

**DARTFORD LOCAL PLAN REVIEW**  
**EXAMINATION IN PUBLIC**

**RESPONSE TO MATTER 7: ECONOMIC AND RETAIL GROWTH**  
**ON BEHALF OF MEDWAY COUNCIL**

**SEPTEMBER 2022**

## 1.0 INTRODUCTION

- 1.1 Medway Council has engaged in many discussions with Dartford BC on the impact of growth at Bluewater on neighbouring centres. Whilst it is accepted that Bluewater functions at a different scale, consents over the years have had an impact on people's shopping patterns.
- 1.2 It is important to ensure that the proposals that come forward at Bluewater are appropriate to its role but also that the impact on neighbouring centres is appropriately considered.
- 1.3 The only appropriate location to express these views are via question 117 as set out below.

## 2.0 INSPECTORS MATTER 7: Economic and retail growth

**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***

### **Q117. Is the threshold for impact assessments for developments over 2,500sqm justified?**

- 2.1 It is acknowledged that the approach taken on retail matters is flexible and supports the definition of centres differently than the norm due to the constantly changing economic climate spurred on by online sales and the impact of Covid. Much of the retail is focussed appropriately in Dartford town centre. Floorspace provision is distributed across the centre to strengthen its offer and remain relevant for use by residents.
- 2.2 The appropriate strategy and hierarchy of centres is set out in the strategic policy, however with regards to Bluewater, policy M22 incorrectly sets out under bullet 2a) that proposals in Bluewater shouldn't undermine **its** role. There should be more of an emphasis on proposals at Bluewater not undermining other neighbouring centres roles, which together with bullet 3b will give neighbouring authorities comfort in such dire economic circumstances that their centres can also achieve their ambitions to be focal points for communities and support sustainable ways of living.
- 2.3 The wording of 2a) needs to also consider impact on neighbouring centres with regard to other uses outside of purely retail and leisure as set out in bullet 3. In order to survive and start to thrive again the role of centres have to be redefined, focussing on community uses and other uses that provides convenience for residents. If Bluewater starts to also go down this route of including such uses, there could be a threat to neighbouring centres. A regional centre should be providing specialist uses that smaller centres cannot provide and not taking away focus from these more locally situated centres.
- 2.4 Additionally, whilst Bluewater is much larger than other neighbouring centres, in defining the threshold one needs to factor in the impact on centres and what scale is considered impactful. 2,500sqm is for most centres a significantly large-scale proposal but smaller thresholds could also have an impact and therefore doesn't capture the correct threshold point that is appropriate. The figure may need to be reduced to appropriately address sensitivities of neighbouring centres and give proper consideration particularly where specific uses are more sensitive to the functioning of neighbouring centres.