1. Summary

1.1 On 31 March 2006 the South East England Regional Assembly submitted a draft South East Plan to Government and published the document for public comment.

1.2 This report presents a summary of the main points of the Consultation Document, and suggests a response.

2. RECOMMENDATIONS

2.1 That the Council thanks the South East England Regional Assembly for the opportunity to comment on the draft plan submitted to Government.

2.2 That Examination in Public Panel Secretary be informed that this Council

1) Agrees to work towards the housing target set out for Dartford, in the South East Plan, subject to arriving at a suitable level of commitment between the implementing agencies (including Government Departments) for a programme for the effective management of transport impacts, arising from the proposed level of housing growth.

2) Seeks a reduction in the minimum level of employment floorspace set out in sub section E paragraph 2.14 to 940,000 square metres.

3) Given the scale of proposed development and emerging water supply issues, that the caveat to Policy KTG1 be widened to make clear that ‘infrastructure’ includes water supply.

4) Objects to the inclusion of Bluewater/Ebbsfleet as a Primary Regional Centre and that a fall back position be adopted by reference in South East Plan Policy TC2 (sub section D9), that the specific roles of these centres is set out in Policy KTG8 (sub section E4).

5) Requests that Ebbsfleet be identified as an International Gateway on Maps T1 and T2.

2.3 That the comments forms attached in Appendix A of this report be submitted to the South East Plan Examination in Public Panel Secretary as the formal response of the Council to the content of the Consultation Document.

2.4 That Cabinet note if there are financial or staffing implications that cannot be managed within existing resources, the costs will be met from the unallocated balance on the Planning Delivery Grant.
3. **Background and Discussion**

3.1. The Draft South East Plan Part 1: Core Regional Policies was published for public consultation in January 2005 and submitted to Government on 29 July 2005. The document did not include district housing figures. The draft plan was reported to Cabinet on 14 April 2005 (minute 392 refers).

3.2. The South East England Regional Assembly (the Regional Assembly), on 13 July 2005, agreed the total housing numbers in each sub-region. These figures were set and were not the subject of separate consultation.

3.3. The Regional Assembly asked the County Council and Medway Council to provide further advice on:

- The broad locations for new employment-generating development, along with employment numbers in Kent Thames Gateway and East Kent & Ashford sub-regions.
- District-level housing allocations within the sub-regions and across the rest of the county based on overall quantities decided by the Regional Assembly in July 2005.
- The critical infrastructure provision required for the level and pattern of growth proposed in Kent Thames Gateway and East Kent & Ashford.

3.4. The advice was submitted to the Regional Assembly in early December 2005. Kent County Council and Medway Council published a consultation document on 5 September 2005, for six weeks. The consultation process included a public meeting at Dartford Civic Centre. The draft employment, housing and infrastructure advice was reported to Cabinet on 27 October 2005 (minute 151 refers).

3.5. The Regional Assembly agreed the final draft of the South East Plan on 1 March 2006.

3.6. The Plan is now on public consultation. The consultation period ends on 23 June 2006. Agreement has been obtained from the South East Plan Panel Secretary, for the Council’s formal views to be submitted after the Cabinet has had the opportunity to consider the Council’s response.

3.7. The Examination Secretariat has requested that responses are submitted using the standard response form. Draft copies of the Council’s response, based on this report, are attached as Appendix A.

**Housing Numbers**

3.8. The submission South East Plan in policy H1 (Housing provision) sets out the level of housing provision that the local authorities should make in their Local Development Documents for the period 2006-2026. The
Dartford Borough figure is 15,700. Of this figure 15,500 should be provided north of A2 within the Kent Thames Gateway sub-region (policy KTG1 Amount and Distribution of Housing Development). Policy KTG1 states that ‘delay in infrastructure, services and employment may reduce the number of dwellings that can be achieved, particularly in Dartford where the quantity is the maximum that can be delivered by 2026.’

3.9. The level of housing provision and the caveat to policy KTG1 fully reflect the Council’s view set out in 27 October 2005 (minute 151).

3.10. The submission South East Plan also requires local authorities to address any under provision of housing in the period 2001-2006. There was a shortfall of 1946 units in the Borough.

3.11. An analysis of available land supply undertaken for the Local Development Framework Core Strategy – Preferred Policy Approaches, reported on this agenda at Item 7, shows that sufficient land can be identified to meet the target figure of 15,700 homes by 2026, and to make up the 2001-2006 shortfall. It should be noted, however, that some of the sites which make up this land supply are not yet available for development.

3.12. It should also be noted that the capacity of Dartford’s transport systems to absorb this level of housing growth, is currently under review. This review is being undertaken for the Kent Thameside area as a whole, and involves representatives of the agencies, which share responsibility for implementing the Thames Gateway Strategy – the Departments of Communities & Local Government and Transport, the Highways Agency, the Kent Thameside Board and the three Local Authorities.

3.13. It is expected that this review will result in a clearer understanding of the role each agency needs to play, to ensure that the planned level of growth can be absorbed, providing the basis for a commitment between the relevant parties to work together to manage the impacts effectively. This will provide a firm foundation upon which the Council can commit to growth suggested in the draft South East Plan.

3.14. In the meantime, in order to protect the Council’s position, it is suggested that the Examination in Public Panel Secretary be advised that the Council agrees to work towards the housing target set out for Dartford, in the South East Plan, subject to arriving at a suitable level of commitment between the implementing agencies (including Government Departments) to a programme for the effective management of transport impacts, arising from the proposed level of housing growth.

Employment Floorspace

3.15. Paragraph 2.14 of the Kent Thames Gateway Sub-region section (E4) sets out the minimum level of business floorspace that should be
provided by the Local Development Framework. This is given as 959,000 square metres. The South East Plan at section E4 paragraph 2.15 requires the Council to treat the figure as the minimum that should be provided for, by the Local Development Framework.

3.16. The figure was based on the County Council’s 2004 Employment Land Survey which is based on allocations and planning consents at 31 March 2004. This figure included the original employment floorspace estimate for Eastern Quarry set out in the adopted planning brief which is higher that the current application. An analysis of the available employment land supply undertaken for the Local Development Framework Core Strategy – Preferred Policy Approaches shows that planning permissions and preferred employment allocations are capable of providing up to 940,000 square metres employment land. It is recommended that Cabinet agree to seek a reduction in the minimum level of employment floorspace set out in Section E4 paragraph 2.14 to 940,000 square metres.

Water Supply

3.17. The Submission South East Plan identifies water supply as an issue. Policy CC2 (Climate Change) seeks to guide strategic development to locations offering greater protection from water shortages and Policy NRM1 (Sustainable Water Resources, Groundwater and River Water Quality Management), requires local authorities in preparing Local Development Documents and determining planning applications to:

"Ensure that the rate and location of development does not lead to unacceptable deterioration of water quality and is in step with current and planned water supply .." as well as to "work with water companies and the Environment Agency to identify infrastructure needs, allocate areas and safeguard these for infrastructure development."

3.18. Significant levels of development are proposed for the Borough in the South East Plan. The Borough is presently subject to a ‘hose pipe ban’ and earlier this month, Thames Water applied for a Drought Order to further restrict use of water by its 5 million customers in London.

3.19. The Council will work with relevant utility companies to ensure that their plans reflect the need to provide new water supply infrastructure, in line with expected growth.

3.20. Given the scale of proposed development and emerging water supply issues, it would be helpful for the caveat to Policy KTG1 to be widened to make clear that ‘infrastructure’ includes water supply (see paragraph 3.8 above). Cabinet is recommended to agree this proposed change.
3.21. The submission South East Plan at Policy TC2 (Strategic Network of Town Centres) identifies Bluewater/Ebbsfleet as a Primary Regional Centre which would be the focus for major retail developments, uses which attract large numbers of people including major cultural, tourism, social and community venues, employment, particularly large scale leisure and office (Class B1a) developments and a range of housing, where possible as part of wider mixed use developments. Submission Policy KTG8 (The Role of the Retail Centres) identifies Bluewater as a centre where limited additional floorspace should be permitted, if it maintains the specialist regional role of the centre for comparison goods shopping. Ebbsfleet is identified for ancillary retail and service space of a scale and character to serve the residential and daytime population. The reason given by SEERA in Pre-submission Consultation Statement that accompanies the submission plan is that:

“Bluewater/Ebbsfleet is designated as a town centre based on the potential for combined development of retail/service space at Ebbsfleet, regional retail space at Bluewater and housing development at Eastern Quarry. Policy TC2 and KTG8 are consistent, with TC2 defining the regional network of town centres and deferring the specification of the role of the retail centres to KTG8.”

The submission South East Plan does not set out that policy TC2 defers the specification of the role of the retail centres to KTG8.

3.22. The draft South East Plan (January 2005) identified Bluewater and Ebbsfleet separately as town centres that would be the focus for the uses set out in paragraph 3.14 above excluding residential.

3.23. The Council’s response to SEERA in April 2005 was:

“The Council considers that Bluewater has an important role to perform as a regional comparison shopping centre and leisure destination. It does not consider that it is an appropriate location for other town centre uses and requests that the South East policy approach set out in Policy TC2 be amended to follow that set out in Policy KTG7.

The Local Plan Review identifies Ebbsfleet as a new business centre comprising predominantly employment floorspace, supported by residential, leisure, retail and cultural uses. The planning permission provides for some retail provision to reflect the demands of the future working population, the travelling population and the residential community resulting from the development, but this is secondary to its function as a business location and a key economic driver for the area. It is suggested that an alternative designation be used in subsequent drafts of the Plan which are more appropriate to this primary function.”

3.24. The submission approach of grouping both Bluewater and Ebbsfleet into a combined ‘Primary Regional Centre’ is inappropriate. It is also inconsistent with the submission Policy KTG8. Ebbsfleet is not
identified in the Kent & Medway Structure Plan Strategic Hierarchy of Retail and Services Centres in Kent (Table EP4). It is recommended that Cabinet agrees to make formal objection to the inclusion of Bluewater/Ebbsfleet as a Primary Regional Centre with a fall back position, that submitted South East Plan Policy TC2 needs to state that the specific roles of these centres, is set out in Policy KTG8.

Transport

3.25. Maps T1 and T2 show Ashford, Dover, Manston, Medway/Sheerness and Medway Thamesport as International Gateways. Ebbsfleet, with its CTRL International Passenger Station is omitted. Cabinet is recommended to object to this omission.

Next Steps

3.26. The South East Plan Examination in Public is scheduled to run from November 2006 to March 2007. It is hoped that the Council’s comments regarding Water Supply, Bluewater/Ebbsfleet and Maps T1 and T2 will be accepted and not require any further input from the Council. The Council’s qualified support for the housing targets and comment on employment floorspace might require additional work and possible attendance at the Examination, preferably as part of a partnership with Kent authorities. This might have financial and staffing implications which cannot be identified at present. If there are financial or staffing implications that cannot be managed within existing resources, the costs will be met from the unallocated balance on the Planning Delivery Grant.

4. Relationship to the Corporate Plan

Environment: To ensure that development in Dartford is sustainable.
Regeneration: To work with partners to promote Dartford as a prime location for inward investment.
To ensure that Dartford residents enjoy equal access to employment and other opportunities in the Borough from regeneration.

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

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<td>The South East Plan when approved will form part of the Development Plan. The Plan will provide the spatial context with which the Local Development Framework will be expected to be consistent.</td>
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<td>The Council's involvement to date has been in the form of officer and Member involvement on Working Groups. The next stage is Examination. The Council will continue to work with others on</td>
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areas of common concern to reduce officer involvement in the examination process. Depending on the complexity of the examination process, this could prove insufficient.

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**Risk Assessment**
The Planning Policy Team’s priority task is the production of the Council’s Local Development Framework and diversion of officer time away from this to deal with often important matters such as this poses a risk to completion on time.

Not submitting a holding objection on housing or objecting to the submitted approach to Bluewater/Ebbsfleet could leave the Council having to satisfy regional housing targets and comply with retail policy that conflicts with the Council’s preferred approach.

6. **Details of Exempt Information Category**

Not applicable

7. **Appendices**

Appendix A: Suggested Responses on the submission South East Plan.

**BACKGROUND PAPERS**

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<td>March 2006</td>
<td>Paul Buckley</td>
<td>Policy</td>
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<td>Document Draft Plan for Submission to Government.</td>
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