

Dartford Borough Council Local Plan Regulation 19 – Kent County Council Response

Policy / Paragraph	Commentary
2. BOROUGH STRATEGY & OBJECTIVES	
Strategic Objectives	<p>The County Council continues to be 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>The County Council welcomes the amendments made to policies throughout the document, in response to its comments submitted under the previous Regulation 19 consultation and 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 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> <p>Highways and Transportation: KCC 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.</p> <p>Public Rights of Way (PRoW): The Plan’s emphasis on enhancing walking and cycling opportunities within the Borough, particularly for access to services and commuting, is welcomed. It identifies residents presently commute on foot or bicycle less than the average for the South East (paragraph 1.18). Predicated on a growing Borough population (paragraph 1.34) and also recognising the legal requirement for net zero greenhouse gas emissions (e.g. paragraph 2.40), it is understandable the Plan seeks to encourage more active travel within the Borough. The Plan should make reference to the current Rights of Way Improvement Plan (ROWIP), a statutory policy document for PRoW, as the Local Plan and ROWIP are complementary in seeking active travel improvements for the benefit of residents and visitors.</p> <p>Waste Management: Under ‘objectives for infrastructure and economic investment’, the County Council has previously set out its comments in respect of waste in previous Local Plan consultations. Under ‘objectives for infrastructure and economic investment’, the County Council again recommends the following objective is included:</p> <p><i>15: 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 (HWRCs). 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 collection from the Borough’s kerbside collection service.</i></p>
Borough Spatial Strategy (S1)	<p>Highways and Transportation: KCC supports the proposal for mixed use development to reduce the need to travel, and to direct development towards sites with existing/improved/new access by public transport, walking and cycling. Development on brownfield sites should also have access to sustainable travel.</p> <p>The 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. 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>Public Rights of Way (PRoW): It is encouraging to note the Local Plan places considerable emphasis throughout on walking and cycling access, particularly within its Vision (paragraph 1.35) and Strategic Objectives (paragraph 2.2). The Vision and Strategic Objectives do not recognise other users of PRoW, notably horse riders. This is a popular activity for many and a considerable contributor to a local economy; re-wording to specifically reference PRoW would ensure regard to all.</p> <p>The Local Plan omits mention of the England Coast Path, which is a new National Trail, promoted at national level, aligned along the Borough's coastline. The Path will be heavily promoted and is expected to be a popular future destination for residents and visitors. The Borough Council is requested to support the new National Trail, to ensure it is incorporated positively within future developments and to deliver accessible and convenient 'feeder' paths. This will enable residents and visitors to enjoy the Borough's interesting landscapes and green spaces.</p> <p>Provision and delivery of County Council Community Services: The approach continues to be 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: The County Council would highlight that adequate waste infrastructure is an essential part of sustainable growth. The Pepperhill Waste Transfer Station (WTS) that serves Dartford and Gravesham is now at capacity, with alternative arrangements for dry recycle 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 waste disposal and health facilities, and improvements to walking and cycling links, railway stations and the bus/ Fastrack networks”.</i></p>

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	<p>Biodiversity: Policy S1 that “5. <i>Designated sites of biodiversity value will be protected, and improvement of ecological sites and networks maximised.</i>” There is currently a consultation on Local Nature Recovery Strategies (LNRS) https://consult.defra.gov.uk/land-use/local-nature-recovery-strategies/ and so any ecological networks should be linking in to the LNRS. Ideally, the policy should be referencing that as well.</p> <p>Public Health: KCC is strongly supportive of the theme throughout the Dartford Local Plan around improving health and wellbeing and reducing health inequalities. There are a number of areas which need to be considered further to ensure these priorities become reality through local plan making in Dartford. One area which needs to be further considered and therefore reflected in the Local Plan is how health inequalities can be reduced through local plan making. To do this, an understanding of the definition of what health inequalities are is important, so that this can be tackled and practically reflected in policy. Health inequalities are avoidable and unfair differences between groups of people or communities. Factors commonly understood to contribute towards health inequalities in relation to place shaping include socio-economic status, deprivation, unemployment, poor housing, educational attainment, population composition, the built and natural environment, levels of social connectedness and features of specific geographies such as urban, rural and coastal.</p> <p>Whilst the Dartford Local Plan repeatedly has a theme of improving health and wellbeing through various interventions (such as reducing the need to travel by private vehicles, retaining and providing community facilities and open space), there does not appear to be consideration of how to understand the avoidable and unfair differences between groups of people or communities within Dartford and how new development could practically reduce these differences and therefore reduce health inequalities. Reducing inequalities will support improving the health of all residents and is of particular importance due to an over eleven-year difference in life expectancy at birth for both males and females between the most deprived and least deprived wards in Dartford (which is a bigger difference than reported in Appendix B of the Sustainability Appraisal).</p> <p>In relation to new developments for example, it is important to consider whether the affordable and social housing has equitable access to community facilities, green spaces and amenities as the rest of housing, which is likely to mean there will need to be a greater focus on improving access from these properties to promote reduction in health inequalities. Furthermore, it is important to understand the impact of new development on surrounding existing communities. For example, Ebbsfleet is likely to be a less deprived area than many of those existing communities which surround it (such as Swanscombe) and that even though the new development will have new amenities and facilities close to existing communities, they still may not benefit from these even if access is perceived to be improved. Therefore inequalities will likely widen. Whilst policy E1 references the differences between the two communities, this could be more explicit in what that means in terms of tackling these differences.</p> <p>In addition to the important public health issues raised, paragraph 1.23 provides a further opportunity to raise the profile of the health inequalities in the borough and in particular the differences between communities in Dartford. Improving health and wellbeing is a strong theme within paragraph 1.23. However, reducing health inequalities could also be included within the Objectives, as it has been highlighted as a key issue within the Sustainability Appraisal.</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 inclusion of text that states that that infrastructure must be “<i>front loaded and provided early on in regenerating areas</i>” (paragraph 2.19) and that “<i>infrastructure needs and growth will be regularly reviewed to ensure a flow of sufficient facilities are secured in appropriate locations</i>” Policy S2: Part 2).</p> <p>The County Council welcomes continued involvement in 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> <p>The County Council would welcome continued engagement with the Borough Council to ensure the balanced delivery of infrastructure to meet growth needs within the Borough and to ensure that sites provide and fund the appropriate infrastructure.</p> <p>Highways and Transportation: It is understood that due to current uncertainties 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>Paragraph 2.34 - KCC supports the proposal to seek measures to secure major modal shift to sustainable modes, as this will reduce the impact on the local highway network.</p> <p>Paragraph 2.37 - the need for major improvements to the railway stations in the Borough is supported and KCC agrees with paragraph 5.141 that sites “<i>located near to railway stations will be expected to support/ contribute to station upgrades including measures to improve interchange arrangements and passenger facilities</i>”.</p> <p>Paragraph 2.38 - KCC supports the requirement for major improvements to the wider Fastrack route, expansion of the Fastrack services and priority measures at strategic junctions. KCC also welcomes the statement at paragraph 5.156 that “<i>Particular attention should be paid to ensuring that major new residential and employment developments are directly served by Fastrack, preferably by a dedicated route, or, where this is not possible, that improved provision is made to conventional bus service</i>”. Dedicated Fastrack corridors are required in order to reduce journey times, delays and increase the attractiveness of the services which should in turn increase passenger numbers and contribute positively to Dartford’s sustainable aims.</p>

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	<p>Policy S2 - in respect of transport, KCC supports the policy to locate developments in areas which are “<i>well-served by public transport, and within easy walking distance of local facilities and jobs...All major development will feature significant measures to provide improved safe and secure active travel routes integrated with the surrounding area</i>”. With regard to point 4, KCC supports this approach and will work with Dartford Borough Council to realise these ideas. It is disappointing that 4b “<i>New and improved Fastrack and bus services/ routes, including addressing non-dedicated sections of Fastrack routes which are vulnerable to general traffic congestion</i>” does not directly require new sections to be dedicated for buses/Fastrack, although KCC welcomes the additional sentence “<i>and bus priority at junctions where possible</i>” and notes that dedicated routes are stated in M16/M17.</p> <p>Education: KCC notes within the glossary the two descriptions for “Community Infrastructure Levy (CIL)” and “Section 106 legal agreements” (page 212, Appendix B). KCC would highlight that new primary schools can cost as much as £9m, in addition to the cost of land. It is well established that new schools should have a nil net cost to the commissioning authority and so it would be helpful for the Local Plan to set out that CIL does not cover the full cost, nor can it be used for land costs. KCC requests that there is acknowledgement within the Local Plan that where a new school is needed to mitigate the impact of new development, the charge on developers is via section 106, not CIL.</p> <p>It should also be noted that the land required for a new school is laid down in building Bulletin 103. There is a range, but broadly, land requirements are as follows:</p> <p>New 1FE primary school requires 1.07 hectares New 2FE primary school requires 1.7 – 2.0 hectares New 6FE secondary school requires 6 – 7 hectares New 8FE secondary school requires 7 - 8 hectares.</p> <p>KCC cannot provide a new school without the full funding being made available and the land transferred without charge.</p> <p>Provision and Delivery of KCC Community Services: KCC recommends encourages the use of equalisation agreements for major development in the Borough. An equalisation agreement set early on in the negotiation process with more than one developer can ensure that development benefitting from a school to be located on development sites in more than one ownership will allow those developers to equally contribute their due proportion of land costs. This ensures that each developer is equably treated for land take which will meet the needs of other development.</p> <p>Government guidance (2019) “Housing for older and disabled people” sets out the need to provide housing for older and disabled people. Accessible and adaptable housing enables people to live more independently and safely and provides safe and convenient homes with suitable circulation space and suitable bathroom and kitchens. KCC requests these dwellings are built to Building Reg Part M4(2) standard to ensure they remain accessible throughout the lifetime of the occupants to meet any changes in the occupant’s requirements.</p> <p>Youth services should be viewed as an essential element of the sustainable mix of community services. In general terms, there is a need for additional resources for youth services. KCC focuses on outreach and direct community support rather than the provision of buildings, which was the emphasis in the past.</p> <p>KCC would encourage the promotion and commitment to funding of multi-functional community hubs, which provide an excellent mix of services including social care, libraries and adult education facilities.</p> <p>Public Rights of Way: The local PRoW network can play a significant role to deliver the desired behavioural modal shift (paragraph 2.34). KCC supports the recognition of PRoW as part of the Borough’s Green Grid network (Glossary, p.214), thereby giving it due regard within Policy S2(6) (p.36). PRoW will play an important part in realising the Strategic Green Grid as shown in Diagram 3 (p.38), so PRoW should be specifically included on the list in paragraph 5.125 to highlight its value within and linking to green spaces.</p> <p>The present PRoW network needs to be enhanced and extended to support the Plan’s active travel ambitions. Dartford Borough Council should actively encourage this within the Plan, recognising where PRoW are to be affected by development that paths can be enhanced - e.g. widened, year-round surfacing - to provide attractive facilities for future residents. The Plan should also note the PRoW network is fragmented, as identified in the latest ROWIP, whether severed by roads or having no continuity of public rights to walk and/ or cycle. It should be noted the PRoW network in the Borough is predominantly comprised of Public Footpaths, where lawful public use is limited to pedestrian and mobility vehicle access, so it would be inappropriate in their current form to promote them for cycling. The Borough Council should ensure these issues are recognised in the Plan and identified at an early stage of any site’s design process so improvements can be successfully incorporated into future development and maximising the value of local PRoW.</p> <p>Additionally, the value of the PRoW network can be maximised by delivering improvements outside of ‘red line’ boundaries and on third party land. Many improvements will be identified within the Infrastructure Delivery Plan (IDP) and KCC would request that consultation is undertaken on all future IDP reviews, ensuring this remains relevant to changing needs. Table 8: Key Implementation Documents (p.203) should, therefore, reference the IDP in addition to paragraphs 6.15 and 6.16. It is welcomed the Plan recognises using the Community Infrastructure Levy (paragraph 2.24) and Section 106 legal agreements (paragraph 2.25) to fund improvements and use of Dartford Borough Council’s compulsory powers (paragraph 6.6) to fund, secure, and deliver these routes.</p> <p>Waste Management: The County Council, as Waste Management Authority, recommends reference to waste at paragraph 2.16 – to include “<i>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.</i>”</p>

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	<p>In its previous submission, the County Council welcomed the inclusion of a Bean Triangle Materials Recycling Facility project within Dartford’s Infrastructure Delivery Plan. This project has now changed, to become provision for a Waste Transfer Station/ Household Waste Recycling Centre. The County Council would like to work with the Borough Council to progress the much-needed project to deliver essential waste services to support growth in the Borough.</p> <p>Public Health: In respect of “Managing travel demand and infrastructure” (page 32), it is positive that there is an emphasis on modal shift and active travel. However, there could be more detail on the current state of play with regards to active travel within the Borough as there is for other modes of transport. For example, the Public Health Outcomes Framework Public Health England Fingertips tool indicates that the percentage of adults cycling for travel at least three days per week is lower in Dartford than both Kent and England averages.</p>
Climate Change Strategy (S3)	<p>KCC supports this policy, which seeks to embed sustainable travel into developments. KCC previously supported the Plan’s inclusion of the need to be resilient and adaptive to climate change and drew attention to areas where some of the policies could be stronger. KCC notes the changes made in this policy, and throughout the document, to address this.</p> <p>Waste Management: The County Council notes the reference to efficiently manage and re-use natural resources and waste and for early design for waste storage within individual units and also within serviced areas of flatted developments. It states that 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’ Waste Disposal Infrastructure Plan.</p> <p>Sustainable Urban Drainage Systems: 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>
Borough Development Levels (S4)	<p>Education: KCC uses several moderating factors to produce the provision planning forecasts in the Kent Commissioning Plan. One of these moderating factors is the number of new homes that have planning approval. Table 1 at 2.63 does not allow KCC to identify how many new homes have already been factored into its forecasts. The methodology used by Dartford Borough Council is different from that which KCC uses. The number of new homes that are not accounted for in KCC’s forecasts will not feature in the Kent Commissioning Plan. This means that the number of such new homes will require additional schools and school places. For example:</p> <p><i>For primary</i> 750 new homes will require a new 1FE primary school 1500 new homes will require a new 2FE primary school 3000 new homes will require two new 2FE primary schools 6000 new homes will require four new 2FE primary schools</p> <p><i>For secondary</i> 750 new homes will require 1FE of secondary provision (expansion) 1500 new homes will require a 2FE of secondary provision 3000 new homes will require 4FE secondary provision 4500 new homes will require a new 6FE secondary school (6FE is usually the smallest size secondary school that the DfE will allow to be created. Occasionally, 5FE, if no other solution is possible) 6000 new homes will require a new 8FE secondary school.</p> <p><i>Special Needs Provision</i> KCC notes that there is no mention of creating additional provision for special schools. Demand created by new housing increases the need for places at primary, secondary and special schools. It is essential that the Local Plan specifically refers to the need to provide land and section 106 funds to build new special school provision. There has been no provision for places for special needs children in previous Local Plans and there is a current high need for additional special school capacity. Thousands of new homes would increase the demand for special school places far beyond the current capacity. Forecasting the demand for special schools is challenging, but KCC uses a trend-based forecast system. KCC would welcome a dialogue with Dartford Borough Council to explore how much additional special provision is needed following the planned housing development. In common with mainstream provision, new special schools require land and funding through section 106 contributions.</p> <p><i>0-5 Early Years Provision</i> KCC would also highlight the need for the Local Plan to set out requirements to enhance 0-5 early years provision. KCC would again welcome a dialogue with Dartford Borough Council on this provision.</p>

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	<p><i>Table 2</i> Some of the school establishment entries set out in Table 2 of the Local Plan (page 49) are out of date or unclear:</p> <ul style="list-style-type: none"> - Under Dartford - It is not clear whether the “1FE Primary school expansion” is for Northern or Central Dartford. If for Northern Dartford, it is correct. - Under Stone/Greenhithe - Stone Lodge school is already built. Only 2FE is yet to come on line, which is due in 2023-24. - “New Primary School” should be amended to “2FE of primary provision”, because it is not yet decided whether it will be a new school or an expansion. - Under Ebbsfleet Garden City - the Alkerden school should be referred to as an all-through, 3 - 18 school. It will not be a separate primary and secondary school. - The Alkerden all - through school is not scheduled to open until 2024-25 and will open as 2FE primary and 4FE secondary. - The 1FE expansion to the school on Ebbsfleet Green is due in 2024-25, not 2025-30 <p>Waste Management: The County Council, as Waste Disposal Authority, notes the level of housing identified within table 1 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. The County Council welcomes the new reference made to waste within table 2. The County Council is facing waste capacity issues as a result of increased demand from housing growth in the Borough. As 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 Strategy (D1) and site allocations (D4-D7)	<p>The County Council continues to support 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>Highways and Transportation: KCC supports policy D1, 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. KCC supports the three sites identified as specific mixed use development allocations (D4, D5 and D6). Their location in the heart of the town centre means the uses 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. KCC also supports policy D7.</p>
4. EBBSFLEET AND SWANSCOMBE	
Ebbsfleet & Swanscombe Strategy / Ebbsfleet Development Principles (E1 & E2)	<p>Highways and Transportation: KCC supports these two policies, as the 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 in accordance with the Kent Design Guide. It is disappointing that that the policies do not specifically mention dedicated bus / Fastrack lane or segregated cycle lanes, as these go hand in hand with the ethos of the Garden village and are achievable (and necessary) at new sites where there isn’t a need for retrofitting. The Garden City should lead by example. It is noted, however, that dedicated lanes are mentioned in M16/M17.</p>
Swanscombe (E3)	<p>Highways and Transportation: KCC 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 mode switch for both new and existing residents.</p>
Ebbsfleet Central Allocation (E4)	<p>Transport Strategy: As worded, the current policy states: “Provide a new public transport hub with ease of interchange between rail services at Ebbsfleet International and other local rail stations, Fastrack and local buses”. It is requested that the policy is made a little more explicit and less open to interpretation. Specifically, one can reasonably interpret that as stipulating that interchange between rail services should be improved at Ebbsfleet International station, and separately between rail services at other local stations – i.e. that could be step free access improvements between platforms. Furthermore, what qualifies as “ease” is also open to interpretation – improving wayfinding signage between two stations could be classed as having eased interchange. If the policy is seeking, as KCC considers it should, to ensure that a direct interchange link is provided between Ebbsfleet International station and Northfleet Station, then the policy should include at least the wording to that effect - <i>Provide a new public transport hub consisting of a new direct interchange link between Ebbsfleet International Station and Northfleet station and ease of interchange between rail services at Ebbsfleet International and other local rail stations, Fastrack and local buses.</i></p> <p>Highways and Transportation: KCC supports Policy E4 Ebbsfleet Central Allocation for 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 from 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. It is noted however that dedicated Fastrack routes are stated in policies M16 and M17.</p> <p>Education: KCC welcomes the policy statement that a new 2FE primary school will be required for this development (page 96, paragraph 4.36)</p>
Alkerden and Ashmere Allocation (E5)	<p>Highways and Transportation: KCC supports Policy 5E Alkerden and Ashmere Allocation and will continue to work with Ebbsfleet Development Corporation and developers to help achieve the vision for this garden village. Paragraph 4.47 refers to the London Resort and states “<i>In the event that it gets consent and applicable development commences, a review of the Local Plan will consider the need to revise plan policies in response to projected impacts</i>”. Given that an application has been submitted, it is surprising that Local Plan policy has not been provided, as a sensitivity test was originally proposed. However, it is noted that the trip generation and distribution information isn’t readily available to obtain the level of detail needed, and also that the Local Plan can be updated if this site obtains permission.</p> <p>Education: The Alkerden school should be referred to as an all-through, 3-18 school. It will not be a separate primary and secondary school (page 100, paragraph 4.43).</p>

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North of London Road Area Allocation (E6)	<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, and notes that a decision on the project will not be made until after the Local Plan has been submitted. KCC continues to work 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 secure consent or any consent 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: KCC supports policy E6, particularly point 2f, to provide “a high quality network of links to the wider area including improved pedestrian and cycle access to Swanscombe, the River Thames and Ingress Park (Greenhithe)”. It is noted that reference to a Fastrack route has been removed from the updated version. Any application that is submitted in this location will need to investigate whether Fastrack is required and if so, provide this service. KCC requests that any Fastrack routes to be provided / diverted, are on dedicated routes. Any impact on the local highway network including local junctions should be assessed and mitigated where appropriate.</p> <p>Minerals and Waste: KCC’s previous comments noted 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. The details provided in this further consultation do not materially change KCC’s previous comments. The policy (E6) identifies mineral safeguarding matters in part 2 criterion (e). However, there is no elaboration on the potential exemption from the presumption to safeguard the land-won minerals from sterilisation (via a detailed assessment and then an invocation of an exemption criterion as detailed in Policy DM 7). The policy’s supporting text does not address matters relating to the need to assess the possibility for mineral safeguarding exemption, as set out by Policy DM 7. The matter, therefore, is being left to the planning application stage.</p> <p>Waste Management: 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. Strategic allocation policies will need to take account of the lack of capacity of waste disposal infrastructure to 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>
5. DEVELOPMENT MANAGEMENT POLICIES	
	<p>Waste Management: The County Council would welcome consideration of a 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 the Waste Collection Authority (WCA) and Waste Disposal Authority (WDA) to efficiently manage waste arising from the development.</p>
Good Design for Dartford (M1)	<p>The County Council welcomes reference to the Kent Design Guide and the other guidance now referenced, such as Secured by Design and Building for a Healthy Life. The County Council would recommend that high quality design should take account of varying needs of the evolving community – and this includes consideration of dementia friendly design and supporting healthy lifestyles. 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>Public Health: As well as how the built environment can support increases in physical activity given the relatively high levels of overweight and obesity in both adults and children in Dartford, further consideration within this policy should be around the food environment such as access to healthy food, allotments, garden space for growing food etc. (in line with NPPF)</p>
Environmental & Amenity Protection (M2)	<p>Public Health: At paragraph 5.20, further consideration should be given on mitigation around groups which are more susceptible to harm from poor air quality including older people, children, individuals with existing cardiovascular disease and or respiratory disease, pregnant women and low-income communities.</p>
Sustainable Technology, Construction and Performance (M3)	<p>Sustainable Business and Communities: 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 County Council therefore recommends that a higher uplift is explored (subject to viability) and the application of the policy requirement should be extended to apply to all development, not just major development.</p>
Designated Heritage Assets (M5) Historic Environment Strategy (M6)	<p>Heritage: On balance, although it is considered that from a heritage perspective, the draft Local Plan is technically sound, it has significant weaknesses that will limit its effectiveness at fulfilling its responsibilities to the historic environment (as required by the NPPF) in respect of plans setting 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...” (NPPF, paragraph 190). The only policies in the draft Local Plan that concern the historic environment at all are policy M5 (Designated Heritage Assets) and policy M6 (Historic Environment Strategy). Policy M5 essentially summarises paragraphs 199 to 202 of the NPPF. The new clause: “Geoarchaeological Sites - Sites designated for their geoarchaeological interests, including the Swanscombe Skull SSSI and Swanscombe Peninsula SSSI, are irreplaceable and therefore will be protected and conserved” is, however, welcomed.</p> <p>Policy M6 has been given a heading of Historic Environment Strategy, but really just summarises the relevant paragraphs of the NPPF that apply to non-designated heritage assets (203 to 208). The only text that seems intended to comprise a Historic Environment Strategy is set out within clauses 1 to 3 of policy M6. These just state that the Borough Council will try to find opportunities for the enhancement of heritage on a site-by-site basis, expecting developers to bring forward proposals. 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 to 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, KCC 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

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	<ul style="list-style-type: none"> 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. Dartford Borough Council is therefore encouraged 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>Highways and Transportation: KCC supports this policy, where unplanned windfall sites will only be acceptable if they are in a sustainable location, “<i>within easy walking distance of a range of community facilities and is well located with respect to walking / cycling or good public transport to a choice of employment opportunities</i>”.</p> <p>Education: KCC welcomes the policy statement that acknowledges that the aggregation of smaller sites needs to factor in the need for new schools (page 141, paragraphs 5.81 and 5.82).</p>
Green Belt (M13)	<p>Public Rights of Way: There are comparatively few Public Bridleways in the Borough, and they tend to be isolated, not making a coherent off-road network and so require cyclists and equestrians to use the road network, exposing them and motorists to the potential for conflict. This lack of bridleways will make it difficult for future stables to be sited 'in reasonable proximity to bridleways' (paragraph 5.120) and so KCC requests reconsideration of this point. The deficiency could be overcome by supporting the creation of more bridleways, primarily by uplifting existing Public Footpaths to Public Bridleways where practical, which, working with KCC, will enable the borough’s objectives for Active Travel to be realised.</p>
Green and Blue Infrastructure and Open Space Provision (M14)	<p>KCC would reiterate the benefit of considering Sport England planning guidance, along with Active Design principles - these strategies for sport are 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. 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>
Biodiversity and Landscape (M15)	<p>Heritage: Policy M15, which is the main policy to concern SSSIs, is very generic at present and does not make reference to any special character of the Swanscombe SSSI, let alone to any archaeological significance. This is because it concerns landscape and biodiversity generally. Given the scale and importance of the notified SSI at Swanscombe, it would be preferable to include a specific policy on the SSSI so that it is clear how it will be managed and how the needs of the different issues (biodiversity, archaeology, growth and development) will be balanced.</p> <p>Biodiversity: Policy S3: “Climate Change Strategy” refers to the mitigation hierarchy. However, policy M15 does not refer to the mitigation hierarchy and instead is quite vague and includes phrases such as: <i>Developments will be expected to protect and enhance biodiversity. In the event that development adversely affects any existing habitats, this must be replaced by compensatory habitat of a similar type, size and condition in close proximity to that which is being lost. The new national biodiversity net gain requirements will apply to all applicable developments.</i> As this is the biodiversity policy, KCC would expect it to reference the mitigation hierarchy (particularly as BNG Good Practice Principles references this (https://cieem.net/wp-content/uploads/2019/02/Biodiversity-Net-Gain-Principles.pdf)). KCC advises that it needs to be clear in this policy that the mitigation hierarchy must be followed within planning applications.</p> <p><i>The ‘mitigation hierarchy’ described in British Standard BS 42020:2013, which involves the following step-wise process:</i></p> <ul style="list-style-type: none"> <i>Avoidance – avoiding adverse effects through good design;</i> <i>Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;</i> <i>Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm;</i> <i>Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.</i> <p>As such, the policy needs to be reviewed and be more specific about what is required when considering biodiversity.</p>
Travel Management (M16) Active Travel, Access and Parking (M17)	<p>Highways and Transportation: In general, in addition to Manual for Streets, developments must be designed in accordance with the Kent Design Guide and national guidance (e.g. LTN L/20). Paragraph 5.159 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 designer’s response submitted for review. Paragraph 5.160 relates to how the design of new access points should consider vulnerable road users such as pedestrians. Given the Borough’s 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>KCC particularly welcomes the requirement that “<i>New major development sites should include layouts that allow for routes into and dedicated routes within the site for Fastrack, buses and taxis</i>”. Whilst it does not say explicitly, it is assumed that policies M16 and M17 include bus priority measures at junctions. KCC welcomes the reference to ‘segregated cycle routes’, although it is disappointing that this is “if possible” rather than taking a proactive approach and expecting these to be included. The inclusion of the use of the river is welcome as this will assist in removing trips from the network. The</p>

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	<p>requirement for electric vehicle parking provision is welcomed, however, communal parking should have a proportion of both active and passive provision.</p> <p>Public Rights of Way: When future site specific schemes are being designed, KCC advises consultation and contribution at an early stage - this includes all sites identified in the Plan. PRoW should be used by all in convenience and without fear of personal safety. The Plan makes various references to creating safe environments for residents and visitors to enjoy access. This is welcomed and will support KCC's ambitions. The needs of those with disabilities, including mobility impairment, must be given high regard in provision of future access. The Plan gives limited recognition of these users and the difficulties they face in accessing around the Borough - there is need for greater regard than access onto the highway network (paragraph 5.159) and across kerbs (paragraphs 5.160-161). The Plan should be reworded to make clear the need to provide for all users onto and along all future new routes and to improve existing routes for the convenience of all users.</p>
Sustainable Economic Locations / Provision for Local Businesses & Skills (M19 & M20)	<p>Broadband - The County Council would continue to recommend that 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. Policy EMP6 within the Ashford Borough Council adopted Local Plan is a reference for the type of policy recommended.</p>
Identified Employment Areas (M21)	<p>Highways and Transportation: KCC recognises the limitations of achieving high levels of operational sustainable trips from employment such as industrial uses and appropriate highway mitigation / contributions will be required where impacts on the network are severe.</p>
Bluewater (M22)	<p>Highways and Transportation: 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>District and Local Centres (M23)</p> <p>Food and Drink Establishments (M24)</p>	<p>Public Health: At paragraph 5.213, given that obesity is recognised as being a significant issue for both adults and children in Dartford (also identified in the Sustainability Appraisal) alongside low levels of consumption of '5 a day fruit and veg', it would be helpful for this to be reflected within this section. There are an increasing number of academic studies that identify the role of physical access to takeaway food outlets in promoting unhealthy diets and obesity. While not all fast food is unhealthy, it is typically higher in salt, calories and saturated fat, all of which can cause serious health problems when consumed too often and in large quantities. Children with excess weight are consuming up to 500 extra calories per day, so creating healthier environments could play an important role in tackling obesity and health inequalities. Furthermore, Dartford has significantly higher density levels of fast-food outlets than Kent and is also higher than the England average.</p> <p>NICE Public Health Guideline on Cardiovascular disease prevention recommends action to encourage local planning authorities to restrict planning permission for takeaways and other food retail outlets in specific areas (for example, within walking distance of schools) and Planning Practice Guidance supports actions, such as the use of exclusion zones, to limit the proliferation of certain unhealthy uses within specified areas such as proximity to schools and in areas of deprivation and high obesity prevalence. Given the high levels of childhood obesity and density of fast-food takeaways in Dartford, this should be a consideration and reflected within Policy M24 that any requirements should reflect robust public health data and intelligence.</p> <p>As a more general point, providing evidence of the health needs of the population is in line with the NPPF and will justify planning policies regarding health and wellbeing in addition to providing a better understanding of residents' health needs and any impact new development may incur on residents health and wellbeing. Greater use of the evidence base is recommended using data from the Kent Joint Strategic Needs Assessment (JSNA) and/ or other sources of public health data from the Public Health Outcomes Framework (PHOF), including ward level data in addition to referencing how these policies support the Kent Health and Wellbeing Strategy.</p> <p><i>Paragraph 5.214</i> – Dartford has a significantly higher number of premises licensed to sell alcohol per square kilometre than both England and Kent in addition to having significantly higher hospital admission episodes for alcohol related conditions than the Kent average. This similarly should be a consideration within the Local Plan and reflected in Policy M24.</p>
IMPLEMENTATION AND MONITORING	
	<p>Paragraph 6.14 – A number of indicators from the PHOF could be used here particularly further consideration is needed to reflect on how health inequalities will be monitored particularly the differences in PHOF indicators between communities and population groups.</p> <p>Page 208, Table 10 - The Alkerden school should be referred to as an all-through, 3 -18 school. It will not be a separate primary and secondary school.</p>
GLOSSARY	
	<p>Public Rights of Way: PRoW is the generic term for Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic. The PRoW network is often considered a recreational network of paths; however, it is also a vital means for people to access services and workplaces, and a safer alternative to local roads, thereby increasing value to communities and individuals. All PRoW must, therefore, be considered within the Plan's definition of Active Travel (Glossary, p. 212)</p>
SUPPORTING DOCUMENTS	
Transport Background Paper	<p>In respect of highways and transportation, at the time of writing this report, the mitigation work for the Local Plan has not been completed. 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 further examination of the Local Plan.</p> <p>KCC is happy with Dartford's approach of monitoring and managing and encouraging sustainable travel.</p> <p>Stage 2b Reference Case Methodology - KCC notes the change in reference case to take on board National Highways' comments. As the modelling work is still to be completed, KCC will need to discuss this separately with Dartford Borough Council.</p> <p>Stage 3a and 3b Methodology Reports - KCC has comments to make on the Stage 3a and 3b methodology reports. As the modelling work is still being undertaken, these will be raised separately.</p>
Sustainable Transport Strategy for Dartford	<p>The addition of the Sustainable Strategy is welcomed. KCC previously provided comments on a draft version of the report and a number of the comments have been included in the final version. KCC particularly welcomes the following sentence at paragraph 6.4 "<i>The direct delivery of transport infrastructure improvements by developers would be sought and for major sites the provision of segregated routes for walking, cycling and public transport would be pursued</i>". The lack of reference to segregated cycle routes and bus priority measures is disappointing.</p>