

For office use only Consultee ID: Agent ID: Date Received: :	
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Dartford Local Plan Pre- Submission (Publication) February 2020 Town and Country Planning (Local Planning) England Regulations 2012 – Regulation 19

Representation Form

Representations on the Dartford Local Plan should be submitted by **4pm on Friday 9 April 2021. Late representations will not be accepted.**

Representations should be made using this form and submitted to Dartford Borough Council by email to localplan@dartford.gov.uk or sent to: Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR.

Advice on how to make representations is provided in the guidance notes which accompany this form. You are strongly advised to read the guidance notes before completing this form.

This form comprises 3 parts:

- Part 1: Your details
- Part 2: Your representation(s). Please fill out a separate sheet for each representation you wish to make. However, only fill in Part A once and send all representations in together.
- Part 3: Declaration

If you have any queries about this consultation, please contact the Planning Policy Team by emailing localplan@dartford.gov.uk or by phoning 01322 343213.

Part 1: Your details

	1. Personal details	2. Agent details (if applicable)
Title		
Name		
Organisation / group		
Address 1		
Address 2		
Address 3		
Postcode		
Telephone number		
Email address		

If you are replying on behalf of a group, how many people does it represent?

Part 2: Representation

For office use only Consultee ID: Agent ID: Date Received: :	
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Please use a separate sheet for each representation

Name or Organisation:	
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1. To which part of the Local Plan does this representation relate?

Paragraph:

Policy:

Policies Map:

2. Do you consider the Local Plan is:

Please select the boxes as appropriate

- | | | |
|---|-----|----|
| (1) Legally compliant | Yes | No |
| (2) Sound | Yes | No |
| (3) Complies with the
duty to co-operate | Yes | No |

3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 3 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing sessions(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they may wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Part 3: Declaration

Data Protection

The personal information you provide on this form will be processed in accordance with the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004, and may be used by the Council to contact you, if necessary, regarding your submission. Under Regulation 22, we have a duty to send all representations to the appointed Planning Inspector. Your name, organisation name (if relevant), comments and town/parish of residence will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

Declaration:

By completing this form and ticking this box:

I agree to my name, organisation, town/parish of residence and representations being made available for public inspection.

Date:

Signed (print name):

Dartford Local Plan to 2037 Pre-Submission Document February 2021

Response from CPRE Kent

1. Introduction

We are CPRE, the countryside charity. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected environmental groups in England, with over 40,000 members and supporters living in our cities, towns, villages and the countryside. CPRE Kent is the largest of the CPRE County branches with over 2,300 members, including 150 parish councils, civic societies and other Kent organisations and companies.

We believe that the planning system is a toolbox for achieving better – for people, nature and the economy – while supporting the delivery of more badly-needed homes to end the housing crisis.

In general, CPRE Kent supports a development strategy which meets the following criteria:

1. Brownfield first, especially in urban areas and not in rural areas where it would result in unsustainable patterns of development
2. Development should result in sustainable communities
3. Provision in rural areas where there is an identified local need and the scale of development is appropriate for the size of the settlement
4. The plan should promote development in locations:
 - a. That are well supported by, or that will support, sustainable transport and active travel.
 - b. That are well served by regular public transport services and social and community facilities, that are in safe walking and cycling distance or would support, or result in, a sustainable settlement. Such routes need to feel safe, be well lit, especially for children and women who have to use them after dark – otherwise cars will be the preferred mode of transport.

Overall, it is our position that local planning authorities should seek to ensure that the impact of development on the countryside, both directly and indirectly, is kept to a minimum and that development is sustainable in accordance with national planning policy.

Our Detailed comments are as follows:

Para / Policy	Page	Comment
1.35 Borough Vision Dartford Town Centre	18	<p>Whilst we welcome much of the aspirations contained within the vision, it should be noted that, with Dartford town located on the north-western side of the Borough, the M25 and Dartford Crossing Approach Road separates the town from the eastern part of the Borough. This is coupled with the fact delays on the Crossing can make travel to the town centre difficult from the eastern parishes and that communities such as Swanscombe and Southfleet are as close to Gravesend as Dartford and to Bluewater.</p> <p>The consequence is that Dartford's Towns role as the community heart of the Borough risks being eroded further given Bluewater's role and future aspirations for the area around Ebbsfleet Station.</p>

		<p>For example Policy E1.2 refers to a new urban heart at Ebbsfleet Central. We are also concerned that if London Resort is consented, Dartford Towns role will become yet further eroded.</p> <p>We would therefore encourage a further strengthening of wording to ensure Dartfords towns role is protected and enhanced for future generations to come.</p> <p>We consider that these points may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: The modifications suggested will ensure the plan is positively prepared so as to be consistent with achieving sustainable development and justified as an appropriate strategy.</p>
2.2 G1	20	<p>This objective seeks to recognise and respect green assets. The plan will need to take into account Natural England’s recent designation of Swanscombe Marshes and land to the south as SSSI.</p> <p>This is to ensure the plan is legally compliant.</p>
2.2 G4	21	<p>This objective promotes biodiversity net gain. The plan will need to take into account Natural England’s designation of Swanscombe Marshes and land to the south as SSSI.</p> <p>This is to ensure the plan is legally compliant.</p>
Policy S1: Borough Spatial Strategy	26	<p>We strongly support the overall sentiment of this policy and in particular the emphasis upon the reuse of brownfield land and damaged and despoiled land allocated.</p>
Policy S1: Borough Spatial Strategy paragraph 5.	26	<p>This refers to protecting designated sites of biodiversity value. The plan will need to take into account Natural England’s designation of Swanscombe Marshes and land to the south as SSSI.</p> <p>This is to ensure the plan is legally compliant.</p>
Policy S1: Borough Spatial Strategy paragraph 7 a) Economic Strategy.	27	<p>Land at Manor Way, Swanscombe supports a range of smaller local businesses and should be supported by the plan.</p> <p>We would therefore recommend this be referenced within the wording of this policy.</p> <p>We consider that this may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: The modifications suggested will ensure the plan is positively prepared so as to be consistent with achieving sustainable development and justified as an appropriate strategy.</p>

2.18	30	<p>CPRE Kent strongly agree that infrastructure must be front loaded and provided early on in regenerating areas.</p> <p>The Maidstone Borough Local Plan Review Scoping Themes and Issues Consultation July 2019 at Issue 12 stated ‘Research has shown that travel habits develop very quickly in new developments and once people have chosen their travel mode, they tend to stick to it.’ This was an approach pursued by Dartford Borough Council in connection with the provision of Fastrack A at The Bridge.</p> <p>This approach has unfortunately not been forthcoming at Castle Hill where the Fastrack route from Ebbsfleet Station to Bluewater has still to be provided. Pedestrians walking or cycling from Castle Hill to Ebbsfleet Station have until this week had to cross Southfleet Road without the benefit of a crossing.</p>
2.27	32	<p>CPRE Kent fundamentally disagree with the Lower Thames Crossing proposal.</p> <p>We are of the view that additional capacity here or the Dartford Crossing was unacceptable in terms of longer-term induced traffic growth, congestion and reduction in air quality.</p> <p>Much of the traffic using the channel crossing has its UK origins or destinations in places remote from Kent, such as the Midlands. This results in the fundamentally unsustainable position of facilitating and encouraging the unconstrained growth of road-borne traffic and we suggested that full consideration be given to dispersing this traffic to other modes and ports of access.</p> <p>The CPRE report <i>The end of the road? Challenging the road building consensus</i>, March 2017 [https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus] reveals that road-building is failing to provide the congestion relief and economic boost promised, while devastating the environment. It directly challenges government claims that ‘the economic gains from road investment are beyond doubt’; that road-building will lead to ‘mile a minute’ journeys; and that the impact on the environment will be limited ‘as far as possible’. The report shows how road building over the past two decades has repeatedly failed to live up to similar aims.</p> <p>Soundness reason: The wording as suggested is promoting unsustainable development and therefore is not considered to be positively prepared or consistent with the NPPF policies on sustainability.</p>
Policy S2: Infrastructure	34	<p>The wording should also support safe walking and cycling routes. These should be lit (to be safe for women, children and young</p>

<p>Planning Strategy paragraph 2</p>		<p>people) and have firm surfaces. It would be helpful to amend the text accordingly to be consistent with Policy M17 3c).</p> <p>We would recommend amending the second sentence to read: 'Development will be located where well served by public transport, and in safe and secure walking and cycling distance of local facilities '</p> <p>And the penultimate sentence to read: 'All major development will feature significant measures to provide improved safe and secure walking and cycling routes integrated with the surrounding area.'</p> <p>We consider that this may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: The modifications suggested will ensure the plan is positively prepared so as to be consistent with achieving sustainable development and justified as an appropriate strategy.</p>
<p>Policy S2: paragraph 4 c)</p>	<p>34</p>	<p>We strongly object to the notion opportunities to achieve highway and junction upgrades should be "maximised" as would be the outcome the current policy wording.</p> <p>The CPRE report The end of the road? Challenging the road building consensus, March 2017 [https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus]</p> <p>finds that major new roads increase traffic above the general traffic increases for their areas, with traffic increases of up to 47% over 20 years.</p> <p>It is also the case that by not fully taking into account induced traffic, the benefits and costs of a new road will not be accurately calculated and the full environmental impact of the scheme will be underestimated. Even if induced traffic is forecast correctly, it will still cause damaging environmental impacts and extra congestion that make building big new roads more pointless than ever.</p> <p>We therefore object to the inclusion of subsection c) within paragraph 4 and request that it be deleted.</p> <p>We would only accept alternative wording that recognises road building will be regarded as the option of last resort and that all other possible alternatives, including non-road-building options and making more efficient use of existing infrastructure, have been fully considered.</p> <p>Soundness reason: The wording as suggested is promoting unsustainable development and therefore is not considered to be</p>

		positively prepared or consistent with the NPPF policies on sustainability.
Policy S3: Climate Change Strategy	38	<p>The policy would benefit from supporting the provision of inclusion of Miyawaki forests (mini-forests of around an acre in size) in the larger allocations, and where appropriate in the urban area as they help boost bio-diversity and carbon sequestration. (Fast-growing mini-forests spring up in Europe to aid climate Trees and forests The Guardian).</p> <p>We consider that this may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: The modifications suggested will ensure the plan is positively prepared so as to be consistent with achieving sustainable development and justified as an appropriate strategy.</p>
Policy S3: Climate Change Strategy paragraph 3	39	<p>CPRE believe the planning system should help tackle the biodiversity crisis. This means better protecting species and our most important habitats, with no reduction in the current level of protection, and positively supporting nature’s recovery from freefall decline by identifying new Highly Protected Areas and Nature Recovery Areas and strategically planning ‘nature recovery areas’.</p> <p>At the same time, the UK’s wildlife continues to decline. Since the 1970s, there has been a 13% decline in average abundance across wildlife studied and the declines continue unabated. While the biodiversity crisis also has other causes, climate change is a significant contributor, so the two crises are two sides of the same coin, and we must address them together.</p> <p>Therefore, and whilst we support the priority to protect and enhance existing features of biodiversity interest, we would encourage Dartford to go further than this and commit to putting a principle of a 20% increase in biodiversity net gain within this strategic policy. This approach is being supported by a number of other Kent Councils</p> <p>The plan will need to take into account Natural England’s recent designation of Swanscombe Marshes and land to the south as SSSI needs to be taken into account.</p> <p>We consider that this may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: The modifications suggested will ensure the plan is positively prepared so as to be consistent with achieving sustainable development</p>

<p>Policy S3: Climate Change Strategy Sustainable design and technology</p>	<p>38 and 39</p>	<p>There is no reference to the provision of electric car charging points at new development. We therefore suggest that the wording be amend so as to include reference to this.</p> <p>We consider that this may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: The modifications suggested will ensure the plan is positively prepared so as to be consistent with achieving sustainable development</p>
<p>2.43</p>	<p>40</p>	<p>We recognise and support the statement that the scale of development is unlikely to be maintained and sustainably accommodated over a long period within the Borough. Failure to recognise this would create yet further unacceptable pressure upon the Green Belt.</p> <p>Consideration should therefore be given to the extent that future residential development should be curtailed to allow sufficient land to meet future locally generated housing need.</p> <p>Soundness Reason: The modifications suggested will ensure the plan is positively prepared so as to be consistent with achieving sustainable development and justified as an appropriate strategy.</p>
<p>2.50</p>	<p>42</p>	<p>It is noted that the 2020 Affordability Ratio for Dartford is now 8.57%, a reduction of 0.66% against the is lower than the 2019 figure. This means that the objectively assessed need for the Borough is 750 dwellings a year.</p> <p>As this is 40 dwellings less a year rolling forward from 2021, the total housing requirement across the remaining 15-year plan period should now be reduced by 600 units.</p> <p>This approach would be prudent as it will help manage existing permissions, increase resilience with respect to the five-year land supply position and housing delivery test requirements across future years and safeguard the Green Belt.</p> <p>We consider that this may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: The modifications suggested will ensure the plan is positively prepared so as to be consistent with achieving sustainable development, justified as an appropriate strategy and consistent with NPPF policies regarding housing need.</p>
<p>Policy S4: Borough Development Levels Paragraph 6.</p>	<p>45</p>	<p>The housing provision includes 2,177 homes at Ebbsfleet Central. Natural England has designated the site an SSSI which if confirmed will influence the scale of housing, if any, that can be provided.</p> <p>This is to ensure the plan is legally compliant</p>

4.7	76	<p>The reference to Swanscombe Peninsula needs to be updated to take account of Natural England’s designation of Swanscombe Marshes and land to the south as an SSSI.</p> <p>This is to ensure the plan is legally compliant</p>
4.16	80	<p>Developments that require the provision of social and community facilities such as shops or doctor’s surgery should be encouraged to provide them early on in the development. This will help encourage sustainable travel patterns as well as supporting the new community. Where it is not possible to deliver the building developers should be encouraged / required to provide temporary facilities until permanent buildings are built. This was an approach used at Temple Hill Square for the medical practice.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared</p>
Policy E1: Ebbsfleet Garden City Strategy section 4 f)	82	<p>The section will need take account of Natural England’s designation of Swanscombe Marshes and land to the south as an SSSI.</p> <p>This is to ensure the plan is legally compliant.</p>
4.26	84	<p>The Institute of Highways and Transportation: Guidelines for Providing for Journeys on Foot 2000 at paragraph 3.30 provides the following guidance on acceptable walking distances: ‘Approximately 80% of walk journeys and walk stages in urban areas are less than one mile. The average length of walk journey is one kilometre (0.6 miles). This differs very little by age and sex and has remained constant since 1975/76. An average walking speed of approximately 1.4m/s can be assumed which equates to approximately 400m in five minutes or three miles per hour. The situation of people with mobility difficulties must be kept in mind in applying any specific figures.’</p> <p>Many parts of Swanscombe are a long walking distance from Ebbsfleet International Station and Fastrack stops on London Road beyond a kilometre. The footpath to Ebbsfleet Station undulates and is not suitable for wheelchair users.</p> <p>It would be helpful to support services like Arriva Click for residents who do not live within close, easy walking distance of Ebbsfleet Station or Fastrack.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies on sustainability</p>
Policy E3: Swanscombe section 3	85	<p>Swanscombe railway station is only accessible via long flights of steps and cannot be used by everyone. The use of the phrase ‘ensure where possible’ will not necessarily result in the improvements needed to enable Swanscombe railway station to be upgraded and be used by all members of the community. If the Council wishes to encourage greater travel by public transport this will require the station to be upgraded.</p>

		Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies on sustainability
4.31	87	The land identified for the Ebbsfleet Central Major Park has been designation by Natural England as an SSSI and this will need to be taken into consideration. This is to ensure the plan is legally compliant.
4.39	93	CPRE Kent does not support the London Resort proposal.
Policy E6: Land North of Swanscombe Area Section 2 a) and d)	96	Swanscombe Peninsula has been designated an SSSI by Natural England and this will need to be given greater weight by the policy. This is to ensure the plan is legally compliant.
Policy E6: Land North of Swanscombe Area Section 2 f)	96	It will also be important to ensure that open views across the area from localities such as Ingress Park, Swanscombe and Northfleet are safeguarded.
DM Policies		
5.7	98	Whilst we commend the best examples of design within the Borough, we would encourage the Council to also look to the best examples of design beyond its administrative boundary.
Policy M1 Good Design for Dartford	101	1 d). With regard to pedestrian and cycle linkages the wording should also require safe walking and cycling routes. These should be lit (to be safe for women, children and young people) and have firm surfaces. It would be helpful to amend the text accordingly to be consistent with Policy M17 3c). See comment on S2 above. We consider that this may be adequately addressed through modification of the current wording. Soundness Reason: This is to ensure the plan is positively prepared.
5.20 and Policy M2 Environment and Amenity Protection 1 a).	103	The Dartford area has some of worst air quality in South East. It will be important that development individually and cumulatively does not make matters worse in within or adjacent to existing AQMAs and does not result in the creation of new AQMA. Active travel and public transport needs to be prioritised and supported by new developments. Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies on sustainability
5.20 and Policy M2 Environment and Amenity Protection		There is no policy protecting intrinsically dark landscapes.

		<p>NPPF paragraph 180(c) requires local plans to limit the impact of light pollution from artificial light on local amenity and intrinsically dark landscapes.</p> <p>The southern part of the Borough in the Green Belt has darker skies where such a policy approach would be appropriate to safeguard that which remains. The CPRE Dark Skies map can be found at: https://www.nightblight.cpre.org.uk/maps/</p> <p>Policy M2 could be expanded to address this current non-conformity with the NPPF.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF paragraph 180.</p>
5.32	107	<p>Given the significance of the water scarcity issue, CPRE Kent are firmly of the view all new developments should play their part in addressing the issue. This would include uses such as hotels, places of employment and education and should be made explicit within the text.</p> <p>We consider that this may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies on sustainability</p>
5.34	108	<p>Given the scale of development at Ebbsfleet Garden City, we would recommend requiring residential schemes of less than 100 link into any low / zero carbon technologies promoted by EDC where it is appropriate and feasible to do so.</p> <p>We would also recommend policy protection to ensure against the subdivision of sites into under 100 homes to avoid the requirement.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies on sustainability</p>
5.66 and Policy M8 Housing Mix section paragraph 2.	126	<p>CPRE Kent would like the case made for all homes to be made accessible.</p> <p>This should be a basic requirement, not only so that people can stay in their homes longer, but so that people of reduced mobility are afforded the same opportunities to visit families and friends as the more able.</p> <p>We therefore strongly consider this to be a basic Equalities issue and would encourage and call upon all Councils to view it the same.</p>

<p>Policy M9 Sustainable Housing Locations paragraph 2b)</p>	<p>131</p>	<p>The wording should also support safe walking and cycling routes. These should be lit (to be safe for women, children and young people) and have firm surfaces. It would be helpful to amend the text accordingly to be consistent with Policy M17 3c).</p> <p>Amend 2b) to read: 'It is within easy, safe and secure, walking distance and is well located in respect to safe and secure walking/cycling</p> <p>See comments on Policy S2</p> <p>We consider that this may be adequately addressed through modification of the current wording.</p> <p>Soundness reason: The wording as suggested is promoting unsustainable development and therefore is not considered to be positively prepared or consistent with the NPPF policies on sustainability.</p>
<p>5.86</p>	<p>132</p>	<p>Note that in the south of the Borough (villages within the Green Belt) much larger gardens should be delivered. There is the risk that will result in larger homes (4+ bedrooms) and may not provide affordable private housing for people who need or want to live in a rural location.</p>
<p>M10: Residential Amenity Space</p>	<p>134</p>	<p>COVID19 has shown the importance of public open space, especially for people / families that do not have access to a private garden. It will important that public open space is provided that is sufficient to meet the needs of people in flatted developments and provided early on in the development.</p>
<p>Policy M14 Green and Blue Infrastructure and Open Space Provision</p>	<p>151</p>	<p>COVID19 has shown the importance of public open space, especially for people / families that do not have access to a private garden. It will important that public open space is provided that is sufficient to meet the needs of people in flatted developments and provided early on in the development.</p>
<p>Policy M14 Green and Blue Infrastructure and Open Space Provision paragraph 3b)</p>	<p>151</p>	<p>The wording should also support safe walking and cycling routes. These should be lit (to be safe for women, children and young people) and have firm surfaces. It would be helpful to amend the text accordingly to be consistent with Policy M17 3c).</p> <p>Amend 3b) to read: 'Where development Like for like re-provision must be delivered within easy, safe and secure, walking distance of the site,'</p> <p>We consider that these points may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies</p>
<p>5.126</p>	<p>152</p>	<p>Since publication of the Pre Submission Plan Natural England has designated Swanscombe Marshes and land in the Ebbsfleet Valley</p>

		<p>as an SSSI. The plan: its strategy and development management policies will need to take this into consideration.</p> <p>This is to ensure the plan is legally compliant</p>
5.130	154	<p>Since publication of the Pre Submission Plan Natural England has designated Swanscombe Marshes and land in the Ebbsfleet Valley as an SSSI. The plan: its strategy and development management policies will need to take this into consideration.</p> <p>This is to ensure the plan is legally compliant</p>
Policy M15 Biodiversity and Landscape	157	<p>The policy would benefit from supporting the provision of inclusion of Miyawaki forests (mini-forests of around an acre in size) in the larger allocations, and where appropriate in the urban area as they help boost bio-diversity and carbon sequestration. (Fast-growing mini-forests spring up in Europe to aid climate Trees and forests The Guardian).</p> <p>At paragraph 3a) consideration should be given to requiring at least one tree for every new home.</p> <p>At paragraph 3a) and 4 there should be a requirement for trees planted to be replaced where they die or are vandalised.</p> <p>See comment on policy S3.</p> <p>We consider that these points may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies on sustainability.</p>
5.145		<p>The wording should also support safe walking and cycling routes. These should be lit (to be safe for women, children and young people) and have firm surfaces. It would be helpful to amend the text accordingly to be consistent with Policy M17 3c).</p> <p>We consider that these points may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies</p>
Policy M16 Travel Management	162	<p>The policy should promote and support initiatives such as:</p> <ul style="list-style-type: none"> • Car club : short-term car rental services that allow members to locally parked cars and pay by the minute, hour or day. These are an alternative model to private car ownership for individuals and businesses and reduce the need for private parking. • Public bicycle hire scheme, such as in London.

		<p>We consider that these points may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies on sustainability.</p>
<p>Policy 17 Active Travel, Access and Parking paragraph 5a)</p>		<p>Whilst supporting the approach it will be important to ensure that the type of charging point provided enables speedy charging and that sufficient charging points are provided.</p> <p>7kW EV charge points are OK for domestic purposes. They are ‘trickle chargers’ which means a vehicle will take 6-8 hours to charge. However:</p> <ul style="list-style-type: none"> • In commercial settings ie at business parks and shopping centres (where you may be calling in to re-charge mid-journey, or because you don’t have a charge point at home) the chargers need to be faster (40 minutes) otherwise they are useless. This means at least 50kW charge points. • If the plan intends to be ‘radical’ as stated it needs to be more aspirational in terms of EVs and include future proofing for 150kW charge points, or the 300kW charge points at petrol stations (the 5-minute charge). <p>With regard to one charge point per dwelling. Is there evidence that this is the right level of provision? Whilst this may be reasonable for urban developments, it may not be appropriate for homes in a more rural area with public transport that doesn’t get you to work or school on time. In such instances 2 or even 3 charge points may be required.</p> <p>It is noted that charging points have been provided for flats at Ebbsfleet Green and there would be no reason for this approach not to be promoted in new development elsewhere in the Borough.</p> <p>We consider that these points may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies on sustainability.</p>
<p>Policy M18 Community Uses paragraph 1c)</p>	<p>167</p>	<p>Whilst supporting the approach it should be clear that this includes convenience shops. It is an important approach for the major developments such as at Ebbsfleet Garden City. Chafford Hundred in Essex (a scheme for 6,000 homes) provided doctor and convenience shop in portacabins from very early days in the development. This helped create sustainable journeys and community cohesion. In Dartford a doctor’s surgery was provided in a portacabin until the surgery was completed and available.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies on sustainability.</p>

5.165 and 5.166	169	<p>COVID 19 and the resulting lockdown has resulted in greater numbers of office workers working from home. A number of major employers are considering their future need for office space. This may affect demand within Dartford town centre. The same is likely to be true for Ebbsfleet Central.</p> <p>London Resort, if permitted, will provide a significant number of jobs. If this happens the plan’s employment strategy will need reconsidering to ensure that the local economy is not overheated. [For information the planning permission for the sites around Ebbsfleet Station provided for some 16,000 jobs and London Resort 48,000 in the wider area].</p>
Table 7 Role of Retail Centres	171	<p>It is noted that a hotel is identified at Bluewater even though one has not been built. It would be helpful to add an asterisk after ‘hotel’ to indicate that it has not yet been built.</p> <p>It is also noted that Ebbsfleet Central is identified as a District Centre and Local Centre. The Key Diagram (Diagram 1 page 25) shows it as a District Centre. Is this in error?</p> <p>We consider that this may be adequately addressed through modification of the current wording.</p>
Policy M22 Bluewater paragraph 2d)	182	<p>Some types of recreational provision could be in direct conflict with the parkland’s setting as a biodiversity resource as shown by the recent withdrawn application for the use of the Nature Trail Lake. It will be important that the biodiversity and nature conservation value of the parkland setting is not lost. The wording should be amended to read:</p> <p>The parkland setting is maintained and enhanced as a recreational and biodiversity resource and as flood risk mitigation. Recreational use may be permitted where this does not conflict with the biodiversity resource.</p> <p>We consider that these points may be adequately addressed through modification of the current wording.</p> <p>Soundness Reason: This is to ensure the plan is positively prepared and consistent with the NPPF policies</p>
Table 11 Triggers for Local Plan Review and Reporting Dates	192	<p>For the London Resort development proposal the trigger is given as ‘on construction of first significant phase’. This would seem to be too late given the scale of the project and the implications for the Borough and wider area. Should London Resort be permitted a partial review would need to commence immediately after the decision. This would be in line with the trigger for ‘Substantial new railway infrastructure for the north Kent Line.’</p> <p>Confirmation of the Ebbsfleet Valley SSSI and its implication for the provision of housing at Ebbsfleet Central will require an early review of the Plan.</p>

		<p>See comment on SHLAA 2020/21 below.</p> <p>This is to ensure the plan is legally compliant.</p>
SHLAA 2020/21 Appendix D: Phased Housing Land Supply	50	<p>The Appendix identifies land in the Ebbsfleet Valley (Site Ref 1 Ebbsfleet Central). This includes land that Natural England has now designated SSSI. The site provides for 2,177 homes. The plan may need amending if the SSSI designation is upheld.</p> <p>This is to ensure the plan is legally compliant.</p>
SHLAA 2020/21 Appendix D: Phased Housing Land Supply	50	<p>We have concerns regarding the peaks and troughs within the housing trajectory. Firstly, with the current standard method effectively baking in current and recent past levels of housing delivery, peak years of housing delivery risk incorrectly distorting future housing needs unduly upwards.</p> <p>Secondly, with the Housing Delivery Test only looking back over 3 years of past delivery, the Council may find itself unfairly penalised through the failure of the test where there has been a year or more of entirely planned for lower levels of development.</p>