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CONSULTATION ON EBBSFLEET IMPLEMENTATION FRAMEWORK

1. Summary

- 1.1 This is a Key Decision as it is significant in terms of its effects on communities living or working in an area of the Borough comprising two or more wards.
- 1.2 This report is responding to the request by the Ebbsfleet Development Corporation (EDC) to endorse the Ebbsfleet Implementation Framework as compliant with the Council's policy framework (Local Plan) so that it can be used as a material consideration in EDC planning decisions. The report addresses the key issues that the Council previously raised on the draft Ebbsfleet Implementation Framework and the response from the EDC.

2. RECOMMENDATION

2.1 That the EDC be advised:

- 1. That Dartford Council gives its support to the Ebbsfleet Implementation Framework dated November 2016 for providing clarity with regard to the integrated master planning of the whole of the EDC area.
- 2. That the Council endorses the Ebbsfleet Implementation Framework as guidance for pre-application discussions with developers and a material consideration in determining planning applications but with primacy given to Dartford's Local Plan and Supplementary Planning Documents where there is a conflict between the documents and as a basis for the comprehensive identification of policy requirements.
- 3. That the Council considers there are some specific areas of non-compliance between the Ebbsfleet Implementation Framework and the Council's planning policy framework, as set out in Table 1 and paragraph 3.16 of this report but will seek to assist the EDC in resolving these issues when proposals come forward.
- 4. That endorsement of the Ebbsfleet Implementation Framework does not imply acceptability of some of the proposals or information shown outside of the EDC area.

3. Background and discussion

- 3.1 The Ebbsfleet Development Corporation (EDC) advise that the Ebbsfleet Implementation Framework (EIF) seeks to provide a structure for integrating the variety of masterplans which cover the EDC area into a coherent and cohesive vision. The majority of the sites within the Borough Council's boundary already have planning permission: with each site having a separate Masterplan relating to the planning permission boundary. There is however no single masterplan for the area. The EDC advise that the EIF will be used to inform, shape and support their delivery work and that it

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underpins the EDC Corporate Plan and subsequent investment planning and programme management. It is intended that the EIF will define the long-term ambition for Ebbsfleet, identifying what type of place Ebbsfleet will become in the future. Council officers have been involved in the process of preparation of the EIF and have sought to ensure that it reflects the adopted Local Plan, takes account of wider infrastructure delivery requirements and does not create unacceptable impact on parts of the Borough outside of the EDC boundary. This has been an iterative process. However, the EIF is a document prepared by the EDC and, as such, responsibility for its final content rests with the EDC.

- 3.2 The Ebbsfleet Development Corporation published the Ebbsfleet Implementation Framework as a Public Presentation Draft in October 2016. The draft Framework was reported to Cabinet on 27 October 2016 and Members resolved (Minute 69) that the EDC be advised of the comments and key issues set out in the report (these are summarised in the table below).
- 3.3 Officers have been advised that the Council's comments were reported to the EDC Board in the closed part of the agenda of its November meeting and it resolved at this time to adopt the Ebbsfleet Implementation Framework dated November 2016. The EDC have provided a response to the Borough Council's comments and these are set out in the table below.
- 3.4 The Council is now asked by the EDC to formally endorse the Framework as compliant with the Local Plan. Whilst some changes were made following submission of the Council's comments, some, but not all of these, have adequately addressed the concerns raised. Officers are of the view that some conflicts with the Core Strategy and the Development Policies Plan remain. Whilst the EIF is in many respects compliant with the Local Plan, taken as a whole, it is not considered to be fully compliant.
- 3.5 Additionally, some notations within the document are unclear. Larger scale plans have been previously requested and are awaited, in order to allow for better interrogation of these. If any further concerns arise following the receipt of these documents these will be reported verbally to Cabinet.

Planning status of the Ebbsfleet Implementation Framework

- 3.6 As Members will be aware, the EDC does not have plan-making powers and cannot produce its own development plan (or supplementary planning document). Moreover, the requirement in primary legislation for the development plan to be the starting point in determining applications applies at Ebbsfleet. However, the EDC wish to use the Implementation Framework document in discussions with developers and in considering planning applications. The EDC has asked the three local authorities - Dartford Borough Council, Gravesham Borough Council and Kent County Council - to endorse the final document as compliant with each authority's Local Plan so that it can be used by EDC as a material consideration in determining applications i.e. legitimately considered as a (material) factor. As noted at

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paragraph 3.4 above, officers do not consider that the EIF is fully compliant with the Development Plan.

- 3.7 It is recommended that the Implementation Framework be recognised as one of the potential material considerations used to determine applications. Nevertheless, it must be highlighted that a clear legal distinction is made between the question of whether something is a *material* consideration, and the *weight* which it is to be given. This means the central issue will in practice be the relative weight that the EDC attaches to the Framework versus the Development Plan and other material considerations. The starting point for consideration of planning applications is the statutory development plan. This is confirmed in the National Planning Policy Framework, whereby the government support a 'plan-led' system. This is because these plans are produced in a transparent and robust manner: informed by a specified minimum level of public consultation, and independently examined with regard to evidence (including overall appraisal of sustainability impacts) and alternative options. Although informed by consultation exercises and technical information, informal planning documents such as the Framework do not benefit from the extent of scrutiny, public involvement and information gathering of the development plan. The EDC have confirmed that the Implementation Framework is not intended to be a Supplementary Planning Document, but is instead a statement of ambition. Members may also wish to note that it has not been the subject of formal public consultation and reporting that would be required for a Supplementary Planning Document to be adopted.
- 3.8 The Framework is a material consideration, and is a weighty factor alongside the range of site-specific material considerations that normally arise on planning applications. However it does not have the status of a formal Supplementary Planning Document, let alone a development plan document (Local Plan). It has, therefore, less than the very significant weight that applies to the Development Plan, which must prevail in the event that any conflict is identified with proposals. For the avoidance of doubt, in addition to the Core Strategy, Dartford's development plan is considered to include the Development Policies Plan once adopted - and also, in effect, as currently presented (given its very advanced stage and advice in the National Planning Policy Framework).

Content of the Implementation Framework

- 3.9 The document sets out the existing context for development in the EDC area: the planning permissions, the policy context, the delivery so far and an overview of the engagement events carried out by the EDC in 2015. It also sets out the objectives and key performance indicators that the EDC have set for itself in relation to its six delivery themes: Quality homes and neighbourhoods; enterprising economy; connected people and places; healthy environments; a civic community; and resilient and sustainable systems.

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- 3.10 The document then goes on to set out the spatial framework for the area and defines the Strategic Development Areas within the EDC boundary as Ebbsfleet Central; Castle Hill, Western Cross, Alkerden and Ebbsfleet Green (formerly Eastern Quarry and Northfleet West Sub-station); Northfleet Riverside and Swanscombe Peninsula. It provides strategic guidelines for each of these areas.
- 3.11 The Framework provides some generic guidance for development coming forward and seeks to provide a vision for the 6 key themes. The final section of the EIF creates diagrammatic high level masterplans for each of the Strategic Development Areas but which join together to form the Framework for the whole area.
- 3.12 The key ambitions that underpin the EIF are set out as being 12,842 new homes with a resultant population of 27,993 plus 82 hectares of employment and commercial land, 564,480sqm commercial floorspace and 70,310sqm retail floorspace and up to 32,000 jobs (excluding the entertainment resort proposal). Education provision is also quantified as being a total of 13 primary school forms of entry primary (all of which are already consented) and an 8 form entry secondary school consented at Eastern Quarry plus potential for a further 6 form entry secondary school at Ebbsfleet station.

Issues for consideration

- 3.13 With the exception of Northfleet Riverside, all of the Strategic Development Areas fall within the Borough Council boundary. Much of the work set out within the strategic development area guidelines are based on the planning permissions, and are therefore broadly compliant with adopted planning policy. However, there are some proposals and commentary that vary from this.
- 3.14 Members welcomed the Framework at Cabinet in October [Minute 69] and were keen to show support where it aligned with DBC aspirations but noted that there were some key issues which did not fully align with the Council's adopted Development Plan. The following is a table which summarises the Council's comments on the October consultation document and sets out the EDC's response and amendments, together with further Dartford Council officer comments on these issues.

Table 1: Comments and Responses on the Ebbsfleet Implementation Framework

Comments at DBC October Cabinet	EDC Response and suggested amendments	Further DBC officer comments
Framework shows changes to the proposed road network within the sites, which have not been fully assessed. E.g a new access road onto Alkerden Lane from Eastern	The current Section 73 application currently shows a new connection onto Alkerden Lane in the centre of Eastern Quarry, to replace the previous access onto	The Framework proposes a road network which would supersede proposals in an extant planning consent. The proposals in the planning permission have

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<p>Quarry, is likely to result in increased traffic along Alkerden Lane and result in rat-running through the new development.</p>	<p>Alkerden Lane in the north western corner of the site.</p> <p>EDC acknowledges that any change in access onto Alkerden Lane from Eastern Quarry should be evaluated to understand the impact, and identify opportunities for mediation, which will be addressed through the statutory planning function.</p> <p>In order to avoid prejudicing this process through establishing a principle within the Framework document, an additional clause has been inserted substantiating the need to assess the impact of any such new access.</p> <p>Proposed changes:</p> <p>Page 59 : Strategic movement hierarchy plan :</p> <p>Link connecting Eastern Quarry to Alkerden Lane now illustrated as 'potential new link - subject to transport modelling' and key updated accordingly.</p> <p>New clauses under diagram caption (top right) stating :</p> <p><i>Any changes to the transport strategies and associated road networks as defined under current planning permissions within the Ebbsfleet area is subject to verification through transport modelling</i></p> <p>Plans on 108, 109,110, 111 updated accordingly.</p>	<p>been fully assessed and are considered to make suitable provision for transport impacts arising from the development.</p> <p>The Framework should not prejudice or pre-judge formal assessment of an alternative route, as referred to in the prospective Section 73, which has not been assessed and is likely to be sub-optimal to the already consented route and may give rise to off-site impacts which have not been assessed.</p> <p>In advance of assessment which can demonstrate that the proposed route can adequately address transport impacts arising from the development, it is considered that the proposal is not compliant with the Local Plan.</p> <p>Officers recommend that this element of the EIF is not endorsed.</p>
<p>Concerns raised about the ability for the amended Implementation Framework masterplans to provide the appropriate green</p>	<p>Ongoing review of open space provision within Eastern Quarry (with EDC's planning team) to confirm open space provision is in alignment with</p>	<p>The comments and the proposed changes does not address the fundamental issue raised by DBC, that although open space is</p>

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<p>infrastructure required to enable the provision of formal recreation such as playing pitches and parks as well as adequate space for informal recreation and sports. The approved Masterplans under the planning permissions for Eastern Quarry, Ebbsfleet and Ebbsfleet Green all indicated locations for the required number of playing fields. The Council has raised concerns already about the EDC agreement to reduce the playing fields on the Ebbsfleet Green site without a holistic approach being considered. Concern that the Implementation Framework shows a reduced amount of useable green space and has not demonstrated that the playing pitches, required by the planning permissions based on need assessments, can be provided or that adequate parks can be provided in Eastern Quarry beyond simply a walkway adjacent to a lake, river, marsh or cliff.</p>	<p>DBC policy.</p> <p>Proposed changes:</p> <p>New clause added to page 96 (1st column , 3rd para)</p> <p><i>Further parkland and public realm will be created throughout the area as an integral part of development, to provide at least 30% of the Ebbsfleet Central area as open space.</i></p> <p>New clause added to page 111 (1st column 1st para)</p> <p><i>The following green infrastructure has been consented within the current development proposals to provide for at least 30% of the site area as open space.</i></p>	<p>shown in the EIF it may not provide the same level of <i>useable</i> open space as required under the existing planning permissions.</p> <p>The change suggested simply repeats the policy requirement (in Core Strategy CS5) for 30% open space by area but does not demonstrate how it will be achieved. This is considered inadequate in this Framework which would be expected to take Core Strategy policy to a greater level of detail.</p> <p>The change does not address the policy requirement that open space be provided that is multi-functional greenspace providing for leisure and recreation purposes. The Core Strategy (Diagram 6) indicates a requirement for a large area of open space to be provided as an urban park as well as a biodiversity corridor. Without these more significant areas of open space Officers do not consider the Framework can be considered policy compliant. Instead, the Framework shows small, fragmented areas and pathways.</p> <p>Officers consider that the open space provision within the proposed developments should meet the requirements of the planning permissions as approved with regard to scale, coherence and usability of formal and informal recreation space. Any changes to these requirements should be</p>
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		<p>justified on basis of need and access to facilities.</p> <p>Officers recommend that this element of the EIF is not endorsed.</p>
<p>It is not clear where the proposed playing pitches for Eastern Quarry are to be provided (4 pitches are required by the s106 to the planning permission over and above the secondary school shared provision) or whether they can be accommodated in the green space identified given constraints and other requirements.</p>	<p>The current draft section 73 application identifies 4 new sports pitches will be provided, with at least 2 within Eastern Quarry, and a further 2 within a 2.5m distance.</p> <p>In order to avoid prejudicing the statutory planning process around the section 73 application, suggest a new clause is added requiring at least 4 new pitches to be provided either within the Quarry or in open spaces within communities directly adjacent to Eastern Quarry.</p> <p>Proposed changes:</p> <p>Page 111:</p> <p>Additional reference added :</p> <p><i>'A minimum of four sports pitches and three tennis/netball courts to be provided as per the current planning permission (in addition to the facilities within the education campus)'</i></p>	<p>The s73 application referred to by the EDC in their comments has not yet been submitted or assessed to determine its acceptability.</p> <p>The current EQ planning permission requires 4 playing pitches (outside of the school sites) to serve the needs of the new community. It allows for 2 of these pitches to be provided outside of the site within close proximity.</p> <p>The additional reference confirms this requirement and is welcome. Nonetheless, it is of concern that the Framework, which would be expected to add a greater level of detail to the Core Strategy, does not show specifically where and how the playing pitches can be accommodated.</p> <p>Consideration will need to be had at the planning application stage that this is not at the expense of useable informal open space.</p> <p>Officers recommend that the endorsement of the Framework is subject to the proposed additional reference that the four playing pitches be provided in accordance with the existing planning permission which requires at least 2 of these pitches to be provided on site and</p>

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		the others to be provided within a defined area.
<p>The northern east-west ecological corridor through Eastern Quarry appears to have been lost due to proposals for development and roads. It is a requirement of the adopted Core Strategy to provide a biodiversity corridor through this area. This is intended to form part of the wider biodiversity corridors being provided throughout the area which create linked habitat. In Eastern Quarry this area was partly intended to retain and enhance important and rare chalk grassland habitat. A smaller park area is now shown but the open space is likely to have several conflicting uses, in a small area that also contains water or cliff. The ecological corridor is likely to be further eroded by proposed access points down the cliffs, the road to Alkerden Lane and play areas.</p>	<p>This corridor has been incorporated within the Implementation Framework, providing a minimum of 15m width at limited points within the corridor. An additional clause has been added on the landscape section for Eastern Quarry to reaffirm this requirement</p> <p>Proposed changes:</p> <p>Page 111: Insert new reference :</p> <p><i>'Ecological corridors to be established running east to west along the northern boundaries of the site, to a minimum width of 15m and connected to the city-wide garden grid.'</i></p>	<p>The proposed changes are welcome. Nonetheless, there is a concern about impact on the biodiversity corridor from conflicting development such as road accesses.</p> <p>With these changes, the Framework appears to be compliant with the Core Strategy. However, there is insufficient clarity to have certainty that a planning application would be compliant with the Development Plan policy because of potential fragmentation.</p> <p>Consideration will need to be had at the planning application stage that a coherent biodiversity corridor is provided.</p> <p>The primacy of the Development Plan and its objectives is therefore important to emphasise.</p>
<p>The north-south ecological corridor/green space to the east of Southfleet Road appears to have been lost on the Framework plans.</p>	<p>The current location is impacted by the Paramount access road.</p>	<p>The Framework plan does not show this access road rather that the ecological corridor is impacted on by development.</p> <p>It is accepted that a wide open space would be difficult to deliver but a stepping stone ecological corridor should be provided through the development.</p> <p>The Framework appears to be compliant with the Core Strategy. However, there is insufficient clarity to have certainty that a planning application would be</p>

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		<p>compliant with the Development Plan policy objectives because of potential fragmentation of biodiversity corridors.</p> <p>Consideration will need to be had at the planning application stage for provision of a stepping stone north-south ecological corridor to the east of Southfleet Road.</p>
<p>The southern east-west ecological corridor to Eastern Quarry seems to be eroded and broken by high density development</p>	<p>This corridor has been planned for and shown within the Implementation Framework, providing a minimum of 15m width, and at limited points within the corridor. An additional clause has been added on the landscape section for Eastern Quarry to reaffirm this requirement.</p> <p><i>Proposed changes:</i></p> <p>Page 111:</p> <p><i>'Ecological corridors to be established running east to west along the northern and southern boundaries of the site, connected to the city-wide garden grid.'</i></p>	<p>The proposed changes are welcome. Nonetheless, there is a concern about impact on the biodiversity corridor from conflicting development such as road accesses.</p> <p>The Framework appears to be compliant with the Core Strategy. However, there is insufficient clarity to have certainty that a planning application would be compliant with the Development Plan policy objectives because of potential fragmentation of biodiversity corridors.</p> <p>Consideration will need to be had at the planning application stage to provision of a coherent biodiversity corridor which is not fragmented by hard structures such as roads.</p>
<p>Swanscombe Peninsula</p> <p>No details have been provided for Swanscombe Peninsula in the Implementation Framework with instead the position being reserved for the entertainment resort NSIP application. Concerns raised that an application is still to be made with regard to this proposal and as a result of the blanket designation of the area, the</p>	<p>The current Framework document does already make extensive reference to the ecological issues and opportunities of the peninsula:</p> <p>Page 24 and 27 provides a summary of the Core Strategy requirements, and opportunities and constraints or the area.</p> <p>Ecological enhancements are referenced throughout Section</p>	<p>This additional text is welcomed to acknowledge the issues with the A226.</p> <p>The EIF is not considered to be fully compliant with the Development Plan with regard to Swanscombe Peninsula as little detail is provided and not all the policy requirements for this area are shown on the</p>

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<p>issues with regard to this strategic site and the requirements of the Core Strategy are not identified. Such issues include the important ecology in the area and the opportunity for biodiversity enhancement; the narrowness and lack of resilience of the London Road corridor and the potential for a bypass through the site; the lack of separation for Fastrack; and the need for connections to Ebbsfleet. Concern that a lack of acknowledgement of these issues could undermine the Council's and the EDC's position in seeking improvements for any development (including the entertainment resort) coming forward on the Peninsula</p> <p>Does not identify site issues or requirements of Core Strategy, and could therefore undermine DBC and EDC's ability to seek improvements from the development.</p>	<p>4, and our headline vision identifies the peninsula as an 'open estuarine ecological park.'</p> <p>New line added to area guidelines for Swanscombe Peninsula to reference need to upgrade the local road network.</p> <p>Proposed changes:</p> <p>Page 128 : Add additional line within the area guidelines (4th bullet):</p> <p><i>'The capacity and resilience of the A226 and associated local road network is considered, together with the provision of dedicated Fastrack routes.'</i></p>	<p>Framework eg. Green grid requirements.</p> <p>Officers recommend that this element of the EIF is not endorsed.</p> <p>Given the general lack of detail in the EIF for this site, consideration of any planning proposals should be assessed against the adopted Local Plan, which as the statutory development plan takes primacy over the EIF.</p>
<p>The Tank Site is not indicated as housing (as per the Core Strategy)</p>	<p>Page 126 does reference the 'tank' site on London Road and its allocation.</p> <p>Proposed changes:</p> <p>Page 127: New Caption added to diagram affirming allocation of the Tank for 200 homes.</p>	<p>Noted and welcomed</p>
<p>There are some errors/omissions on the notations for green space and public rights of way, footpaths, cycle ways on the area outside the EDC area and it is not made clear in the Framework that these areas are not covered by the</p>	<p>Proposed changes:</p> <p>Page 67 : Diagram titled amended to state</p> <p><i>This diagram provides a starting point for a walking and cycling strategy for</i></p>	<p>The plans are still not considered fully representative or accurate on the areas outside of the EDC boundary.</p> <p>Information about networks outside the EDC area is not</p>

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Framework. It is suggested that it is made clear these are illustrative and the Framework only relates to the EDC area	<i>Ebbsfleet, showing the principal networks within the EDC urban regeneration area, and how these relate to existing rights of way, bridle paths and cycle paths in Gravesham and Dartford.</i>	endorsed by officers. Consideration must be given to how networks within the EDC area relate to those across its boundary at the planning application stage.
The road network shown on the masterplans and other diagrams is not consistent across the plans	Proposed changes: Reviewed and updated to improve consistency of mapping of road network across document.	Noted
The walking and cycling diagram fails to show all the connections and links outside the EDC area and also fails to show existing public rights of ways within the EDC area and requirements for routes in the planning permissions granted.	Proposed changes: Page 67 walking and cycling strategy diagram updated using PDF provided and the KCC GIS to show all public footpaths / bridle paths etc within the area shown. The diagram is intended at this scale to demonstrate the networks rather than provide an accurate map of rights of way. EDC propose to co-develop with GBC / DBC and KCC a walking and cycling strategy for Ebbsfleet, which would be the basis for a more detailed mapping of rights of way.	Noted and the co-ordination of a wider walking and cycling strategy is welcomed. The plans are much improved but still do not show all the routes required by the planning permissions granted in the EDC area(e.g. connection of DS20 north-south) and are still not considered fully representative on the areas outside of the EDC boundary. Information about networks outside the EDC area is not endorsed by officers. Consideration must be given to how networks within the EDC area relate to those across its boundary at the planning application stage.
The plans in the document are quite small and the keys are not always fully comprehensive such that it is difficult to assess the	The EDC is printing off larger plans but at the time of writing this report they had not been provided to officers.	Reserve comment pending consideration of the large scale plans

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proposals fully. In addition, some of the plans do not fully match across the document with regard to road, pedestrian and cycle network.		
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Further detailed issues for consideration

3.15 The EIF sets out parking standards for new residential development (p.70) which the document advises is to encourage modal shift and reduce congestion on roads. The standards set out in the EIF are:

- 1 and 2 bed flats: zero parking where within 400m of public transport nodes
- 1 and 2 bed houses: 0.75/1 space per unit within 400m of public transport node.
- 3 bed houses: 1 space;
- 4 bed houses: 2 spaces.

The DBC adopted Parking Standards Supplementary Planning Document (SPD) requires higher levels of parking provision for 1-3 bedroom dwellings. It allows for reduced parking provision on a site by site basis, however, this must be based on evidence to justify the specific circumstance and be supported by transport assessment and management of the reduced parking provision. (paragraph 4.4 of the SPD). Paragraph 4.9 (1) of the SPD advises that on large schemes developers should set out an overall approach to parking at an early stage. Paragraphs 4.10 and 4.11 of the SPD set out what the Council considers should be covered by Parking Management Strategy, such as parking enforcement, Traffic Regulations Orders (TROs), private parking management and requires the developer to fund the cost of these. Although suggesting lower standards, the EIF does not set out any caveats or requirements which might mitigate lower levels of parking provision, such as parking management, payment of the costs for introducing parking enforcement, TROs etc.

3.16 Officers have concerns that lower parking standards are being proposed with no regard to a wider parking strategy or management. No reference is made to the requirements of the Council's adopted SPD with regard to these matters. The objective of encouraging modal shift away from car use is supported. However, officers consider this needs to be part of a holistic approach with good public transport services in place, good cycling facilities, and easy walking distances to main community facilities, an effective parking strategy and management and additionally access to car club vehicles or similar.

3.17 It is considered that the proposed standards are not compliant with Dartford Council's policy framework as set out in the Parking Standards SPD. This formal planning policy document has significant weight in the consideration of development proposals. This SPD allows for reduced parking standards where these can be justified and where appropriate mitigations are in place.

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In addition to the comments set out in Table 1, officers consider that the EDC should be informed that the Parking Standards SPD should be the starting point for consideration of parking provision as part of planning applications and policy contained therein should not be overridden without adequate justification.

Conclusion

- 3.18 The Ebbsfleet Implementation Framework is welcomed as it provides clarity with regard to the integrated masterplanning of the whole of the EDC area.
- 3.19 The EDC has requested that the Council endorses the EIF as consistent with the Development Plan, so that the EIF can be used as a material planning consideration. It is considered that for the most part, the EIF is compliant with the Local Plan and would generally assist in implementing the Council's objectives. However, Officers are concerned that there are some elements of the EIF that are not consistent with the Development Plan and could undermine specific objectives.
- 3.20 Conflicts with the Local Plan and the Council's objectives were identified in the Cabinet report of 27 October 2016 and forwarded to the EDC for consideration. Unfortunately, the EDC responded to these concerns too late to allow for further discussion and resolution of these concerns. In these circumstances, Officers recommend that the EIF is endorsed as guidance for pre-application discussions with developers and a material consideration in determining planning applications, with the caveat that Dartford's Local Plan and Supplementary Planning Documents are acknowledged as having primacy over the EIF where there is a conflict between the documents and also as the starting point for a comprehensive identification of policy requirements. Specific elements of the EIF which have been identified in Table 1 as being non-compliant include the following issues:
- Amendments to the currently consented highway network and means of access. (Alternative routes may be possible but subject to demonstration through appropriate transport assessment that they are satisfactory)
 - Lack of evidence that useable formal and informal recreation space can be provided within the land identified for open space. (Any changes to the requirements of the planning permissions as approved with regard to scale and usability of formal and informal recreation space should be justified on basis of deliverability, need and access to facilities)
 - Biodiversity corridors which appear to be fragmented by hard structures such as roads, development and conflict with other uses.
- 3.21 The EDC should be advised that applicants be made aware of these issues at the pre-application stage. Furthermore, applicants should be advised to undertake their own assessment of compliance with the Development Plan when preparing proposals and to ensure that requirements and criteria

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which are not covered by the EIF are nonetheless addressed. Council officers will be able to advise on Local Plan requirements and seek to assist in resolving any issues of non-compliance, where they are involved in discussions on planning proposals.

- 3.22 Officers would recommend that if Members are minded to endorse the EIF it is made clear that this does not imply the acceptability of some of the proposals or information outside of the EDC area.

4. Relationship to the Corporate Plan

- 4.1 To ensure that regeneration in Dartford is sustainable and of benefit to all our communities.

5. Financial, legal, staffing and other administrative implications and risk assessments

Financial Implications	None
Legal Implications	None
Staffing Implications	None
Administrative Implications	None
Risk Assessment	None

6. Details of Exempt Information Category

Not applicable

7. Appendices

None

BACKGROUND PAPERS

<u>Documents consulted</u>	<u>Date / File Ref</u>	<u>Report Author</u>	<u>Section and Directorate</u>	<u>Exempt Information Category</u>
Ebbsfleet Implementation Framework (full reference)		S Bunn	Planning	N/A