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## Growth and Communities

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### BY EMAIL ONLY

25 June 2021

Dear Mark,

### Re: Stone Parish Neighbourhood Plan - Regulation 16 Consultation

Thank you for consulting Kent County Council (KCC) on the Stone Neighbourhood Plan, in accordance with the Neighbourhood Planning (General) Regulations 2012.

The County Council has reviewed the Neighbourhood Plan and for ease of reference, has provided comments structured under the chapter headings and policies used within the document.

#### Chapter 2 – Stone parish story

Public Health: The County Council recommends that the data provided regarding life expectancy is more accurately sourced, with the geographical area of the data included. Stone parish appears to cover two wards (Stone Castle and Stone House) which, using the [Public Health England Local Health tool](#), have different life expectancies.

The life expectancy presented within this Neighbourhood Plan is the same as that identified in the ward of Stone House, which is considerably lower than that of Stone Castle. It is important to reflect life expectancy accurately within the Neighbourhood Plan to ensure that proper consideration is given in identifying how to prioritise objectives on a granular level to reduce health inequalities and improve the overall health and wellbeing of the area.

#### Chapter 4 - Neighbourhood Plan Area

Heritage Conservation: The Neighbourhood Plan does not make reference to the history of Stone, nor of its surviving heritage, which has the potential to help deliver the wider objectives of the Neighbourhood Plan. There are no policies directly related to the historic environment and the background section on the history of Stone only starts with the Saxons.

The County Council considers this to be a missed opportunity, given that Stone has an important archaeological resource spanning geographically the transition from the Thames and former wetland edge to the higher ground of the chalk to the south, and chronologically from the Palaeolithic to the present day.

Stone sits in an area of international importance for palaeolithic archaeology (up to one million years ago to c. 11,000 BC). The oldest skull found in Britain was found a short distance away at Swanscombe and within Stone there have been numerous finds of palaeolithic hand axes. At Crossways Business Park, these were accompanied by finds of lemming. Other extremely important discoveries undoubtedly remain to be found in the parish. There have also been numerous finds of Mesolithic and Neolithic worked flints across the parish and a rare middle Neolithic pit at the allotment gardens. Important 'Beaker period' (late Neolithic to early Bronze Age transition period) pottery was found north of Beechin Wood Cottages in the 1930s.

There are similarly numerous later prehistoric sites from Stone parish. These include a Bronze Age ring-ditch and associated features at Waterstone Park, Bronze Age features from St Clements Valley, London Road and Iron Age settlements at Louvain Road, Stone Castle Quarry and especially Waterstone Park, as well as Iron Age cremation burials from Cotton Lane Pit.

Roman Watling Street ran from Canterbury to London through the Neighbourhood Plan area, probably following earlier routes, and a large number of Roman sites have been discovered alongside. These include settlements at Stone Castle Quarry, Stone Castle and Waterstone Park, and many cemeteries as at Stone Court Pit, Cotton Lane and Stone Cemetery. Numerous finds of Roman pottery and coins have also been discovered in the parish.

From the Anglo-Saxon period, discoveries include a system of tide walls on Littlebrook Marshes, known as Littlebrook Walls, mentioned in a charter of Ethelred, A.D.995, and a small cemetery at Littlebrook Farm. Stone also contains notable Medieval buildings in the form of Stone Castle and the church of St Mary (both Listed Buildings), as well as the former site of Stone Court and the Old Rectory (both now lost).

More recent and perhaps more visible remains can be seen in the form of Stone's 19<sup>th</sup> and 20<sup>th</sup> century industrial heritage. Numerous cement works were developed in Stone in the 19<sup>th</sup> century. Some of these cement works used pioneering technology, and some of the industrial structures survive today as Listed Buildings. The cement industry also used a network of tramlines to connect to the Thames where pontoons and wharves can still be seen. Farmsteads also survive from this period. In the 20<sup>th</sup> century, this heritage was joined by military and civil defence structures, particularly domestic and industrial air-raid shelters.

The factors that produced this diverse heritage remain important in the future of the parish. The geological history that helped Palaeolithic artefacts survive and be discovered, for example, later encouraged the development of the cement industry. The routeway that became Roman Watling Street was associated with the wealth of later prehistoric and Roman sites and still forms the southern boundary of the parish in the form of the A296. Many of the residential developments along the Thames are sited to take advantage of the historic waterfront, which is largely what makes up the remains of the industrial past of the

parish. Stone's heritage thus provides numerous visible markers that connect the landscape and townscapes of today with its past and which show the continuity of settlement and land use throughout prehistory and history. As such, these could be used to help anchor new development in the parish to the existing community, but the Neighbourhood Plan does not seem to recognise this or the role that heritage could play in other goals of the Neighbourhood Plan.

The County Council notes that the 'Vision' on page 13 includes a number of phrases which could relate to heritage. The vision for people to be 'proud' of Stone, for it to be a place where they can 'put down roots' and for Stone to have a strengthened environment, can all be more effectively delivered if people have a connection with past generations, with their achievements and struggles and with a sense that the community has existed in Stone over the years. The parish's heritage can directly help in achieving this by ensuring that new development is well integrated with the old, that older generations retain their connection with the past, rather than seeing it swept away, and by contributing to health and well-being for all. The County Council would therefore recommend that Neighbourhood Plan has better consideration for the historic environment to ensure the Vision is delivered upon.

Sport and Recreation: The enablement of a local sustainable community by maintaining and improving the availability and quality of community services within the parish is welcomed. KCC would recommend consideration is given on the accessibility of services and connections available for the wider community, to seek limit car usage where possible.

KCC seeks to ensure the adequate provision for sport and recreation within the surrounding area and open spaces, and would recommend consideration in how activity, green space and services are accessed and provide opportunities, where possible, for Active Travel.

Consideration of the Kent Design Guide and the Sport England Active Design Guide is recommended, and it is important to ensure that these strategies and any subsequent developments take account of the KCC and Sport England Guidance that is available<sup>1</sup>.

Sport England currently runs 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 surveys 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](#). Data can also be explored and filtered using the [Active Lives Online tool](#). A summary of the Children and Young People report can be found [here](#).

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.

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<sup>1</sup> <https://www.sportengland.org/facilities-planning/active-design/>  
<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/>

### *GS1 Local Green Space*

Heritage Conservation: The County Council considers that the strategic goal for 'Green Space and Recreation' could be more effectively delivered by including aspects of Stone's heritage. At present, the text discusses a few key green spaces but an effective green space and recreation strategy also needs to include routeways between the interior of the parish and the riverbank. These routes could incorporate heritage assets such as historic buildings, information and interpretation and the historic waterfront.

### *Policy GS2 - Stone Recreation Ground*

Highways and Transportation: Within this policy, the principles of the masterplan are generally supported, but will need to be reviewed in detail once an application has been submitted. In general, parking provision should be in line with Dartford Parking Standards and / or based on a first principles assessment, including provision of disabled spaces, electric vehicle charging provision and cycle parking. Where routes are improved or new routes are created, they should be constructed in line with Kent Design Guide and LTP 1/20 (and other relevant guidance) and provide for both walking and cycling. Appropriate visibility splays, swept path analysis and Road Safety Audits will be required to demonstrate that any amended vehicular access points adhere to appropriate guidance.

### *Policy GS4 – St Clements Way Buffer*

The County Council is in dialogue with the local Clinical Commissioning Group (CCG) for West Kent (whose duties are to be delivered through the West Kent integrated Care Partnership) to deliver a healthcare facility at this site.

As such, the County Council as landowner objects to the designation of the St Clements Way as a buffer, as proposed under Policy GS4. KCC seeks the deletion of Policy GS4 from the Neighbourhood Plan, alongside the supporting text and all references to the policy.

Full comments in respect of the County Council's position on this policy have been submitted to Dartford Borough Council as a separate submission and for ease, are also provided within Appendix 1.

### *Health and Wellbeing*

Heritage Conservation: The Neighbourhood Plan goals for health and well-being, as presented on page 25, could be enhanced by incorporating the parish's heritage. The current and substantial pressures faced by health and social care demand a search for innovative solutions in order to continue meeting the demands of a modern population over the coming years. As such, heritage can play an important role in the contribution of the arts to person-centred, place-based care through means such as arts-on-prescription activities, cultural venues and community programmes, as well as walks, trails and educational actions. The historic environment, archaeology and heritage form part of our experience of being human and can provide individual as well as collective opportunities to engage with arts and culture whilst having positive effects on our physical and mental health and wellbeing in the process.

### *Policy HW1 - Trees, shrubs and air quality*

Biodiversity: The Stone Neighbourhood Planning Area does not encompass any statutory or non-statutory designated sites for biodiversity. To maximise biodiversity value, KCC would recommend that the 'additional tree cover, shrubs and hedgerows' referred to in this policy consists of native species only. This is because native species offer the foliage and woody material which invertebrates (the faunal basis of ecosystems) require to complete their lifecycle. Often, non-native species cannot provide this. The County Council also recommends that native species are incorporated into the design of the 'Future Stone Recreation Ground' and other areas where vegetation planting is planned.

Highway verges are one of the most important remaining reservoirs of wildflowers, particularly important for pollinating insects. This includes ecologically rich verges on historic routeways as well other highway verges in the parish, including new highways and public rights of way in new developments. Other important areas to protect and enhance include coppiced woodland and rare remaining areas of semi-improved grassland and lowland heathland.

KCC would be highly supportive of the inclusion of consideration of biodiversity net gain to ensure alignment with local and national policy.

### *Policy HW2 – Travel Plans*

Highways and Transportation: This policy is generally supported and KCC would like to see walking and cycling for shorter journeys as 'the norm'. However, with regard to the length of time over which the Travel Plans should be monitored, Government guidance, 'Travel Plans, Transport Assessments and Statements' states that "*The length of time over which monitoring will occur and the frequency will depend on the nature and scale of the development and should be agreed as part of the Travel Plan with the developer or qualifying body for neighbourhood planning*". Whilst the monitoring period should therefore be decided on a case by case basis, in line with the period for which monitoring fees apply, KCC generally requires Travel Plans to be monitored for a minimum of five years post full occupation, unless the Travel Plan has not achieved its target, in which case monitoring may be required to be continued.

### *HW3 Walking & Cycling Neighbourhood*

Highways and Transportation: KCC supports the principles of this policy. It is agreed that proposed routes should join the existing network, though it is unclear from the plans which routes are proposed for walking and which are proposed for cycling. Any applications put forward will need to be designed in line with Kent Design Guide, LTP 1/20 and other relevant guidance (e.g. Wheels for Wellbeing), providing sufficient width and gradients for intended users. With regard to land ownership, the County Council Highway Definitions Team would need to be contacted to determine which land is within the publicly maintainable highway; proposed routes on third party land can be considered during the planning application stage. Whilst not stated in the Neighbourhood Plan, KCC considers that where relevant, developers

should be encouraged to fund the installation of cycle and pedestrian counters and maintenance for a minimum of five years.

With regard to the evidence base 'Proposed Pedestrian and Cycle Network, Preferred Projects for Stage One' 2019 (as referenced within the supporting policy paragraphs), KCC has concerns regarding the proposed structural changes at M25 / A282 Junction 1a (as shown on page 6 of the Preferred Projects for Stage One). These would be very challenging to construct and the junction is maintained by Highways England, not KCC. However, the junction is the subject of a current joint study between KCC, Highways England and Dartford Borough Council, seeking to resolve congestion. Any mitigation put forward should consider pedestrian and cycle movements across the junction.

Proposals that include lighting on the footways / cycleways would need to be reviewed and agreed by the KCC Lighting Team. Whilst no detail has been given in the document, KCC would also need to be consulted on surfacing materials. Tarmac type surfaces are preferable, as they reduce future maintenance, however, cycle paths through green space may need to be softer/more permeable, to consider surrounding impact on trees and wildlife.

#### *Housing – Context*

Biodiversity: To support declining wildlife, such as swifts, KCC would recommend that new residential developments should seek to incorporate simple yet effective ecological enhancement measures. This includes integrated bird nest bricks, native species landscaping and hedgehog gaps in any close-boarded boundary fencing.

KCC highlights that all three 'common' reptiles have recently been found at a site to be developed along Crossways Boulevard – these have been/will be translocated to the seawall grassland area running along the entire northern boundary. Where possible, KCC would advise that more protection/ecologically-beneficial management is implemented for the green areas in the north of the parish.

#### *Policy LI1 Stone Crossing Station*

Highways and Transportation: KCC supports the principles of this policy and considers walking and cycling links to this facility to be key. Consideration should also be given to funding step-free access to both platforms and improved cycle parking facilities.

#### *HC1 – Horns Cross Neighbourhood Centre*

This policy supports the development of a new health centre. The provision of a health centre in this location conflicts with plans being progressed by KCC to provide a health centre at St Clements Way. The County Council advises that this policy is amended to remove its support for a health centre at this location. KCC's full position on the provision of health centre is set out in Appendix 1.

Highways and Transportation: Any planning applications for this site should be accompanied by a Transport Statement / Transport Assessment (depending on scale of development) that

demonstrates the impact of the development on the local highway network. This would be reviewed by KCC during the application stage.

## **Chapter 7 – Our key themes and objectives**

Public Health: To ensure the robustness of the themes and objectives within the Neighbourhood Plan, the County Council would recommend greater use of data from the [Kent Joint Strategic Needs Assessment](#) (JSNA) and other sources of public health data from the [Public Health Outcomes Framework](#) (PHOF), including ward level data. Reference should also be made to set out how the policies support the [Kent Health and Wellbeing Strategy](#). Providing evidence of the health needs of the population is in line with the National Planning Policy Framework and will justify health and wellbeing policies.

## **Annex 2 – Pedestrian and Cycle Network**

Public Rights of Way (PRoW): The County Council would draw attention to the following factual clarifications required within this Neighbourhood Plan:

- On page 51, the path shown as 4C on Figure 10 is not a PRoW.
- The PRoW DR13 is not shown and goes from the lower end of 4C in a south west direction to meet Hedges Place Road.
- On Figure 9, the new route for DR9 is not shown and the original proposal which was not adopted is shown instead.

The County Council would welcome further engagement on these points to ensure that the PRoW network is being properly represented within this Neighbourhood Plan.

### **Additional commentary**

Sustainable Urban Drainage Systems: The Neighbourhood Plan covers a geographical area that includes areas of defended flood risk and with areas shown as potentially subject to surface water flood risk as shown on the Environment Agency Surface Water Flood Risk Mapping, yet there is no reference within the document to the importance of surface water drainage and the water environment.

It would be beneficial if the Neighbourhood Plan considers the importance of surface water management within new development but also more opportunistically within improvements to green and open spaces. Recent development proposals at Stone Pit included sustainable drainage improvements.

The County Council would specifically encourage the Neighbourhood Plan to consider what protections should be in place and what aspects the Parish would like to see implemented in relation to the management of surface water. The NPPF, at paragraph 165, specifically requires that major developments incorporate sustainable drainage systems and that they should, where possible, provide multifunctional benefits. The Parish should require all development drainage systems to include drainage systems which are at surface and provide water quality benefits, promote amenity and increase biodiversity.

The County Council would also recommend that the Neighbourhood Plan considers Kent County Council's Drainage and Planning Policy<sup>2</sup>.

Minerals and Waste: The Neighbourhood Plan area does have safeguarded land-won minerals (Alluvial and Sub-alluvial River Terrace Sand and Gravels), though the vast majority is also within the defined urban area of Dartford and are thus exempt from land-won mineral safeguarding as set out in Kent Minerals and Waste Local Plan (KMWLP) Policy CSM 5: Land-won Mineral Safeguarding. There is also significant safeguarded mineral infrastructure at the river frontage, Johnsons Wharf, of which the relevant policy is Policy CSM6: Safeguarded Wharves and Rail Depots of the KMLWP.

The Neighbourhood Plan is not allocating sites and the area is mainly urbanised and is therefore exempt from the land-won mineral safeguarding policy provisions of the KMWLP. However, it is recommended that the Neighbourhood Plan does include reference to the KMLWP and minerals safeguarding issues to demonstrate that they are not applicable to ensure that this matter is properly considered.

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KCC would welcome continued engagement as the Neighbourhood Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours sincerely,



**Stephanie Holt-Castle**  
Director for Growth and Communities

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Appendix 1: Tetra Tech Limited Response submitted on behalf of Kent County Council regarding St Clements Way

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<sup>2</sup> <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/flooding-and-drainage-policies/drainage-and-planning-policy-statement>