

Inspector's Matters, Issues and Questions

Matter 7: Economic and Retail Growth

Response by Dartford Borough Council

30 September 2022

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Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to economic and retail growth

Relevant policies – S4, M19, M20, M21, M22, M23, M24

Approach to employment

Question 102 – Policy S4 Amount of Commercial Floorspace

How has the requirement for an additional 22,000 sqm of new commercial, business and service use space per annum in policy S4 been calculated? Is this intended to represent uses within Class E of the Use Classes Order, as amended?

1. Evidence document [BAR-6](#) considered employment land, non-residential development levels and national policy, leading to policy S4's (clause 6) floorspace quanta. The methodology is set out at Appendix C (of this document (page 38 of [BAR-6](#)) and growth outcomes discussed in Section 4 (pages 19-20 of [BAR-6](#)).
2. Paragraph 5.6 of the Business and Retail Topic Paper (page 17 of [BAR-1](#)) summarises step-by-step the calculations set out in the table in [BAR-6](#) Appendix C. This shows calculations producing an annualised rate flowing from delivery rates achieved, planning permissions, Local Plan proposals, and an uplift factor for market choice/ competition.
3. This rate is projected forward and applies to the end of plan period; and very significant business floorspace will be brought forward. Looking at recent proposals in Dartford, the future prospects are positive for employment growth. Nationally, however, and with recent and current major changes and macroeconomic impacts influencing investment decisions, there is growing uncertainty what the future of economic development looks like, and as such it is not appropriate to identify specific locations where commercial growth will occur over the final five years of the Plan. The Plan's positive provisions, flexibility and criteria sought in national policy is addressed in Question 105 below.
4. The 22,000sqm per annum floorspace level approximates to uses within Classes E and F of the Use Classes as amended.

Question 103 – Policy S4 Amount of Industrial Floorspace

How has the requirement identified in policy S4 for 25,000 sqm been calculated and is it justified? Is there a split envisaged between the quantum of floorspace directed to B2 and/or B8 uses?

5. The overall methodology for industrial/ distribution is as stated above (Question 102) i.e. flowing from delivery rates achieved, planning permissions, Local Plan proposals, and an uplift factor. Therefore see [BAR-1](#) page 17 (paragraph 5.6) on the step-by-step calculations in the table in [BAR-6](#) Appendix C.
6. DBC considered this level is justified in proportionate evidence including as set out in [BAR-6](#), (notably page 18 to 20), and is appropriate reflecting local and national needs and Dartford's growth and potential (see [BAR-7](#), for example the page 21 summary).

The long-term perspective of changing economic circumstances, and a suitably positive framework is again relevant here.

7. The resulting scale of non-residential growth supported by policy S4, needs to be seen in its practical context i.e. provision of sufficient economic and jobs growth. The deliverable ambition of S4 can be compared favourably: for example with the floorspace uplift on Core Strategy growth ambitions ([BAR-1](#) page 16 paragraph 5.2), economic development levels planned elsewhere, and the positive outcomes for jobs within Dartford (as set out in [EXAM-9](#) page 3, paragraphs 1.10 to 1.13).
8. The strategy is not intended to be too prescriptive in how the market achieves Plan objectives and spatial strategy (policy S1) requirements, and consistent with the approach in policy M21, a split in floorspace between B2 and B8 uses is not considered necessary.

Question 104 – Employment Floorspace

[First question] *Does the submitted plan positively identify the location and quantity of employment floorspace for growth?*

9. Yes the submitted Local Plan includes a range of policies to identify and positively encourage sustainable economic growth. These are outlined in the Business and Retail Topic Paper [BAR-1](#):
 - Pages 13 to 15- Policy S1 (clauses 7 to 8) highlights Central Dartford and Ebbsfleet Garden City and elsewhere, including the identified employment areas.
 - Pages 16 to 18- Policy S4 (clause 6) addresses floorspace quantity.
 - Pages 19 to 21- Policy M19 Sustainable Economic Locations provides clear Borough-wide location criteria for employment.
 - Pages 22 to 24- Policy M21 Identified Employment Areas, a very important policy, confirms the criteria for business proposals to be positively supported.

[Second questions] *What is the total quantum of land proposed to be allocated to meet the floorspace requirements and where is this set out? Can the Council clarify the planning status of the additional commercial and industrial floorspace requirement?*

10. Predominantly, land to meet economic needs will be at Ebbsfleet Garden City or Central Dartford, or at identified employment areas (either in their current form, or through proposed strategic expansions documented in the following question). The planning status of these locations are addressed in Question 47 or the following Question (105).
11. The Borough's identified employment areas cover a range of locations and scales, as shown in Table A below. Based on their current size, they provide approximately 240 ha of identified employment land in total.

Table A – Identified employment areas current size

Area name	Current size (to the nearest 1ha)
Crossways Business Park, Stone	97
Manor Way, Dartford	12
Northfleet, Swanscombe	9
Galley Hill Road, Swanscombe	1
Princes Road/ Watling Street, Stone	5
Dewlands (London Road), Stone	1
Newtown, Dartford	0.4

Area name	Current size (to the nearest 1ha)
Orbital One, Dartford	3
Questor, Dartford	22
Victoria Road and The Base, Dartford	6
Riverside/ Northern Gateway, Dartford	6
Burnham Road, Dartford	11
Rochester Way, Dartford	5
West Hill, Dartford	2
Littlebrook/The Bridge, Dartford	50
Westwood	2
Pinden End, Longfield	1
Malt House Farm, Green Street Green	3
St Margarets Farm, Darenth	2
Darenth Hill, Darenth	1
London Road, Dartford	0.3

12. Four of these are proposed to have strategic extensions to meet needs (see the following question 105). The scale of this is over 90 hectares of extra identified land.
13. Information on the availability and delivery of the proposed strategic extensions to the identified employment areas was set out in the Economic Land Report [BAR-6](#) (including at page 15, table 5, and within the Appendix A table, pages 33 to 35).

Question 105 – Employment Land and the Policies Map

It is noted at paragraph 5.7 of the Economic Land report that strategic modifications including additions be made to the Policies Map. However, there does not appear to be any corresponding allocation(s) within the plan. It is reminded that the Policies Map is not part of the Development Plan only a representation of it. As such, how does the submitted approach plan positively to meet the identified needs in full and will it be effective in meeting employment needs?

14. The identified employment areas and their location is set out in Figure12 (page 189) of the submitted Local Plan¹. The Key Diagram (Local Plan diagram 1, page 25) outlines the proposed boundaries geographically. These offer a specific indication of the Local Plan's identified employment areas. Their precise geographic extent is mapped via the proposed Policies Map (documents [COR-2](#), [COR-3](#) and [COR-4](#)).
15. Strategic allocations - all including potential business development - in the focal economic growth locations of Central Dartford and Ebbsfleet (see policy S1) are featured in policies D4 to D6, and E4 and E5. These are all shown via Diagrams 6 to 8 (pages 68 to 73) and Diagrams 11 and 12 (pages 97 and 101) of the submitted Local Plan.
16. Demonstrating confidence that the identified extensions will be secured effectively and as planned, and the positive prospects of delivery, Table B below confirms their current planning status:

¹ With one omission to be corrected as set out in row SC12 of [COR-6](#).

Table B: Delivery of identified employment area extensions

<i>Identified employment area to be extended (see Local Plan page 189, Figure 12 locations).</i>	<i>ELR map page</i>	<i>Size of extension (net, hectares)</i>	<i>Planning/ build out status summary (September 2022).</i>
Burnham Road, Dartford	BAR-6 Page 25	4	Local Plan landowner submission. No planning application.
Crossways, Stone	BAR-6 Page 23	22	The extension, comprising land at the former Thames Europort/ Dartford International Ferry Terminal, fully benefits from planning permission for commercial redevelopment: <ul style="list-style-type: none"> • Phase 1: Recently complete (ref. 19/00991/FUL). • Phase 2: Extant permission not yet implemented (ref. 21/3491/FUL).
The Bridge/ Littlebrook, Dartford	BAR-6 Page 24	58	The extension is predominantly made up of redevelopment of land at the former Littlebrook Power Station: <ul style="list-style-type: none"> • Phase 1: Recently complete (ref 18/00457/FUL). • Phase 2: Complete (ref. 19/01515/FUL). • Phase 3: Under construction (ref. 21/01005/FUL). • Phase 4: This final and smallest phase is anticipated (but no planning application currently). Residual (other) parts of the extension are accounted for by commercial redevelopments that are now complete or under construction.
Riverside/ Northern Gateway, Dartford	BAR-6 Page 23	10	Developments complete, site built out.

17. It can be seen that the greater proportion of new employment land has planning permission (with part of this under construction, or now recently complete). This is supplemented by land at Burnham Road which will come forward over the longer-term to help meet fully needs. This provides further confirmation that commercial needs will be positively and effectively met with deliverable land identified and retained, and necessary development will be achieved under the Local Plan.
18. NPPF ([NAT-1](#)) paragraph 82a sets out policies should set criteria or identify strategic sites to meet anticipated economic needs. The submitted Local Plan includes both criteria and sites to meet needs.
19. As set out in paragraph 7 above, DBC considers ample provision will be made to meet identified needs in full; and allied with the extra flexibility provided through criteria in policies M19 clause 3 (strategic investment proposals) and M21 clause 3 (service business intensification and enhancement) this allows for responsiveness to meeting market needs.

20. In this context and with regard to national policy, the submitted Local Plan's policies make satisfactory provision to positively secure the delivery of suitable development, and the identified employment land (existing areas and as extended), and will be effective, deliverable and appropriately flexible.
21. If necessary, in support of policy M21, the reasoned justification could be expanded to list the identified employment areas/ the expansions.

Approach to retail development

Question 106 – Retail Approach

Is the overall strategy for retail development sufficiently clear and is it justified?

22. DBC considers the overall strategy for retail is supported by the Borough spatial strategy and clearly set out in policy S1 clause 8b and policy M19 clauses 1c and 2, policy M22, and other policies of the submitted Local Plan. Paragraphs 3.6 (page 52) and paragraphs 3.33 to 3.35 (page 65) and Table 7 (page 186) explain the strategy further.
23. This justified by the Retail & Leisure Study Key Findings & Recommendations ([BAR-3](#)) document and in the Topic Paper [BAR-1](#) (pages 18-21).

Question 107 – Retail Development and Compliance with the NPPF

Does the approach to retail development accord with paragraphs 86a) and 86b) of the Framework?

24. Yes the submitted Local Plan's approach to retail development accords with NPPF paragraphs 86 a and b.
25. A suitable network of centres is identified at policy S1 clause 8b, and Table 7 (page 186)/ policy M19 clause 1. This is supported by, for example, provision for potentially rapid growth and diversification for residential retail and leisure uses in Central Dartford, building on its historic market town character, and by capturing expenditure from significantly increasing population in its vicinity. Section 3 of the submitted Local Plan covers this in various provisions, including paragraphs 3.6, 3.13, 3.22 and 3.31, and policies including D2 clause 1b and D3 clause 1.
26. The extent of the town centre is included on Diagram 4 (page 55) of the Local Plan, and its primary shopping area/core frontage on Diagram 5 (page 62) as discussed in paragraph 3.35 (page 65) (and also with addresses listed in Plan Appendix D, page 219). Policy D3 clause 1 provides the applicable policy in sub-clauses (a) and (b) respectively, confirming the diverse range of ground floor uses positively supported.
27. The rationale for the retail network/ hierarchy, extent of the town centre and primary shopping area, is set out in [BAR-3](#) pages 21-23 (paragraphs 12.106-12.118).

Policy M19 – Sustainable Economic Locations

Question 108 – Policy M19 B Class Development

Would all forms of B class development be appropriate in all of the locations set out in policy M19?

28. DBC considers that while M19 clause 1 does include support in principle for Class B2 and B8 (and Class E) development, as a clear and positive approach, this is however contingent on them being “appropriately located and designed”.
29. Allied with development management policies (including for instance, M1, M2, M13, M16, and M21), and ample provision at suitable other locations within M19, it is viewed that the Local Plan would not likely lead to inappropriate uses at harmful locations.

Question 109 – Policy M19 Impact Assessment Threshold

Is the impact assessment threshold of 280 sqm set out in policy M19 justified?

30. Yes, the impact threshold is specifically addressed and justified at pages 23-25 (paragraphs 12.119-12.130) of [BAR-3](#).

Policy M20 – Provision for Local Business and Skills

Question 110 – Policy M20 Local Skills Training or Apprenticeships

Is policy M20 clear as to how the delivery of local skills training or apprenticeships would be secured? Will the policy be effective?

31. Policy M20 and its reasoned justification do not specify the means of delivery of local ‘up-skilling’ from appropriate developments. The submitted Local Plan (pages 11 to 12, paragraph 1.25) and evidence including [HOU-7](#) page 27 paragraph 2.19 notes some of the training needs of the Borough, for example those without qualifications.
32. Informed by this and [BAR-8](#), DBC and EDC would anticipate an Employment and Skills Plan secured by a section 106 agreement on applicable developments. This would include objectives and monitoring arrangements focusing on local labour, apprenticeships, local supply chain, training providers and education outreach.
33. The submitted Local Plan could be modified reflecting this (for example) if required to address soundness.

Question 111 – Policy M20 Threshold for Contributions

Is the threshold of 20,000 sqm (gross) for contributions towards the accommodation needs of local businesses and training needs of the Borough’s workforce justified? Is it supported by evidence?

34. The threshold aims to target the largest developments, rather than small-medium scale proposals. The approach is considered as justified by evidence and the level set is

appropriate by DBC in light of the Table on pages 14 to 15 of [BAR-7](#) looking at the biggest completions in a 10 year period.

35. Policy M20 and the threshold are also regarded as suitable in the general context of commercial viability evidence ([VIA-1](#) page 91 paragraph 4.4.2).

Policy M21 – Identified Employment Areas

Question 112 – Policy M21 Office Development

Does policy M21 reflect the role of Office development under Class E of the Use Classes Order in identified employment areas?

36. Yes clause 3 of policy M21 addresses office development, including with a specific requirement at sub-clause (a) for office (and research and development).
37. M21's reasoned justification (submitted Local Plan paragraph 5.189) is clear and explicit in this respect, that office is one of the applicable uses within Class E.

Question 113 – Policy M21 Non-Job Generating Development

Is the approach to non-job generating development justified? Would it result in unnecessary restrictions on existing businesses in identified employment areas?

38. Development introducing new types of land use to identified employment areas that do not contribute to the operation, setting or commercial appeal of existing businesses – for example residential development – would undermine the major contribution the areas make to the Borough and wider economy. DBC considers the aim of avoiding non-job generating uses in new proposals is justified in light of the quality, scale and recent investment in the key identified employment areas, as covered in submitted Local Plan page 183 (paragraph 5.174) and page 188 (paragraphs 5.183 to 5.184) and future needs.
39. The approach to identified employment areas has secured a significant quantity and range of business development in the Borough as evidenced in chapter 3 and 4 of [BAR-7](#) (pages 9-22). The policy M21 would serve to support the areas, with existing businesses allowed to diversify appropriately.

Question 114 – Policy M21 Affordable Commercial Premises

Is the reference to affordable commercial premises sufficiently clear? Is it justified?

40. Commercial rents are amongst the very highest in Kent, as outlined for example at [MON-2](#) charts on page 30 (paragraph 5.13 to 5.14).
41. DBC considers this provided a justification for general regard in plan making to affordability, and the balance between development for inward investment and maintaining suitable modern business stock for local companies.
42. This is thought to be a relevant issue to address, however the submitted Local Plan could be amended as necessary. One example is that the points in the two previous

paragraphs could be reiterated in the reasoned justification of Local Plan employment policy.

Question 115 – Policy M21 Littlebrook/ The Bridge

Is the extension to the Littlebrook/ The Bridge Identified employment Area a formal site allocation? If not, should it be?

43. No given the fact that this site is now predominantly complete, and the strategic approach to site allocations in the Local Plan consistent with the Borough's spatial strategy policy S1 (see questions 105 and 49 respectively), DBC believes this both to be unnecessary and inappropriate.

Policy M22 - Bluewater

Question 116 – Policy M22 Bluewater as a Regional Centre

Is the identification of Bluewater as a regional centre justified?

44. Yes, the continued recognition of Bluewater in the plan as a regional centre is justified and appropriate. Detailed evidence is set out in chapter 8 (pages 82-91) of the Retail & Leisure Study, within document [BAR-2](#). This is summarised in [BAR-1](#) paragraph 8.5.
45. [BAR-2](#) page 86 Table 8.2 confirms that Bluewater, at approximately 153,000sqm, is larger than other regional centres, apart from the Metrocentre Gateshead and the two relatively recent centres in London by Westfield.
46. The Retail & Leisure Study's conclusions ([BAR-3](#) page 19 paragraph 12.98) are clear that Bluewater's current definition and role as a regional shopping centre within the Borough's network and hierarchy of centres is appropriate in policy terms and should be maintained.
47. It should be noted that the role of Bluewater as a regional centre was planned to serve large scale population growth and to support regeneration of the sub-region (regional policy RPG9a). Its role was recognised accordingly in the subsequent Core Strategy ([POL-1](#) page 60, paragraph 3.30), and this remains salient, not least given its close proximity/ relationship to supporting the growth of Ebbsfleet Garden City.

Question 117 – Policy M22 Threshold for Impact Assessments

Is the threshold for impact assessments for developments over 2,500 sqm justified?

48. Yes, the Retail & Leisure Study clearly recommends that impact assessment is justified and required ([BAR-3](#) page 20 paragraph 12.100): "Notwithstanding the potential to extend and diversify Bluewater's mix of uses, it is critical that any new investment in the shopping centre complements rather than competes with Dartford and other town centres. New uses proposed for Bluewater over the plan period should not result in potentially significant adverse impacts on investment, trade/turnover and the overall vitality and viability of existing and planned centres (including Ebbsfleet Central). In this context, it is important that there are policies in place for Bluewater that allow for the

assessment of the impact of new retail, leisure and town centres uses (in compliance with paragraph 89 of the NPPF)."

49. DBC considers that in line with usual practice and rather than every application requiring an impact assessment, a threshold is appropriate. No specific level is proposed in the Retail & Leisure Study. However NPPF ([NAT-1](#)) page 26 paragraph 90 sets out a "default" of 2,500sqm. This is also regarded as justified in context of Bluewater, and the most appropriate level at which to require assessment; its rationale and application are covered in submitted Local Plan page 195 paragraph 5.202.

Policy M23 – District and Local Centres

Question 118 – Policy M23 Effectiveness

Is policy M23 effective in the absence of thresholds for impact assessments?

50. Yes policy M23 would be effective, as its centres would benefit from the provisions of M19 clause 2. This requires impact assessment for applicable proposals outside of the network of retail centres – including all the centres covered by policy M23.

Policy M24 – Food and Drink Establishments

Question 119 – Policy M24 Hot Food Takeaways

How would the policy address any over-concentration of hot food takeaways in an area? What criteria would be used and how would the policy be implemented?

51. The concentration of hot-food takeaways would be addressed and M24 implemented in a number of ways:
- Policy M24 clause 2 restricts a takeaway being allowed next to another existing or permitted takeaway,
 - Policy M24 clause 2 also directs takeaways to designated centres only and therefore policies M23 and D3 would also apply, implementing requirements on the mix of uses that will help ensure an excessive over concentration of takeaways does not occur
 - Policy M24 clause 1 and development management policies such as M2 recognise cumulative impacts and provide criteria that will work to prevent unacceptable concentrations of takeaways.

Question 120 – Policy M24 Sufficient Effective Marketing

How will 'sufficient effective marketing' for the proposed loss of Public Houses in the Borough be assessed? What criteria would be used? Is the policy likely to be effective?

52. DBC considers policy M24 clause 3 is likely to be effective as it clearly highlights aims to retain pubs as possible and appropriate. Putting a policy in place serves to deter speculative and unnecessary proposals arising from shorter term motives or a gap in the monetary value of community facilities and some other uses.
53. "Sufficient Effective Marketing" is set out in the glossary of the submitted Local Plan (Appendix B, page 217). This sets out the applicable criteria. The policy has the flexibility

to allow alternative community uses i.e. change of use class F2 if the marketing has taken place; this is considered an effective approach without forming an unreasonably rigid policy.