b>
<b>1.0 INTRODUCTION</b>	<b>01</b>
<b>2.0 RESPONSE TO QUESTIONS</b>	<b>02</b>

## **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 6 relating to the strategy for Ebbsfleet and Swanscombe. 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 6: STRATEGY FOR EBBSFLEET AND SWANSCOMBE

### **Whether the strategy for Ebbsfleet and Swanscombe is justified, effective and consistent with national policy**

#### Ebbsfleet Central Allocation

*Q.84. What are the expectations in terms of the timing and rates of housing delivery? Are these realistic? What evidence is there to support the anticipated timing?*

- 2.1 Ebbsfleet Central area comprises the land at and around Ebbsfleet International Station and includes land in both Dartford and Gravesham Council areas. Para 4.32 of the Plan anticipates the masterplan for the area will be produced through collaboration between the authorities, Ebbsfleet Development Corporation (EDC), local communities and relevant agencies.
- 2.2 As detailed EDC's Matter 1 Hearing Statement, EDC acquired the central area land in 2019 and has since been developing its proposals for the land with a view to submitting an Outline planning application later in 2022.
- 2.3 Draft Policy E4 identifies the portion of the site within Dartford Borough should deliver approximately 2,000 dwellings, approximately 100,000sqm floorspace within use class E (with a maximum of 20% retail), substantial education, health and community facilities, and 30% of the site (in total) as open space.
- 2.4 The Phased Housing Land Supply of the Strategic Housing Land Availability Assessment Findings (September 2021, HOU-2) identifies Ebbsfleet Central to deliver 1,975 homes across the Plan period as below:
  - Central B – 1,302 homes (2027/28 – 2034/35);
  - Central A – 505 homes (2032/33 – 2036/37); and
  - Central C – 168 homes (2035/36 – 2036/37).
- 2.5 This is clearly a significant supply from a single site, which does not yet have permission.

Alkerden and Ashmere Allocation*Q.90. What are the expectations in terms of the timing and rates of housing delivery? Are these realistic?*

2.6 Alkerden and Ashmere are new neighbourhoods located within the Eastern Quarry area of Ebbsfleet. These are the largest source of housing identified within the Local Plan with an expectation (through Policy E5) for 4,700 or more homes to be delivered alongside 10,000sqm floorspace within use class E, plus a District Centre and a Local Centre, and strategic and local greenspace. It is not detailed in the policy, but Para 4.43 identifies an expectation of a 2-form entry primary school at Ashmere and a education campus and sports centre at Alkerden including a 8-form entry secondary school and 2-form entry primary school.

2.7 The Phased Housing Land Supply identifies the following sources of supply within the Plan period (and their status):

- Alkerden Gateway Parcel 7 (Full permission) – 67 homes (2022/23 – 2025/26);
- Alkerden South Phase 1 (Pending current application) – 230 homes (2023/24 – 2025/26);
- Alkerden 3 (Pending current application) – 138 homes (2023/24 – 2025/26);
- Alkerden 5 (Pending current application) - 182 homes (2022/23 – 2025/26);
- Alkerden Market Centre (Pre-app engagement) – 523 homes (2024/25 – 2027/28);
- Alkerden South (Pre-app engagement) – 410 homes (2025/26 – 2028/29);

**Alkerden sub-total = 1,550 homes**

- Ashmere Phase 1 (Full permission) – 281 homes (2021/22 – 2024/25);
- Ashmere Phase 2 (Full permission) – 235 homes (2023/24 – 2025/26);
- Ashmere Option IX (No application) – 190 homes (2024/25 – 2026/27);
- Ashmere Phase 4 Local Centre (No application) – 118 homes (2025/26 – 2026/27);
- Ashmere Phase 3 (No application) – 450 homes (2026/27 – 2031/32);
- Ashmere Phase 4 (No application) – 400 homes (2027/28 – 2031/32);
- Ashmere Phase 5 (No application) – 450 homes (2029/30 – 2032/33);
- Ashmere Phase 6 (No application) – 247 homes (2029/30 – 2034/35);
- Ashmere Phase 7 (No application) – 110 homes (2030/31 – 2032/33);
- Ashmere Phase 8 (No application) – 150 homes (2031/32 – 2033/34);
- Ashmere Phase 9 (No application) – 150 homes (2031/32 – 2034/35);
- Ashmere Phase 10 (No application) – 122 homes (2032/33 – 2034/35);

- Ashmere Phase 11 (No application) – 100 homes (2033/34 – 2034/35); and
- Ashmere Phase 12 (No application) – 100 homes (2033/34 – 2035/36).

**Ashmere sub-total = 3,103 homes**

- 2.8 Again, this is a substantial level of delivery from a single site. 4,650 homes out of total 5,800 homes allocated for development (80%) and 11,900 housing supply (39%) – with the majority of which not yet subject to consent, planning application or pre-application discussions.
- 2.9 When considered in isolation, both of these schemes are reliant on providing for a significant number of homes in a relatively short period of time.
- 2.10 When considered in conjunction with each other – and due to their close physical locations with each other they should be – this raises an even greater level of uncertainty in respect of market forces and whether such a level of delivery is realistically achievable.
- 2.11 In the light of such uncertainty, we consider that the overall strategic housing requirement for the Plan period should be increased by at least 10%, and perhaps even 20%.