

We set out in advance how national guidance on SHLAAs is applied locally. This outlined Dartford SHLAA stages and the criteria for assessing land so that it is suitable, available and achievable for future consideration.

Strategic Housing Land Availability Assessment (SHLAA)

Methodology September 2021

DARTFORD
BOROUGH COUNCIL

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INTRODUCTION AND SCOPE

BACKGROUND

- 1.0 Dartford Borough Council has undertaken a new Strategic Housing Land Availability Assessment (SHLAA). This is technical evidence that informs the Publication Local Plan, alongside a host of other information. In particular, the new SHLAA includes up-to-date information on housing sites and developments including new homes at Dartford town centre, sites in other locations well served by public transport, and on appropriate brownfield land.
- 1.1 Dartford has consistently maintained a five year supply of deliverable housing sites, a critical government requirement. However, a long-term supply should also be maintained. The Publication Local Plan looks to 2037 and the SHLAA identifies sites to meet the needs for the first 15 years of the plan to 2032.

Government guidance explains:

“An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment is an important piece of evidence to inform plan-making and decision-taking, and the identification of a 5 year supply of housing land. It can also inform as well as make use of sites in brownfield registers...”

However, the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority’s requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements...”

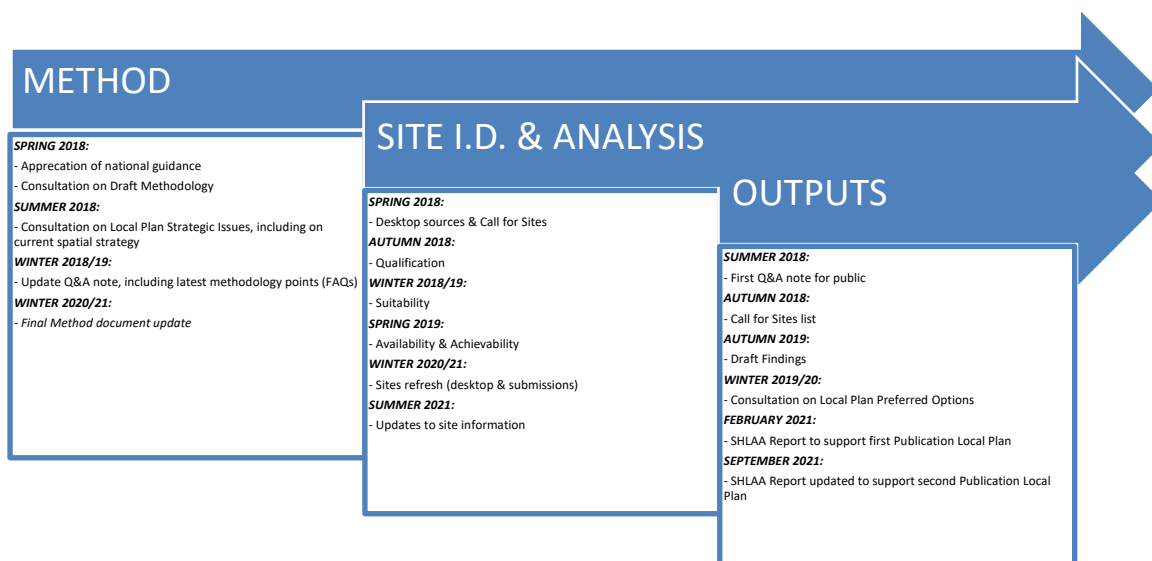
Paragraph: 001 Reference ID: 3-001-20190722

- 1.2 The SHLAA is produced to establish the range of possible local land options that are available and could be suitable. Having a SHLAA in place with decisions based on clear and consistent criteria means sustainable residential development sites can be identified. For example, a pattern of development can then be explored in more detail through the Local Plan to limit demand on infrastructure, e.g. less need for vehicular travel. It was documented early on in Dartford’s SHLAA (i.e. via the draft methodology which was subject to consultation) that large rural locations are likely to have sustainability performance constraints. These site are looked at through consistent criteria alongside urban sites.
- 1.3 It is important to note that the SHLAA has the status of technical evidence to inform future decisions. Where land is found deliverable (or developable) after successful SHLAA assessment, it does not indicate it should be granted planning permission or will be selected for Local Plan site allocation.
- 1.4 Dartford’s SHLAA informs the following:
- Publication Local Plan Policies 2021
 - Infrastructure planning
 - Five Year Deliverable Supply calculation 2021
 - Dartford Brownfield Land Register 2021

SHLAA SCOPE AND THE CALL FOR SITES/ METHODOLOGY CONSULTATION

- 1.5 The overall approach of Dartford’s SHLAA was based on the Kent SHLAA Protocol and is similar to that undertaken in the last Dartford SHLAA. The Kent approach was approved and widely applied in SHLAAs across Kent, after consultation with private and public sector representatives. The specific approach has been updated in line with current national guidance and local progress, such as selected up to date policies in Dartford’s Local Plans. Some SHLAA milestones are shown in a chronology of the method, assessment and key outputs below:

Figure 1: SHLAA Chronology



- 1.6 The focus of the assessment was on identifying land for residential dwellings (class C3), including when brought forward in conjunction with other uses i.e. mixed use sites. The relationship between employment land and residential opportunities
- 1.7 The government do not require public consultation as part of SHLAA production process. Nevertheless, it was considered prudent to set out in advance details SHLAA procedures and requirements, and the Council undertook consultation on the draft methodology, demonstrating how it was in line with national guidance.
- 1.8 The consultation was open to all organisations and individuals for four weeks in May 2018. Views on this methodology were also specifically sought from public sector partners, under the Duty to Cooperate requirement that applies to Local Plan production. No objections were received from any party on the overall structure or approach proposed.
- 1.9 The SHLAA looks at all sites within Dartford Borough, including land within Ebbsfleet Garden City, applications for which are dealt with by the Ebbsfleet Development Corporation (EDC). The EDC has provided input throughout the assessment process. This Borough-based approach is consistent with other authorities in Kent.

- 1.10 In parallel with the draft methodology consultation, a 'call for sites' was also conducted in May 2018. Maps of land arising from the call for sites process were subsequently made public.
- 1.11 The following sets out details of the consequent Dartford SHLAA methodology.

MAIN ASSESSMENT STAGES

QUALIFYING LAND

- 2.1 The Dartford SHLAA uses the 5 dwelling size threshold for sites to qualify for assessment in accordance with national guidance:

“It may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings...Plan-makers may wish to consider alternative site size thresholds.”

Paragraph: 009 Reference ID: 3-009-20190722

- 2.2 Land was identified through a variety of means, including the call for site submissions and collation of desktop data (sources assessed in line with guidance as set out in the table). Table 1 below shows how all recommended data sources have been explored to ensure comprehensive land identification. This resulted in over 230 land parcels being assessed.

Table 1: SHLAA data sources

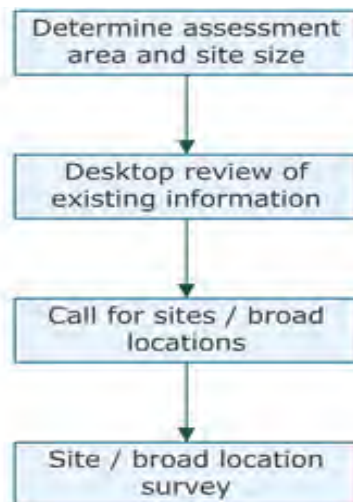
Type of site: government guidance	Potential data source used in Dartford
Existing housing and economic development allocations and site development briefs not yet with planning permission	Allocations have been included, including a desktop review of employment site boundaries (see Appendix 6). No development briefs applicable elsewhere, however sites from pre-application discussions are addressed.
Planning permissions for housing and economic development that are unimplemented or under construction	Planning application records, housing and mixed use proposals. Development starts and completions records, sites under construction included.
Planning applications that have been refused or withdrawn	Planning application records used.
Land in the local authority’s ownership	Local authority records explored.
Surplus and likely to become surplus public sector land	Kent County Council land received via call for sites. Engagement with public sector bodies such as National Health Service, policy, fire services, utilities providers, statutory undertakers.
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential	Brownfield land register and other existing sources of derelict land addressed. Applicable office to

Type of site: government guidance	Potential data source used in Dartford
permitted development changes, e.g. offices to residential).	residential sites identified through application records.
Additional opportunities in established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	Mapping, surveys and online sources were brought together in an exercise to identify and consider low intensity existing uses that may have potential.
Business requirements and aspirations	Largely outside the scope of the SHLAA, but existing premises were reviewed.
Sites in rural locations	Reflecting the scale of current plans and permissions, no proposals have been received for new settlements/ urban extensions.
Large scale redevelopment and redesign of existing residential or economic areas	
Sites in and adjoining villages or rural settlements and rural exception sites	Green Belt and village sites were put forward to the Council, and have been included. Rural land not a focus on land identification in its own right (i.e. additional to the above sources), given national and local policy on Green Belt and on sustainable development.
Potential urban extensions and new free standing settlements	

Adaptation of table from government guidance: [Source: Paragraph: 011 Reference ID: 3-011-20190722](#)

- 2.3 National policy is of particular importance, and this was addressed from the outset in the Dartford SHLAA. Figure 2 reproduces the illustration in guidance of key initial stages:

Figure 2: Government summary of early SHLAA stages



- 2.4 After site identification, Dartford undertook an extensive series of surveys. However, national guidance states that whatever the source of site, certain locations will not be surveyed and fully investigated in the SHLAA if they are incompatible with national policies and designations:

“How detailed does the initial survey need to be?”

At this stage, there may be some sites which, when taking into account national policy and designations, it will not be appropriate to carry out these more detailed assessments for, where it is clear that they will not be suitable for development. The initial surveys need to be proportionate, with a more detailed assessment being made at Stage 2...”

Paragraph: 014 Reference ID: 3-014-20190722

- 2.5 In line with the above, sites were also ‘disqualified’ from investigation if they had the potential to adversely affect the following, and if boundaries could not be amended to exclude the part of the land designated as follows:

- Listed Buildings/ Scheduled Monuments
- Ancient Woodland
- Site of Special Scientific Interest (SSSI)/ Regionally Important Geological Sites (RIGS)
- National and local wildlife sites
- Protected Local Green Space (policy M14 in the Publication Local Plan 2021)
- Crossrail safeguarding
- Common land/ Designated village greens
- Sites mainly covered by Tree Preservation Orders (TPO)

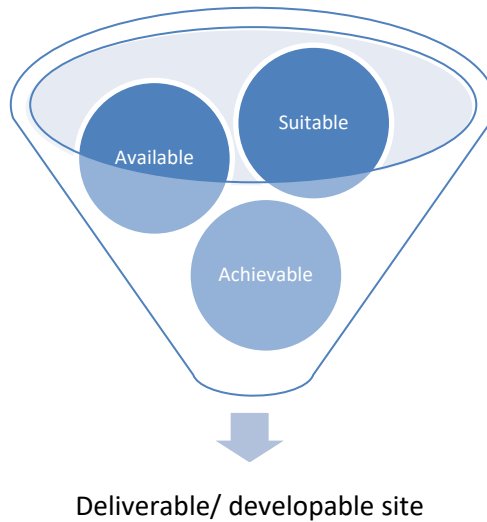
- 2.6 The disqualification criteria are generally derived from environmental legislation and policy, and the spatial extent of most them in the Borough can be found via the policies map at: <https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/adopted-plans>.

- 2.7 Disqualified sites were all reviewed and agreed by the Planning Policy Manager.

OVERALL ASSESSMENT APPROACH

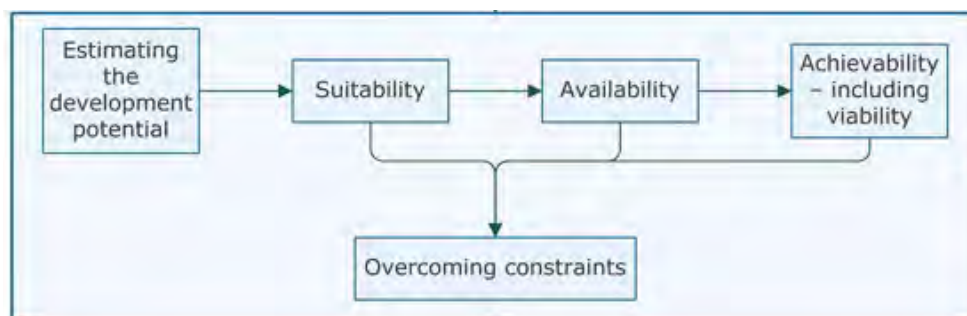
2.8 As set out in the rest of this section, the main SHLAA stages are based on a step-by-step ‘filtering’ process: checking if sites are suitable, then (if applicable) available and achievable. This is established practice in Kent and Dartford. Figure 3 shows the broad structure whereby, in simple terms, land which successfully passes each of these stages is developable (and possibly deliverable) and can be considered further in separate Local Plan procedures.

Figure 3: SHLAA Filtering Process



2.9 In practice, the use of information is not purely linear. For example, some ‘suitability’ factors may strongly influence achievability or availability characteristics. Figure 4, extracted from national guidance, indicates inter-relationships:

Figure 4: Government summary of site / location assessments



2.10 The central SHLAA suitability, availability and achievability stages in Dartford are set out in sections A-C below:

A. SUITABILITY

- 2.11 The assessment of suitability in Dartford's SHLAA is comprised of up to three steps:
- I. **Location and accessibility criteria**
 - II. **Essential policy [Borough Open Space (BOS) and Community Service Land]**
 - III. **Site physical [environmental] factors**
- 2.12 **Suitability was assessed in the order outlined above. Land needs to meet the suitability criteria at each stage to proceed.** For call for Sites land submissions, where these failed the location and access requirements, they nevertheless were also reviewed at the physical/ environmental stage to give a full picture (but in any event found unsuitable, due to location and access).
- 2.13 The purpose of this approach is to identify the potential for sustainable development. Constraints that need to be overcome are investigated through the SHLAA stages and this informs whether necessary actions are likely to be successfully addressed.
- 2.14 As noted in the introduction, there is large amount of housing land supply with planning permission. Sites with consent have all been re-assessed, with the general exception of the physical suitability stage (which would replicate the extensive evaluation undertaken for the planning application unless circumstances on the ground have changed considerably). This accords with government guidance:

"Sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability. This can be informed by a range of factors including the suitability of the land for different uses and by market signals, which will be useful in identifying the most appropriate use."

Paragraph: 018 Reference ID: 3-018-20190722

- 2.15 A SHLAA does not conduct a Green Belt assessment or review, although it could indicate the need for further research. In the SHLAA, sites within the Green Belt are not disqualified and are accepted for assessment using the usual step by step processes. However the existence of this strategic designation cannot be disregarded and/ or land confirmed as fully suitable given national and local policy. Ultimately whilst the SHLAA can gather evidence that be may be of interest, sites within the Green Belt cannot be counted as meeting the government's definition of deliverable or developable at present. This is due to national planning policy set out in the NPPF and the approach to development being taken forward in the Publication Local Plan in accordance with this.

SUITABILITY FIRST STEP - LOCATION AND ACCESSIBILITY

- 2.16 Reflecting the aim of the planning system to focus development in sustainable locations, and drawing from national guidance that allows regard to policies in the Publication Local Plan 2021, new housing land in Dartford should, as a minimum, be one of the following:
- within Dartford Town Centre.
 - in the urban area (defined as all land north of the A2 which is not within the Green Belt) and well served by public transport.

- sufficiently sustainably located small or brownfield site.

Figure 4: Location and Accessibility



- 2.17 The preference for sites in the town centre or urban area was outlined at the outset. The appropriateness of this focus is in line with the strategy in the Publication Local Plan 2021. The Sustainability Appraisal of the Local Plan considered a contrasting approach (Local Plan Preferred Options Main Plan Option 1D) and found it to be unsustainable.
- 2.18 The requirement to be *well served by public transport* reflects the Borough's well recognised severe highway conditions and the emphasis of the spatial strategy on achieving a major transport shift away from private vehicles. The focus on the northern area (encompassing the North Kent line and Ebbsfleet International Station) responds to the need for good access to high order facilities, as well as local services, to meet the economic, social and environmental requirements of residents. This means access – with a short journey time – to resources such as a range of job sectors, major cultural facilities, a choice of secondary/ further education, comparison retailing, key public services, hospital provision and other town centre/urban services.
- 2.19 **To be well served by public transport locations in the SHLAA must be within:**
- 800m of Ebbsfleet International railway station or the four stations on the North Kent Line in the Borough (or 400m beyond that along dedicated cycle routes);
 - or

- ii) 400m from routes with a peak service level of at least 6 buses per hour in the day time (including Fastrack) in both directions.
- 2.20 Nevertheless, all other parts of the Borough are also evaluated for their suitability even through lacking any public transport that may be regarded as of a ‘turn up and go’ frequency. The required criteria for those sites that are not located in Dartford Town Centre or not within the urban area and well served by public transport is as follows:
- Land under 1 hectare or brownfield land (or both), and**
- i) within 400m walk from a bus stop with an average of approximately 2 buses per hour (in the day time) in both directions, **or**
- ii) meeting the majority i.e. three or more, of the following accessibility to local facilities criteria:
- Within 400m walk from a bus stop with an average of at level of at least hourly buses (in the day time) in both directions
 - Primary school within 400m or secondary school within 800m walk,
 - GP/ hospital within 800m walk.
 - Convenience A1 store within 400m or designated Town Centre/ District or Neighbourhood Centre within 800m walk (policy DP17 and 18).
 - Designated employment area (policy DP20) within 800m walk.
- 2.21 This is summarised in flow chart form in Appendix 1, which guided assessment evaluation of sites.
- 2.22 The threshold of under 1ha for small sites is consistent with the government’s greater emphasis on such sites, as set out in the new National Planning Policy Framework (NPPF 2021). This was raised from the size threshold first proposed in the draft methodology, reflecting government policy. Similarly the brownfield sites factor reflects that national policy.
- 2.23 In those locations in the assessment where a “safe and attractive” walking route (policy DP6:2b) is not apparent, precise walking distances were measured along public highways/ rights of way that have surfaced pavements and street lighting.
- 2.24 In some instances, for example in designated retail centres or on large sites, suitability for residential development may be contingent on other uses also being provided or there may be a prerequisite to provide active ground floor uses/commercial premises.
- 2.25 All sites were assessed in detail by a dedicated planning policy officer, with each result verified and signed off by the Planning Policy Manager.

SUITABILITY SECOND STEP - ESSENTIAL POLICY

- 2.26 National guidance advises:

“When assessing sites against the adopted development plan, plan-makers will need to take account of how up to date the plan policies are and consider the relevance of identified constraints on sites / broad locations and whether such constraints may be overcome. When using the emerging plan to assess suitability, plan-makers will need to account for potential policy changes or other factors which could impact the suitability of the site / broad location...”

Paragraph: 018 Reference ID: 3-018-20190722

Government guidance therefore permits the use of appropriate up-to-date local policy in SHLAAs. The Publication Local Plan 2021 takes forward some of the recently adopted policies from the Development Policies Plan 2017.

- 2.27 It is considered in keeping with the purpose of a SHLAA to focus on only the most important of these policies at this stage. As one of the most rapidly growing locations in the country, and with the north of the Borough subject to major urbanisation, policies pertaining to open space and community infrastructure uses are regarded as essential. Thus, Publication Local Plan policies M14 (Green and Blue Infrastructure and Open Space Provision) and M18 (Community Uses) are relevant to the second stage of the suitability process. These are reproduced at Appendix 2.

OPEN SPACE

- 2.28 Applicable local planning policy may prevail for greenfield land that is identified on the Policies Map. New open space should be provided along with residential developments, but as a growing Borough it is important existing open spaces are retained. Development on designated open space is therefore likely to be unsuitable. Borough Open Space land is only considered suitable in the SHLAA, if it is clear how policy M14 can be satisfied.

COMMUNITY SERVICE LAND

- 2.29 The Borough's growth is generating critical pressure on community infrastructure, including education, healthcare, culture and recreation facilities. Dartford has a new policy to safeguard such land and premises (policy M18). Accordingly residential redevelopment resulting in the loss of premises in community use is likely to be unsuitable, particularly on essential public service land, and the following criteria apply:
- Proposals on existing community facilities are only be considered suitable in the SHLAA, if it is apparent policy M18:2 would be met, or alternative proposals for local re-provision are available.
 - Proposals on any land identified for new community use, even if there has been a delay in construction or granting permission, will be unsuitable under policy M18:3 without specific agreement that a community use is unnecessary for the land.

- 2.30 Sites confirmed as unsuitable at this stage all follow review by the Planning Policy Manager.

SUITABILITY THIRD STEP – PHYSICAL [ENVIRONMENTAL] FACTORS

- 2.31 This step examined the range of local environmental conditions and associated impacts that may determine the site's potential physical suitability for residential development. In addition to the land itself and external impacts of development on its immediate surrounds, an evaluation was made as a whole about the living conditions of current and future residents, considering the criteria in policy M2 (Environmental and Amenity Protection) and evidence gathered through the site survey or via desktop sources.
- 2.32 National guidance states the factors in this element of the suitability assessment process include:

- *land uses and character of surrounding area*
- *physical constraints (e.g. access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities)*
- *potential environmental constraints*
- *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation*

Excerpts from Paragraph: 015 Reference ID: 3-015-20190722 and Paragraph: 018 Reference ID: 3-018-20190722

- 2.33 Accordingly, this step of the assessment looks at land widely, including with respect to if development could meet infrastructure connection, conservation and amenity requirements. A list of some of the relevant impacts is available in policy M2:1 (Environmental and Amenity Protection), and example factors are illustrated in Appendix 3.
- 2.34 Physical factors on the site can have an impact on the achievable site capacity. Discounting part of the land from development on large sites can ensure it meets the criteria for suitability, but will impact on resulting capacity (and must not result in it falling below the five dwellings inclusion threshold).
- 2.35 Sites need to be capable of providing safe and satisfactory highway access, on available land, for the likely level of development. For a number of sites, specialist input was provided by Kent County Council, as highway authority. Sites likely to be contrary to policy M16 (Travel Management) following individual survey were not considered suitable.
- 2.36 The assessments consider whether the sites affect minerals safeguarding areas, as their development for residential use would prevent the future extraction of minerals. In the case of infill sites in the urban area, it is not considered that minerals safeguarding is an issue. In other cases, the need for a minerals assessment is highlighted. There is also the potential for sites for new residential development to impact on the operation of existing minerals and waste facilities/ infrastructure. Thus, where a site is within the consultation zone for such a facility, this issue is highlighted.
- 2.37 National policy has an increased emphasis on air pollution, from which Dartford is particularly adversely affected in and around strategic highways. Sites within the designated Air Quality Management Areas, in particular around the A282 Tunnel Approach Road, have received close attention in order to ensure safe and healthy living conditions for future occupants. In these instances regard was had to the degree of existing pollution and the potential for securing healthy living conditions. Noise was also a salient factor, in particular relative to railways and main roads.
- 2.38 Ground conditions were taken into account. Those submitting sites were asked to supply full information in relation to underground considerations, including contamination from previous uses, land safety and stability and buried infrastructure. It was noted that significant constraints in these areas were likely to have material implications for the assessment.
- 2.39 The approach outlined in policy M2:3 is important in the evaluation of former landfill sites. Under policy M2:3, previously filled/ contaminated land in the Borough may be unsuitable for residential development in the shorter term due to delivery issues. An assessment for the future has to be made from robust evidence on current physical suitability. Clear evidence was sought that landfill gas or land stability would not

present a hazard and that such sites would not adversely impact groundwater. Policy M2:3 states that for contaminated sites to be considered suitable, it must be clearly demonstrated that it will avoid risks to neighbouring uses/ the wider area and that it will not compromise the achievement of design quality, infrastructure provision, affordable housing and other policy requirements as a result of high remediation costs or uncertain timescales for delivery.

- 2.40 Flood risk was also evaluated using existing flood zone information (rather than the updated flood zones identified in the new SFRA), both with regard to the ability to safely construct residential accommodation and to the appropriate form of residential development. For sites in flood zones, the implications of the sequential and exception tests were considered. For further information and the application of the tests, please refer to the Flood Risk Sequential Approach Topic Paper 2021.
- 2.41 To ensure the safety and amenity of new residents, the impact of avoiding adverse physical features, such as pylons and overhead power lines, was considered. This exercise ensured that sites were capable of yielding the necessary threshold housing capacity.
- 2.42 In addition, some parts of the Borough fall within Health and Safety Executive (HSE) consultation zones. The zones ensure that where there may be risk arising from major hazard sites proper consideration is given to development proposals. Sites within the consultation zone were scrutinised in accordance with general HSE advice and may result in insufficient homes being deliverable or a lack of clarity on how the restriction will be overcome. This is an example of where physical suitability factors impact on decisions at the achievability stage.
- 2.43 Where relevant, biodiversity and agricultural land factors were assessed. Potential biodiversity issues were noted, including within the urban area. Elsewhere, the implications of the national policy on agricultural land were flagged up, as appropriate, as a constraint to consider on sites.
- 2.44 In accordance with national policy, landscape impact is another factor which needs to be taken into account. A broad approach to landscape impact was taken, using information from on-site surveys. For sites outside the identified urban area, the relationship of the site to existing built development and urban features and the scope for significant impacts on the wider and local landscape were considered. Assessment took into consideration the degree of urbanisation, potential coalescence, landscape setting and topography.
- 2.45 Where relevant, attention was given to protecting the residential/visual amenity of existing residents and impacts on the historic environment e.g. conservation areas, listed buildings and areas of archaeological potential.

ASSESSMENT PROCESS SUMMARY

- 2.46 Overall physical suitability judgements were made in light of the above according to the following traffic light system:

- green: *suitable*
- amber: *issues/constraints to overcome but if so, potentially suitable*
- red: *constraints unlikely to be overcome,*

They were assessed against the following groups of factors:

- I. **Infrastructure and safeguarding [including access]**
- II. **Pollution/ contamination**
- III. **Flood risk**
- IV. **Heritage**
- V. **Landscape, biodiversity and agricultural land**

- 2.47 Land was deemed to be unsuitable if it received the red light against any of these five sets of considerations (N.B. a Call for Sites submission may already have been assessed as unsuitable under the previous stage).
- 2.48 Appendix 3 provides a brief example of the assessment sheets for this stage, looking at all sites in a ward. Further information on site-by-site outputs is available in the SHLAA findings documents.
- 2.49 All sites at this stage were assessed by an experienced planning policy officer, with each result verified and signed off by the Planning Policy Manager.

AVAILABILITY AND ACHIEVABILITY

- 2.49 Notwithstanding planning requirements, private developers' intentions, together with legal and financial matters, determine whether development will be progressed. The government defines these issues as 'availability' and 'achievability' and they required to be assessed as key components of the SHLAA.

B. AVAILABILITY

- 2.50 Suitable land will be assessed for *availability*. According to national guidance:

"A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.

The existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years, further guidance to this is contained in the 5 year housing land supply guidance. Consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions."

Paragraph: 019 Reference ID: 3-019-20190722

- 2.51 Dartford's SHLAA followed this guidance to arrive at a judgement on the availability of sites for development. Up-to-date information on developers/landowners was reviewed and the delivery track record of the parties/land involved was examined. For suitable sites without confirmation of availability, the Council carried out legal searches and engaged in correspondence to identify ownership and intentions, as well as checking for major legal constraints.

- 2.52 The availability questions, on which decisions were based, can be found in the Appendix 4. Some of the questions are entitled as follows:
- *Site situation*
 - *Existing use*
 - *Land legal restrictions*
- 2.53 The operational expectations of landowners were an important consideration. The fact that land is currently in productive use does not necessarily constrain future development, if it is shown to be available.
- 2.54 In line with the regulations pertaining to “availability” in a very similar context (the Brownfield Land Register), a critical view was taken of land in multiple ownership, especially in situations in which two or more owners had not put land forward or have not indicated an intention to sell.
- 2.55 This stage was conducted by a dedicated planning policy officer, and sites identified as potentially unavailable were all reviewed and agreed (as applicable) by the Planning Policy Manager.

C. ACHIEVABILITY

- 2.56 Government guidance advises:

“A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.”

Paragraph: 020 Reference ID: 3-020-20190722

- 2.57 Available land was assessed for achievability. This stage looks over the long-term to ascertain whether, considering all commercial factors and constraints, it is probable that residential development will be permissioned and constructed on site within the plan period.
- 2.58 The particular emphasis at this stage is on financial implications, and therefore the current financial value of the land and its existing use and commercial performance (compared to the alternative) will always be a significant consideration.
- 2.59 The timescale spans typical national economic cycles, and therefore achievability need not depend on shorter term individual commercial responses to economic fluctuations. This stage is concerned with ensuring that there is a reasonable prospect of delivery (against the definition of ‘developable’) at a point within the stipulated time horizon.
- 2.60 With record rates of housing delivery, there is no evidence of a generalised concern over the viability of residential development in the Borough. Moreover, there is an expectation by government that, over time, landowner expectations (land costs) will adjust to account for policy requirements such as affordable housing and developer contributions. However, site-specific circumstances (including existing use value), may adversely impact on viability especially where abnormal costs or significant mitigations are likely. Some individual sites may be subject to combination of development

constraints, which mean that, whilst not failing suitability and availability criteria, five or more new dwellings are not likely to be achievable.

- 2.61 The process of assessing achievability made use of a wide range of evidence sources, including information gathered at the preceding stages in the SHLAA (e.g. the landowner's intentions). In addition, at this stage, identified physical/ environmental issues, such as site ground conditions or mitigations for large sites, were considered collectively in terms of their degree of significance and impact of achieving overall development aspirations.

ASSESSMENT PROCESS SUMMARY

- 2.62 Achievable sites, as the final stage of consideration whether successful in SHLAA terms, are developable as set out in the NPPF 2021:

“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”

- 2.63 Some 'developable' sites are also 'deliverable'. The first stage of the process of evaluating achievability was to determine if there was robust evidence demonstrating that the site met the NPPF new definition of "deliverable" set out in national policy. Sites which met these criteria were not only developable, but achievable within the first five years.

- 2.64 The remaining available sites were evaluated in detail and a judgement made regarding achievability, based on all the information gathered. Specifically, analysis was conducted to determine:

- **Are delivery and market constraints having an impact on developable potential?** → At the achievability stage it is important to consider the existing economic value of site now and in the foreseeable future versus the likely realistic scale of valuable residential development, as means of establishing the likelihood that the land will be released for development. Sites not containing a viable and well performing business/ other current use (perhaps with limited local competition or relocation options) - or facing abnormal site costs and other applicable considerations under the criteria - may not be developable given known information on constraints for residential development (once checked against the government definition). If so, they were reviewed in further detail in terms of:
- **If specific developable opportunities to support achievement were established?** → If these positive conditions were not in place, those sites were deemed incapable of meeting the definition of developable and were therefore unachievable.

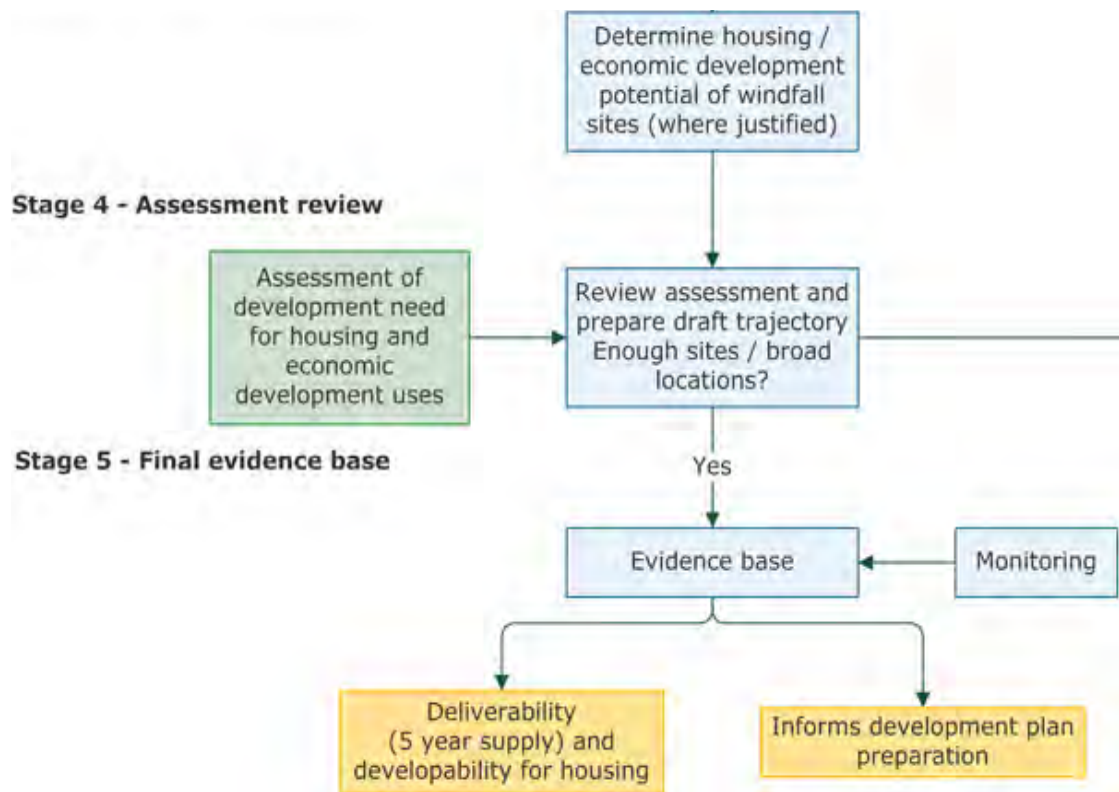
- 2.65 For more information on the criteria, please see Appendix 5.

- 2.66 Achievability stage evaluation and verification were undertaken by the Planning Policy Manager.

FINAL STAGES FOR THE SHLAA

- 3.1. After developable/ deliverable sites have been identified after the stage-by-stage assessment, a series of further actions are required. These lead towards a robust new Local Plan. In particular, these relate to quantifying the overall level of estimated housing supply after the SHLAA, and the sufficiency of this quantity (and therefore the SHLAA) against government requirements.

Figure 5: Government summary of later SHLAA stages



ESTIMATING RESIDENTIAL CAPACITY

- 3.2 Individual developable or deliverable sites are carefully considered in terms of the number of additional new homes they can suitably accommodate. The central principles in estimating residential capacity in Dartford's SHLAA were as follows:

- 1) Where extant detailed permissions are present and considered likely to be implemented, this is the primary determinant of the residential potential of the site.
- 2) Appropriate and applicable information from the developer, with work supplied to justify the proposed capacity would be applied.
- 3) In the absence of bespoke robust information supplied, development potential is derived by firstly confirming the gross developable land area and considering quantitative outputs from a density matrix (Table 2 below) and adjusting them as appropriate in light of the site's specific context – particularly using information gleaned from the site survey.

- 3.3 If the matrix-led approach to density is applicable for a site found achievable, firstly it is important to carefully consider the area to input, before a density multiplier is used.
- 3.4 To be suitable in the SHLAA (or to qualify) sometimes the land area used is a refined land area. Land currently in use for essential utility functions will be taken into account and may be deemed undevelopable. On occasion, this includes overhead wiring, significant buried pipes and cabling required to remain in situ.
- 3.5 Ordinarily the capacity estimate is derived netting off land for density calculation on the following basis, creating a more realistic developable area, including some policy requirements such as main new open space provision:
- 90% of sites of 0.5ha or less gross, to be applied
 - 80% of sites larger than 0.5ha but up to 2ha
 - 75% of sites larger than 2ha but up to 20ha
 - 70% of sites of more than 20ha
- 3.6 This determines the appropriate density calculation starting point, and using site survey, developer and suitability/viability stage information. Whether or not the site has the potential to accommodate flatted development is considered to guide matrix based decisions. The matrix, Table 2 as follows, is also structured using the framework of adopted local policy on density (policy CS17:4), which identifies areas of the Borough with reference to their role within the spatial growth strategy:

Table 2: Indicative density matrix

Location	Development for houses (approx. dph)	Development for flats and houses (approx. dph)
South of the A2/ Green Belt	15-25	25-40
In Dartford town centre boundary	70-100	100-180
Northern Gateway allocation	30-45	50-180
Ebbsfleet Valley allocation	30-45	70-180
Thames Riverside priority area	30-45	50-180
Elsewhere in the urban area	30-40	50-70

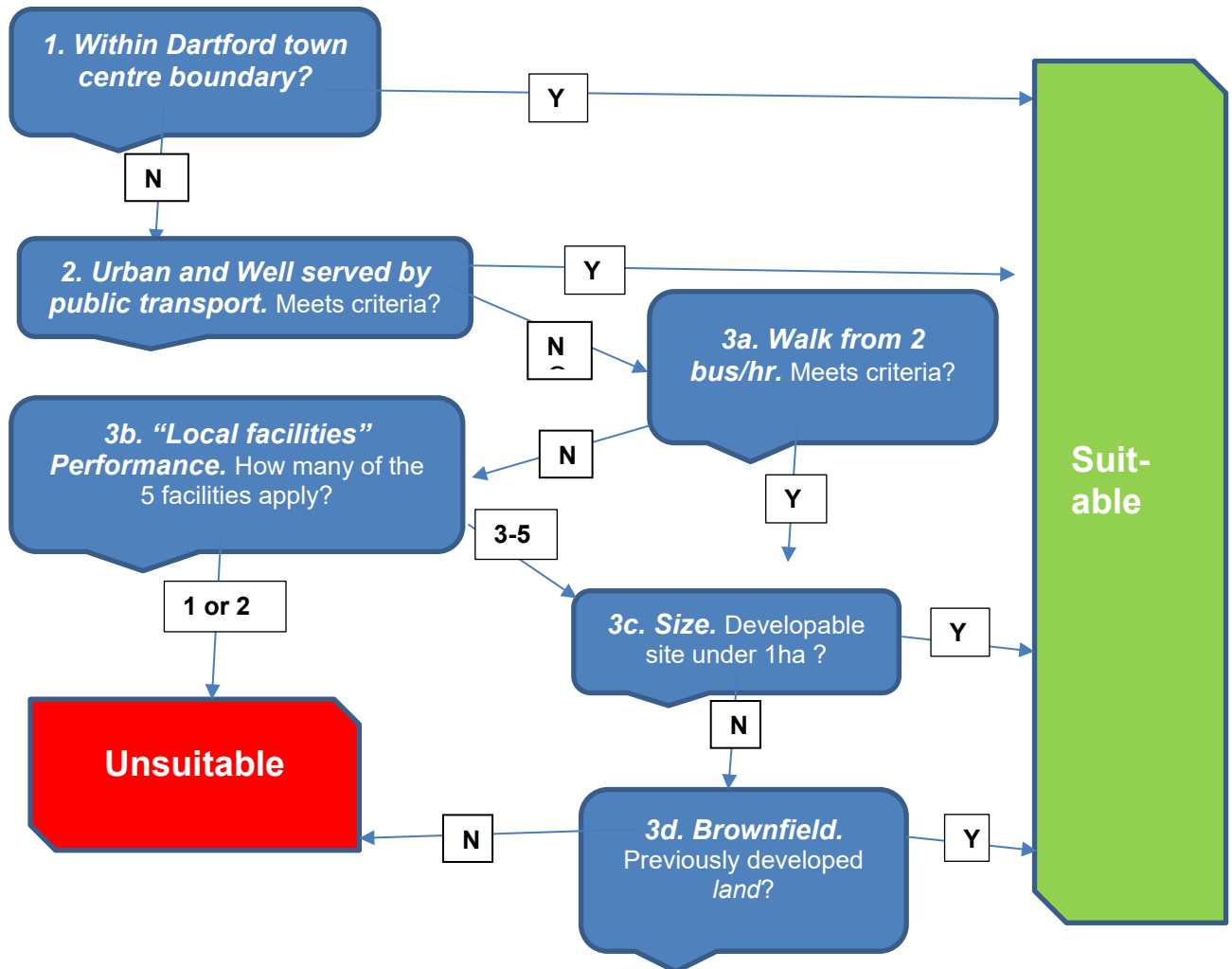
- 3.7 These figures are a starting point based on:
- Adopted local policies CS17 and CS18. Policy CS18 sets out that a greater proportion of flats may be justifiable in certain locations. These are those shown as up to 180dph above; however it should be noted that at Thames Riverside the range of up to 180dph will normally be focused on locations adjoining the Thames where it is well served by facilities and public transport.
 - Dartford's bespoke housing density research. This found:
 - Existing densities vary. Many longstanding neighbourhoods in urban parts of Dartford provide popular houses, local amenity greenspace and living environments at calculated densities of typically 40-60dph, sometimes 70pdh or more.
 - New developments in and around Dartford have been using land more efficiently. It is not considered this is significantly

attributable to smaller dwelling size. Densities vary according to context and type of dwelling, but homes have been constructed in Dartford at 100/150pdh and exceptionally, greater.

- National studies estimating a sustainable urban density to be c. 70dph, as a level that may be sufficient to for population densities to prove effective support for modern networks of urban transportation and services. This intensity of development is common to British cities/ towns whether through Victorian terraces or sensitive urban infill.
 - Where a range is identified, the mid-point may be used. On large sites, separate zones within the developable area may be defined and multiple density assumptions applied, consistent with the location, to derive total residential potential. The largest sites do not uniformly apply the highest density assumptions.
- 3.8 Figures from this matrix approach may be adjusted, particularly accounting for public transport hubs or locations with poor choice of transport, particularly speed/ frequency of public transport. The current government emphasis on achieving best use of land is particularly focused on town centres and areas well served by public transport.
- 3.9 Derived around existing policy and urban form, the matrix is therefore considered a realistic, generic basis, once local characteristics are reflected in confirming site capacity.
- 3.10 Residential potential may be lower in Areas of Special Character on the Policies Map and – particularly - statutory Conservation Areas, with lower densities resulting for the SHLAA than in the matrix.

Appendix 1: Suitability - Location/ Access Assessment Process

Yes/No[Y/N] questions and other criteria.



Appendix 2: Suitability - Essential Policy

Policy M18: Community Uses

1. New community facilities will be supported where they are in an appropriate location and of a type, scale and design to reflect the needs of the existing and emerging communities they will serve. In this respect, the following will apply:
 - a) New services should be sited close to the population they will serve, with reference to access routes for active and other forms of travel, and a suitably locally based catchment for the facility provided.
 - b) Wherever possible, new facilities must be provided and designed in a way that allows benefits to be shared by existing and new communities, and to be operated flexibly by a variety of users.
 - c) Strategic developments must normally provide social and community facilities, with access to required facilities at an appropriately early stage. Land will be secured until a facility is in operation as set out in criterion 3. Where permanent provision is not possible from the outset, temporary provision will be sought for first occupants.
 - d) Large scale new community uses that attract the majority of users travelling in from outside the Borough must demonstrate the local need for the scale of the proposal, unless delivering an essential public sector service or shown to be required to serve the neighbourhood community.
2. Development of existing community facilities/ land for non-community purposes will be refused unless there is clear evidence that:
 - a) the facility is not needed by the existing and future community; and
 - b) all reasonable efforts have been made to preserve a community use, including exploration of appropriate solutions to retain the facility with operators/ service providers and, where appropriate, the local community. Consideration should include any potential future demand arising from new development located within the catchment area of the facility/ use.
3. Specific land that has been earmarked for community facilities through planning obligations, other formal agreements, approved planning permissions, or identified in Dartford's published infrastructure planning documentation will be safeguarded until a community facility is delivered or agreement is reached that land for a community use will not be required.

Policy M14: Green and Blue Infrastructure and Open Space Provision – Excerpt

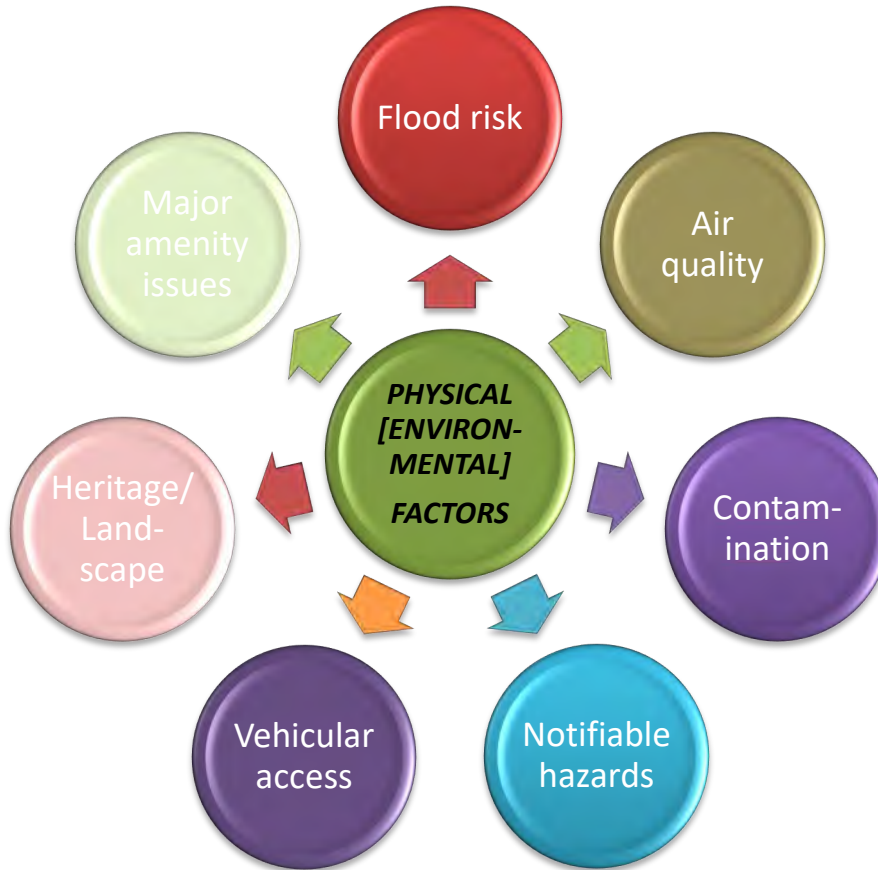
3. Borough Open Spaces will maintain their overall green environmental value. Development on Borough Open Space will not be permitted unless it is clearly demonstrated that one of the following criteria is satisfied:
 - a) Where the space will be retained in its current primary function, with development limited to a small proportion of land, the proposal must support or enhance the existing space in this overall green infrastructure role. The proposal must not lead to any significant loss or deterioration in quantity and level of open space provision.
 - b) Where development will result in a significant loss in the quantity of open space, like for like re-provision must be delivered within easy, safe and secure walking distance of the site, unless it is clearly demonstrated that

the existing provision is surplus to current and future requirements for biodiversity and/ or the amenity and health/ wellbeing of residents. The replacement must be shown to be of an equivalent type and of equal or greater quantity and quality to that being lost.

4. Development of other public amenity space will only be permitted where a convincing justification is made. This must take account of:
 - a) the quality, quantity and function of the space relative to alternative provision in the locality; and
 - b) the benefits/ disbenefits arising from the proposed development.

Appendix 3: Suitability - Physical Factors

Illustration of example factors



Example Contents Page of assessment sheet

Heath Ward

Contents

40 Chastilian Road (53)	Page 1
History	1
Description	1
Infrastructure and Safeguarding	1
Pollution/Contamination	2
Flood Risk	2
Heritage	3
Landscape, Biodiversity and Agricultural Land	3
Summary	3

Appendix 4: Availability Template

Availability Assessment Form used for every suitable site

Site situation

1. Does the site appear readily available for development proposals to come forward from site survey/ desktop work, for instance a single simple vacant/ underused site or open land; and the land is without a track record of poor delivery of previous housing proposals?
 - Yes → Q2
 - No → Q3

Active source and information

2. Is a planning application being taken forward or a 'call for sites' / a PDLR submission received from the landowner or developer / is a house builder formally involved with the site; and there is with sufficient information supporting availability and delivery?
 - Yes → AVAILABLE.
 - No → Q3

Existing use

3. Is the site just completed/ in new residential use¹/ in very good condition and relatively high density; or alternatively, is there an indication tenants have lease rights extending to 2035/ reasonable likelihood that a commercial use on site will still be operational - not be viably able to relocate - by 2035?
 - Yes → UNAVAILABLE.
 - No → Q4

Land legal restrictions

4. Is there a reasonable likelihood of multiple ownerships not working together (including for necessary access routes), other prospects of lack of timely freehold controlling interest to bring forward realistic proposals, or evidence of substantive and enduring legal restrictions to residential development that are unlikely to be overcome?
 - Yes → UNAVAILABLE.
 - No → Q5

Changes or continuity

5. Does the site have planning permission for residential and there has been no known change in ownership adversely impacting on availability/ have development proposals been considered¹ by a relevant party (e.g. pre-app. by owner)/ or was the site confirmed developable in the SHLAA before and it is clear no availability changes/ restrictions have arisen; or alternatively, is the land for sale?
 - Yes → AVAILABLE.
 - No → Q6

¹ In approximately the last three years.

Practical action/ inaction

6. Has the landowner or house builder responded positively to direct enquiries about availability/ changing ownership, or alternatively is there evidence emerging the owner is committed to preparing the site for redevelopment/ relocating occupants/ removing impediments to availability, or other on the ground activity to make it likely residential proposals will be brought forward?
 - **Yes** → **AVAILABLE**.
 - **No** → **UNAVAILABLE**.

Appendix 5: Achievability

TEMPLATE: Achievability Assessment Form for every available site

SHLAA site ref.	
Address/ name	

Criteria	Data sources	Achievability evaluation
1a. Does it meet new government definition of 'deliverable'? This incorporates sites with detailed extant planning permission, unless (for major sites) there is clear evidence that homes will not be delivered within five years (e.g. no longer viable, phased late delivery).	-Permissions -5 Year Supply -PPAs -EDC -Viability studies -Masterplanning -Pre-app. -Market info. -Call for sites	Yes = (Evaluate) DELIVERABLE , [No → go to 1a.]
1b. Is there credible and convincing current evidence that residential completions would occur on site by March 2025 demonstrating achievability?		Yes = (Evaluate) DELIVERABLE [No → go to 2.]
<ul style="list-style-type: none"> STAGE 2: DELIVERY AND MARKET CONSTRAINTS IMPACTING ON DEVELOPABLE POTENTIAL? 		
2a. Does the site face abnormal land preparation costs, or would constructing the development present significantly greater than average challenges due to the site (e.g. plot shape/size/surroundings) or form of residential development proposed?	-Physical suitability stage -Records: Contamination Minerals safeguarding Flooding -Site survey -Mapping -Density	
2b. Does residential development face site-specific significant additional infrastructure burdens, or does completing residential permission face greater than average costs, with major extra mitigation required?	-Permissions -IDP -Viability studies -Masterplanning -Pre-app. -Call for sites -Site survey	
2c. Are there market-based constraints of viability e.g. existing use value that are likely to endure, or specific and particularly low private/affordable residential values arising	- Site survey -Zoopla/ Land Register	

Criteria	Data sources	Achievability evaluation
with the proposal that are likely to remain?		
2d. Are there likely to be long-term delivery issues impacting on the capability to achieve residential development successfully, including if the site held by the same owner or developer that gained permission or sought residential development five or more years ago, and no residential development has been completed?	-Call for sites -Internal records	
<p><i>If 2a-d apply → Evaluate, then go to 3. OR, 2a-d do NOT apply → DEVELOPABLE.</i></p>		
<p>• STAGE 3: DEVELOPABLE OPPORTUNITIES TO SUPPORT ACHIEVEMENT?</p>		
3a. Are current developer actions at the site a clear indication of confidence in viability; or are stated aspirations reasonable in the context of final site capacity estimate (and no major reduction necessary in developable area)?	-Call for sites -Pre app.	
3b. Is there an evident positive gap between the existing use value (nature/ scale of use) and a much greater potential of the site for residential?	-Site survey	
3c. Is there independent evidence available of relevance indicating that residential viability is sufficient within the neighbourhood, or for the typology of development?	-Viability studies/ profiles -Zoopla/ Land Register	
3d. Are there specific government incentives/ supporting actions for the nature of the proposal or its location e.g. significant committed funding, forthcoming supporting infrastructure, special regulatory regime (including PD rights) or other interventions?	-EDC -Dartford Town Centre SPD -GPDO	
<p><i>If 4a-d apply → Evaluate, consider if DEVELOPABLE. OR, 3a-d do NOT apply → UNACHIEVABLE.</i></p>		

Note on site specific achievability context:

- Overall viability and the prospects for achieving delivery may depend on existing value and construction and land costs; the type of development/ developer and individual financial circumstances; development contributions/ levies; and revenues received (i.e. factors impacting on expected sales prices for the site).
- The SHLAA will consider all available evidence, and use appropriate data sources as set out below. The ability for the market to realise residential potential will be assessed by identifying if there is a strong indication that potential costs would be of a significant

scale to outweigh prospects of delivery. This assessment would take into account the type and characteristics of the site (and developer, if applicable).

SITE COSTS FACTORS	DELIVERY / MARKET FACTORS
<ul style="list-style-type: none"> • Site preparation costs to overcome constraints. ➔ Considering Suitability Step III and submission information. <p>This covers several ‘abnormal cost’ issues including landform, contamination and topography. The requirement is that development should be both safe and policy compliant. The SHLAA will pay close regard to policy DP5:3 (plus paragraphs 8.7 – 8.10) where applicable. Developers of contaminated/ former landfill sites are strongly advised to supply information in their submission to address both technical concerns and in support of the case that development will be acceptable, viable and suitable in Local Plan terms.</p>	<ul style="list-style-type: none"> • High existing use values. ➔ Considering market evidence. <p>The current value of land is pivotal in determining whether it is profitable to redevelop it for alternative use. A premium is likely required beyond the existing use value for the current landowner to sell, and to bring new developments forward. Account is then needed of developer profit – which should particularly relate to the degree of risk. In Dartford, as a broad rule of thumb, house prices are such that they should ordinarily be sufficient for residential development to be viable. Existing land value use examples of relatively low value uses include agricultural land, some community facilities and of course vacant land without planning permission. It should be not assumed that commercial land is low value: there is evidence that in Dartford at certain locations this land commands very high values compared to many uses, especially where it is adjoining employment land that is likely to remain in that use. Aggregate existing values will also reflect the current amount of accommodation on site (floorspace provided by the plot) and the condition of premises compared to modern expectations for that use.</p>
<ul style="list-style-type: none"> • Construction/ build costs. ➔ Considering site environment from survey. <p>Issues with the ease of building on the site e.g. access and any particular constraints from the surroundings; form of residential development proposed i.e. high rise apartment which can result in additional costs, are relevant. It also will include demolition requirements.</p>	<ul style="list-style-type: none"> • Existing higher value residential locations. ➔ Considering broad zones identified in CIL viability study, and other data e.g. Zoopla. <p>Whilst sites in the rural parts of the Borough command a premium as is the case in much of southern England, values are also clearly higher in certain other general locations. GVA previously identified a zone near the River Thames/ Greenhithe that commands higher values and is proving popular market information indicates this still continues. In these areas, possibly even on sites with a degree of additional complexity, their established value provides developer confidence/ less risk.</p>
<ul style="list-style-type: none"> • On-site and off-site physical infrastructure requirements. ➔ Considering SHLAA information collated on the site and scale of development. <p>Infrastructure needs can in particular circumstances raise considerable risk of potential increased costs/ delay. The investment necessary to make land suitable in planning terms will be influential. It will not normally be considered necessary to ‘underground’ major overhead cables, unless specifically required and accounted for on large sites to realise their capacity.</p>	<ul style="list-style-type: none"> • Attractive surrounds/ adjoining uses. ➔ Considering site survey
<ul style="list-style-type: none"> • Charges arising from infrastructure/ environmental regulations. 	<ul style="list-style-type: none"> • Attractive surrounds/ adjoining uses. ➔ Considering site survey

SITE COSTS FACTORS	DELIVERY / MARKET FACTORS
<p>→ Considering parts of the Borough where North Kent protected habitats mitigation (policy DP25:5) and higher CIL levels apply, and where section 106 obligations still apply.</p> <p>The southern part of the Borough has higher residential CIL rates, although this was set to reflect greater viability.</p>	<p>Whereas some adjoining uses may detract from a locality, there is particular potential for development next to existing high quality/ desirable properties, open space or water features, and in the immediate vicinity of prime commuting services e.g. the best served railway stations.</p>
<ul style="list-style-type: none"> • Other identified constraints that need mitigation for development to be achieved. Considering SHLAA information collated on the site. 	

Appendix 6: Employment Areas and Potential SHLAA Sites

Employment Areas and Potential SHLAA Sites

Current Employment Areas – Background to Designation

The current identified Employment Areas are shown on the Policies Map and subject to Local Plan policies CS7 and DP20. These were justified on the basis of the Identified Employment Areas Report June 2016². Each site was assessed as a whole according to the following criteria:

Physical

- a. Strategic road network and public transport availability
- b. Site access and parking
- c. Quality and condition of premises

Commercial

- d. Image and commercial attractiveness
- e. East of re-development of site for employment

Sustainability

- f. Lack of conflicts with neighbouring uses/designations
- g. Potential for site to remain employment with little potential for change to residential
- h. Proximity to labour and supporting services/business

The report led to the removal of two previous employment sites:

- Dartford Road
- St Vincent's Road – 3 sites to the west of

It also resulted in the 2017 Dartford Policies Map, from which changes to the following employment sites can be identified compared to indicative boundaries in earlier evidence:

- Victoria Road – removal of gasholder and another area to the east
- Crossways – removal of an area to the south of Crossways Boulevard
- The Bridge – removal of the residential areas (assuming that this reflected the details in the planning permission)
- Westwood Farm – removal of part of the area to the west but addition of area to the north

This was in response to site specific issues that arose rather than a focussed review of the boundary for each area.

² https://www.dartford.gov.uk/_data/assets/pdf_file/0003/232653/029-2Employment-Paper-Final-June-2016.pdf

There are a mix of sites confirmed on the Policies Map and in policy DP20 of the adopted Dartford Development Policies Plan. These include very high end employment sites (e.g. Crossways, Questor), leading urban industrial estates (e.g. Orbital One, Princes Road & Watling Street), other urban industrial areas (e.g. Galley Hill Road, Dewlands) and rural sites (e.g. Darenth Hill, Westwood Farm).

Scope for including Employment Areas in SHLAA Assessments

The National Planning Policy Framework (NPPF) 2021 is clear that Local Plans should look at planning for economic growth in addition to planning for housing needs in the context of using land efficiently and protecting the Green Belt. However, the emphasis and specific methodology in national guidance is on exploring potential sources of housing land supply via the SHLAA. It is important that this does not neglect the possibility of employment land forming a potential source of supply to consider in the SHLAA. In this respect, the Planning Practice Guidance includes reference to the following types of sites as being a potential source of supply:

- Existing economic development allocations not yet with planning permission;
- Additional opportunities in established uses; and
- Large scale redevelopment and redesign of existing economic areas.

For this reason, this paper has been prepared to explain how existing employment land has been considered in the SHLAA as a potential source of previously developed land. It is not intended to be a wholesale review of land identified as employment areas under policy DP20 of the adopted Dartford Development Policies Plan. This is because this policy was adopted only recently (in 2017) and monitoring evidence does not suggest any diminution in the strong overall performance of existing commercial land demand and supply in the Borough. It is a proportionate consideration of existing employment land in the context of the healthy current Borough housing land supply as noted in the SHLAA methodology.

It remains the case that the SHLAA will not inform Local Plan future housing locations alone and that other evidence will also inform decisions as to future proposed uses, e.g. Sustainability Appraisal and studies looking at the need for the existing use of a site (where not residential).

The following employment sites were identified early on for SHLAA assessment:

- Dewlands Avenue – one part of it (ref 50)
- Malt House Farm – two parts of it (refs 61*, 185*)
- St Margaret's Farm – one part of it (ref 59*)
- The Bridge – two parts of it (ref 132)
- West Hill – three parts of it (refs 82, 108, 127)
- Westwood Farm – two parts of it (refs 182*, 195*)

Predominantly, this is a result of submissions by landowners from the 'call for sites' which took place in May 2018 (shown with an * above). These are shown in Appendix 6A.

Methodology

A desktop review of all the existing identified Employment Areas shown on the Local Plan Policies Map was carried out to consider whether peripheral parts of them might be suitable for inclusion as SHLAA sites. Site visits were carried out where required. The analysis included consideration of:

- the quality of the employment area as assessed in Identified Employment Areas Report June 2016;
- occupancy rates/density of use;
- access points and whether the accesses only serve the employment area or also serve other areas, i.e. levels of self-containment;
- proximity to existing residential development or sites earmarked for residential development; and
- other policy matters, e.g. Green Belt.

The conclusions reached are set out in the sections on the four types of Employment Area below.

Findings 1: Business Parks

Dartford has three large business parks which provide high end employment use. These are: Crossways; The Bridge; and Questor (90%). With assessment scores of 100%, 97.5% and 90% respectively, they are very high quality. Furthermore, there is evidence of market interest in these areas with recent completions and planning applications for employment units at all three sites.

There could be general intensification or redevelopment opportunities in these areas, e.g. the former Ambulance Station site at Questor (a cleared site on the edge of the area next to existing residential development) which has outline planning permission for the provision of new build employment units. However, given their quality, recent market interest and contribution to the provision of jobs in the Borough, ***it is not considered that any part of Questor and Crossways should be assessed for residential use through the SHLAA. The relevant areas of The Bridge are already included in the SHLAA assessments and will be assessed in accordance with the wider planning objectives for the area.***

Findings 2: Urban Industrial Estates

The following industrial estates were identified in the previous Employment Areas report:

- Burnham Road
- Manor Way
- Northfleet Industrial Estate
- Orbital One
- Princes Road & Watling Street
- Riverside Industrial Estate

When assessed against physical, commercial and sustainability criteria, these all scored above 72%. Most of these industrial estates are largely self-contained, in active use and have minimal conflicts with neighbouring uses/designations.

Whilst there may be patches of land which could be more intensively used in the Manor Way and Northfleet Industrial Estates, the potential introduction of residential uses should only be considered on the basis of a comprehensive redevelopment of the whole area in order to provide a suitable residential environment and not adversely impact on the operation of employment uses.

The main part of the Burnham Road Employment Area is accessed from Sandpit Road. However, some premises are accessed directly from Burnham Road including a modern petrol filling station and car dealership. The premises in the southern part of the site are accessed from Lawson Road which mainly serves a residential area, including the new development at the former Arjo Wiggins site to the east. ***The southern part of the site is occupied by premises which largely appear to be unused or underused. Given this and the fact that***

access is from a residential area, it is considered that this area merits consideration within the SHLAA.

A map showing the site is included in Appendix 6B.

Findings 3: Other Urban Industrial Areas

The Employment Areas report lists a number of other urban industrial areas as follows:

- Dewlands
- Galley Hill Road
- London Road
- New Town
- Rochester Way
- Victoria Road & The Base
- West Hill

These generally score lower than the urban industrial estates, with the exception of Victoria Road & The Base. As many of these are located close to existing residential areas, comprise more of a mix of uses, and have varied access arrangements, it may be appropriate to consider parts of some of the sites within the SHLAA. However, it should be noted that they generally accommodate smaller local companies which need lower cost sites and any erosion of the boundaries could affect the ability of these companies to find suitable premises. Each site is considered below.

Site	Comments
Dewlands	The Kwik Fit premises is being considered as part of the SHLAA as it is subject to a current planning application for residential use. Overall, this employment area appears to be well used (especially the large Jewson builders merchants). No further opportunities.
Galley Hill Road	Self-contained site in use. No opportunities.
London Road	The purpose built business block and the G&M Motors site adjacent appear to be well used. No opportunities.
New Town	Self-contained site in use. No opportunities.
Rochester Way	This is a safeguarded waste site and needs to be retained for this use.
Victoria Road & The Base	This is a higher scoring site where most of the premises are accessed from the road serving the western part of the employment area. However, a few premises are accessed from Lower Hythe Street to the east. Some of these are poor neighbour uses. Residential development is currently taking place on the Abbott Murex site immediately east of Lower Hythe Street. <i>The Gas Holder Site and Steam Crane Wharf are located in close proximity and are under consideration as part of the SHLAA. Given this, there is merit in considering all the employment premises which access from Lower Hythe Street as a potential residential site through the SHLAA. This could also include the existing residential properties and pub located on the junction with Victoria Road to bring about the wider regeneration of the area.</i> A map showing the site is included in Appendix 6C.
West Hill	There are three parts to this employment area, with the part to the north of West Hill in use and self-contained. The southern area may overall have potential to consider via the Local Plan process. There are three SHLAA sites under consideration to the south of West Hill within the employment area; however there has been limited information provided by means of the call for sites. As there are no current clear indications

Site	Comments
	that the Royal Mail wishes to cease use of the site, which is at present a prominent part of the group of employment premises, it is not considered that there would be any further opportunities in this employment area in terms of the SHLAA actions. <i>However this could be revisited if the need for a cohesive approach for the area is identified.</i>

Findings 4: Rural Sites

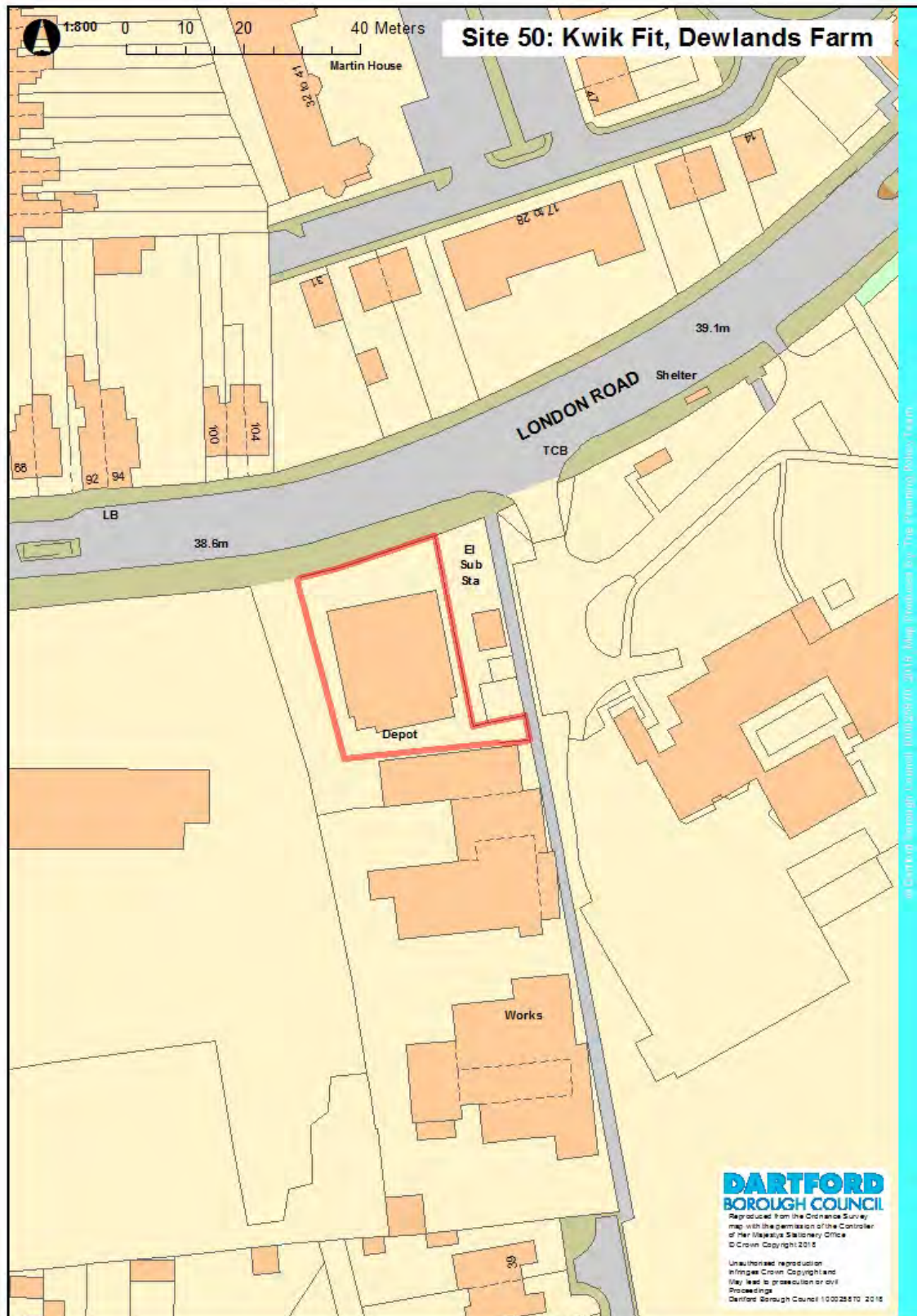
The following employment sites are within the rural area:

- Darenth Hill
- Malt House Farm – parts of this site are already included for SHLAA assessment
- Pinden End
- St Margaret’s Farm – part of this site are already included for SHLAA assessment
- Westwood Farm – parts of this site are already included for SHLAA assessment

Submitted sites in the rural area will be considered in the SHLAA. No further sites for potential consideration in the SHLAA have been identified as part of this process for the following reasons:

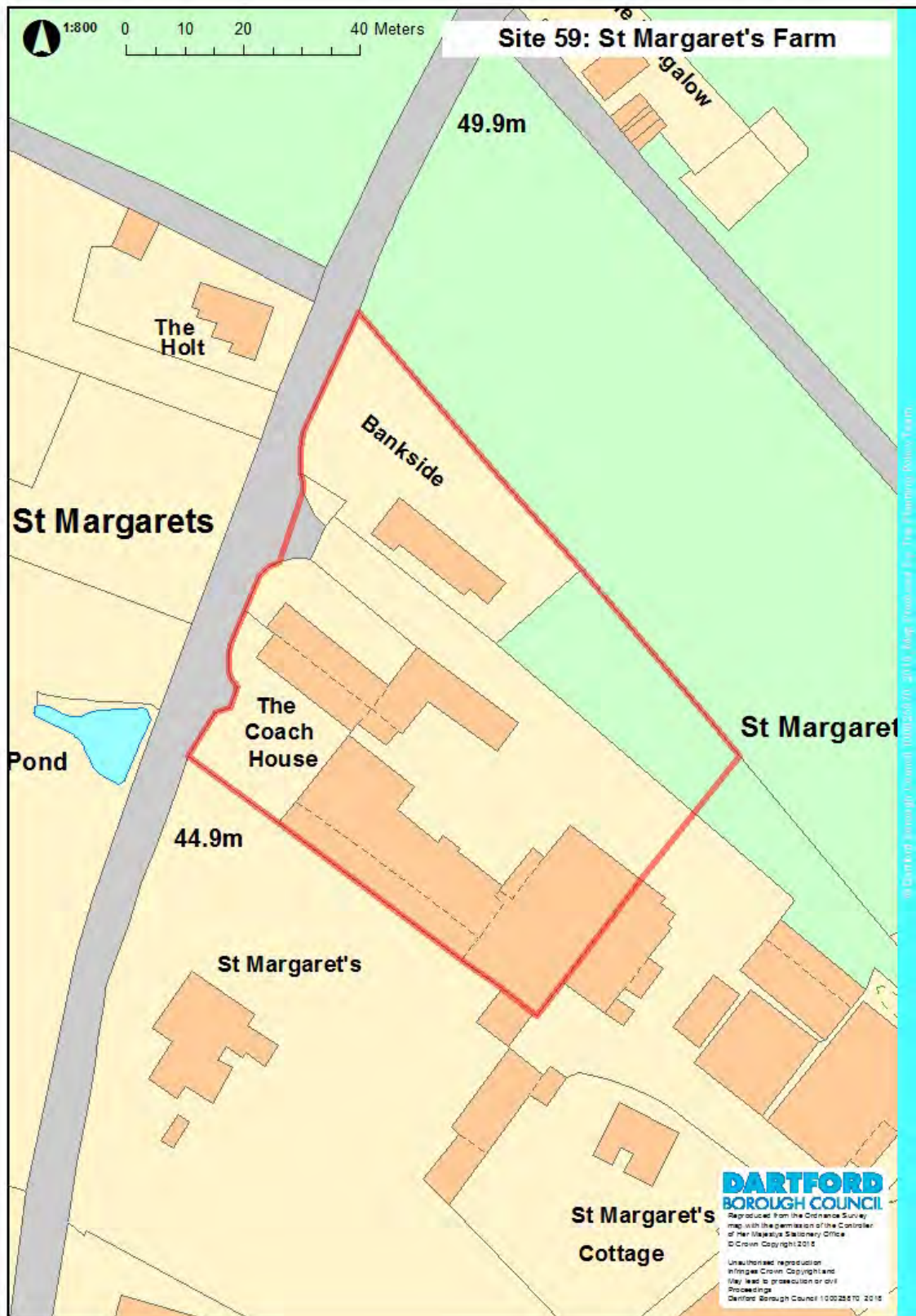
- Systematic release of a set of sites making up a very large land area should be led via new policy, firstly identified as necessary and tested with Local Plan options development.
- They are all located within the Green Belt. Their redevelopment for five or more dwellings would lead to more intensive development which is contrary to national and local Green Belt policy.
- With good occupancy levels found, they are likely to meet a need for employment in the rural area.

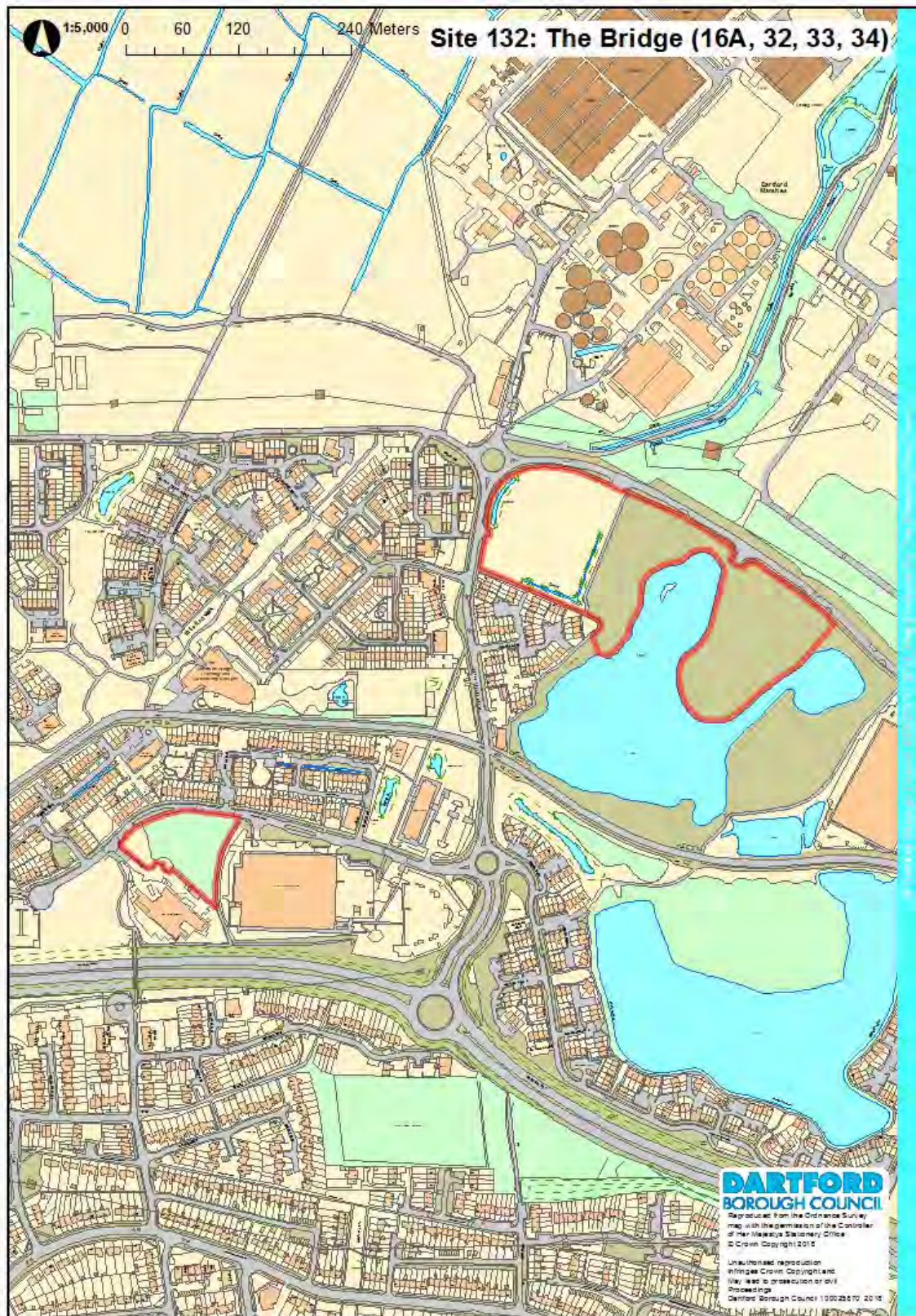
Appendix 6A: Existing SHLAA Sites in Employment Areas

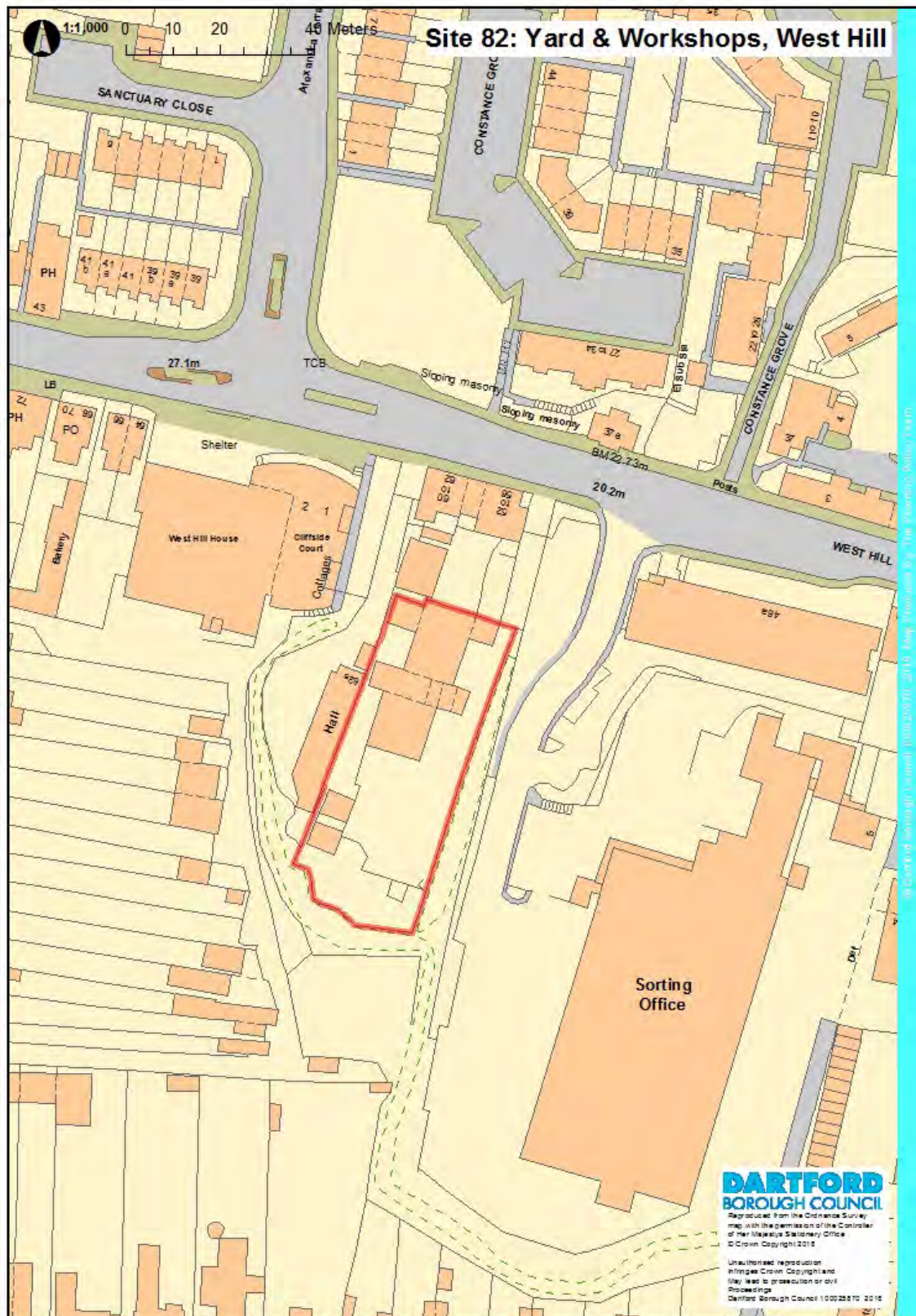




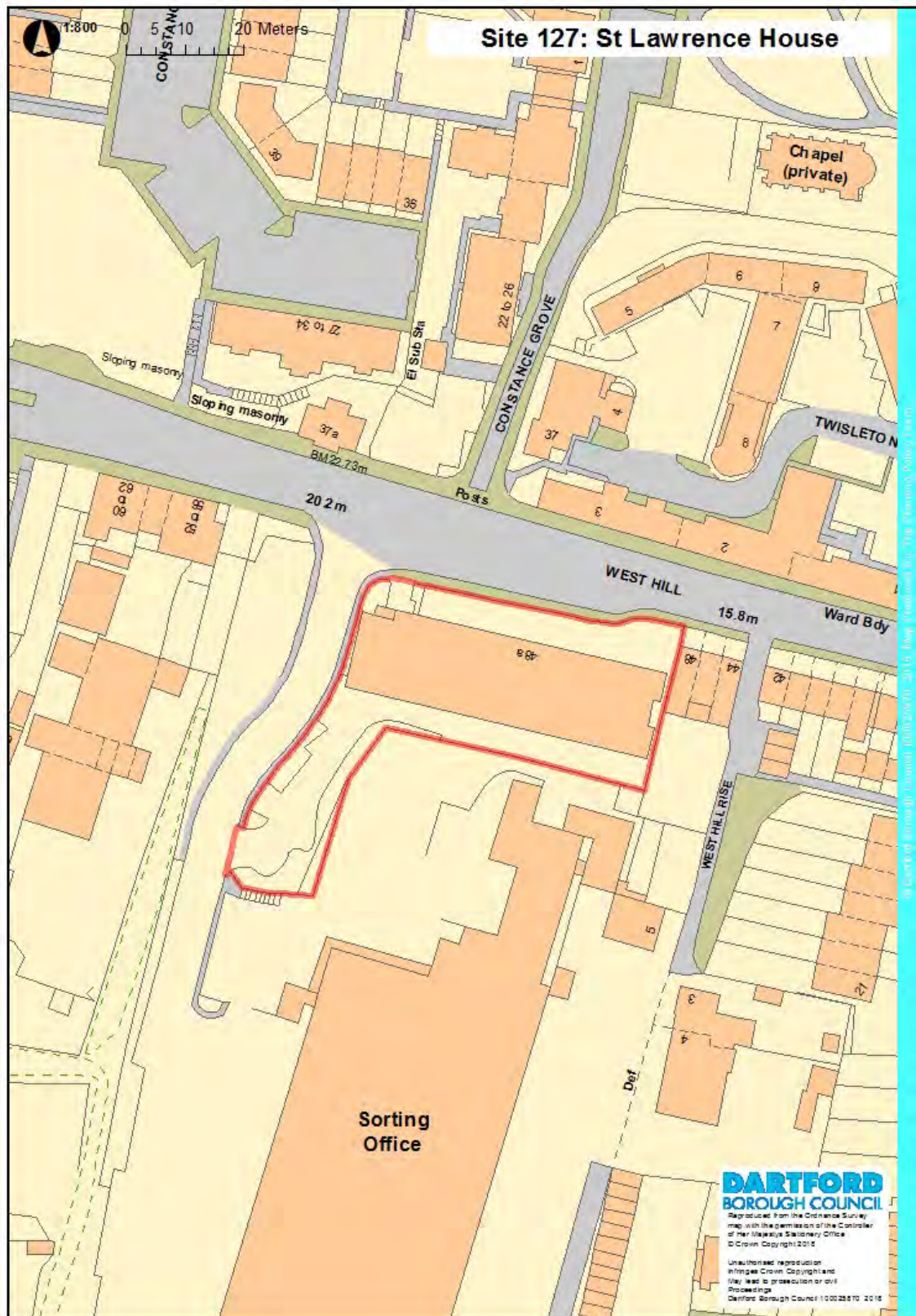














Appendix 6B: Burnham Road Proposed SHLAA Site



