

Policy / Paragraph	Commentary
1. INTRODUCTION	
	<p>The County Council is supportive of the Local Plan’s growth strategy, which looks to deliver a sustainable future for Dartford by focusing growth through the delivery of large-scale, strategic mixed-use developments at Ebbsfleet Garden City and in central Dartford. The County Council welcomes the incorporation of strategic policies to set out the role of infrastructure in the delivery of sustainable new communities. This will help ensure that planned residential and commercial growth will be of high quality and delivered in a way that will help to create the places people want to live now and in the future. Taking an “Infrastructure First” approach is advocated by the County Council and is also embedded in the Kent and Medway Infrastructure Proposition, a proposed deal with Government for new infrastructure investment that will enable accelerated housing delivery, which is focussed on building the right homes in the right places and providing the public services, transport infrastructure, jobs and homes that residents will need, now and in the future.</p> <p>Within this response, the County Council provides detailed commentary on the proposed policies and supporting paragraphs and suggests areas that could be strengthened, particularly regarding climate change adaptation and mitigation, heritage conservation and waste management.</p> <p>The County Council will continue to work closely with Dartford Borough Council as the Local Plan is progressed and as high levels of growth continue to be delivered in the Borough. Commitment to close collaboration between key partners will be essential to ensure that good growth is planned, funded and delivered in a timely manner and will help to ensure that full infrastructure funding is available to enable the delivery of the necessary infrastructure to support new development at the right time.</p>
2. BOROUGH STRATEGY & OBJECTIVES	
Strategic Objectives	<p>Highways and Transportation</p> <p>The County Council, as Local Highway Authority, supports the Local Plan objectives to create cohesive, safe, walkable and attractive neighbourhoods, reducing the need to travel, upgrading the transport network to provide a choice of travel options including reliable and rapid public transport to key destinations and enhancing green grid networks. The County Council is overall supportive of the measures within the Local Plan which seek to provide opportunities for a modal shift towards more sustainable forms of transport – this will in turn have health and wellbeing benefits for residents with enhanced opportunities for active travel, but also wider environmental benefits including an improvement in air quality.</p> <p>Education</p> <p>KCC, as Education Planning Authority, supports the reference in Strategic Objectives W1 and W2 to the need to deliver housing development that is within walking distance of schools. KCC looks forward to assisting the Borough Council in achieving this aspiration.</p> <p>KCC welcomes the Borough Council’s commitment to create infrastructure for school provision in Objective I1, as urban areas are regenerated. Objective I2 looks at transport links and KCC would ask that Objectives W1, W2 and I2 are considered together in discussion about new school provision.</p> <p>Waste Management</p> <p><i>Objectives for infrastructure and economic investment</i></p> <p>The County Council has previously set out its comments and requests in respect of waste in previous Local Plan consultations. Under ‘objectives for infrastructure and economic investment’, the County Council recommends the following objective is included:</p> <p><u>“I5: Provision of a sustainable waste management service by ensuring facilities are re-developed to meet the obvious increased demands of the additional residents at the Household Waste and Recycling Centres (HWRC). A new dedicated Waste Transfer Station facility for the Borough to meet the demands from housing growth and to also support the statutory increases in recycling through rom the Borough’s kerbside collection service.</u></p>
Borough Spatial Strategy (S1)	<p>The County Council supports the development strategy for the Borough, which seeks to provide development in “<i>planned locations in the Borough to meet assessed needs, securing new infrastructure provision and brownfield land re-use, creating neighbourhoods resilient and adaptive to climate change</i>” and which looks to focus growth through strategic mixed-use developments planned within Ebbsfleet Garden City and central Dartford. As a key infrastructure provider, KCC supports the prioritisation of the delivery of new and improved infrastructure.</p> <p>Highways and Transportation</p> <p>KCC supports the focus on delivering mixed use development that seeks to reduce the need to travel and the intention to direct development towards sites with existing (or opportunities to improve access to) public transport, walking and cycling. Development on brownfield sites should also have access to sustainable travel. Walking, cycling and public transport should be at the forefront of any new proposals when planning applications are submitted and applicants should engage with KCC highways and Public Transport at the outset in order to ensure that the infrastructure is designed appropriately and accords with the latest guidance.</p>

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	<p>Dedicated infrastructure separating Fastrack vehicles from other road users is vital to ensure more reliable and faster journey times for Fastrack users. Faster and more reliable journey times are important factors in attracting car users to utilise Fastrack, which can contribute towards the sustainable mode shift required in Kent Thameside as the population rises significantly in the next decade.</p> <p>Where Fastrack runs through new developments, policy should require dedicated routes along the entire corridor, reinforcing the notion that buses are the preferred mode over the private car. Where Fastrack will serve new sites from the existing route, policy should require opportunities to improve the service in those locations to be explored and appropriate improvements secured.</p> <p>The recently released Bus Strategy 'Bus Back Better' (2021) states that bus rapid transit (BRT) can be a 'game-changer for bus networks' and is able to 'deliver a large proportion of the benefits of rail-based schemes at much lower cost.' (P66). In line with the Government's bus strategy, buses need to have greater priority on urban roads and this should be set out in the Local Plan. Bus gates should be provided where possible to reduce travel times and services should run during the day, evening and night, to offer a real choice of mode. Local junctions should be upgraded to give bus priority measures. High quality bus stops will be required on new routes and consideration must be given to cycle parking, to enable a seamless transition between modes.</p> <p>The success that the free bus tickets given to residents at The Bridge development has had on passenger levels should be recognised and built upon and further financial incentives for new residents / employees are likely to be requested in section 106 agreements. It is requested this approach is supported by the Borough Council.</p> <p>Education</p> <p>KCC as Education Planning Authority notes in Para 2.18 that the provision of education is recognised as being underway or complete. KCC looks forward to working with the Borough Council to continue this.</p> <p>KCC suggests a clearer statement is provided in 2.21 about the issue of securing more sites for new schools. Currently the provision of new sites is dependent on many issues, including the scheduling of the land and the willingness of the landowner to agree to pass the land to education for a new school.</p> <p>Paragraphs 2.24 and 2.25 refer to CIL. KCC would like to mention that the cost of a new school is unlikely to be covered by a CIL contribution, especially if the cost of associate infrastructure is included. Therefore, for major developments where a new school is indicated, KCC would recommend the use of section 106 contributions rather than CIL.</p> <p>The legend on Diagram 2 appears to show the marker for secondary schools swapped with the marker for primary schools.</p> <p>Provision and delivery of County Council Community Services</p> <p>This approach is supported, provided that there is adequate provision for the improvement of KCC social and community services to meet the needs generated by the planned development through the expansion of existing services and facilities or delivery of increased capacity.</p> <p>Waste Management</p> <p>The County Council would highlight that adequate waste infrastructure is an essential part of sustainable growth. At present, the Pepperhill Waste Transfer Station (WTS) that serves Dartford and Gravesham is now at capacity, with alternative arrangements for dry recyclate collected within Dartford having to be made to enable waste to be disposed of in a timely manner. Waste management needs must be catered for in the delivery of sustainable development. Under 'Urban Area Principles', the County Council requests the following amendment:</p> <p><i>"b) Provision of infrastructure, including for education, dedicated <u>waste disposal</u> and health facilities, and improvements to walking and cycling links, railway stations and the bus/ Fastrack networks"</i></p>
<p>Infrastructure Planning Strategy (S2)</p>	<p>The County Council advocates an "Infrastructure First" approach to development, ensuring that well designed infrastructure is funded and delivered in a timely manner to support sustainable growth. The County Council therefore welcomes the consideration that infrastructure must be <i>"front loaded and provided early on in regenerating areas"</i> and that <i>"infrastructure needs and growth will be regularly reviewed to ensure a flow of sufficient facilities are secured in appropriate locations"</i>.</p> <p>The County Council welcomes continued involvement in the annual review process of both the Infrastructure Delivery Plan (IDP) and the allocation of CIL funding. This approach allows any new necessary infrastructure identified to be included within the IDP. Where new infrastructure is required specifically to meet the need generated by development, the County Council prefers to secure any land necessary and contributions towards the cost of construction through the imposition of a Section 106 Agreement or planning obligation and would strongly request that this mechanism is used, particularly for larger sites.</p>

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	<p>The County Council would welcome continued engagement with the Borough Council to ensure the balanced delivery of infrastructure to meet the needs of growth within the Borough and to ensure that sites provide and fund the appropriate infrastructure.</p> <p><i>Highways and Transportation</i></p> <p><i>Paragraph 2.24</i></p> <p>It is understood that due to current uncertainties in part associated with the pandemic, the financial viability of development sites is coming into question and there is concern as to whether appropriate highway infrastructure can be secured. KCC requests continued engagement with the Borough Council to ensure that any highway related impact can be appropriately mitigated via CIL contributions and other mechanisms.</p> <p><i>Paragraph 2.29</i></p> <p>KCC supports the proposal at paragraphs 2.29 and 2.31 to seek measures to secure major modal shift to sustainable modes, as this will reduce the impact on the local highway network.</p> <p><i>Paragraph 2.32</i></p> <p>This paragraph set out the need for major improvements to the railway stations in the Borough – which the County Council supports. The County Council is also supportive of paragraph 5.1.4.1 that sites “located near to railway stations will be expected to support/ contribute to station upgrades including measures to improve interchange arrangements and passenger facilities”.</p> <p><i>Paragraph 2.33</i></p> <p>KCC supports the requirement for major improvements to the wider Fastrack route, the expansion of the Fastrack services and priority measures at strategic junctions. However, the policies do not specifically require dedicated Fastrack/bus links through larger sites, which is disappointing (S2 states that non-dedicated sections of Fastrack routes which are vulnerable to general traffic congestion will be addressed). This is required in order to reduce journey times and delays and increase the attractiveness of the services which should in turn, increase passenger numbers and contribute positively to Dartford’s aims for sustainable growth.</p> <p><i>Policy S2: Infrastructure Planning Strategy</i></p> <p>KCC supports the policy to locate developments in places with good quality connections to key facilities, where they are well served by public transport and where they are in walking distance to local facilities and jobs (although KCC would question the use of ‘good’ instead of ‘high’). In addition, KCC welcomes the approach for trip generating sites to have ‘significant measures’ for improved walking and cycle routes connecting to the existing communities. With regard to point 4, KCC supports this approach and welcomes continued working with the Borough Council on this matter. As set out above, it is disappointing that 4b “New and improved Fastrack and bus services/ routes, including addressing non-dedicated sections of Fastrack routes which are vulnerable to general traffic congestion”, does not directly require new sections to be dedicated for buses/Fastrack.</p> <p><i>Education</i></p> <p>KCC as Education Planning Authority supports the statements at paragraphs 2 and 3 whereby education provision is set out as essential in promoting and maintaining the sustainability of new development.</p> <p><u><i>Place Planning and Contributions</i></u></p> <p>The detailed information on what KCC is forecasting that it will need is included in the Kent Commissioning Plan – a copy of which was sent to Dartford Borough Council.</p> <p>KCC as the Local Planning Authority has to ensure provision of sufficient pupil spaces at an appropriate time and location to meet its statutory obligation under the Education Act 1996 and as the Strategic Commissioner of Education provision in the County under the Education Act 2011.</p> <p>KCC will commission additional pupil places required to mitigate the forecast impact of new residential development on local education infrastructure generally in accordance with its Commissioning Plan for Education Provision 2021-25 and Children, Young People and Education Vision and Priorities for Improvement 2018-2021.</p> <p><i>Primary</i></p>

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	<p>There is currently a very small element of surplus capacity in primary in Dartford, but some areas have little or no capacity, most notably in North and West Dartford.</p> <p>The new housing will generate primary demand considerably in excess of the existing capacity and KCC will therefore be seeking section 106 developer contributions to facilitate new schools or CIL contributions for the expansion of existing schools. In addition, KCC will need the Borough Council to identify suitable sites for the new primary schools and to make those sites available to KCC at no cost.</p> <p>Final decisions on which schools can be considered for expansion and sites of new schools will be determined following more information as the Local Plan is published.</p> <p><u>Secondary</u></p> <p>There is a borough-wide deficit of secondary places and KCC has embarked on a process to increase the number of secondary places. However, that work is being undertaken to manage the existing forecasting demand. Any additional demand from this development will require additional commissioning.</p> <p>Distances from the development to the Dartford secondary schools are less important due to the expectation that students will travel further to access the type of school that they have chosen.</p> <p>KCC will therefore be seeking CIL for secondary provision expansion that will be applicable to developments. The precise amount will depend on the eventual number of dwellings and housing mix, but the indicative numbers suggest that section 106 developer contributions for a new 6-8FE secondary school will be required to accommodate the demand, over that being provided by Stone Lodge and Alkerden.</p> <p><u>Special Educational Needs (SEN)</u></p> <p>SEN commissioning is challenging because there is no method to forecast the number of SEN places needed. Assessments of need are therefore undertaken largely on trending data.</p> <p>Currently, there is a significant deficit of places for children with Special Educational Needs, of all types. KCC is undertaking an assessment on the demand and what measures can be put in place to ameliorate this demand. Any additional demand from this development will increase that demand and therefore require additional commissioning.</p> <p>Different types of Special Needs are one factor, with the level of need being the other. A child's Special Educational Needs are assessed by a team of professionals, usually including a Consultant Paediatrician. Part of that assessment will be to indicate what level of support is required, and whether that can be given in a mainstream school, a special school or in a Specialist Resource Provision (SRP), which is a unit within a mainstream school that can provide a higher level of support.</p> <p>To accommodate existing demand, KCC is looking to establish a 210 new special school to provide for students whose primary barrier to learning is Profound, Severe and Complex Needs (PSCN) and/or Communication and Interaction (C & I). This will offer places to students from the Dartford area. KCC raises this now with Dartford Borough Council to request that with new housing developments, the need for a new special school site will become pressing.</p> <p>The additional new housing will see the demand for SEN places increasing. The way that KCC would seek to manage this demand depends on the needs of the children. It might be that they are better supported in a special school, or through the establishment of a primary or secondary Specialist Resource Provision. KCC will therefore be seeking CIL or section 106 developer contributions from this development, that will then be applied either to the build costs of a new special school or for the establishment of one or more SRPs in existing schools.</p> <p><u>Early Years</u></p> <p>There is a surplus of Nursery or Early Years places across Dartford, with the exception of North Dartford which has a large deficit.</p>

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	<p>Surplus/Deficit of 0-4 Childcare Places by Primary Planning Area – Summer Term 2021</p> <table border="1" data-bbox="477 310 1614 793"> <thead> <tr> <th>Planning Area</th> <th>0-4 Population (Edge Analytics)</th> <th>0-4 Population Requiring a Childcare Place</th> <th>0-4 Childcare Places Available</th> <th>Indicative Surplus/ Deficit of 0-4 Childcare Places</th> </tr> </thead> <tbody> <tr> <td>Darenth and Sutton-at-Hone</td> <td>422</td> <td>220</td> <td>518</td> <td>298</td> </tr> <tr> <td>Dartford East</td> <td>1,953</td> <td>1,030</td> <td>1,139</td> <td>109</td> </tr> <tr> <td>Dartford North</td> <td>1,780</td> <td>942</td> <td>513</td> <td>-429</td> </tr> <tr> <td>Dartford South West</td> <td>442</td> <td>258</td> <td>550</td> <td>292</td> </tr> <tr> <td>Dartford West</td> <td>1,279</td> <td>660</td> <td>1,729</td> <td>1069</td> </tr> <tr> <td>Longfield</td> <td>409</td> <td>227</td> <td>467</td> <td>240</td> </tr> <tr> <td>Swanscombe and Ebbsfleet</td> <td>1,472</td> <td>716</td> <td>963</td> <td>247</td> </tr> </tbody> </table> <p>The number of new dwellings, particularly family homes, being planned will swiftly reduce that surplus and so during the period of this local plan, there will likely be a need to create more nursery places.</p> <p>KCC will therefore be seeking CIL contributions to establish 26 place nursery/early years provisions in any new primary schools in Dartford.</p> <p>Waste Management</p> <p><i>Page 28 Infrastructure Planning Strategy</i></p> <p>The County Council, as Waste Management Authority, recommends reference to waste within this section, as set out below:</p> <p><i>“2.15 Infrastructure planning is an essential part of the sustainable growth of the Borough. The provision of community infrastructure, such as schools and health facilities, is essential to meet the wellbeing and personal requirements of residents. Development should also be complemented by green infrastructure, the open and green spaces necessary for residents to enjoy a healthy and good quality of life and for providing habitats for nature. <u>Provision of sufficient waste infrastructure is also essential to ensure that a sustainable service is available that allows residents to maximise recycling of their collected household waste and hence minimise their environmental footprint.</u>”</i></p> <p>Section 2.16 notes that <i>“The Council works with partners, including Kent County Council, the Clinical Commissioning Group/ the Primary Care Network (NHS) and Highways England, to use contributions from developers and to secure the delivery of the land to provide the facilities that are required as a result of development.”</i></p> <p>The County Council requests confirmation that the reference to facilities includes the necessary waste disposal facilities to support sustainable growth.</p> <p>The County Council welcomes the inclusion of a Bean Triangle Materials Recycling Facility project within Dartford’s Infrastructure Delivery Plan. The County Council would like to work with the Borough Council to progress this much needed project to deliver essential waste services to support growth in the Borough.</p>	Planning Area	0-4 Population (Edge Analytics)	0-4 Population Requiring a Childcare Place	0-4 Childcare Places Available	Indicative Surplus/ Deficit of 0-4 Childcare Places	Darenth and Sutton-at-Hone	422	220	518	298	Dartford East	1,953	1,030	1,139	109	Dartford North	1,780	942	513	-429	Dartford South West	442	258	550	292	Dartford West	1,279	660	1,729	1069	Longfield	409	227	467	240	Swanscombe and Ebbsfleet	1,472	716	963	247
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Climate Change Strategy (S3)	<p>Highways and Transportation</p> <p>KCC supports this policy which seeks to imbed sustainable travel into developments.</p> <p>Education</p> <p>Project viability can be a challenge when designing and building new facilities that mitigate the effects of climate change – this should be recognised within the Local Plan.</p> <p>Sustainable Business and Communities</p>																																								

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	<p>The Borough Council has included the need to be resilient and adaptive to climate change throughout the Local Plan, however, KCC would recommend that the policy approach could be strengthened to align with other local plans in Kent. The County Council recommends the following points are considered:</p> <ul style="list-style-type: none"> • Paragraph 5.35 refers to embedded carbon – KCC recommends that this is included within policy with further guidance and potentially a threshold specified. • KCC would encourage policy/guidance on heat networks be included within the plan. • KCC would encourage policy/guidance around carbon offset be included within the plan. • KCC would welcome mention of the district’s own recognition of climate emergency or target for net zero. <p>KCC welcomes the reference to the Kent and Medway Energy and Low Emissions Strategy.</p> <p>Waste Management</p> <p>The County Council notes the reference “to efficiently manage and re-use natural resources and waste’ and ‘early design for waste storage within individual units and also within serviced areas of flatted developments. Waste storage for flatted developments must provide sufficient and easy access for collection vehicles”. However, this primarily relates to the function of the Borough as the Waste Collection Authority (WCA), with no consideration of the impact of additional waste on KCC’s function as the Waste Disposal Authority (WDA). The two are intrinsically linked and KCC requests that this is considered within the Local Plan to ensure a fully sustainable waste management solution for the Borough is promoted.</p> <p>This principle is supported by the National Planning Policy for Waste (NPPW), which states that ‘waste planning authorities should work collaboratively in groups with other waste planning authorities, and in two-tier areas, through the statutory duty to cooperate, to provide a suitable network of facilities to deliver sustainable waste management’. KCC has developed its own Kent Minerals and Waste Local Plan (KMWLP) which aims to work alongside Local Plans to make provision for essential waste disposal infrastructure. Local waste disposal transfer facilities were identified to be at capacity in the Disposal Authority’s Waste Disposal Infrastructure Plan.</p> <p>Sustainable Urban Drainage Systems</p> <p>The County Council notes that the Local Plan promotes the consideration of flood risk in siting development and the inclusion of sustainable drainage systems where appropriate. It is agreed that infiltrating drainage systems may be constrained by underlying ground conditions for large areas of Dartford. The County Council supports the inclusion of green and blue infrastructure within this policy.</p> <p>It is noted that the Local Plan is supported by a Strategic Flood Risk Assessment, which includes a Level 2 Assessment of a number of sites which are at risk from flooding. The information presented in this assessment should be incorporated into the policy statements of the Local Plan where appropriate. For specific sites where flood risk is present, this must be assessed within any development proposal and accommodated within the layout. This is of particular importance for the Priory Shopping Centre and Dartford Town Centre areas.</p> <p>Biodiversity</p> <p>Policy S3 includes the following statement; “Development on sites designated for their biodiversity value will not be granted planning permission unless it can be clearly demonstrated that the biodiversity value will not be adversely affected by the proposals”</p> <p>KCC recommends that any development which is impacting biodiversity must also be following the mitigation hierarchy – this could be referenced within this policy.</p>
<p>Borough Development Levels (S4)</p>	<p>Education</p> <p>The Local Plan indicates that in addition to the development already planned/ allocated, there are an additional 7000 new dwellings being proposed. Assuming an even mix of dwelling types, 7000 new homes would suggest the need for:</p> <p>Primary 3 x two form entry primary schools 1 x three form entry primary schools (or combinations to make up nine forms of entry)</p> <p>Secondary 1 x nine forms of entry secondary school</p>

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	<p>Special New special school provision for 100- 120 students across the 4-19 age range</p> <p>Table 2: Summary Illustration Clarity needs to be given over whether the entries for new schools under ‘Community Infrastructure’ are what has been determined as necessary, according to the housing development that has already been planned for.</p> <p>Under Dartford: there is a new primary school and an expansion to an existing primary school. KCC is not aware of a new primary school, although a candidate school for expansion has been identified.</p> <p>Under Ebbsfleet Garden City: Four new primary schools are mentioned. One of these has been in operation for two years now and another has opened this year, albeit off site in temporary accommodation. It is suggested that this paragraph is updated to reflect that.</p> <p>Waste Management</p> <p><i>Table 1: Sources of Housing Supply and Numbers of Homes</i></p> <p>The County Council, as Waste Disposal Authority, notes the level of housing identified within this table and requests engagement with the Borough Council regarding development contributions towards waste disposal infrastructure. Adequate developer contributions will be crucial in ensuring that capacity for waste disposal services can be developed to support growth and obvious demands in the Borough.</p> <p><i>Table 2: Summary Illustration of Types and Locations of Development</i></p> <p>The County Council requests reference is made to waste within this table and has provided some suggested text below:</p> <p><u>What: Waste facilities (1 new Waste Transfer Station and a relocated Household Waste and Recycling Centre)</u> <u>Where: In an area well placed to serve the needs of the Borough. Site search currently underway.</u> <u>How: Aligning infrastructure plans of service providers with planned growth locations. Dartford’s CIL income leveraging additional investment sources. Securing further developer contributions to funding. Securing on-site new provision where appropriate. Working in partnership to retain land for timely service delivery.</u> <u>When: WTS by 2023, HWRC at same time as WTS delivery if co-located or at least by 2025 if a separate site.</u></p> <p>The County Council is facing waste capacity issues as a result of increased in demand from housing growth in the Borough. A new site for additional waste infrastructure is yet to be identified, the County is reliant upon the Borough’s support in this development.</p>
3. CENTRAL DARTFORD	
Central Dartford Strategic Policies	<p>Education</p> <p><i>Paragraph 3.25</i></p> <p>KCC as Education Planning Authority would like to mention that the co-location of schools with non-school activities presents issues for safeguarding that need to be considered. The Dartford Bridge Primary School is a good indication of how it might work, although the costs are generally higher.</p> <p>Also, it is important to note that any new housing development in central Dartford needs to come with new land for schools. All the nearby primary and secondary schools in Dartford have been expanded to the maximum possible under the guidelines in the Governments Building Bulletins for schools.</p> <p><i>Paragraph 3.36.</i></p> <p>The re-purposing of existing buildings into residential accommodation does not always come with CIL or section 106 contributions. This means that extra pressure is put onto the school provision in the area, without the ability all to provide the school places that are needed. KCC would advise that the Borough Council considers robust and imaginative ways to ensure that those that make the profit from such new homes contribute to the infrastructure required to make these new homes sustainable.</p>

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Central Dartford Strategy (D1)	<p>Highways and Transportation</p> <p>The County Council, as Local Highway Authority, supports this policy as development focussed in mixed use town centres will help to reduce the need to travel and encourage the use of sustainable modes. KCC further supports the improvement of walking and cycling links to enhance permeability. With regard to point D, developers will need to mitigate their predicted impact on the highway network where required.</p>
Town Centre Mix of Uses (D3)	<p>The County Council supports the aim to retain a strong sense of vitality within the town centre of Dartford. Ensuring town centres have the flexibility to meet changing demands and shopping patterns will boost the resilience of these centres in the long-term. The County Council supports the recognition of the need for town centres to evolve to meet the changing needs of the community and this may include long term changes resulting from a movement towards online retail and short-term shopping and behavioural changes resulting from the COVID-19 pandemic.</p> <p>The policy makes reference to the continuation of a diverse mix of ground floor uses – the County Council requests consideration of how community facilities, delivered as multifunctional spaces, are particularly well placed to adapt to meet the changing needs of the community and could be considered as part of this policy</p> <p>Cultural infrastructure is also an essential feature in the creation of sustainable places and should feature within a town centre to create a vibrant mix of uses. It can be delivered as multifunctional spaces that offer opportunities for community services and affordable creative workspaces to support small businesses and freelancers, alongside cultural offerings. The cultural sector also provides local employment opportunities, with the role of higher and further education facilities developing skills in the cultural and creative industries. The Local Plan should therefore consider the delivery of necessary cultural infrastructure to support sustainable development in the district. The County Council would also encourage the use of art in design to create a sense of place and identity in both new and existing communities.</p>
Westgate Allocation (D4)	<p>Highways and Transportation</p> <p>The County Council, as Local Highway Authority, supports the development of this site, which is identified as a mixed use development allocation. The location in the heart of the town centre means the users will have access to a range of key facilities and will be located within walking distance of the bus stops and train station, making sustainable travel a viable option.</p> <p>Education</p> <p>KCC would highlight that there is no surplus capacity in the schools in this area of Dartford to accommodate a scheme for 100 dwellings.</p>
East of Lowfield Street Allocation (D5)	<p>Highways and Transportation</p> <p>The County Council, as Local Highway Authority, supports this site, which is identified as a mixed use development allocation. Its location in the heart of the town centre means the users will have access to a range of key facilities and will be located within walking distance of the bus stops and train station, making sustainable travel a viable option.</p> <p>Education</p> <p>There is no surplus capacity in the schools in this area of Dartford, and 700 new dwellings would indicate a need for a new 1FE primary school.</p>
Priory Centre Allocation (D6)	<p>Highways and Transportation</p> <p>The County Council, as Local Highway Authority, supports the development of this site which is identified as a mixed use development allocation. Its location in the heart of the town centre means the users will have access to a range of key facilities and will be located within walking distance of the bus stops and train station, making sustainable travel a viable option.</p> <p>Education</p> <p>The County Council highlights that there is no surplus capacity in the schools in this area of Dartford. This level of growth, for 400 dwellings, would indicate a need of about half a form of entry. This could be combined with the school requirement for the scheme set out under Policy D5, if sited sympathetically.</p>
Station Surrounds/ River Darent Area (D7)	<p>Highways and Transportation</p> <p>KCC as Local Highway Authority, supports this policy.</p>
4. EBBSFLEET AND SWANSCOMBE	

Policy / Paragraph	Commentary
<p>Ebbsfleet Garden City Strategy (E1)</p>	<p>Highways and Transportation</p> <p>KCC, as Local Highway Authority, supports Policy E1 Ebbsfleet Garden City Strategy and E2 Ebbsfleet Garden City Development Principles, as their location in the Garden City and associated designs aim to reduce the number of car-based trips to/from the area by providing a range of high quality walking, cycling and public transport facilities for genuine modal choice. Design should be developed in line with the Kent Design Guide.</p> <p>The County Council recommends that these policies include specific mention of dedicated bus / Fastrack lane or segregated cycle lanes (apart from Bluewater) as these go hand in hand with the ethos of the Garden City and are achievable (and necessary) at new sites where there is not a need for retrofitting. The Garden City should aim to be an exemplar for sustainable transport opportunities.</p> <p>KCC would like to explore, in dialogue with Dartford Borough Council and Ebbsfleet Development Corporation, what certainty can be provided to ensure that the original consent at Ebbsfleet Central and the full consent for Eastern Quarry will not be built out, to ensure that the higher levels of trips originally consented will not be generated.</p> <p>For clarity, the Local Plan modelling scenario should not include infrastructure linked to the original consents for Eastern Quarry or Ebbsfleet Central that have not been built out and are unlikely to be built out under the current consent - as the modelling may then be taking into account more capacity than will actually be delivered.</p> <p>Education</p> <p>The County Council would suggest that the Local Plan provides a clearer differentiation between what has already been planned for, and what new developments are being identified in the Local Plan.</p>
<p>Ebbsfleet Garden City Development principles (E2)</p>	<p>Highways and Transportation</p> <p>The County Council refers to commentary regarding Policy E1, which is also applicable to this policy.</p>
<p>Swanscombe (E3)</p>	<p>Highways and Transportation</p> <p>KCC, as Local Highway Authority, supports this policy as any new development coming forward will need to enhance connections to public transport facilities, walking and cycling connections and potentially upgrade Swanscombe Station. KCC views this as a potential modal switch for both new and existing residents.</p>
<p>Ebbsfleet Central Allocation (E4)</p>	<p>Highways and Transportation</p> <p>KCC, as Local Highway Authority, supports Policy E4 which proposes a mixed-use development, creating a new public transport hub, interchange with Northfleet Station, direct Fastrack route linking with Southfleet Road and major new walking and cycling connections to existing and new communities. These proposals will help to retain trips on site, reduce car-based trips on the local highway network from new development and may also assist in creating modal switch by existing residents in surrounding areas. It is, however, disappointing that the policy does not go further and directly state that Fastrack should have a dedicated route through this area, and segregated cycle lanes, further enhancing its appeal.</p> <p>Education</p> <p>The total number of dwellings on this development is identified as 2000. Currently, only one 1FE primary school has been allocated. A total of 2000 new dwellings would indicate a need of 2.5FE of primary and 2.5 FE of secondary. KCC, as Education Planning Authority, would welcome engagement with the Borough Council to identify sites and funding for the new provision.</p>
<p>Ebbsfleet South and West Area (E5)</p>	<p>Highways and Transportation</p> <p>KCC supports this policy and will continue to work with Ebbsfleet Development Corporation and developers to help achieve the vision for this Garden City.</p> <p>Education</p> <p>The total number of dwellings on this development is identified as 7,100. The education offer is well identified and needs no revision, unless the number of dwellings increases (including on the Bean Triangle). If development is to be intensified on this site, the County Council, as Education Planning Authority, would welcome engagement on the impact on education provision for the area.</p>

Policy / Paragraph	Commentary
<p>Land North of Swanscombe Area (E6)</p>	<p>The County Council notes that Policy E6 includes the area across Swanscombe Peninsula that has been put forward by developers as the potential site for an entertainment resort, known as London Resort, and is aware that a decision on the project will not be made until after the Local Plan has been submitted. KCC is working closely with Dartford Borough Council, Gravesham Borough Council and the Ebbsfleet Development Corporation in respect of its input into the London Resort Development Consent Order (DCO) application and supports the requirement within this policy to provide a policy framework for appropriate development in the event that the London Resort does not consent or is not implemented. It also supports the policy commitment to carry out a Local Plan Review to consider the need to revise policy in response to projected impacts if the London Resort is constructed.</p> <p>Highways and Transportation</p> <p><i>Paragraph 4.41</i></p> <p>This paragraph states <i>“In light of the uncertainty over the future of the area, and its location within the defined Ebbsfleet Garden City area, it is appropriate for the Local Plan to provide a policy framework for appropriate development in the event that the proposed London Resort either does not get consent or it gets consent but is not implemented. In the event that it gets consent and development commences, a review of the Local Plan will consider the need to revise the policy in response to projected impacts”</i>.</p> <p>It is noted that the trip generation and distribution information is not readily available to obtain the level of detail needed to fully assess the proposal, and also that the Local Plan can be updated if this site obtains permission.</p> <p><i>Policy E6 Land North of Swanscombe Area</i></p> <p>The County Council, as Local Highway Authority, supports this policy, particularly point 2e, to provide <i>“a high quality network of links to the wider area including the provision of a Fastrack route; improved pedestrian and cycle access to Swanscombe, the River Thames and Ingress Park; and the upgrade of Swanscombe Station”</i>. Any impact on the local highway network, including local junctions, should be assessed and mitigated where appropriate.</p> <p>Education</p> <p>KCC notes that the London Resort will look to provide up to 500 dwellings. The suggested demand from this new housing would require about 0.75 FE of primary and secondary provision. It is unlikely that this demand indicates a new school, so provision would be sought off site.</p> <p>Minerals and Waste</p> <p>The County Council, as Minerals and Waste Planning Authority, notes that the Borough has safeguarded waste management facilities and land-won minerals – the County Council would recommend reference to the adopted (and recently Reviewed) Kent Minerals and Waste Local Plan 2013-30 (KMWLP) that has relevant safeguarding policies.</p> <p>The County Council notes that one allocation - Policy E6: Land North of Swanscombe Area- affects safeguarded mineral deposits - Sub Alluvial River Terrace Deposits in the Swanscombe Peninsula. The County Council is pleased to see that Part 2. d) identifies that minerals safeguarding will need to be taken into account. This should be expanded further to include reference to the KMWLP Policy DM7: Safeguarding Mineral Resources, and the need to satisfy any of the relevant exemption criteria of this policy of the adopted Development Plan for the area – this will ensure the Local Plan’s comprehensive understanding of the KMWLP policies that this proposed allocation will need to address.</p> <p>Waste Management</p> <p>No provision or demand analysis has been made by the Ebbsfleet Development Corporation on the burdens upon existing Waste Disposal infrastructure, and as such the local waste disposal infrastructure is at capacity. Policies E1, E2, E3, E4, E5 & E6 must account for the lack of capacity of Waste Disposal infrastructure meet the demands of Government’s Resources and Waste Strategy through the provision of appropriate land and relevant Developer contributions to sustainably support the additional demands of existing and new waste growth.</p>
<p>5. DEVELOPMENT MANAGEMENT POLICIES</p>	
<p>General Commentary</p>	<p>Waste Management</p> <p>The County Council would welcome consideration of an additional Development Management Policy for Sustainable Waste Management. The policy should cover all aspects from good design in new housing to ensure recycling opportunities are available for all, to access to sustainable HWRC facilities and adequate provision of capacity through the development of a dedicated WTS to enable Waste Collection Authority (WCA) and Waste Disposal Authority (WDA) to efficiently manage waste arising from the development.</p>

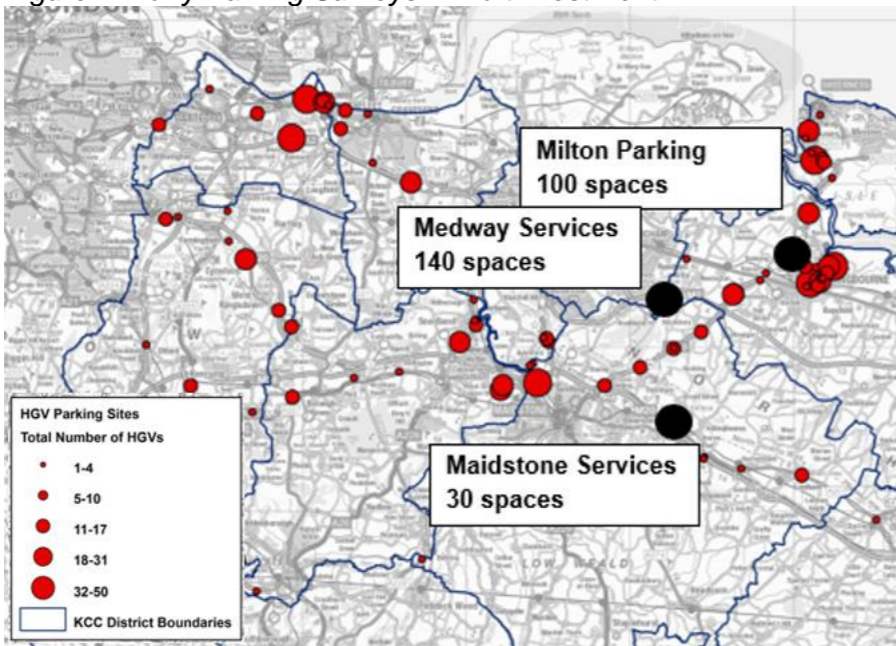
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Policy / Paragraph	Commentary
	<p>The County Council would welcome consideration of how the Borough will deliver against the targets and ambitions of the Governments Resources and Waste Strategy that are due to be delivered from 2023.</p>
<p>Good Design for Dartford (M1)</p>	<p>The County Council welcomes reference to Kent Design Guide and would urge the Borough Council to consider Approved Document M: “Access to and use of buildings” and Secured by Design guidance and emerging guidance on the matter of design.</p> <p>Given the anticipated impact from COVID-19 of increased home working as a permanent adjustment to people’s working lives, the County Council recommends consideration of how to ensure safe and reasonable home working areas. Ensuring that suitable spaces for home working are designed into new development will have positive benefits by boosting the resilience of this area of the local workforce and their ability to continue working and to learn.</p> <p>High quality design should also be accessible, taking into account the varying needs of the evolving community – providing diverse housing types, such as extra care housing, that is flexible and responsive to changing needs. The County Council would recommend that this should include consideration of dementia friendly design within the Local Plan. Small design changes to housing and infrastructure can help someone living with dementia to be more independent by providing a home and environment that is clearly defined, easy to navigate, and feels safe.</p> <p>Education</p> <p>In paragraph 5.11, KCC would suggest that the Borough Council liaises with ‘Secured by Design’ to minimise opportunities for criminality in schools and other community buildings. KCC recommends reference is made to Building Bulletins 103 and 104 when considering the design characteristics of schools.</p>
<p>Environmental and Amenity Protection (M2)</p>	<p>Public Health</p> <p>The County Council has public health responsibilities across Kent and would highlight that how places are designed and built is crucial to creating a healthier, fairer and more sustainable society. Growth across the County offers a unique opportunity to build communities that actively promote positive health and wellbeing choices, thereby easing future pressures on health and other public services. For example, consideration can be given to the accessibility of schools via active transport and the availability of healthy food choices near schools. Growth can also be designed to be resilient to public health emergencies and offer, for example, opportunities for home working designed into new development. The County Council would recommend consideration and implementation of the positive learning from the Healthy New Towns concept in the delivery of sites across Dartford (particularly in relation to connectivity between old and new communities) – and would welcome continued engagement, including knowledge and data sharing, to ensure the best possible outcomes for growth.</p> <p>Development must also address health and wellbeing for new and existing communities. This can be achieved not only by considering healthcare and leisure infrastructure, but also by consideration of the wider determinants of health, such as access to green space, air quality and economic opportunity, and planning them into growth accordingly. The County Council would welcome consideration of infrastructure that should be delivered to support the health and wellbeing of the Borough’s residents and visitors, particularly through the wider determinants of health and ensure that growth does not widen health inequalities between local communities. It should allow access to green and blue spaces for leisure – which would have positive effects on mental and physical health by providing opportunities for leisure, culture and for physical activity.</p>
<p>Sustainable Technology, Construction and Performance (M3)</p>	<p>Sustainable Business and Communities</p> <p>Policy M3 states that all residential development should “Achieve a minimum on-site reduction in regulated carbon emissions of at least 19 per cent beyond Part L of the Building Regulations” for major development until such time that amendments are made to national legislation/ policy which have the effect of surpassing this. The future buildings standards uplift to part L of 31% will be in place in 2021 – this policy will therefore be surpassed later this year. The County Council therefore recommends that a higher uplift is explored and the application of the policy requirement should be extended to apply to all development, not just major development.</p> <p>Education</p> <p>The County Council would draw attention to the potential increase in cost when delivering higher specification education and community facilities – this will need to be reflected in S106 and CIL decisions to ensure sufficient funding is made available.</p>
<p>Designated Heritage Assets (M5)</p>	<p>Heritage Conservation</p>
<p>Historic Environment Strategy (M6)</p>	<p>The County Council would strongly encourage the Borough Council includes a policy to commit to undertaking a Heritage Strategy, with partners and stakeholders. On balance, whilst the draft Local Plan is considered to be sound in respect of heritage conservation, it has significant weaknesses that will limit its effectiveness at fulfilling its responsibilities to the historic environment, as required by the NPPF.</p>

Policy / Paragraph	Commentary
	<p>The NPPF states (para 185) that: <i>“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</i> <i>a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;</i> <i>b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;</i> <i>c) the desirability of new development making a positive contribution to local character and distinctiveness; and</i> <i>d) opportunities to draw on the contribution made by the historic environment to the character of a place.”</i></p> <p>The only policies in the draft Local Plan that concern the historic environment are Policy M5 (Designated Heritage Assets) and Policy M6 (Historic Environment Strategy). Policy M5 essentially summarises paragraphs 186 - 188 of the NPPF. Policy M6 is entitled “Historic Environment Strategy”, but mainly just summarises the relevant paragraphs of the NPPF that apply to non-designated heritage assets. The only text that appears to be intended to comprise a Historic Environment Strategy are clauses 1 to 3 of Policy M6, which state that Dartford Borough Council will try to find opportunities for the enhancement of heritage on a site-by-site basis, expecting developers to bring forward proposals, working with the local planning authority, to preserve or enhance the assets. Such a piecemeal approach is unlikely to provide an effective strategy, which needs to take a district-wide view of the historic environment, have defined objectives in mind and have identified opportunities to advance those objectives.</p> <p>Dartford’s heritage has great potential to contribute more effectively to the quality of life in the area than it does at present. The heritage is complex, however, and needs careful consideration to ensure that the opportunities it presents are not missed and that it is not harmed by inappropriate or poorly planned development. In recent years, the County Council has developed a Heritage Strategy for Dover District Council and is currently developing another for Folkestone & Hythe District Council. The goals of these strategies are:</p> <ul style="list-style-type: none"> • To identify and describe the key themes of relevance of the heritage of the district and the heritage assets that represent them • To assess the role that these can play in regeneration, tourism and life in the Borough • To identify both their vulnerabilities and the opportunities they provide • To inform site allocations within the district • To support policy development <p>It is recommended that Dartford Borough Council develops a similar strategy, which would also be compliant with paragraph 185 of the NPPF which requires local authorities to have a “positive strategy for the conservation and enjoyment of the historic environment.” Dartford Borough Council is now a relative rarity among Kent Local Planning Authorities in not having a Heritage Strategy, which is a particular omission given the heavily built-up, but still historic, nature of the northern part of the Borough and the more visibly ancient, rural, southern part of the Borough. Thematically, Dartford has great potential in its palaeolithic, Roman, Anglo-Saxon and industrial heritage assets, among others, but this potential needs clear thinking and a clear strategy to realise. There is a clear need to conserve and enhance the heritage of such diverse areas and themes to help it play a part in shaping the future and in remaining accessible and enjoyable to all Dartford’s residents.</p> <p>KCC would therefore encourage Dartford Borough Council to revise Policy M6 and instead commit to the development of a Heritage Strategy alongside partners and stakeholders to maximise the benefits of the historic environment. A draft text for this clause could be:</p> <p><i>Dartford Borough Council will work with partners and stakeholders to develop a Heritage Strategy for the Borough. This will have the following objectives:</i></p> <ul style="list-style-type: none"> • <i>To identify and describe the key themes of relevance of the heritage of the district and the heritage assets that represent them</i> • <i>To assess the role that these can play in regeneration, tourism and life in the Borough</i> • <i>To identify both their vulnerabilities and the opportunities they provide</i> • <i>To inform site allocations within the district</i> • <i>To support policy development</i>
Sustainable Housing Locations (M9)	<p>The County Council supports the limited reliance on windfall sites – although windfall sites do usually contribute to growth within the Borough, it can sometimes be challenging as an infrastructure provider to ensure that necessary infrastructure is made available to support such developments.</p> <p>Highways and Transportation</p> <p>KCC supports policy M9: Sustainable Housing Locations, where unplanned windfall sites will only be acceptable if they are in a sustainable location.</p> <p>Education</p> <p>KCC supports this policy, which seeks to ensure that new communities have easy access to schools, ideally within walking distance.</p>

Policy / Paragraph	Commentary
Gypsy, Traveller and Travelling Showpeople Accommodation (M12)	<p>Gypsy and Traveller Unit</p> <p>The County Council notes this policy, and the assessment criteria for planning applications for gypsy and traveller pitches. The County Council's Gypsy and Traveller Service would welcome continued engagement regarding the current and future allocations to meet the needs of the Gypsy, Traveller and Travelling Showpeople in the Borough.</p> <p>Education</p> <p>KCC Education supports the policy objective of ensuring that any new accommodation has access to services and facilities – which should also include schools.</p>
Green and Blue Infrastructure and Open Space Provision (M14)	<p>Sports and Recreation</p> <p>The County Council is pleased to see consideration of Active Travel, connectivity between communities, new build homes with larger garden space and providing an environment which encourages active lifestyles.</p> <p>The County Council recommends consideration of Sport England planning guidance¹ along with Active Design principles - these strategies for sport are very much focussed on tackling inactivity and supporting/encouraging under-represented groups to be active and it is therefore important to ensure that these strategies and any subsequent developments take account of the Sport England Guidance that is available.</p> <p>Sport England also produces two surveys: Active Lives Adult, which is published twice a year, and the world-leading Active Lives Children and Young People, which is published annually. Both give a unique and comprehensive view of how people are getting active and can be focused down to local authority level. The latest Adult report can be read here. It is also possible to explore and filter the data using the Active Lives Online tool. A summary of our Children and Young People report can be found here.</p> <p>The latest figures support the notion that inactivity significantly impacts on an individual's physical and mental health, as well as social/community development. Therefore, any development needs to consider this and seek to provide a mix of formal and informal areas/spaces (indoor and out) where people can be active, including walking and cycling routes, open spaces and water-based activity (where applicable).</p> <p>Biodiversity</p> <p>KCC is supportive of the proposal for developments to contribute to the green/blue infrastructure network and would highlight the need for the habitat creation areas not to be isolated and to encourage/promote connectivity through the wider area.</p>
Biodiversity and Landscape (M15)	<p>Biodiversity</p> <p>The County Council notes paragraph 5.134, which makes reference to the biodiversity mitigation hierarchy.</p> <p>The Swanscombe Peninsula Site of Special Scientific Interest (SSSI) has recently been designated (although it will not be known until later in this year if it is confirmed as a SSSI). The County Council notes that this has not been addressed within the Local Plan. The strategic allocation area currently identified within Diagram 1: Key Diagram forms part of the proposed SSSI. If this location is confirmed as a SSSI, the impacts would need to be addressed within a Local Plan review.</p> <p>The County Council notes that the Local Plan has not gone into detail regarding biodiversity net gain but suggests that any offsite mitigation will be within the borough. Whilst KCC appreciates the wish to enhance / create habitat within the borough to mitigate for habitat lost/damaged, the county-wide benefit of contributing to strategic, county-wide habitat creation/enhancement projects cannot be missed. The Local Plan should highlight that its final Net Gain approach will be informed by legislation and the County-wide approach, which is currently being discussed via the Kent Nature Partnership.</p>

¹ <https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>
<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/>
<https://www.sportengland.org/facilities-planning/active-design/>

Policy / Paragraph	Commentary
<p>Travel Management (M16)</p>	<p>Transport Strategy</p> <p>Ministry of Housing, Communities and Local Government (MHCLG) made the following amendment to Paragraph 107 of the National Planning Policy Framework 2019 (NPPF): “<i>Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.</i>”</p> <p>KCC surveys of overnight lorry parking have determined that the Dartford area has significant numbers of heavy goods vehicles (HGVs) parked inappropriately overnight, as indicated in the figure below (data from these surveys can be provided on request). There are also “<i>local shortages</i>” in lorry parking provision, as shown in the figure.</p> <p>The County Council would welcome further engagement in respect of potential provision of lorry parking sites.</p> <p><i>Figure 1: Lorry Parking Surveys in Northwest Kent</i></p> 
<p>Active Travel, Access and Parking (M17)</p>	<p>Highways and Transportation</p> <p>The County Council recognises the focus on sustainable travel within this section. In addition to Manual for Streets, developments must be designed in accordance with the Kent Design Guide and National guidance, such as Local Transport Note 1/20.</p> <p><i>Paragraph 5.152</i></p> <p>The County Council notes that this paragraph relates to new accesses. Applications which include designs for new access on to the highway should be subject to a Road Safety Audit and the report and design response submitted for review.</p> <p><i>Paragraph 5.153</i></p> <p>The County Council notes that this paragraph relates to how the design of new access points should consider vulnerable road users such as pedestrians. Given the proposal to increase cycling, considerable thought should be given to how the access includes safe access for cyclists, rather than just assuming they will all use the carriageway.</p> <p><i>M17 Active Travel, Access and Parking</i></p> <p>Although this policy is supported by the County Council, it should go further in requiring dedicated bus / Fastrack lanes and segregated cycle lanes, where possible, in order to demonstrate their priority and increase the use of these modes. The inclusion of the use of the river is welcome as this will assist in removing trips from the network. The requirement for electric vehicle parking provision is welcomed, however, communal parking should have a proportion of both active and passive provision, not just cabling.</p>

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Policy / Paragraph	Commentary
	<p>Public Rights of Way</p> <p>The County Council is pleased to see that the Local Plan is promoting use of the Public Rights of Way (PRoW) network to improve the well-being of residents and is satisfied with the references made to the network.</p>
<p>Sustainable Economic Locations (M19)</p>	<p>Broadband</p> <p><i>Paragraph 5.163</i></p> <p>The County Council notes reference to digital infrastructure within this paragraph but would recommend a specific policy relating to connectivity is included within the Local Plan. There needs to be a clear policy in place highlighting the need for gigabit capable broadband to new developments. The County Council would draw attention to Policy EMP6 within the Ashford Borough Council adopted Local Plan as a reference for the type of policy which is recommended to be included.</p>
<p>Identified Employment Areas (M21)</p>	<p>Highways and Transportation</p> <p>KCC recognises the limitations of achieving high levels of operational sustainable trips from employment such as industrial uses. Appropriate highway mitigation / contributions will be required where impacts on the network are severe, such as at M25 J1a.</p>
<p>Bluewater (M22)</p>	<p>Highways and Transportation</p> <p>The policy for Bluewater is supported, as a number of the trips to the new facilities are anticipated to be linked trips. Assessments of the local highway network may still be required (depending on the size and type of expansion) and mitigation may be required. KCC supports the requirement for improved access to public transport and active travel and segregated and safe walking and cycling facilities.</p>
<p>POLICIES MAP</p>	
	<p>Highways and Transportation</p> <p>Clarity is requested as to why Eastern Quarry has been deleted from the Policies Map when it is still included in the overall numbers.</p>
<p>EVIDENCE BASE</p>	
<p>Transport Background Paper Dartford Local Plan, February 2021</p>	<p>Highways and Transportation</p> <p>Paragraph 3.47 states that due to the delays associated with the Stage 1 and 2 work, the Stage 3 (option testing) is yet to be completed and is expected in Spring 2021. KCC cannot therefore comment on the outcome of the modelling. This should be provided to KCC when available and KCC comments taken into consideration during the examination of the Local Plan. However, it is noted that a number of the sites identified in the Local Plan already have planning consent and are therefore already included in the Dartford reference case and that non residential development is expected to be lower than that included in the reference case.</p> <p>KCC is happy with Dartford's approach of monitoring and managing and pushing for sustainable travel.</p> <p>Paragraph 3.61 states “<i>Taking these circumstances into account, the Council does not anticipate that the findings of the Dartford Transport scenario testing will identify significant differences to future levels of traffic identified in the reference baseline</i>”. KCC will need to review the outcomes of the modelling work before providing an opinion as to whether further highway improvements are required.</p>