

Inspector's Matters, Issues and Questions

Matter 6: Strategy for Ebbsfleet and Swanscombe

Response by Dartford Borough Council

30 September 2022

Matter 6: Strategy for Ebbsfleet and Swanscombe

Contents

Question 76 – Policy E1 Quantum of Development	3
Question 77 – Policy E1 Gypsies, Travellers and Travelling Showpeople.....	4
Question 78 – Policy E2 Infrastructure Requirements.....	4
Question 79 – Policy E2 Site of Special Scientific Interest	5
Question 80 – Policy E2 and Relationship with Other Documents	5
Question 81 – Policy E3 General.....	6
Question 82 – Policy E3 Swanscombe Boundary	6
Question 83 – Policy E4 Scale and Range of Development Types	7
Question 84 – Policy E4 Timing and Rates of Housing Delivery	8
Question 85 – Policy E4 Implications of Swanscombe Peninsula SSSI on the Ebbsfleet Central Allocation	8
Question 86 – Policy E4 Infrastructure Requirements.....	9
Question 87 – Policy E4 Public Transport Hub	10
Question 88 – Policy E4 Open Space Requirement.....	10
Question 89 – Policy E5 Scale and Range of Development Types	11
Question 90 – Policy E5 Timing and Rates of Housing Delivery	12
Question 91 – Policy E5 Specialist Accommodation	13
Question 92 – Policy E5 Community Uses	13
Question 93 – Policy E5 Infrastructure Requirements.....	14
Question 94 – Policy E5 Greenspace Requirements	14
Question 95 – Policy E5 Custom, Self-Build and Other Forms of Residential Accommodation	15
Question 96 – Policy E5 Social Infrastructure	15
Question 97 – Policy E6 Effectiveness and Timeframe for Delivery.....	16
Question 98 – Policy E6 Forms of Development.....	16
Question 99 – Policy E6 Site of Special Scientific Interest	16
Question 100 – Policy E6 Policy Area Extent.....	17
Question 101 – Modifications for the Swanscombe Peninsula SSSI.....	17
Appendix 1: Changes to the Swanscombe Peninsula SSSI Boundaries between Notification and Designation	19

Issue

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

Relevant policies – E1, E2, E3, E4, E5, E6

Policy E1 – Ebbsfleet and Swanscombe Strategy

Question 76 – Policy E1 Quantum of Development

Is policy E1 sufficiently clear on the quantum of different forms of development that are being planned for at Ebbsfleet?

1. Policy E1 sets out the overall spatial framework for the Ebbsfleet and Swanscombe area, addressing strategy and the approach to delivering regeneration and environmental aims. It seeks to outline strategic principles established across Ebbsfleet Garden City and Swanscombe, reflecting partner input and evidence gathering; and supplemented by other policies and Ebbsfleet Development Corporation (EDC) activities.
2. With regards the particular forms of development, policy E1 in its first sentence indicates a focus on greenspace, infrastructure, homes and business development, and elsewhere schools, health, recreation, leisure and gypsy/ traveller accommodation are highlighted, with criteria outlining where significant levels of development or improvement are indicated.
3. E1's reasoned justification provides guidance including (page 86 paragraph 4.16) noting: "In the Garden City, the opportunity presented by the sizeable development land and its strategic connections must lead to sustainable urban level commercial, cultural, health and education facilities and commensurate parkland provision and ecological enhancement, guided by garden city principles applied for future needs."
4. Policy E1's content and structure is regarded as appropriate given it will be supported by both provisions within the rest of the Ebbsfleet and Swanscombe section and other policies that more suitably identify Borough-wide quantum e.g. policy S4, and the spatial strategy policy S1. The 'future picture' of development levels within the submitted Local Plan is also regarded as sufficient for E1 to be effective given:
 - Submitted Local Plan page 83 (paragraph 4.10/ Table 5) features specific dwelling numbers for the Garden City.
 - That for uses such as residential, the amount is capped/ fixed through planning permissions (see Question 47) or actually already complete or under construction.
 - It is noted that the main undeveloped area presenting a prime opportunity is by the International Station page 82 (paragraph 4.5) however the quantum of development is set out through policy E4, the Ebbsfleet Central allocation.
5. In the statement of common ground ([SCG-6](#) page 6) between DBC and the Ebbsfleet Development Corporation it is agreed that E1 suitably reflects EDC's vision and principles for Ebbsfleet Garden City. The strategy reflects some changing circumstances impacting on Ebbsfleet Garden City as noted at Plan page 87 (paragraph 4.17) and elsewhere.

6. DBC therefore considers this policy sufficiently clear given the role of E1 and its interrelationship with associated policies, particularly E2 and the allocations E4 and E5.

Question 77 – Policy E1 Gypsies, Travellers and Travelling Showpeople

Is policy E1(6) consistent with the approach set out in document EXAM6 in respect of the likelihood of any pitches or plots being available for gypsy and travellers and travelling showpeople?

7. The signed Statement of Common Ground between DBC and the EDC states: "It is agreed that EDC and DBC will work together to explore opportunities for identifying a site or sites which may be suitable for gypsy and traveller pitches within Ebbsfleet Garden City, particularly in the event that the London Resort proposal does not proceed" (page 9 of [SCG-6](#)). Policy E1(6) reflects this and is consistent with it.
8. A commitment to exploring further any opportunity for meeting needs can be seen as a principle that is still relevant. However, opportunities are limited.
9. Sites earmarked for development, most of which already have planning permission, would currently rule out large parts of Ebbsfleet Garden City as a location for the provision of pitches or plots for gypsies, travellers and travelling showpeople, if all sites are fully built out as planned. The remaining areas are either within the Swanscombe Peninsula Site of Special Scientific Interest, at high risk of flooding and/or within the Green Belt (paragraph 5.3 on page 7 of [EXAM-6](#)). National policies may effectively rule out the allocation of such areas for gypsies, travellers and travelling showpeople. Furthermore, there is not evidence that these areas would be suitable to meet the actual needs arising from the existing gypsy and traveller sites, most of which are occupied by families who are more likely to wish to stay living together on the same site.
10. In this context, paragraph 5.6 of DBC's response to the Inspector's Initial Question 23 (pages 7-8 of [EXAM-6](#)) notes that in June 2021 the EDC stated that in the event that the London Resort theme park does not proceed, there could be opportunities to explore gypsy and traveller provision on parts of Swanscombe Peninsula that may be suitable for it. This was after the notification of the proposed SSSI but prior to its formal designation and confirmation of its final extent.
11. If necessary as a result of limited current prospects for new pitches and plots (based on assuming full build out of development proposals in Ebbsfleet Garden City) policy M12(1)(c) of the submitted Local Plan (page 154) can be modified

Policy E2 – Ebbsfleet Garden City Development Principles

Question 78 – Policy E2 Infrastructure Requirements

Is the policy sufficiently clear as to the infrastructure requirements that will accompany any remaining phases of the Garden City?

12. Several parts of Ebbsfleet Garden City already have planning permission and arrangements ensuring infrastructure delivered and in place when and where necessary. Development sites that already have planning permission have infrastructure requirements governed by planning obligations secured through legal agreements. These legal agreements set the delivery of infrastructure in line with the progress of development. The requirements for, and delivery of,

infrastructure provision for the main remaining area without a planning permission being built out, namely Ebbsfleet Central, is covered in the response to Question 86.

13. The provision of community and public facilities that would include schools, health facilities and other public community buildings is covered under Policy E2(1)(b) along with the provision of open spaces. The provision of open spaces, ecological enhancements to the Green Grid network and opportunities for sports is covered under Policy (E2(1)(d). The requirement for development within the Garden City to contribute to enhancement of the public realm with infrastructure that supports walking, cycling and public transport as the most attractive forms of travel is covered under Policy E2(2)(b).
14. Further detail is provided through allocation policies E4 and E5 (See Questions 86 and 93).
15. Supporting documentation can provide additional clarity. Policy E2(2)(c) highlights principles set out in the Ebbsfleet Implementation Framework ([SPS-2](#)). The Implementation Framework for the development of the Garden City identifying the community facilities and other infrastructure needed to support this.

Question 79 – Policy E2 Site of Special Scientific Interest

Criterion 1(e) indicates that buffers will be created in between developments and the Site of Special Scientific Interest (SSSI). What type of buffers are envisaged?

16. As set out in paragraph 4.5 of the Green Infrastructure Paper, the features of special interest for the Swanscombe Peninsula SSSI are: geology; vascular plants; invertebrates; and breeding birds (page 15 of [ECC-2](#))¹. Natural England have advised that buffers should be sensitive to and complement the needs of the SSSI features in line with ecological assessments. They should seek to improve ecological connectivity as part of wider ecological and green infrastructure networks that also support the SSSI where appropriate.
17. The points of agreement in the Statement of Common Ground with Natural England (NE) indicate that NE consider that the text for this policy is sound and accords with the requirements of the NPPF and that, following cooperation between NE and DBC, the text in this policy has taken on board NE's comments (page 6 of [SCG-7](#)).

Question 80 – Policy E2 and Relationship with Other Documents

Is the relationship between policy E2 and the Ebbsfleet Implementation Framework, the design for Ebbsfleet Guide, the Ebbsfleet Public Realm Strategy and the Sustainable Travel Strategy sufficiently clear? What status do these documents have and will any principles embedded in these documents support the implementation of any subsequent planning consents or reserved matters applications?

¹ Full details are available at:

<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S2000813&SiteName=Swanscombe&countyCode=&responsiblePerson=&SeaArea=&IFCAAarea=>

18. Policy E2(2)(c) refers to the need for proposals to be designed to comply with the principles in these four documents and paragraph 4.12 provides some background information on them (pages 91 and 84-85 of [COR-1](#)).
19. The documents are included as part of the evidence base to support the Submission Local Plan (see [SPS-2](#), [DAE-4](#), [DAE-5](#) and [DAE-6](#)). DBC has supported these documents but has not adopted them as Supplementary Planning Documents.
20. The EDC are local planning authority for development management purposes. In implementation terms, it is understood that the EDC would advise that applicants may find it useful to take on board these documents to understand how development can best be designed and to consider the background to how compliance with Local Plan criteria can be demonstrated.
21. For certainty in applying the policy, clause 2c) of the policy could be modified to start: "Take account of the principles set out in...", which may be more appropriate than any reference to "comply".

Policy E3 – Swanscombe

Question 81 – Policy E3 General

Is policy E3 justified and will it be effective? Is the policy sufficiently clear as to what will be delivered?

1. The small town of Swanscombe is encircled by the Ebbsfleet Garden City boundary but outside of it. It is however, subject to pressure for change due to the significant development coming forward and planned in the Garden City. DBC considers it important that Swanscombe itself is not overlooked in planning for the future, and in achieving growth, infrastructure and improvements in the area as a whole.
2. Spatial Strategy Topic Paper [SPS-1](#) states: "Policy E3 and part of policy E1 set out the approach towards the town of Swanscombe, an existing settlement which is encircled by the Garden City. This was included as it is considered important for the distinct character of Swanscombe to be maintained whilst enabling the community to benefit from the opportunities resulting from its proximity to Ebbsfleet Garden City" (paragraph 6.2). This provides a strong justification for a Swanscombe policy.
3. Policy E3 and its reasoned justification in the submitted Local Plan confirms key characteristics and principles for Swanscombe. It is considered this will be effective when allied with applicable other policies including policy S1 clause 6, policy S4 clause 4, and in Swanscombe's two centres, where policy M23 applies

Question 82 – Policy E3 Swanscombe Boundary

Is the boundary of the Swanscombe area sufficiently clear?

4. DBC considers the area, being land (surrounded by but defined and shown as) excluded from the Ebbsfleet Garden City, has a clear boundary mapped with an O.S base map on Figure 8 of the submitted Local Plan (page 85 of [COR-1](#)) as referred to in the last sentence of paragraph 4.23 of the Plan (page 93 of [COR-1](#)).

5. This is regarded as appropriate and suitable given the nature of policy E3. It does not establish site or location specific new allocations or designations. However Figure 8 can be amended as required.

Policy E4 – Ebbsfleet Central Allocation

Question 83 – Policy E4 Scale and Range of Development Types

What is the basis for the scale and range of development types proposed and are these justified?

6. A range of uses are required at Ebbsfleet Central, to sustain and accelerate the realisation of the potential of the whole Ebbsfleet Garden City (submitted Local Plan page 86 paragraph 4.15) and to deliver the Local Plan's Borough-wide spatial strategy (policy S1). The scale and mix of uses is considered to be appropriate and achievable. The policy approach on development scale and type is considered to be consistent with Ebbsfleet Central's future as outlined in the Ebbsfleet Implementation Framework (evidence document [SPS-2](#) page 92), for it to become a dynamic new heart for Ebbsfleet.
7. The opening sentence of the reasoned justification highlights the allocation is for a mixed use commercial hub (submitted Local Plan page 95 paragraph 4.31). The spatial strategy Topic Paper ([SPS-1](#) pages 34 to 35 paragraph 6.12) explains ambitions for Ebbsfleet Central include: creating an urban heart that is complementary, creating a commercial core with a diverse range of opportunities and targeted inward investment, providing city-wide social infrastructure and a transport hub, and high density urban development. Information is provided in the Ebbsfleet Implementation Framework ([SPS-2](#) pages 88 to 102).
8. In relation to the the mix and scale of development, the Topic Paper highlights that Preferred Option 4B for Ebbsfleet Central was consulted upon in producing the Local Plan and favoured by respondents: "4B Create a distinctive mixed and lively urban heart for Ebbsfleet Garden City and the wider area. The provision of a range of uses in higher intensity Garden City form, provided through the Ebbsfleet Implementation Framework, including substantial city-centre level commercial space, community uses, open space, and residential accommodation. It is expected to feature a key health/education and/or leisure/culture facility" ([SPS-1](#) page 33, paragraphs 6.5 to 6.7).
9. The scale of land uses featured in policy E4 clause 5 reflect further evidence including:
- The SHLAA, most recently the September 2021 SHLAA Update document.
 - The Employment Land Report ([BAR-6](#) page 29 paragraph 5.24) concludes on the huge economic potential of land by Ebbsfleet International Station.
 - The Retail & Leisure Study ([BAR-3](#) pages 15 to 17 paragraphs 12.78, 12.79, and 12.82 to 12.85) recommends that as an important economic driver, significant job provision is expected and that Ebbsfleet Central should be planned to feature a District Centre, recognising the need for services for the Ebbsfleet community and workforce.
10. Both DBC and the Ebbsfleet Development Corporation have signed a Statement of Common Ground agreeing that Policy E4 identifies an appropriate mix of land uses and

infrastructure in support of the development of a strategic hub for Ebbsfleet Garden City ([SCG-6](#) page 7).

Question 84 – Policy E4 Timing and Rates of Housing Delivery

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?

11. The delivery programme for Ebbsfleet Central is based on the delivery of three overarching phases of development following infrastructure works commencing in 2024, with 'EC' parcels progressing as identified in the updated Dartford housing land supply (September 2021 SHLAA Update document, see Matter 9):
 - Phase 1 (EC2) Development: 2027 start
 - Phase 2 (EC1) Development: 2032 start
 - Phase 3 (EC4) Development: 2034 start
12. Specific delivery rates of residential development in the housing trajectory are consistent with rates of housing delivery within the Garden City, alongside input on Ebbsfleet Central's development form and build out from the EDC. The EDC are landowner and have been through extensive central government due procedure, and will act as strategic master developer.
13. The new planning application for 'Ebbsfleet Central East' concerns parcels EC1 and EC2.
14. It excludes land in the allocation southwest of the station, which forms EC4. This land, which is at present principally an open car park, is anticipated to commence residential delivery (in 2034); however DBC is not projecting its full completion within the plan period.
15. Therefore, with the phasing of residential development in DBC's housing land supply, the Local Plan has not relied on the allocation's total housing delivery when fully built out.

Question 85 – Policy E4 Implications of Swanscombe Peninsula SSSI on the Ebbsfleet Central Allocation

What effect does the designation of the Swanscombe Peninsula SSSI have on the amount and timing of development planned at the Ebbsfleet Central Allocation?

16. The submission Local Plan document benefited from updating by DBC, after discussion with partners, in light of the pre-notification of the SSSI. However final designation did not occur until after this. Nevertheless, 98% of notified land was ultimately designated; confirmed in the environmental Topic Paper [ECC-1](#) (page 37 to 39, paragraphs 1.62 to 1.63).
17. This means that DBC considers that generally sufficient policy updating occurred and is featured in the allocations and other policies in the submitted Local Plan. However the final designation means it is recognised some final updating will be necessary (including as set out in the submitted schedule [COR-6](#)) particularly for development/ area boundary refinements arising from the precise geographical extent of the SSSI as finalised. There

is no indication any of this minor updating will impact on the substance of the policies or their achievability.

18. An overview map of finally designated, and removed, SSSI land is included here as Appendix 1 below (originally in [COR-6](#), page 5). From this it can be seen a strip of land extending north-south, located between Southfleet Road and International Way, forms one of the more sizeable parts of the small amount of land proposed/ pre-notified as SSSI but not ultimately designed. This is not currently included within the E4 allocation boundary shown on submitted Local Plan diagram 11 / Proposed Policies Map changes [COR-2](#) (Page 6).
19. DBC notes this may be one of the most significant impacts of the SSSI - as finally designated - not accounted for already in the submitted Local Plan. The submitted schedule [COR-6](#) recognised boundary modification will be necessary. However it is not thought further amendment is required to clauses in policy E4 or the projected delivery of the allocation.
20. SSSI modification implications are further set out in response to Question 101 below.
21. In summary, many implications of the SSSI proposal have been accounted in submitted Local Plan policy and evidence (informed by close working with partners following the SSSI early 2021 notification). DBC considers the final designation of the SSSI had no further direct impact on policy E4's requirements or development quantum, or on timing assumptions albeit the most up to date housing trajectory reflects best available current data on Ebbsfleet's Central full phasing: September 2021 SHLAA Update document (see Matter 9).

Question 86 – Policy E4 Infrastructure Requirements

What are the requirements for infrastructure and are these justified? What funding mechanisms are in place to support the timely delivery of the required infrastructure?

22. Paragraph 4.36 of COR-1 identifies a 2FE primary school as a minimum requirement for Ebbsfleet along with the delivery of a new strategic health facility. Walking, cycling and Fastrack infrastructure for Ebbsfleet Central is covered by paragraph 4.37 with paragraph 4.38 setting the role of Ebbsfleet station as a transport hub. These infrastructure requirements are then set out within Policy E4(5)(c), E4(2)(e & f) and E4 (2)(d) respectively.
23. The requirements for development within Ebbsfleet Central were first established through a section 106 Agreement attached to an extant planning permission dating back to November 2002. The justification for the infrastructure provision identified within this s106 was determined through an assessment of the impacts of the planned development by the infrastructure service providers and, in relation to the provision of transport infrastructure, an agreed transport strategy based on traffic modelling. The Ebbsfleet Development Corporation (EDC) is in the process of producing a masterplan for the area and the submission of a new planning application for the development of this area. As part of this process there have been discussions with the infrastructure providers regarding the facilities required to support the planned new development much the same as the original permission.

24. In relation to the delivery of infrastructure this will be an on-going process with the infrastructure providers to ensure that the required facilities to support growth and development within Ebbsfleet Central and provided in a timely manner. The EDC has direct discussions with the infrastructure providers but the Council's regular liaison meetings with infrastructure providers, particularly in relation to education and healthcare provision, provides further opportunities for discussion on the requirements for infrastructure. These discussions inform Dartford's IDP ([INF-2](#)) and in relation to the Garden City input is also solicited from the EDC.
25. Policy E4 is principally targeted towards the delivery of infrastructure directly by the development on site. Where this is not achievable Dartford's CIL Charging Scheme ([DAE-1](#)) provides the ability to secure developer contributions towards infrastructure provision that can be combined with other sources of funding where available. This will be particularly useful for the delivery of infrastructure outside Ebbsfleet Central that provides facilities for the wider community as well as the demand generated by the planned development. In addition the Council can use s106 obligations to deliver infrastructure that is required specifically to mitigate the impacts of the development as set out in Policy S2(7).

Question 87 – Policy E4 Public Transport Hub

Is the policy sufficiently clear as to what is being sought as part of the requirement for a new public transport hub?

22. Policy E4(2)(d) sets the requirement for Ebbsfleet Station to function as a transport hub in terms of its connection with other adjacent stations, the public transport network whilst maintaining sufficient flexibility for the evolving development plans for Ebbsfleet Central.
23. The Ebbsfleet Implementation Framework ([SPS-2](#)) helps evidence and confirm this approach; on page 92 it states it will connect Ebbsfleet International and Northfleet Stations, interchange with Fastrack and local bus network, and provide pedestrian and cycle links and facilities.
24. The policy is also set within the context of the movement expectations in the reasoned justification at paragraphs 4.37 and 4.38 (submitted Local Plan page 96). Also, the Local Plan's more strategic policies, specifically Policy S2(3) require development to be well-served by public transport; Policy E1(1) and E1(2) requiring integrated and accessible sustainable transport focused on Ebbsfleet Station and M16(1) requiring development to minimise and manage transport impacts.
25. These guiding principles provide reasonable clarity on the requirements for the hub, however if the policy criterion is required to be expanded then this can draw from content with the Local Plan including E4's own reasoned justification.

Question 88 – Policy E4 Open Space Requirement

Is the requirement for 30% open space justified?

26. Policy E4(2)(a) requires proposals at Ebbsfleet Central to be designed to provide at least 30% as open space, including varied and well equipped parklands befitting a Garden City (page 98 of [COR-1](#)). As set out in the Strategic Housing Land Availability

Assessment Sites Summary Compendium, the area of the site is over 44 hectares (page 1 of [HOU-4](#)). The open space requirement in policy E4(2)(a) is in accordance with policy M14(1) which requires sites of 20ha and over to contribute at least 30% of the site area to the Green and Blue Infrastructure network.

27. This a large, very high profile, site that will be the heart of a Garden City. Submitted Local Plan Diagram 10: Ebbsfleet as a Garden City (page 90) illustrates the significance of structural green space and green grid links, and complementary and integrating role of on-site open space in the allocations can be surmised. The policy approach also complies with the Ebbsfleet Implementation Framework, with “bringing in the green and the blue” being one of the six key moves to bring Ebbsfleet together (page 36 of [SPS-2](#)). The approach is justified and DBC considers no exemption from the Borough-wide approach is merited.

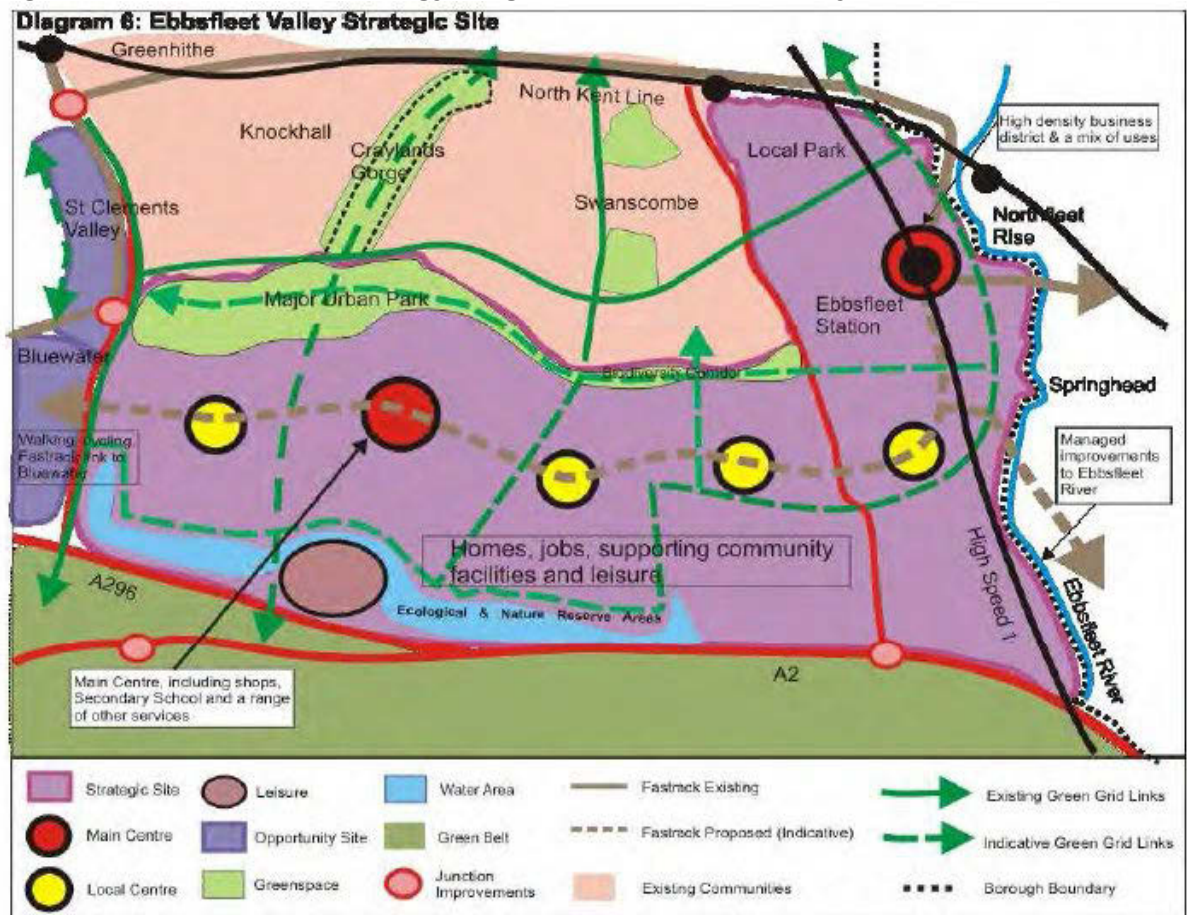
Policy E5 – Alkerden and Ashmere Allocation

Question 89 – Policy E5 Scale and Range of Development Types

What is the basis for the scale and range of development types proposed and are these justified?

28. Policy and proposals for this area are well-established and have been in place for some time, predating preparation of this plan.
29. Alkerden and Ashmere are expected to be largely delivered through the extant outline planning permission (current reference EDC/17/0048) which grants permission for up to 6,250 homes alongside a range of non-residential uses and open space across the whole of Eastern Quarry. Parameters for development types and quanta form part of the permission granted. The remainder of the development approved under the outline planning permission is already largely delivered in Castle Hill. (See submitted Local Plan page 81 paragraph 4.4 regarding the allocation, and Eastern Quarry which includes Castle Hill).
30. The current application of the existing approach in the 2011 Dartford Core Strategy is outlined in the Spatial Strategy Topic Paper [SPS-1](#) (paragraphs 6.1 to 6.3 page 30). This also features (page 32) Core Strategy [POL-1](#) Diagram 6, showing a series of centres/sites between Ebbsfleet Central and Bluewater directly linked by a Fastrack route, reproduced as Figure A below:

Figure A: Dartford Core Strategy Diagram 6 (Allocation Policy CS5)



Based on Ordnance Survey Map © Crown Copyright Dartford Borough Council 100025870 2010

31. Development has proceeded on this basis, with Ashmere (Local Centre) the first neighbourhood east of Bluewater, and east of that, the Alkerden neighbourhood (Main Centre [i.e. District Centre]) as set out Core Strategy Diagram 6, [POL-1](#) page 41.
32. Allocation E5 is now largely based on securing for the future (where development is not already complete) the essential strategic parts of the planned new neighbourhoods thereby permitted or forthcoming.
33. Area masterplans and design codes have been approved for Alkerden and Ashmere which identify a District Centre in Alkerden and a smaller Local Centre in Ashmere, consistent with submitted Local Plan Table 7 (page 186). The floorspace and mix of uses identified in the policy is based on the quantities indicated in these approved documents. Phase 1 of the Alkerden District Centre is currently subject to a live planning application with phase 2/3 expected to be submitted to EDC in October/ November 2022.

Question 90 – Policy E5 Timing and Rates of Housing Delivery

What are the expectations in terms of the timing and rates of housing delivery? Are these realistic?

34. DBC has liaised regularly with the EDC, and discussed in detail the preparation of the submitted Local Plan and its underpinning evidence. This is informed by how the EDC works closely with the primary landowner at Alkerden and Ashmere alongside the

housing developers to understand the phasing of the scheme and forecasts for starts and completions. The progress of delivery is reported frequently by the EDC with regular reviews looking ahead across the whole build out period.

35. Specific quantities are set out in the housing land supply (see Question 47 and Matter 9).
36. Developers across Alkerden and Ashmere have detailed forecasting which has been shared with EDC. This data has been reviewed by EDC and adjusted to lead to the numbers identified in the plan. The adjustments have been carried out on the basis of the interface with the delivery of infrastructure across the site and the track record of developers in the area. DBC has interrogated this information to ensure a robust basis for phasing of the build out of the allocation
37. Alkerden in particular is being delivered by multiple developers and house builders which results in multiple products and outlets being available at any one time. The forms of development in Alkerden leads to high levels of completions at once in some areas (for example the more intensive nature of the District Centre). This approach supports a high number of completions annually. The developers building at Alkerden have operated this way in other parts of Ebbsfleet and this track record leads to confidence in the forecast numbers.
38. Most of Ashmere is being delivered by one joint venture company and products are being examined carefully to release different outlets concurrently where possible.

Question 91 – Policy E5 Specialist Accommodation

What proportion of specialist accommodation is expected to be delivered on the site?

39. The landowner has identified an area of land in Ashmere which could deliver 250 units of specialist housing. The specialist housing is expected to come forward in the form of an older persons sheltered housing scheme
40. This parcel is specifically identified on mapping for Question 47.
41. DBC and EDC are supportive in principle of the provision of such development in order to diversify the range of housing products being delivered in Ebbsfleet and the Borough, supporting meeting demand that may arise from specific groups, and a well differentiated mix of accommodation will also assist the growth in residential development rates in accordance with policy S2(clause 2) aims.

Question 92 – Policy E5 Community Uses

Is the expectation in criterion 3c) sufficiently clear as to the quantum of community uses envisaged?

42. The Community Uses that are expected to be delivered will be delivered pursuant to the outline planning permission. The quantum of community uses are set out clearly in the section 106 and approved strategies pursuant to the outline planning permission. They are of a scale and form to fulfil the role of a District/Local Centre as set out in submitted Local Plan Table 7 (page 186). This sets out new centres would be expected to include:

- a. District (Alkerden): Convenience retail, health, education.
- b. Local (Ashmere): Small convenience retail, local services, potential primary school in vicinity.

Table 7 sets out this is proportionate to their size and function.

43. This planning permission has flexibility for the timing and specific detail of delivery subject to the needs of service providers such as Kent County Council and partners are committed to maximising the benefits to the emerging community. However the exact details will be set through future reserved matters applications and assessed when triggers for delivery are reached.

Question 93 – Policy E5 Infrastructure Requirements

What are the requirements for infrastructure and are these justified? What funding mechanisms are in place to support the timely delivery of the required infrastructure?

44. Requirements for infrastructure are listed in sub-clauses in policy E5 clause 2:
- a. Fastrack route through the site
 - b. Community facilities inc education campus and medical/healthcare
 - d. Full pedestrian/cycle connections
 - e. Strategic and local greenspace inc ecological corridors
45. The full infrastructure provisions are obligated and justified through the original outline planning permission in a series of strategies and a section 106 agreement. The infrastructure that has to be provided includes schools, community space, health provision, open space, retail space and transport improvements.
46. The section 106 agreement was originally agreed in 2007 and subsequently amended under section 73, most recently in 2018. The developers currently on site are building out pursuant to this permission and meeting the terms of the section 106 agreement.

Question 94 – Policy E5 Greenspace Requirements

How much strategic and local greenspace is required by the policy? Is it sufficiently clear?

47. Policy E5(2)(e) requires the delivery of high quality new strategic and local greenspace, including at Craylands Gorge and other north-south ecological corridors, and a major park between Alkerden and Ashmere (page 102 of [COR-1](#)). It does not specify an amount but is intended to clearly set out the greenspace principles that will apply to development in this location. The requirements would be consistent with the requirement in policy M14(1) that at least 30% of the site area for sites of 20ha and over should contribute to the Green and Blue Infrastructure network. The outline planning permission sets out the requirements for minimum green spaces requirements in the section 106 and the associated Strategies
48. Submitted Local Plan Diagram 10: Ebbsfleet as a Garden City (page 90) illustrates the substantial structural green space and green grid links anticipated within the allocation 5 boundary (including the major feature extending south through the middle of the site from Craylands Gorge in the north) and adjoining it and this reflects the obligations in the section 106 agreement and the approved Site Wide Master Plan for the outline planning permission.

49. The policy approach complies with the outline planning permission and the Vision in the Ebbsfleet Implementation Framework, pages 47 and 108 of which show the vision for the major parks across the Garden City and for the pattern of development Eastern Quarry ([SPS-2](#)). Alkerden and Ashmere are located in the western part of Eastern Quarry. Policy E5(2)(e) is in accordance with one of the six key moves to bring Ebbsfleet together – bringing in the green and blue (page 36 of [SPS-2](#)).

Question 95 – Policy E5 Custom, Self-Build and Other Forms of Residential Accommodation

What amount of custom and self-build, other forms of residential accommodation including for older people is expected?

50. A reserved matters application for 67 custom-build units at Alkerden Gateway Parcel 7 was approved by Ebbsfleet Development Corporation on 26 July 2021 (ref EDC/21/0056). The scheme is currently under construction with some properties now occupied. Initial discussions have taken place with the landowner about a further potential area for custom build homes but it is unclear if these will be custom housing or not.
51. As outlined in response to Question 91, in terms of specific known proposals, a scheme for older persons (sheltered housing) accommodation is expected.

Question 96 – Policy E5 Social Infrastructure

Is policy E5 sufficiently clear as to the other social infrastructure that is required to support the planned residential expansion?

52. The key items of social infrastructure are outlined in the policy as set out in answer to Question 93. The outline planning permission sets out the requirements for social infrastructure within the section 106 and associated Strategies allowing some flexibility for provision where this is by commercial operators, such as local shops.
53. The reasoned justification (submitted Local Plan page 100 paragraph 4.43) highlights:
- the significance of the District and Local Centres (see submitted Local Plan Table 7, page 186) to the neighbourhoods and creating active and healthy communities.
 - a primary school at Ashmere and education camps at Alkerden.
54. Given the potential for changing circumstances, particularly shifts in the nature of demand and provision arrangements for social infrastructure, a responsive approach is required and the allocation (supported by other Local Plan provisions) is regarded as consistent with this.

Policy E6 – North of London Road Area, Swanscombe

Question 97 – Policy E6 Effectiveness and Timeframe for Delivery

Is the policy effective in the absence of any clear requirements in terms of square metres of development/ use classes? What is the timeframe for the delivery of this allocation?

55. Policy E6 is regarded by DBC as providing the most effective and deliverable policy approach for delivery of this allocation. The submitted Local Plan (page 103, paragraph 4.47) notes that this land remains at the centre of major uncertainty, but that an appropriate policy framework for this land within the Ebbsfleet Garden City area is still necessary. Given the overall brownfield character of this land, its location and scope to improve the local environment, DBC considers it correct that the Local Plan outlines guidance for the future.
56. There is no set timescale associated with the policy in terms amount of development to be delivered because of the underlying uncertainty. However, it is considered that there are reasonable prospects of development proposals emerging by the end of the Local Plan period. Due to current availability issues no new homes have been projected here in the deliverable or developable housing land supply. Any suitable proposals for residential development that may be permitted would form additional housing land.
57. It should be noted that DBC has not sought to present E6 as a formal/ strategic allocation. It is a broad criteria based policy intended to guide a general area's long-term development, not a site with any boundary on the Policies Map or elsewhere; and no yield from development has been counted within Local Plan housing/ commercial evidence (as set out in [EXAM-5](#) page 15 paragraph 4.5). Nevertheless it is effective and necessary, and supported by the Area Policy Extent shown on the Key Diagram (submitted Local Plan page 25 Figure 1).

Question 98 – Policy E6 Forms of Development

Is policy E6 sufficiently clear as to the forms of development would be acceptable?

58. DBC regards clarity to guide future proposals has been optimised, and would be sufficient and appropriate. Policy E6 clause 1 outlines the principle of support for regeneration of under-used land, subject to further investigation. Policy E6 clause 2 contains a series of criteria (a to g) providing extensive qualitative guidelines as to the satisfactory form of development. The criteria based approach is suitable given the flexibility necessary to respond to changing circumstances.
59. Furthermore, E6 is supported by other policy, including provisions and the spatial strategy for the land as part of Ebbsfleet Garden City. In particular all proposals in the E6 area would be informed by policy E2 (submitted Local Plan page 91).

Question 99 – Policy E6 Site of Special Scientific Interest

Criterion 2 indicates that buffers will be created in between developments and the Site of Special Scientific Interest (SSSI). What type of buffers are envisaged?

60. As set out in paragraph 4.5 of the Green Infrastructure Paper, the features of special interest for the Swanscombe Peninsula SSSI are: geology; vascular plants; invertebrates; and breeding birds (page 15 of [ECC-2](#))². Natural England have advised that buffers should be sensitive to and complement the needs of the SSSI features in line with ecological assessments. They should seek to improve ecological connectivity as part of wider ecological and green infrastructure networks that also support the SSSI where appropriate. The points of agreement in the Statement of Common Ground with Natural England (NE) indicate that NE consider that the text for this policy is sound and accords with the requirements of the NPPF and that, following cooperation between NE and DBC, the text in this policy has taken on board NE's comments (page 6 of [SCG-7](#)).

Question 100 – Policy E6 Policy Area Extent

Is the policy area extent justified having regard to the location of the SSSI?

61. The extent of the policy area reflects the boundaries of the notified SSSI and the criteria in policy E6(2)(a) and (b) seek to ensure that the SSSI will be conserved and enhanced and that any developments will not have any direct or indirect impacts on the SSSI. In this respect, the policy area was justified at the time that the Local Plan was published in September 2021. The boundaries of the SSSI changed when it was finally confirmed in November 2021. As such, it is considered that the extent of the E6 policy area should be increased to include areas which are no longer within the SSSI. The full implications of these changes are set out in response to question 101 below and the map showing the amended boundaries is included in Appendix 1.

Question 101 – Modifications for the Swanscombe Peninsula SSSI

Are any Main Modifications required for soundness having regard to the confirmation of Swanscombe Peninsula SSSI?

62. Yes, as addressed in the submitted schedule [COR-6](#) a number of main modifications will be required following the confirmation of the Swanscombe Peninsula SSSI. This would reflect that as the extent of the area of the SSSI designation was reduced in some locations and this allows the opportunity for the Policy E4 Ebbsfleet Central Allocation and the Policy E6 North of London Road policy area extent to be increased.
63. Appendix 1 includes a map which shows the changes that were made between the notification and designation of the SSSI. The anticipated key main modifications within the Ebbsfleet Garden City in this respect are:
- Diagram 11 (Ebbsfleet Central Allocation): Show an increase to the area covered by the allocation to include areas no longer within the notified/designated SSSI (page 97 of [COR-1](#)). The Ebbsfleet Central site allocation shown in the Policies Map Changes Document should also be amended accordingly (page 6 of [COR-2](#))
 - Diagram 13 (North of London Road Area, Swanscombe): Show the final boundaries of the SSSI and increase the area covered by policy E6 to include areas no longer within the notified/designated SSSI (page 104 of [COR-1](#))

² Full details are available at:

<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S2000813&SiteName=Swanscombe&countyCode=&responsiblePerson=&SeaArea=&IFCAAarea=>

- Diagram 1 should also be amended accordingly, consistent with the above (page 25 of [COR-1](#))
- Diagram 10 should also be amended accordingly, consistent with the above (page 90 of [COR-1](#))
- The Site of Special Scientific Interest shown in the Policies Map Changes Document should be amended to show the confirmed SSSI boundaries (page 25 of [COR-2](#))

There will also need to be changes to text in paragraphs 4.5, 4.8, 4.17, 4.35 and 4.48 to update references from the notified SSSI to the designated SSSI.

Appendix 1: Changes to the Swanscombe Peninsula SSSI Boundaries between Notification and Designation

