

Inspector's Matters, Issues and Questions

Matter 8: Transport and Infrastructure

Response by Dartford Borough Council

30 September 2022

Contents

Question 121 – Policy S2 Key Infrastructure.....	3
Question 122 – Infrastructure Costed	5
Question 123 – Key Infrastructure Delivery and Funding	6
Question 124 – Infrastructure Planning Documents.....	7
Question 125 – New School Provision.....	7
Question 126 – Other Key Supporting Infrastructure	8
Question 127 – Policy S2 and the Dartford Sustainable Transport Strategy	8
Question 128 – Transport Modal Shift	9
Question 129 – Effects on Strategic Road Network	10
Question 130 – Mitigation for Effects on Strategic Road Network.....	10
Question 131 – Mitigation for Effects on Local Highway Network	11
Question 132 – Elizabeth Line Extension	12
Question 133 – Policy M16 Safeguarded Land.....	12
Question 134 – Policy M17 Car Free Developments	13
Question 135 – Policy M17 Lorry Parking.....	13

Issue

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

Relevant policies – S2, S4, M16, M17

Infrastructure overall

Question 121 – Policy S2 Key Infrastructure

Does policy S2 provide sufficient clarity on the key infrastructure required to support the growth identified in the plan?

1. Yes. Policy S2 is a strategic policy setting a clear and appropriate framework for the provision of key infrastructure to support growth in the submitted Local Plan. This framework is supported by documentation that operates to set out up to date details of what will be delivered, and how and when- most notably [INF-2](#), Dartford's Infrastructure Delivery Plan. This evidence, and the Local Plan's long-term Future Infrastructure Statement ([INF-3](#)), is explained at paragraphs 4.3 to 4.8 (pages 11 to 12) of the Topic Paper [INF-1](#). Also see Question 124 below.
2. The allocations within the Local Plan are specifically directed towards the major urban areas of Central Dartford and Ebbsfleet Garden City where either infrastructure is already in place or additional provision has been identified and work is progressing towards its delivery. Specific delivery arrangements for new infrastructure at these locations (including what, who, when, how much) are featured in Dartford's Infrastructure Delivery Plan (IDP), [INF-2](#), with a schedule of fully funded projects at pages 1 to 4. Focusing on the allocations only, and excluding new infrastructure now complete, this includes deliverable future projects at:
 - Central Dartford (allocations D4, D5 and D6)- Dartford TC Regeneration Project: Measures to transform the town centre's highway infrastructure and public realm to support its regeneration, sustainable travel and to encourage modal shift. This is delivering improvements to pedestrian routes, provision of cycle routes and connectivity, junction improvement works and bus stop rationalisation. To expand on and bring fully up to date the IDP, the project supports the town centre's development as a whole, with current and future stages as follows:
 - Phase 1A, High Street public realm and improvements for pedestrians and traffic management, is underway.
 - Phase 2 junction and crossing improvements is about to start work.
 - Phase 3, Hythe Street, which delivers a contraflow cycleway as well as improvements to pedestrian routes, in completing detailed design.
 - Phase 3A which delivers the same along Spital Street is at outline design stage.
 - Phase 4 major junction improvements is currently going through modelling and outline design stage.
 - Ebbsfleet Garden City/ Bluewater- Fastrack tunnel through chalk spine. This is linking Whitecliffe (Ashmere) and the busway through allocation E5 to Ebbsfleet International Station (Allocation E4) to Bluewater, where onward Fastrack and bus services are available. The tunnel will complete the devoted and direct route for Fastrack buses, and a cycle and pedestrian route. Planning permission has been granted. Kent County Council as highways authority have a contractor on board and are finalising details and start time, but DBC anticipates work to start imminently.

- Ebbsfleet Garden City- Three primary schools and a secondary school in Ebbsfleet Garden City due between 2023 and 2029. The secondary school at Alkerden (allocation E5) has planning permission and it is understood the developer is working on contracts for delivery. The operator (Academies Trust) at Alkerden education campus has been selected, and the primary school is scheduled for next year.

Further deliverable projects are identified in the IDP at Ebbsfleet Garden City and elsewhere in the urban area for: the strategic and local highway network, health, community and green infrastructure. These are all fully funded (with the exception of latter phases of the town centre project) by the Borough and County Councils, EDC, National Highways, Education & Skills Funding Agency and planning obligations. There are also part funded projects where CIL funding has the potential to unlock infrastructure and to support the Borough's growth over the next five years: IDP pages 5 to 8. (The Borough's significant CIL income available for new infrastructure is quantified in the statutory [Infrastructure Funding Statement](#)).

3. The submitted Local Plan's allocations have inherent advantages in their current and potential infrastructure provision due to their location and existing characteristics (see submitted Local Plan's paragraphs 2.11 to 2.13, pages 22 to 23) with - in particular - both offering excellent railway and Fastrack connections. This, and their planning status (Question 47), demonstrate the Council's confidence that infrastructure is in place and or will be provided is well placed; infrastructure will not prevent their delivery.
4. The Dartford Local Plan does not identify new urban extensions or strategic greenfield sites in peripheral or freestanding locations. The urban area and brownfield land focus of the Local Plan spatial strategy means allocations have ready access to existing networks, and a lack of dependency on significant costly new connections to link sites to infrastructure networks. For instance additional site infrastructure required in Central Dartford may be nil or negligible at a number of sites. Where new provision is occurring this will happen in a timely manner (see progress outlined in paragraph 2 above), aided by the consistency of spatial strategy in the Borough and well known growth locations such as Ebbsfleet Garden City, understood by service providers.
5. Allocations D4, D5 and D6 in Central Dartford benefit from excellent connections to existing local services by virtue of being well ingrained within Dartford's urban fabric and social infrastructure, and also through having strong existing public transport services to the Borough and wider area. This includes achieving a significant reduction in overall trips made on the road network due excellent rail connections, good bus and Fastrack services and less generous parking arrangements. Central Dartford is also well placed to provide co-location with community services (submitted Local Plan paragraph 3.25, page 57 to 58).
6. The layout and intensity of development in Ebbsfleet has been designed around public transport; notably the high frequency, dedicated bus way (Fastrack), which as well as linking the new homes with local services, will also extend to Bluewater, Dartford Town Centre, and Ebbsfleet International Railway Station. This is reflected in allocated developments, policies E4 and E5 (see Question 89). This has significant potential to reduce reliance on private cars, and thereby minimise impact on the local and strategic road network.
7. The Garden City benefits from the infrastructure delivery activities and resources of the Ebbsfleet Development Corporation (EDC). The EDC's Implementation Framework ([SPS-2](#)) gives close consideration to infrastructure delivery, for example connections (page 54 to 71), community facilities (page 74 to 75), and integrated utilities (page 80 to 82). The town centre and Ebbsfleet also offer opportunity, as clear focal points for development, for efficient maintenance of existing infrastructure (and delivery of new

infrastructure) through scale and the ability to secure shared use/ funding in these locations. All these factors serve to facilitate infrastructure provision for all the allocations, in addition to site-specific arrangements devised for them under policy S2.

8. The allocations (D4 to D6 and E5 and E6) and their infrastructure provisions are further addressed individually in response to Matters 5 and 6. Looking at the Borough's development as a whole there is also the fact, highlighted in Matter 4 answers, that a significant proportion of allocations, plus also some other large developments, have planning permission, bringing greater certainty over infrastructure arrangements and delivery (see paragraph 9 below).
9. Policy S2 builds on all this, including through the key infrastructure for sustained growth outlined spatially in Policy S2's Diagram 2 (submitted Local Plan page 29). This shows key infrastructure expected to be required over time, where specific areas are required or being explored to deliver the infrastructure. The overall picture in Diagram 2 is a mix of projects at various locations in the north of the Borough, rather than there needing to be a concentration on unlocking one particular growth location or infrastructure type.
10. Policy S2 covers the full range of infrastructure provision that should be considered by those proposing development. Accompanying strategic Policy S4 (clause 2) notes large developments should be phased with requisite infrastructure. The nature and scale of infrastructure provision set out is then dealt with in further provisions including Table 2, and the details in Development Management Policies, specifically:
 - M18 (Community Uses)
 - M16 (Travel Management)
 - M17 (Active Travel, Access & Parking)
 - M3 (Sustainable Technology, Construction & Performance)
 - M4 (Flood Defence & Riverside Design)
 - M1 (Good Design)
 - M14 (Green & Blue Infrastructure and Open Space).

Supported by these, policy S2 provides a clear framework for provision of the key infrastructure required for planned growth. The timing for the delivery of the infrastructure needed to support development would be determined through legal agreements where these are applicable or through Dartford's Infrastructure Delivery Plan ([INF-2](#)) where developer contributions are used for its delivery. Planning permission will only be granted if the development is supported by the timely delivery of necessary infrastructure.

11. The significant degree of clarity on infrastructure provision under policy S2 reflects the level of development within the Local Plan at existing allocated land, or has planning permission. Where additional infrastructure is required to meet the need generated by further allocated sites and development, the Council is confident that policies are sufficient to identify the key infrastructure and that the mechanisms exist to support Local Plan policies and to ensure that this infrastructure would be delivered.

Question 122 – Infrastructure Costed

Is the required infrastructure to support the plan's growth ambitions costed?

12. The infrastructure required to support all the planned development and growth set out within the Local Plan has not been fully costed at this stage. A full costing of the infrastructure necessary to support planned development would be undertaken when Dartford's CIL Charging Scheme is reviewed with the CIL rates set in accordance with

CIL Regulations having regard for the likely availability of other funding and the viability of development. DBC agreed to a review of the Charging Schedule (set out in the LDS: [COR-16](#)); it was anticipated this would follow Local Plan work/outcomes, however consideration will also be had to prospective legislative changes to the developer contribution regime.

13. As a significant proportion of the planned development in the Local Plan already has planning permission the infrastructure required to support this consented development has already been identified. For some of the larger development sites the provision of this infrastructure has been secured through planning obligations with either direct delivery by the developer or payment of developer contributions towards its delivery. Where development has been granted permission after the adoption of Dartford's CIL Charging Scheme, contributions towards infrastructure have been secured on chargeable development. The Council has also continued to utilise planning obligations to secure delivery of, or contributions towards, infrastructure that is specifically required to mitigate the impacts of a development.
14. Dartford's Infrastructure Delivery Plan ([INF-2](#)) sets out specific infrastructure projects required to support development within three separate sections depending on the status and progress of the projects themselves or the development that would deliver them. These sections cover:
 1. **Fully Funded Projects** – most of these projects are costed but where this is not the case the infrastructure is required to be delivered by the developer under planning obligation.
 2. **Projects with the Potential to be Unlocked with CIL Funding** – projects are costed where they have been allocated CIL funding whilst an indicative cost and level of potential CIL funding has been given for other projects.
 3. **Other Schemes to be Further Defined** – these are predominantly uncoded projects as on-going work is still required to determine the nature, scale, cost and funding of these projects.
15. Dartford's IDP is subject to a formal annual review that is informed, through on-going discussions with infrastructure providers, of the progress being made on the delivery of individual infrastructure projects already identified and the emergence of further projects. In the case of the latter, these take into account the progress of development within the Borough and the need generated by this development.

Question 123 – Key Infrastructure Delivery and Funding

How would the key infrastructure be delivered and funded?

16. Policy S2(7) covers the mechanisms by which infrastructure would be delivered through the utilisation of:
 - Contributions via Dartford's CIL Charging Scheme or any successor developer contribution scheme.
 - Planning obligations secured by legal agreements.
 - Provision in-kindInfrastructure delivery is also covered under paragraphs 6.15, 6.16 and Table 10 of the Local Plan (pages 207 to 208). This content could be modified as necessary, if further project detail is required.
17. A full outline of the delivery context for key infrastructure is explained throughout the Future Infrastructure Statement ([INF-3](#)).

Question 124 – Infrastructure Planning Documents

What are the infrastructure planning documents referred to in policy S2(7) and how do they relate to the plan?

18. Policy S2(7) refers to the Council's infrastructure planning documents that set out the Council's priorities for infrastructure as the basis for working with partners on infrastructure delivery and emphasising that development will contribute to infrastructure provision. The key documents in this respect that have been submitted as evidence in support of the Local Plan are:
 - [Infrastructure Topic Paper \(INF-1\)](#)
 - [Infrastructure Delivery Plan \(INF-2\)](#)
 - [Future Infrastructure Statement \(INF-3\)](#)
 - [Transport Background Paper \(INF-4\)](#)
 - [Sustainable Transport Strategy \(INF-5\)](#)
19. The Future Infrastructure Statement ([INF-3](#)) provides the broad framework within which infrastructure would be delivered recognising that much of the infrastructure would be delivered by the Council's infrastructure partners rather than the Council itself. The Infrastructure Topic Paper ([INF-1](#)) brings together relevant national planning policy and local evidence to justify Local Plan policies relating to infrastructure provision, namely Policies S2, M16, M17 and M18.
20. The Infrastructure Delivery Plan ([INF-2](#)), the Transport Background Paper ([INF-4](#)) and the Sustainable Transport Strategy ([INF-5](#)) provide detailed information on the delivery of specific infrastructure projects and broader areas of infrastructure provision that show the practical implications of Local Plan policies on infrastructure. [INF-4](#) and [INF-5](#) focus specifically on transport provision. The Transport Background Paper sets out background a non-technical overview of the key outcomes of studies and transport modelling in Dartford as a whole (including the understanding afforded through studies not produced specifically for Local Plan purposes). The Sustainable Transport Strategy provides an outline of the actions being taken by the Council and its partners to encourage travel by more sustainable means in line with the Local Plan's emphasis on sustainable development.

Question 125 – New School Provision

Is requirement for land transfer for new school provision sufficiently clear? Would it be justified and effective?

21. The Local Plan policies on the provision of infrastructure require the development to mitigate the demand that it generates. Local Plan Policies S2 and M18 being the principle policies relating to the provision of community facilities. In the case of education facilities the provision of land for new schools requires a significantly large site that either generates sufficient demand or has the capacity to accommodate a new school. The need for a new school having been discussed and agreed with KCC Education. Provision is then a matter of negotiation with the developer with any land transfer secured through planning obligations. The Council has a good record of achieving this particularly in relation to the major development sites within the Ebbsfleet Garden City.

22. Where development in an area comprises sites that are not capable of providing land for a new school then the Council, having determined the need for a new school, works with KCC Education to identify a suitable site in the area. Diagram 2 of the Local Plan (page 29 of COR-1) shows areas of search for Central Dartford and Stone where this process is currently being applied with paragraph 2.17 supporting partnership working. The requirement for new schools is also identified within Dartford's IDP ([INF-2](#)) with the progress of delivery regularly updated.
23. Discussions with developers will also take place where land could be provided in combination with publicly owned land to enable new school provision. An example of this has been given in the response to questions on Policy D5 (East of Lowfield Street Allocation). The Council, in discussion with KCC Education, will also consider the opportunities afforded by land owned by each authority and example being the delivery of a new secondary school at Stone Lodge. The Council is fully aware that the ability of KCC Education to purchase land for a new school is extremely limited given the residential land values within the Borough.
24. A similar approach to that described above would also apply to the provision of land for other community facilities. The key difference being that the area of land required is usually less meaning that more development sites may be capable of accommodating the provision with the demand for this provision having again been determined in discussions with the appropriate infrastructure provider.

Question 126 – Other Key Supporting Infrastructure

Does the plan adequately identify other key supporting infrastructure including, but not limited to, healthcare, waste, community facilities?

25. The response to previous questions clearly shows that Policy S2 covers the wide range of infrastructure provision that is expected to be delivered to support planned development particularly key infrastructure of transport and community facilities. Policy S2(2) and (5) acknowledge health, community and waste, amongst other infrastructure.
26. Diagram 2 on page 29 of COR-1 provides an illustrative map of the key infrastructure requirements. Policy S2 is supported by development management policies covering different aspects of infrastructure and further details of the delivery of specific infrastructure projects and the broad framework for infrastructure provision is provide through the supporting documents [INF-1](#) to [INF-5](#).
27. This is considered an adequate and appropriate approach, providing sufficient direction helping to plan for the future whilst maintaining responsiveness to changing circumstances. Local Plan content is suitable given the propensity for individual projects to change in form/ location and timing in certain infrastructure sectors, and the support offered by Dartford's established CIL governance and local infrastructure planning regime.

Travel and transport

Question 127 – Policy S2 and the Dartford Sustainable Transport Strategy

What is the relationship between policy S2 and the Dartford Sustainable Transport Strategy?

28. The Sustainable Transport Strategy ([INF-5](#)) relates specifically to Policy S2(3) and S2(4) by providing an overview of the policies, strategies and actions the Council will pursue, in conjunction with its partners and developers, that will, in combination, enable and encourage an increase in the proportion of journeys made by more sustainable forms of transport. The Sustainable Transport Strategy responds to the objectives that underpin much of the Local Plan's preparation.
29. Paragraph 2.33 of the Local Plan (COR-1) states that "even after taking into account planned strategic highway works to address increased demand, development can only be accommodated if the proportion of journeys made by public transport and active travel modes are significantly increased together with other sustainable travel measures undertaken by development to mitigate their impact". In addition the strategy meets the Council Strategic Objective I2 (see page 19 of COR-1) of:

Facilitating a range of upgrades to the transport network; a choice of sustainable and active travel options; with rapid and reliable public transport linking existing neighbourhoods and developments to key destinations and facilities, together with a high quality and comprehensive active travel network.

Question 128 – Transport Modal Shift

Is the level of modal shift envisioned in the transport evidence realistic?

30. Chapter 4 of the Local Plan Strategic Modelling Stage 3a Report ([INF-9](#)) – Local Plan Option Testing Methodology provides the context for the modal shift options tested. This report also shows that the application of the modal shift testing was limited to allocated sites and to local journeys as defined in the report. The principal argument for this approach is that there is more scope within national planning and transport policy to encourage, support and apply pressure on new development to adopt sustainable transport measures as a means of mitigating their transport impacts. This will be achieved through planning obligations secured by legal agreements with individual developers that would require them to produce Travel Plans in accordance with Policy M17(2) and employing a monitor and manage approach whereby thresholds on travel are set and developers are required to provide further mitigation measures or contributions towards mitigation if these are exceeded.
31. Chapter 4 of Dartford's Sustainable Transport Strategy ([INF-5](#)) provides further information on sustainable travel behaviour and trends giving further context for the modal shift assumptions and supporting the actions set out within this strategy. The broad conclusion being that a modest modal shift of around 9% can be achieved through the promotion of more sustainable travel raising awareness of what is available without the provision of additional physical infrastructure. A higher level of 15% is, therefore, achievable with the implementation of relatively low levels of infrastructure provision and a level of 30% is attainable with a stronger focus on an integrated network of sustainable transport measures. This would be achieved through pursuing the requirements set out in Policies S2(3), D1(2), D2(1), E1(1), M16(3) and M17(1).

Question 129 – Effects on Strategic Road Network

What effects does the plan's growth have on the Strategic Road Network?

32. The Local Plan Strategic Transport Modelling Stage 3b Report ([INF-10](#)) – Option Testing Output looked specifically at the impacts on the Strategic Road Network (SRN) with Chapter 5 covering the M25 (A282) Corridor and Chapter 6 covering the A2 Corridor. This modelling indicated the need for further detailed modelling at the following three junctions:
- M25 (A282) Junction 1a
 - A2/A2018 Junction
 - A2 Bean Junction
33. National Highways also requested that an assessment was carried out on the merge/diverge arrangements for each of the junctions on the SRN. This was carried out and the results included within the Local Plan Strategic Transport Modelling Stage 4 Report ([INF-12](#)) – Mitigation Testing. Chapter 3 provides the results of the merge/diverge assessments for the M25 (A282) Corridor, whilst Chapter 4 provides the results for the A2 Corridor. The assessment highlighted that the Local Plan had an impact on the merge/diverge layouts at 12 locations across both corridors of the SRN when compared with the Reference Case. Two of these locations were related to the A2/A2018 Junction highlighted above and three were associated with the A2 Bean Junction. The impact on merge/diverge arrangements at each of the junctions on the SRN within the Borough is a complex matter that is strongly influenced by the volume of through traffic on the main carriageway which the Local Plan has limited influence on.

Question 130 – Mitigation for Effects on Strategic Road Network

Does the plan identify mitigation measures for any effects on the Strategic Road Network?

34. The Council is confident as a result of strategic transport modelling carried out, that the additional traffic generated by the allocations within the Local Plan would not have a significant impact on the SRN bearing in mind the existing and predicted future flows on the SRN itself. The mitigation of any impacts on the SRN is a complex issue, particularly where there are complicated junctions in close proximity to each other. The Stage 3b and Stage 4 reports ([INF-10](#) and [INF-12](#) respectively) acknowledge the limitations of the strategic transport modelling in this respect. The Council has an understanding of the impacts of future development from other recent modelling and mitigation, and as associated with planning permissions (conclusion in the Transport Background Paper [INF-4](#) page 24 paragraph 4.10). The Local Plan strategic transport modelling exercise has added significant detail to this knowledge and confirms the Council's conviction that planned developments are not precluded by infrastructure and the SRN.
35. The submitted Local Plan does not identify specific mitigation measures for impacts on the Strategic Road Network but the M25 (A282) Corridor is identified on Diagram 2 (policy S2 page 29). This recognises the joint work that the Council is already undertaking with both Kent County Council and National Highways to address congestion issues along this corridor with a primary focus on the issues around Junction 1a.
36. The identification of A2 Bean and A2 Ebbsfleet junctions on Diagram 2 is in relation to the strategic highway improvements that were being implemented by National Highways at the time the Local Plan was being prepared. These works have largely been

completed and when designed took into account the scale of development then proposed within the Ebbsfleet Garden City.

37. The Council will continue to engage with National Highways on issues related to the impact of development within Dartford on the SRN. To this end the Council has initiated discussions with National Highways regarding a Statement of Common Ground that would agree a way forward in relation to the monitoring of development, through the further allocations in the Local Plan, and any implications on the SRN this may have as it comes forward. This would build on the collaborative work already being undertaken on M25 (A282) Junction 1a, as mentioned above, within the context of a SRN that is already under pressure with poor resilience to incidents. This would enable any further issues to be identified together with the most appropriate solutions (insofar as they may be available) and the means by which the solutions might be delivered.

Question 131 – Mitigation for Effects on Local Highway Network

Does the plan identify mitigation measures for any effects on the Local Highway Network (LHN)?

38. The Local Plan itself does not identify mitigation measures for the impact of development on the Local Highway Network but, as previously mentioned in response to other questions raised there is a concerted focus on the provision of infrastructure that supports more sustainable forms of transport. This is shown principally through Local Plan policies S2, M16 and M17 and supporting documents such as the Sustainable Transport Strategy ([INF-5](#)). The requirement for development to be well located to public transport and contribute to the improvement of facilities for walking and cycling is also threaded through the policies relating to Central Dartford (D1 to D7) and Ebbsfleet & Swanscombe (E1 to E6).
39. The Local Plan Strategic Transport Modelling Stage 3b Report ([INF-10](#)) – Local Plan Option Testing Outputs provides details of the impacts of planned development on the LHN with Chapter 8 covering the Local 'A' Roads and Chapter 9 covering the Local 'B' Roads. Chapter 10 of this report identified 14 locations on the LHN where mitigation may be required. The Local Plan Strategic Transport Modelling Stage 4 Report ([INF-12](#)) – Local Plan Option mitigation Modelling identified and tested mitigation measures for each of these junctions. In all but two locations the mitigation tested was found to overcome the impact modelled. The two junctions that could not be mitigated were physically constrained.
40. A Statement of Common Ground has been agreed with Kent County Council ([SCG-8](#)) that sets out a way forward for dealing with on-going transport issues related to planned development. This will involve continued engagement with KCC Highways in the pursuit of infrastructure that supports more sustainable forms of transport, the identification and implementation of improvements to the LHN and the adoption of a Monitor & Manage approach to major development sites aimed at reducing and mitigating their transport impacts.

Question 132 – Elizabeth Line Extension

What is the current timeframe for the proposed eastward extension of the Elizabeth Line (Crossrail)? How would the plan respond if the Government approved the project?

41. The Council has worked as part of the C2E Partnership looking at the options and feasibility of improving transport links between Abbey Wood and North Kent to take advantage of the opening of the Elizabeth Line (formerly Crossrail). The C2E Partnership has carried two public consultations to inform this process, the latest taking place in Autumn 2021 when views were sought on three shortlisted options. The study into the options has been completed and submitted in October 2021. A further decision is awaited from Government which will indicate whether more funding will be made available to complete the appraisal of the remaining options and identify a preferred scheme to advance to implementation. At present the Council has had no indication from Government when a decision will be made although they have confirmed that the submitted study is being actively considered. There are no confirmed timescales for when any extension would become operational but the study indicated a timeframe of between 10 and 15 years.
42. Paragraph 5.147 of the Local Plan acknowledges that major development located near to the railways stations on any planned extension of the Elizabeth Line eastwards from Abbey Wood would be expected to support/contribute to the scheme. The scale of this development will depend on what option is chosen for the extension of services. Policy M16(4) states that in the event that the extension of services is achieved through a significant rail infrastructure intervention then a focussed? review of the Local Plan would take place.

Policy M16 – Travel Management

Question 133 – Policy M16 Safeguarded Land

Is safeguarded land referred to in policy M16 clearly defined? Has it been included on the policies map?

43. The land safeguarded at present for the extension of the Elizabeth Line (Crossrail) services referred to in Policy M16(4) is clearly defined but it has not been specifically included on the existing Policies Map. A Safeguarding Direction was issued by the Secretary of State for Transport on 14 October 2009. This followed the outcome in Kent of the original case made for the Crossrail that led to the construction of the Elizabeth Line.
44. Although this has not been updated over the intervening years, including as a result of recent work on and extension into Kent, under this Direction the current safeguarded areas are declared separately by the Council in response to any searches of the Local Land Charge Register.
45. In view of the lack of updating of the Safeguarding Direction, the state of play of the Kent extension case and current uncertainties, it was considered more appropriate to await new information rather than include it now as a revision on the Policies Map.

Policy M17 – Active Travel, Access and Parking

Question 134 – Policy M17 Car Free Developments

How would the policy address proposals for car-free developments?

46. The policy informs development management by facilitating proper assessment as to whether the conditions are right. As set out in the next paragraph, in essence the developer can show that the provision of a car-free development would not have negative implications for the surrounding area and that trips generated by the development would be able to be made by alternative means of transport that are readily available and accessible.
47. Policy M17(2) would require the development to carry out a Transport Assessment and produce a Travel Plan which would be combined with Policy M17(3) relating to the adverse impacts of the development being minimised. The Council would look carefully at the location in question, and for adequate and appropriate provision to be made for walking, cycling and access to public transport covered by M17(1) and M17(4) in the absence of any vehicle parking provision.

Question 135 – Policy M17 Lorry Parking

Does the policy accord with paragraph 109 of the Framework in respect of lorry parking?

48. The issue of lorry parking, and specifically overnight lorry parking, has been recognised as a strategic issue by Kent County Council as local highway authority. The matter is identified within KCC's Local Transport Plan for Kent 2016-2031 (LTP4) and KCC has also produced a Freight Action Plan that highlighted the issue. Both documents have identified the need for the development of a network of small lorry parks across the County together with the enforcement of illegal/inappropriate parking. The issue of lorry parking was not identified within LTP4 for Kent as a specific local issue for Dartford Borough.
49. Policy M21(2)(b)(ii) requires development proposals for industrial and distribution uses to achieve better management of goods vehicle access, parking, waiting (including for loading and unloading) on amenity, safety and congestion, as applicable. Policy M17(5) requires development to provide an appropriate level and form of vehicle parking provision in full accordance with the applicable Parking Standards SPD ([POL-5](#)). Whilst commercial lorry/parking issues are, therefore, addressed, neither of these policies is explicit about the need to accommodate overnight lorry parking. Nevertheless within the Parking Standards SPD the requirements for B8 Use (Storage & Distribution) includes that consideration should be given to overnight lorry parking. Therefore, overnight lorry provision can be seen as recognised in planning policy, as sought by NPPF paragraph 109.