

DARTFORD LOCAL PLAN

Economic Land Report

September 2021

DARTFORD
BOROUGH COUNCIL

Contents

1 INTRODUCTION AND CONTEXT	3
A. Report Purpose and National Policy	3
B. Policy Background– Headline Review	5
2. SITE IDENTIFICATION	8
A. New Planning Permissions	8
B. Potential Residential Sites (SHLAA) Implications	11
C. Employment proposals put to the Local Plan.....	12
3. NEW SITES STRUCTURED EVALUATION	14
A. Evaluation Method	14
B. New Sites Findings.....	15
4. AGGREGATE JOB-GENERATING GROWTH	18
5. CONCLUSIONS AND WAY FORWARD.....	21
B. Strategic Updates to Identified Employment Areas	21
C. Further Employment Policy Aims	26
APPENDICES	30
APPENDIX A: Potential New Sites Assessment	30
APPENDIX B: Identified Area Reductions	36
APPENDIX C: Employment-generating Future Floorspace and Jobs in Aggregate.....	38

1 INTRODUCTION AND CONTEXT

- 1.1 This section sets out the purpose and structure of the report, and its defining existing national and local context.

A. Report Purpose and National Policy

- 1.2 This report focuses on principles for new job-generating development in the Local Plan, particularly the Borough's main employment clusters. Reflecting demand, there is a focus on key policy provisions for industrial and warehousing (B class) and other related uses/ areas, and future employment area boundaries.
- 1.3 Facilitating sustainable economic growth is a central part of the government aims, and is a key feature of the national planning policy. The report addresses many of the associated provisions required for local planning policy. The approach to main town centre uses set National Planning Policy Framework (NPPF) means this is dealt with under separate Dartford Local Plan evidence¹.
- 1.4 NPPF Chapter 6 ('Building a strong, competitive economy') begins (paragraph 80):
"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future...."
- 1.5 Dartford has accommodated major growth through both commercial and housing development. Potential employment and housing sites are given parallel consideration within early parts of this report, in line with national guidance/ policy. Updates to employment sites are considered, including considering via available local evidence the extent to which the land is more suitable for residential development, with both sites identified for assessment by the council and land identified by external parties considered; and potential deliverable new employment land is also identified.
- 1.6 This report principally focuses on implications for new non-residential development specifically it evaluates:
- Proposals put forward to the council in recent years for new employment land in the Borough, either through representations to the Local Plan or through planning applications.
 - Potential local guidance for aggregate levels of non-residential development.
 - Changes that should result for the boundaries of employment areas shown on the Policies Map, notably strategic extensions to meet economic needs.
 - Implications for supporting policies for sustainable economic growth of the Borough
- 1.7 This report on specific policy outcomes is supported by the analysis of national planning policy and wide-ranging synthesis of data (profiling the existing segmentation

¹ LSH (2021) Dartford & Ebbsfleet Retail and Leisure Study
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of the Borough’s economy, growth sector data and consequent economic strategy outcomes) in the Dartford Employment Needs Review (DBC, 2020).² That paper in particular uses the research gathered to reflect that national policy for economic development has a ‘qualitative’ focus on productivity and the growth potential of key sectors. Findings can be summarised as follows in Table 0:

Table 0: Dartford Employment Needs Review 2020

Employment Needs Review 2020 paragraph:	Sub-title:	Findings brief summary:
3.19	Business premises take-up	<ul style="list-style-type: none"> • The volume of businesses has growth significantly in the north of the Borough, particularly through the establishment of land at The Bridge, Littlebrook and Northern Gateway as a location to attract new businesses. Large employers have particularly stemmed from the provision of new premises in high quality and accessible settings. • Loss of employment land has been limited. • The level of vacant premises is low across identified employment areas.
4.21	Market segment trends	<p><i>Industrial:</i></p> <ul style="list-style-type: none"> • This is generally fairly widely distributed in Dartford. • Past losses have been more recently outweighed by new build/ additional floorspace within existing buildings. • There appears to be a good take up of light industrial premises and some interest for manufacturing. <p><i>Distribution:</i></p> <ul style="list-style-type: none"> • This is the dominant form of business floorspace in the district and particularly concentrated north of Dartford town. • The warehousing stock has continued to expand through major recent new-build development. • Rents are very high compared to typical Kent levels. • Further demand is projected in this sector. <p><i>Offices:</i></p> <ul style="list-style-type: none"> • The Borough historically had limited office provision, and the relative may explain why the Borough has not been significantly hit by the Office to Residential PD rights change. • The development of Crossways Business Park has led to the Borough hosting some large offices/ concentrations of employees, and Dartford’s rents becoming amongst the highest in Kent.

² www.dartford.gov.uk/__data/assets/pdf_file/0009/921393/Dartford-Employment-Needs-Review.pdf
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		<ul style="list-style-type: none"> This prompted some updating/ replenishment of the office stock of the Borough.
5.16	Sectors for future productivity.	<p>Growth of new/ improved modern floorspace is expected to continue across sectors, however the greatest interest is likely to be for distribution/ logistics development. In terms of other national priorities for growth, clear opportunities exist for significant new premises of a variety of sizes for:</p> <ul style="list-style-type: none"> knowledge and data-driven business at new complexes at Ebbsfleet Central, and Crossways and other business parks, creative industries at Dartford Town in particular, high technology services and manufacturing, at intensified existing employment locations in the north of the Borough.

1.8 This report builds on the findings, applying them directly to confirm specific key aspects of future Local Plan policy. Below, the next section (2) considers the range of development proposals put forward in Dartford’s identified employment areas, with Section 3 then evaluating the options for strategic scale boundary modifications to secure economic growth. Section 4 considers the aggregate level floorspace needs for job-generating uses; conclusions for the Local Plan are outlined in the final section (5). Firstly, this introductory section outlines some principal background to employment sites and local considerations for the study.

B. [Policy Background– Headline Review](#)

1.9 Dartford has had a strong industrial presence for many decades, partly due its rivers (notably the Thames), mineral assets, and proximity to London.

1.10 Into the 21st Century, the Borough continues to provide many prominent business locations, due to, in particular:

- redevelopment of industrial areas for new commercial provision,
- large urban mixed use developments, and
- the creation of large new business parks based around locations off the M25/ A2(T) providing premises for large employers/ HQs.

1.11 This has contributed to Dartford being a net importer of labour (in-commuting). Clusters of commercial premises are found in the southern part of the Borough, providing complementary employment land to the new premises in the urban area.

1.12 Dartford’s commercial property market has been active in recent years, reflecting the economic regeneration of the Borough.

- On average across the past five years, 13,970 sqm of new commercial floorspace has been delivered each year

- Over the last ten years, a total of 83,822sqm of new commercial floorspace has been delivered
- 1.13 The existing Core Strategy set a clear principle in policy CS7 of protection of existing employment areas (alongside major Borough residential growth).
- 1.14 The current identified Employment Areas are shown on the adopted Policies Map 2017, and are subject to Local Plan policies CS7 and DP20³. They may include a range of service or industrial job generating functions, representing clusters of businesses of sufficient scale. (They are not based around single employers, and exclude areas that are historically retail-led or mixed use eg town centres, Bluewater and district/ local centres). Overall they cover:
- very successful strategic-scale employment sites (e.g. Crossways, The Bridge Questor),
 - highly popular accessible industrial estates (e.g. Orbital One, Princes Road & Watling Street),
 - other necessary urban industrial areas (e.g. Galley Hill Road, Dewlands)
 - and more rural sites (e.g. St Margaret's, Westwood).
- 1.15 These designations were updated and confirmed in 2017, including removal of a series of previous employment sites in part or full (compared to sites identified in justifying 2011 policy CS7):
- Dartford Road – removal
 - Sites off St Vincent's Road – removal
 - Victoria Road – removal
 - Westwood – part removal/ part addition.
- 1.16 Boundaries of large sites e.g. at The Bridge were also updated in 2017 to reflect the commercial area build out of these large mixed use new locations.
- 1.17 Reflecting all this, emerging new Local Plan proposals⁴ therefore indicated that a Borough-wide network of employment sites, where the loss of commercial use is restricted, should be retained. This protects the economic contribution of the Borough, and ensures local jobs are available to accompany the major residential growth occurring at other locations in Dartford. However policy should also, in line with national policy, be (as further considered in this report):
- sufficiently responsive for an appropriate period into the future,
 - recognise the environmental and transport implications of the scale/ locations of commercial activity on Dartford's sustainable development, and
 - be up to date with respect to changes in the planning system e.g. the new more flexible Use Classes.
- 1.18 In considering further updating of boundaries now, changes to identified employment areas may occur for various reasons, notably in response to:
- A *New planning permissions (for employment or other uses)*
 - B *Consistent with government guidance, SHLAA (potential residential sites) outputs*
 - C *Representations put forward as part of the Local Plan process.*

³ These derive from the Identified Employment Areas Report June 2016

⁴ Paragraph F7, Local Plan Preferred Options Consultation (DBC, 2020).

These can all result in changes that bring forward new employment floorspace, or redevelopment of employment land for alternative uses.

1.19 These potential changes *A to C* are reviewed in the next section.

2. SITE IDENTIFICATION

2.1 This section explores specific employment land options through, in turn, looking at relevant planning applications, and then proposals under consideration via the Local Plan to change use of existing employment land or for new employment development.

A. New Planning Permissions

2.2 Although there has been growing flexibility on when full planning consent is needed (particularly for proposals creating new homes) some form of planning permission is usually required to achieve many employment developments, especially involving industrial/ distribution land.

2.3 Borough-wide employment planning application proposals between April 2017 to March 2021, have been reviewed i.e. all types of permissions sought in the plan period.

2.4 As the focus is on potential changes to/ new options for identified employment areas:

- Table 1 below shows proposed net *gains* (where involving 1,000sqm plus of B class floorspace) in locations *not* within identified employment areas, and
- Table 2 shows all proposed net *losses* of B-class floorspace within the identified employment areas.
- Contextual updates/ notes are provided in cross-referred paragraphs following the tables:

Table 1: New employment applications outside employment areas

Site	Planning application reference	Proposed primary use	Scale of development	Status (April 2021)	Policies Map Status
Phase 2 Northern Gateway North, Central Road, Dartford	17/01793/FUL	B1	15,939sqm	Construction finished	Adjacent to employment area (Riverside)
Littlebrook Power Station, Rennie Drive, Dartford (Phase 1)	18/00457/FUL	B8	41,806sqm	Under construction	Adjacent to employment area (The Bridge)
*Littlebrook Power Station, Rennie Drive, Dartford (Phase 2)	19/01515/FUL	B8	215,277sqm**	Under construction	Adjacent to employment area (The Bridge)

*Land At Dartford International Ferry Terminal (Europort), Clipper Boulevard East, Stone	19/00991/FUL	B8	42,653sqm	Approved	Adjacent to employment area (Crossways)
Nursery, Leyton Cross Road Wilmington.	20/00475/COU	B8	1,450sqm	Approved	Green Belt

- 2.5 Table Note- * *Update*: In June 2021, after the end of the last monitoring year, information proposing a further phase to both Littlebrook and Europort sites were received. These land parcels are within the areas shown to be designated on the Policies Map in the final chapter.
- 2.6 Table Note- ** The Phase 2 Littlebrook application has specific features that make this stated floorspace figure less comparable. At (pre) application stage there was discussion as to the application of floorspaces figures due to the unusual nature of this new facility, use of features such as automated mezzanine spaces and its special internal design for the operator (Amazon). The building footprint is less than 60,000sqm. Using the floorspace figure in the table results in an estimated plot ratio of c1.25, which is very high for a warehousing operation even for a new proposal. More typical expected floorspace levels would be approximately half the above, were plot ratios of approximately 0.5 or 0.7 applied⁵, or less at lower plot ratios, if gross site area is c. 17ha. In brief, the overall scale and nature of the facility is clearly distinct.
- 2.7 Reviewing the permissions as a whole; it should also be noted the change of use permission in the Green Belt is not required to be directly addressed further, this has not been implemented and does not relate to any other current or proposed employment site. It will not be designated in Local Plan terms. In summary, it can be seen from all the other applicable proposals they:
- Have been approved or construction commenced (with varying degrees of progress/ completion).
 - Are large (over 15,000sqm).
 - Are outside but adjacent to existing designated employment areas.
- 2.8 All these locations are therefore considered further in section 4 as potential strategic extensions to Dartford’s identified employment areas. Proposals to lose designated employment land are now considered.

⁵ This is used later in the report (section 4/ Appendix C).
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Table 2: All loss of employment applications in employment areas

Site	Planning application reference	Proposed primary use	Scale of development	Status (April 2021)	Employment Area name
* 189 Hawley Road, Wilmington	18/01358/FUL	Sui generis (vehicle hire)	1121sqm	Undetermined but superseded*	Questor
W J King Garages, 573-597 Princes Road, Dartford	18/00551/FUL	Sui generis (showroom facilities)	1250sqm	Complete	Princes Rd/ Watling St
West Hill House, West Hill, Dartford	18/01415/P3O	C3 (dwellings)	960sqm	Prior approval permission	West Hill
Unit 4 Twistleton Court, Priory Hill, Dartford	19/00023/COU	C3 (dwellings)	353sqm	Full permission	West Hill

2.9 Table Note- * *Update*: The proposal at Questor (Hawley Road) remains not determined. The Hawley Road proposal is outmoded as although this application has not yet been withdrawn, a new large employment proposal has just been approved (20/01202/FUL) after the end of the monitoring year on a site that includes this and other land.

2.10 In summary, it can be seen of the approved proposals for loss of identified employment floorspace in identified employment areas:

- Developments are small/ medium sized and limited in number.
- Two are for residential at West Hill, Dartford.
- The other two are for commercial sui generis uses generally appropriate in employment areas

2.11 This is seen as confirming the overall health of the employment areas, consistent with a range of other commercial and planning data e.g. extremely low observed vacancy levels.

2.12 The demand for residential, including at West Hill (highlighted above), is now further considered.

B. Potential Residential Sites (SHLAA) Implications

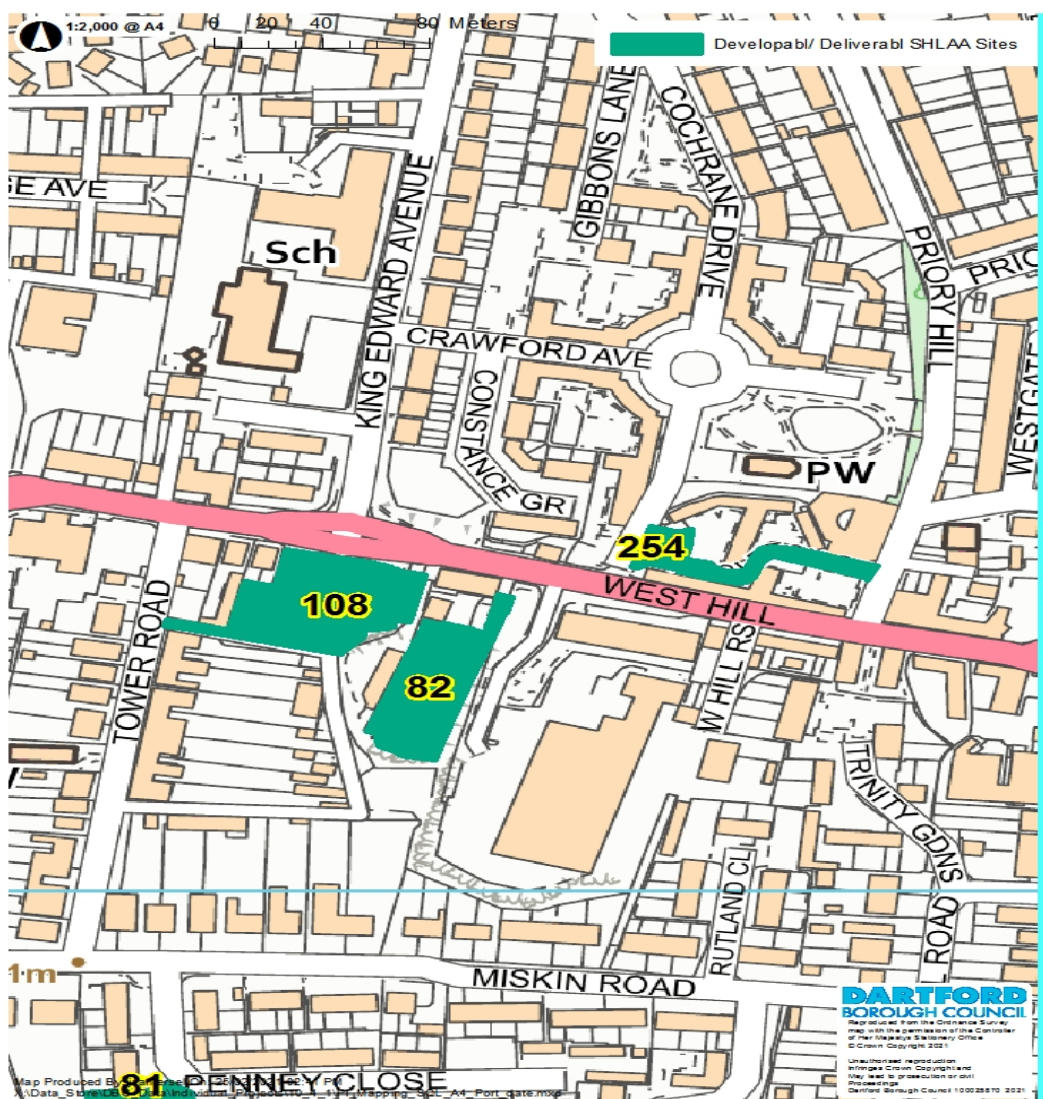
- 2.13 National planning guidance advises Local Plans that employment land growth should be evaluated alongside planning for housing needs. The emphasis and specific methodology in the guidance for employment is on potential sources of development land emerging via the method principally adopted for housing supply- as a found in the Strategic Housing Land Availability Assessment (SHLAA).
- 2.14 The Dartford SHLAA is based on carefully considered factual criteria necessary for delivering sustainable development, with flexibility in relation to existing policies e.g. in relation to the identified employment areas. The outputs therefore warrant review in respect of future employment area boundaries.
- 2.15 As part of the integration between assessment of employment and housing land supported by government, the Council:
- Formulated a methodology that does not constrain the loss of employment land for residential. It is clear in the SHLAA methodology and consistent with the NPPF that prospective residential sites are not discounted due to their current employment land status in Dartford.
 - Received residential proposals put forward for consideration in the SHLAA through a 'call for sites', including on designated employment land.
 - Undertook a special review of existing employment site boundaries to consider there general level of usage/activity and possible 'soft' parts of these areas which could logically be considered for redevelopment, finding potential additional 'desktop' sites for residential assessment (additional to the call far sites land).
- 2.16 The SHLAA sites located within existing identified employment areas were taken through the methodology and this objective assessment found the following sites to be deliverable or developable.

Table 3: Deliverable/ Developable sites in the new SHLAA on current employment land

SHLAA ref.	Address	Size (ha.)	Employment area name
82	Pearson Bates yard/ workshop, West Hill	0.21	West Hill
108	West Hill House	0.26	West Hill
197	Land at Lower Hythe Street, Dartford	0.62	Victoria Rd & The Base
254	4 Twistleton Court, Priory Hill	0.08	West Hill

- 2.17 It can be seen from Table 3 and the map below that three of the employment sites where there is residential interest are in the West Hill employment area. (Table 2 showed two that have planning permission). The map below shows they are in close proximity but are separate proposals.
- 2.18 The SHLAA also highlighted 0.03ha of land that is a former frontage/ entrance to industrial land, but only hosts dwellings: Land Rear of 165-173 Hawley Road (SHLAA ref 273). This had continued to be included in the Questor employment area boundary at the time of assessment.

- 2.19 Looking at the future expected residential supply in the Local Plan, which is the core output of the SHLAA, highlights that a care home (class C2) has been permitted on land currently in the Bridge employment area, and beyond that site (within the periphery of the designated area) education buildings have been sited.
- 2.20 It is apparent that only the West Hill identified employment area in the Borough has attracted more repeated non-commercial (residential) interest; this is therefore considered further. Three other specific areas are proposed for employment land reductions in the Borough, however these only make up a very small proportion on those designated areas. Further details and mapping are provided in Appendix B.



C. [Employment proposals put to the Local Plan](#)

- 2.21 Reflecting strength in the Dartford commercial property market, a series of employment-based proposals have been put forward for the new Local Plan. From the

last ('Preferred Options' and February 2021 Publication plan) consultations, six sites were put forward, all of which can be considered medium or large in size:

Table 4: Preferred Options representations for new employment land

Site	Location	Promoter	Current Status
Bean Triangle	Bean	W T Investments	Green Belt in EDC area
Plots 32-34 The Bridge	North Dartford	Wrenbridge Land Ltd	Designated employment land
Former Littlebrook Power Station	North Dartford	Bericote Properties Ltd	Brownfield land (parcels mostly now permitted / under construction)
Cotton Lane East and West (south of railway)	Stone	Tarmac Trading Ltd	Greenfield land, no designation.
Dartford Marshes	North Dartford	Code Development Planners Ltd	Green Belt
Sandpit Road	North Dartford	Thames Water	Under-used wastewater works and vacant land, neighbouring industrial premises.

- 2.22 As with the SHLAA, these are looked at further against key sustainability principles, and criteria for delivering economic development, rather than evaluating them against current Local Plan policy. However the 'current status' column provides information indicating new employment proposals to the Plan were of a mixed nature on different types of land in different parts of the Borough. All these proposals however are located in the part of the Borough that is north of the A2(T) strategic route.
- 2.23 Land at the Bridge is already within an identified employment area, which is to be retained. It is therefore not directly examined further.
- 2.24 The other proposals for the Local Plan are analysed further in the next section, and included in the detailed assessment at Appendix A.

3. NEW SITES STRUCTURED EVALUATION

3.1 This section is an important part of the report, looking in further detail at the possible new employment land proposals identified earlier. It provides key findings for the future of the Local Plan's identified employment areas.

A. Evaluation Method

3.2 The appropriateness of the potential new employment land options (see section 2: Tables 1 and 4 outcomes) should be reviewed against national policy and Borough aims, to inform Local Plan/ Policies Map content, and to underpin strategic economic growth.

3.3 The framework for this evaluation has been derived from principles in national policy and guidance. The range of considerations is based on planning practice guidelines for employment, that are well established for residential site (SHLAA) evaluation, namely:

- Suitability considerations
- Availability considerations
- Achievability considerations.

3.4 These are addressed below, and key parts of the guidance reflected here is reproduced at Appendix A, followed by individual site assessment.

3.5 **Suitability:** the guidance notes primary factors include performance against national policy, contribution to regeneration priority areas, and environmental issues (the guidance highlights landscape impact). However it is important that economic factors are appropriately weighted as per the NPPF. Paragraph 82 focuses on growth sectors that should be closely considered. These account for 4 of the scoring factors in the Appendix assessment, plus the overall Local Plan objective of sustainable transport for trip generating developments. The existence of new planning permission is regarded as significant in the guidance.

3.6 **Availability:** national guidance states this covers any identified legal issues of relevance, and also the delivery background/ track record of the developer/ land. However it should be noted that this longlist has been drawn up based on sources that are likely be seen (from the landowner/ developer perspective) as available.

3.7 **Achievability:** Under the guidance, 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 important factor requires a judgment on viability, which can be seen to related both to potential costs of bringing the site forward and its potential value for employment i.e. market attractiveness. Both aspects are rated in consideration of overall achievability.

3.8 Outcomes from these factors need to be applied in the context of meeting qualitative requirements for a sufficient range of economic development options over the plan period.

B. New Sites Findings

- 3.9 The above factors form eight individual criteria that have been assessed. Each criterion is scored for performance 1 to 5, with results set out in the Appendix A.
- 3.10 This provides a framework to consider the relative performance of land in terms of planning for economic development, and to then inform evaluation of overall sustainable development merits and Local Plan appropriateness.
- 3.11 Outcomes of the assessment are summarised as follows, along with the influential matter of the site’s current planning status:

Table 5: New strategic employment land summary scoring and planning status

Proposed Site	Total score (40= maximum)	Planning permission?
Cotton Lane East and West, Stone	22	No
Bean Triangle	20	No
Former Littlebrook Power Station	30	Yes
Dartford Marshes	15	No
Phase 2 Northern Gateway North	28	Yes
Dartford International Ferry Terminal (Europort)	30	Yes
Sandpit Road, Dartford	25	No

- 3.12 National guidance and established practice suggests serious consideration is given to sites with planning permission. With many demonstrated positive attributes, the three sites with permission score highly against the criteria. Taking these sites forward in the Local Plan is confirmed in concluding this report.
- 3.13 Middle ranking/ fairly highly scoring against the criteria is land at Sandpit Road. In planning terms this may perform well -assisting its delivery (depending on future details of proposals), given the lack of strategic constraints such as Green Belt and other impacts. Weight is also given, in reviewing its economic scoring of 25/40 (63%) and final decisions, to the fact that it offers an opportunity over time that can complement the sites already with permission; with realistic possibilities of gaining permission. Presented as a clear and logical extension to the existing Burnham Road area also assists delivery prospects. Its relative proximity at northern Dartford town to some of the largest recent investments in the wider area (including at former Northern Gateway/ Littlebrook sites), may support its economic development potential.
- 3.14 This leaves questions over whether to designate the remaining lower scoring proposals, the best of which scored 22/40. They have not had recent relevant planning applications, but appear to face environmental and planning constraints that would have to be appropriately and robustly overcome for the purpose of this research on very weighty and specific economic grounds.

- 3.15 With 15/40, half the score of the best performing sites, it is not considered there is evidence that land at Dartford Marshes be taken forward.
- This land is in a strategic part of the Metropolitan Green Belt and therefore separate assessment would be required as to whether key tests of national policy could be met to amount to exceptional circumstances, but in any event it is considered to perform relatively poorly in terms of the relevant considerations for employment land.
 - That partly reflects the lack of a clear site/ employment proposals, but also its relatively peripheral location for a site at Dartford, and without opportunity to adjoin the cluster of strategic employment provision at nearby Bridge/ Littlebrook.
- 3.16 Proposals at Cotton Lane and Bean Triangle perform better than this, albeit ranked in the bottom half of sites scoring. Both are in close proximity to the strategic road network. It emerges that both sites have their own disadvantages and constraints, which have no clear prospects of being able to be removed or sufficiently mitigated in the short/ medium term:
- Land at Bean Triangle falls just within the Ebbsfleet Development Corporation's administrative boundaries. Bean Triangle is nevertheless within the Green Belt (as is Dartford Marshes). It is not in close proximity to employment proposals at Ebbsfleet Garden City, being best related to - albeit at the top of a cliff face - to the residential-led developments of Ashmere and Alkerden. It is also isolated from other clusters of employment.
 - Bean Triangle is also not expected to bring forward strategic economic development of a priority form/ sector envisaged in local or national policy. It also is likely to promote vehicle dependent development, with poor public transport accessibility
 - Land off Cotton Lane may hold the market advantage of being in the proximity of the very successful Crossways business park, albeit separated by topography and the railway line.
 - Land off Cotton Lane is c. 500m from M25 Junction 1A. This locational advantage in market terms however also means that major strategic issues are expected to arise in terms of the impact on this highly congested junction (the last point of entry to the Tunnels making up the Dartford Crossing into Essex). It is apparent from several employment schemes further afield that also load onto this junction that, if feasible at all, any scheme of mitigation is likely to be very major in scale.
 - Further impacting on suitability and delivery, land at Cotton Lane is a former landfill site, which has not been fully remediated, generating major uncertainty. Existing 2017 Local Plan policy DP7 (and its successor) would apply for any application as this form of land contamination land generates several issues on development impact and achievement. The cumulative impact of making the land good for development and strategic transport issues are a fundamental concern. Finally, the proposed employment development of land at Cotton Lane, with high visual prominence (e.g. from the north) is likely to raise major environmental and landscape impact issues.
- 3.17 In summary, Dartford Marshes, Bean Triangle and Cotton Lane are not recommended to become new identified employment areas. It is considered that land at four sites forming strategic extensions to existing clusters (and three sites with permission) can

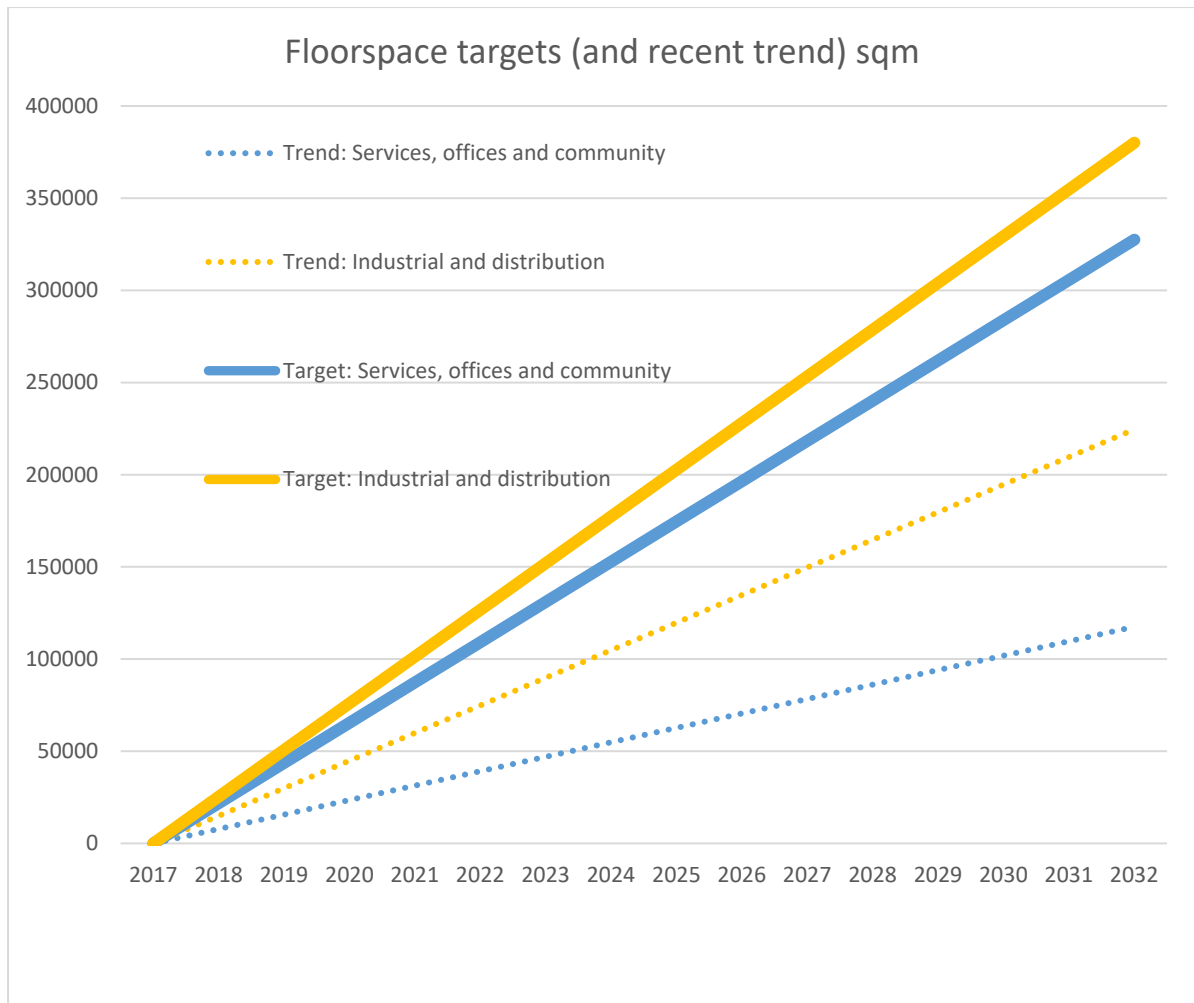
be developed and make a substantial provision towards economic needs, and are appropriate to recognize within the identified employment areas on the Policies Map.

- 3.18 This new land to designate amounts to approximately 100hectares.
- 3.19 More detailed in Appendix A, no other land than these four extensions and no new freestanding locations perform sufficiently well against applicable considerations to merit designation within the Local Plan/ Policies Map.

4. AGGREGATE JOB-GENERATING GROWTH

- 4.1 This section puts identified employment areas, and more industrial uses/ clusters in a quantified wider context of Borough-wide planning for levels of employment and business growth.
- 4.2 Dartford has a strong emphasis on achieving sustainable development and integrated neighbourhoods with an aim for the growth in the population to be well served by local jobs, and infrastructure. Serving residential growth with sufficient supporting uses promotes reduced need to travel and avoids exacerbating the inefficiency of further commuting trips on an overloaded transport network. Sustainable transport and 'walkable' neighbourhood place shaping objectives should be closely reflected in policy for trip-generating development.
- 4.3 It should also be noted on the wider scale that the government have responded to economic needs by recasting the tools of planning. In particular the new Use Classes order has a more aggregated or flexible approach, mostly notably the creation of Use Class E, merging many aspects of the service sector in planning terms, leaving the only B-class uses as B2 and B8 now. Future development levels should be broadly expressed on this basis, providing the overall scope for market responsiveness that is appropriate to support delivery.
- 4.4 Balancing growth sustainably in Dartford means the increased population needs expanded economic opportunities (particularly facilities and jobs within the Borough, wherever possible in walking distance to reduce congestion and pollution). It is therefore considered that whilst viable site-specific economic development opportunities – as reflected in the previous section and other parts of this assessment - are central to the delivery of government objectives, and local prosperity, it would be advantageous for the Local Plan to include high level guidance on the scale of employment development.
- 4.5 This could include not just class B (industrial/ warehousing) development but other types of job-generating growth eg services - particularly offices that typically have high employment densities - which are now found in new uses classes E and F. This principle would ensure there are a range of job opportunities, essential social infrastructure, plus service and entertainment facilities, for residents as the Borough grows.
- 4.6 A jobs projection-led method (requiring national macroeconomic predictions to be modelled at local level, then average past employment densities applied) is not proposed as appropriate for these purposes; not least when there is hard factual information on current strategic development demands in the Borough from existing extensive proposed scheme data. Floorspace trend analysis can use the extensive current development activity/ data in the Borough and suitable assumptions on the growth in new job-generating activity investment and construction to provide sufficient and deliverable quanta in policy guidance. Floorspace figures usually capture the development intensity of a scheme and by-sector scope for employment.
- 4.7 With these considerations and national policy, it is considered:

- This requires a positive approach to development levels that is sufficiently rooted in reality e.g. blending recent proven delivery trends, but also with a strongly weighted forward looking growth component, and accounts for findings in section 3 on new sites.
 - Figures are to be presented over an average basis, accounting for macroeconomic cycles; avoiding the impression of false precision over time in guideline amounts; and in recognition of projecting forward over several years in current circumstances.
- 4.8 With this, the blended pipeline/ recent delivery uplifted trend approach in Appendix C is considered credible and realistic, with a buffer and adjustments containing sufficient flexibility to achieve further acceleration of economic growth levels. No reliance is made on future unidentified development that may occur from investment/ regeneration consistent with policy.
- 4.9 Including quantitative 'targets' can achieve additional guidance/ policy context, complementing (but not replacing) location-based policy promoting employment locations. This approach provides a signal towards the longer-term, and indicate the provision for balanced growth and suggesting aggregate non-residential development levels to be attained over time (annual average); of the magnitude:
- circa 25,000sqm of new industrial and distribution premises p.a.
 - circa 22,000sqm of other job-generating/ community premises p.a.(including offices/services and social infrastructure).
- 4.10 This quantum should provide for accelerated economic development delivery against recent trends. The chart below plots this future rate to 2031/32, and for illustrative purposes only, also projects forward recent past delivery (by 2020/21).



- 4.11 It is apparent achievement of this delivery rate (thick lines) would imply a clear notable uplift compared to the trend in recent years. The dotted lines show relatively high recent delivery rates that would achieve over 100,000 or 200,00sqm by 2032 even without the uplift. Therefore the approach is seen as implying suitably ambitious growth. It is in excess of other external jobs led methodology floorspace outputs.
- 4.12 The quantitative guidelines for future non-residential growth to promote balanced and mixed development should be applied with a flexible approach. Consistent with the thrust of national policy, they should not be seen as a cap or binding requirement, but as reference points with the potential to surpass where sustainable land capacity is demonstrated. For example, suitable site intensification potential may emerge to provide additional sustainable opportunities for net gains in employment premises and to meet qualitative objectives. Industrial intensification could have a very significant role meeting the long-term needs in Dartford, an alternative means to contribute towards meeting the guideline targets.

5. CONCLUSIONS AND WAY FORWARD

- 5.1 This final section firstly considers the main outcomes of the preceding evaluation, then confirms proposals for identified employment area boundaries, and then concludes in relation to associated economic policy implications for the Local Plan.

A. Summary Findings

- 5.2 Appropriate Local Plan policy should be formed from - in particular - national policy and guidance, this study and the DBC (2020) Employment Needs Review. From this document, in summary:
- Section 2 found, from studying planning permissions and future development proposals, that there is strong and continuing market interest in commercial development in the Borough, and only limited pressure for introducing non-economic uses at the Identified Employment Areas.
 - Section 3 examined seven sites put forward by developers for employment land designation in the Dartford Local Plan, and found four proposed strategic sites potentially meet national policy economic and planning criteria. These are confirmed below.
 - Section 4 considered the implications of sections 2 and 3 in the aggregate context for potential future floorspace levels for industrial/ warehousing, and other, principally 'service sector', activities (job generating/ non-residential uses). The resultant quantitative guidance (average floorspace rates) for the two broad development types are shown to imply an acceleration in business/ employment generating rates of development, compared to the current delivery trend. This is due to the new floorspace arising from proposals included in the Local Plan (employment area expansions, and mixed use allocations), new planning permissions, recent delivery, and adding onto this a buffer uplifting the rate further. This would provide an overall guiding context as to Borough- wide performance.

B. Strategic Updates to Identified Employment Areas

- 5.3 It is envisaged that the most effective way to ensure planning policy responds to business needs and promotes efficient development delivery, is principally through earmarking specific land in sustainable locations to promote/ guide investment to the right place. Development management decisions for economic development proposals would therefore be supported 'in principle' after consideration of compliance predominantly with spatial policy and area based criteria. (Unlike delivery rate quantities, these are not prone to the fluctuations of the national economy).
- 5.4 Sustainable economic locations include overall priority (mixed use) strategic development locations in the Local Plan, designated retail centres, and notably the updated identified employment areas. Confirming the extent of these is therefore a central part of the conclusions of this report.
- 5.5 To recap, national guidance seeks employment supply decisions to be reviewed against economic and wider development need. It is apparent from this study that the local context for this is that proposals for future economic land changes in Dartford is to gain

new business space – a clear trend of net growth. With the consistency of employment land demand for forms of large-scale provision, there has been little pressure for major loss of employment floorspace. Allied with extensive provision of new land for residential development, this means identified employment area boundaries can be updated responsively in Dartford i.e. variously expand and contract in response to development pressures, with a net gain of employment land appropriate to business growth.

- 5.6 This should occur both to deliver the economic strategy and also to take on board (where appropriate) demand for alternative uses, notably selected residential proposals as sought by government policy.
- 5.7 Options for additional employment provision through planning applications and proposals put to the Local Plan were assessed and reviewed in sections 2 and 3. As a result, it is recommended strategic modifications be made to the following identified employment areas on the Policies Map.
- 5.8 *North of Victoria Way*, land adjacent to the industrial estate extending to Dartford Fresh Marshes. This major warehousing development was planned under the Core Strategy's Northern Gateway allocation and has now been completed. Clearly this should be recognised and retained.

**Proposed Polices Map change (Riverside/ Northern Gateway employment area):
Riverside Industrial Estate/ Northern Gateway, Dartford**



5.9 *Crossways, land in the east extending to the River Thames. The previous 'Thames Europort' land is being brought forward for employment use, and it should all be included (i.e. along with the remaining land bordering Crossways/ the Thames).*

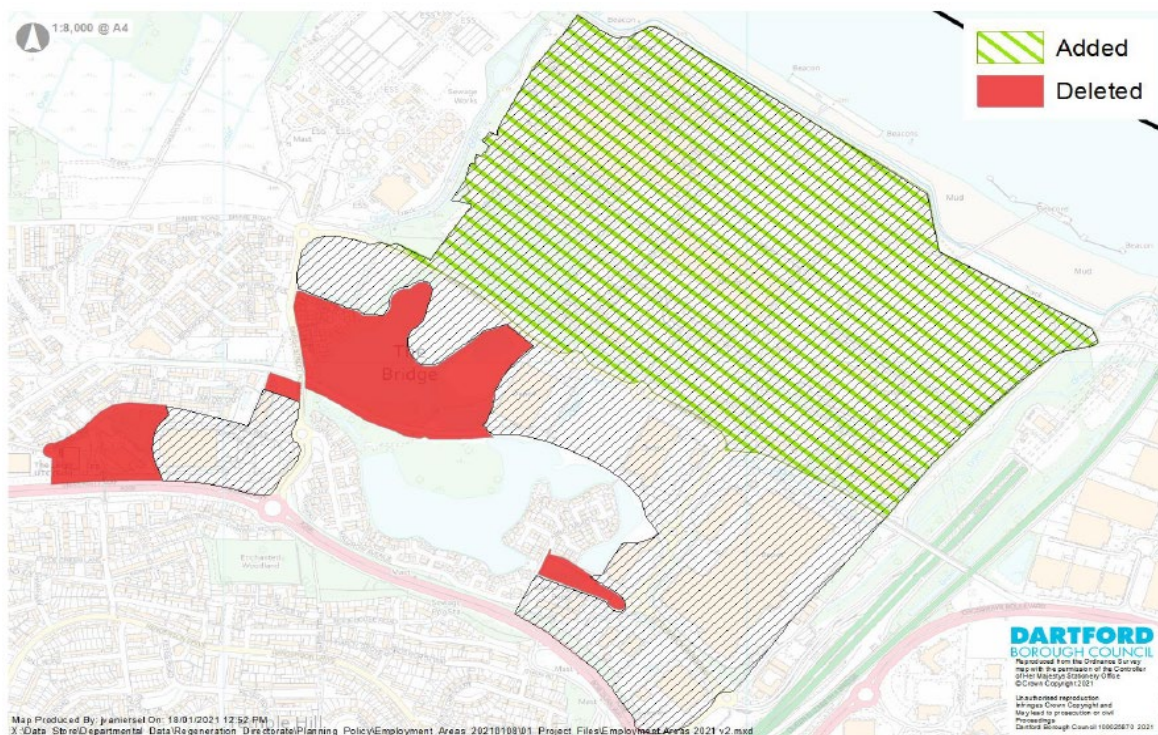
Proposed Polices Map change (Crossways employment area):



- 5.10 North of *The Bridge*, the site of the former Littlebrook Power Station, extending to the River Thames. The vast majority of the land from the Power Station has employment permission or proposals, and the remaining element of the power station land (adjacent, not incorporating, the sewerage works) should also be included.
- Adjoining, to the south, The Bridge large mixed use site has progressed significantly, and designated employment land there should continue to be shown, plus Littlebrook.
 - However, it recommended at the far western periphery, new education facilities/ the proposed care home should be removed. Also in terms of ‘tidying up’ boundaries, land now shown on the Policies Map as open space (or acting as strategic waterbodies) should not be included in this designation either.

Proposed Polices Map change (The Bridge/ Littlebrook employment area):

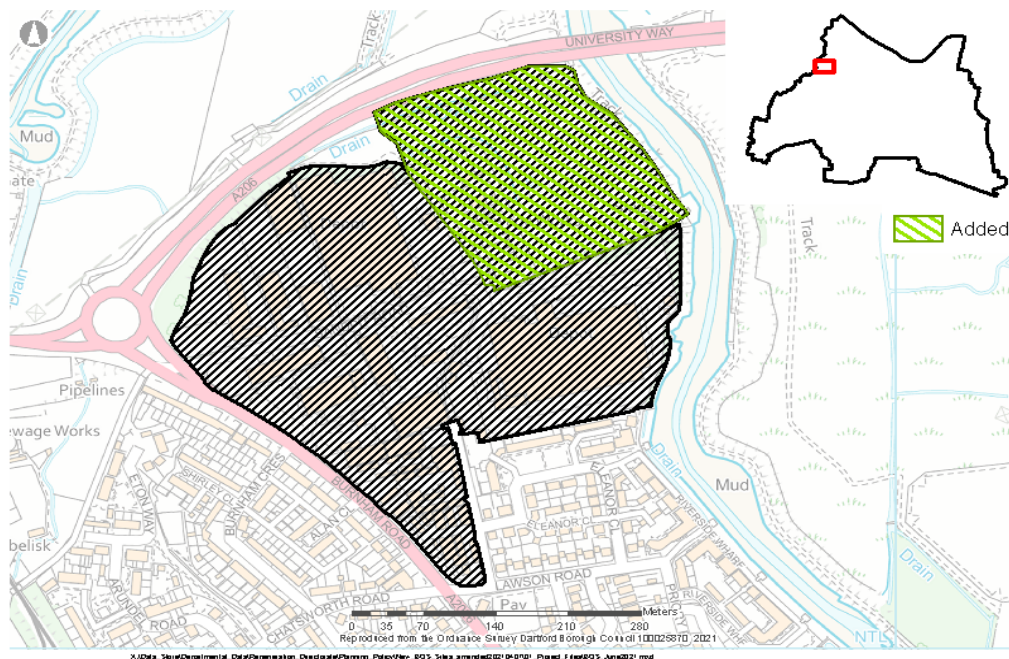
The Bridge/ Littlebrook, Dartford



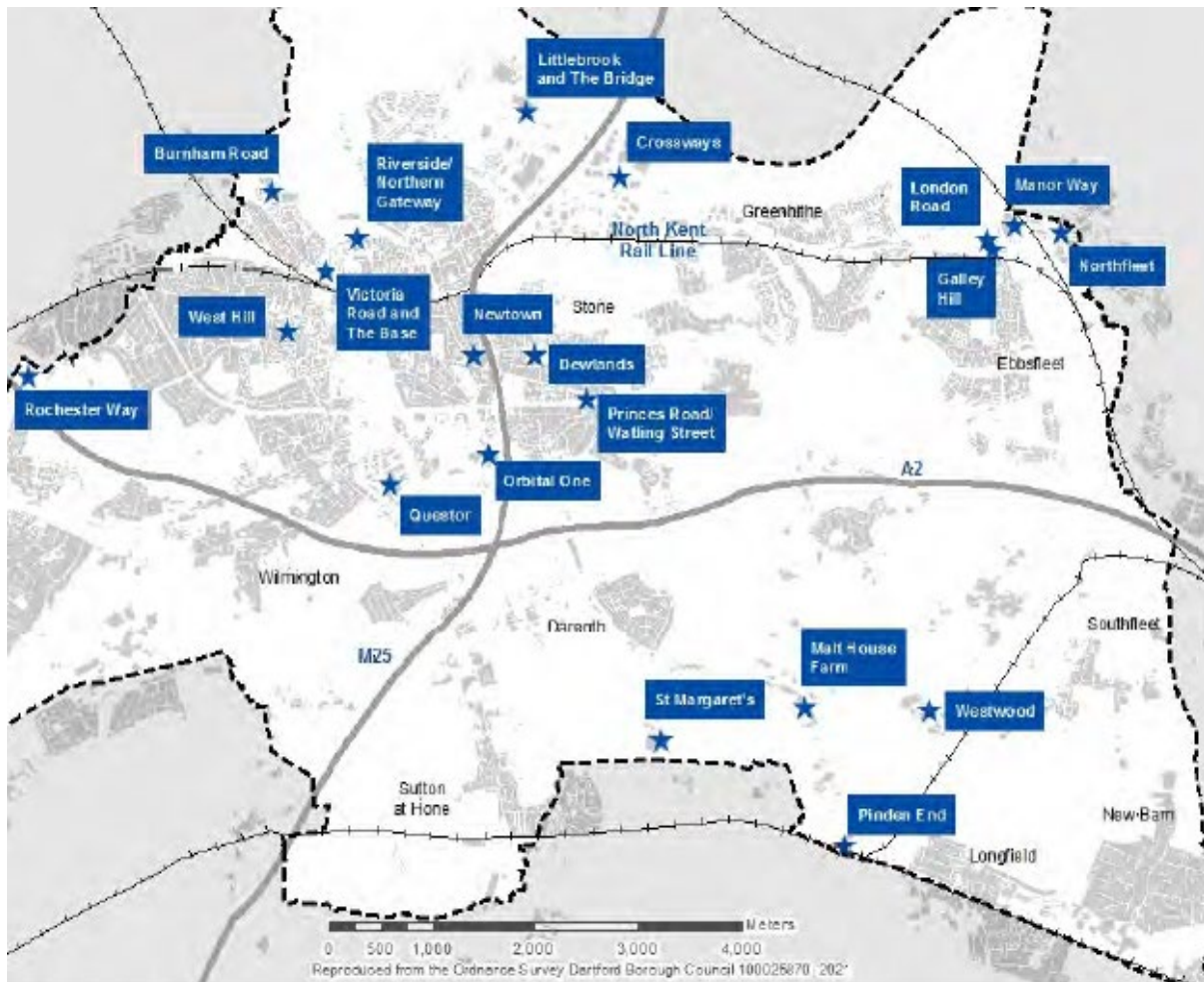
- 5.11 *Land off Sandpit Road*, adjacent land between Bob Dunn Way and the River Darent. This under-used land has been put forward to the Local Plan and is suitable, representing a logical, longer-term, strategic extension to an identified employment area with opportunity for small/ medium scale premises for local firms and lighter industrial purposes.

Proposed Polices Map change (Burnham Road employment area):

Burnham Road, Dartford



- 5.12 These employment sites are all accessible locations with modern successful premises, and as relatively well served by public transport (Fastrack or railway stations) are generally sustainable for development/ expansion, in addition to meeting economic needs.
- 5.13 In terms of scope/ demand for removing employment land, Section 2 (Tables 2 and 3) show limited proposals for non-commercial development on Dartford's employment land. Proposals have been reviewed and as per Appendix B these small-scale changes are proposed for deletion from current identified employment area boundaries, particularly with the objective of promoting regeneration of land in and around Dartford town centre. These changes do not undermine the cohesiveness, appeal or functioning of any whole employment area. The study has confirmed (Section 2) no other new non-commercial developments have been put forward in the identified employment areas
- 5.14 In summary on the network of identified employment areas, they are currently serving needs collectively and individually. There is no evidence of economic need for complete removal of any whole identified employment area in the Local Plan. Therefore the overall distribution across the Borough will remain the same - albeit with a growth in the size of the some of the largest urban areas/ other changes in size - as shown below (with suitable area renaming where applicable).



- 5.15 The overall upshot of proposed expansions is a gross gain of new employment land of over 100ha. Accounting for land/ waterbodies removed, this implies from all proposed boundary changes in this report, a net gain of circa 90ha in Dartford's identified employment land. This additional employment land is consistent with findings in section 4 of substantial expected aggregate future industrial/ warehousing provision (greater than expected for other job generating uses) in the Borough.
- 5.16 As well as strategic outward expansion of applicable sites, further economic growth opportunities are expected through intensification for business uses. Applicable policy should provide sufficient flexibility to attract investment for modernisation of the employment stock, and potential introduction of appropriate new contemporary growth sectors of high productivity, or as sought in national and local economic strategy.

C. Further Employment Policy Aims

- 5.17 The Dartford Local Plan has been drafted and published with four objectives for infrastructure and economic investment. Two pertain to brownfield regeneration/ new infrastructure delivery (I1), and the town centre (I3), the others are:

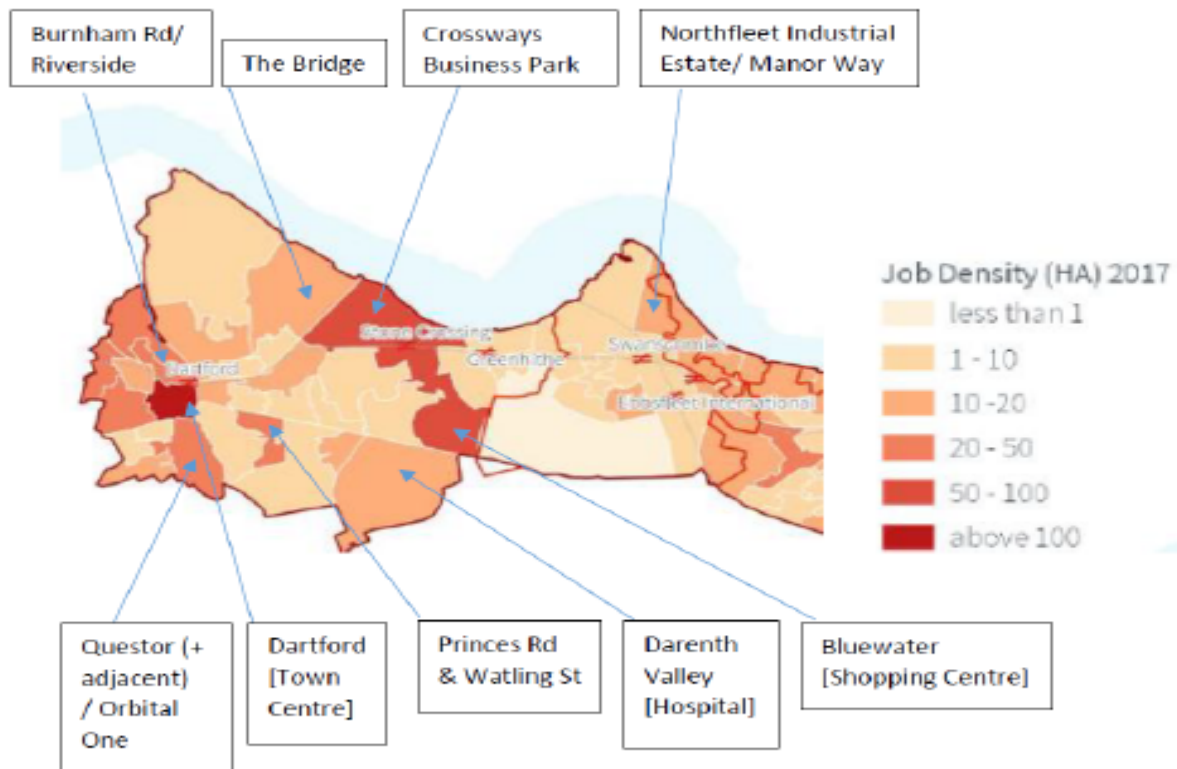
- *12: Facilitating a range of upgrades to the transport network, and a choice of sustainable and active travel options, with rapid and reliable public transport linking existing neighbourhoods and developments to key destinations and facilities, together with a high quality and comprehensive walking and cycling network.*
- *14: Retaining a prosperous economy with a good choice of jobs per resident, increasing high quality, accessible, local employment opportunities, maintaining a diverse supply of premises and supporting existing business needs, with Ebbsfleet providing a productive mix of new commercial, community and residential activities.*

These are strongly relevant to the provisions made within specific employment Local Plan policies.

- 5.18 The Local Plan should have opportunities for employment redevelopment consistent with economic, transport and environmental strategies. A range of qualitative and site-specific factors should be capable of being addressed through policy on identified employment areas collectively but also Borough-wide policy.
- 5.19 The Employment Needs Review (DBC, 2020)⁶ showed employment at Dartford is concentrated at both the commercial locations designated as identified employment areas, and other urban locations - notably Dartford Town Centre and Bluewater (but also Darenth Valley Hospital). This is illustrated in the red/ dark orange areas in the figure below, focusing on jobs per hectare in the Borough's urban area.

⁶ www.dartford.gov.uk/__data/assets/pdf_file/0009/921393/Dartford-Employment-Needs-Review.pdf
DBC Planning Policy Team 2021

Local Pattern of Employment Density (all jobs) & Key Dartford Economic Locations:



Source: Adapted by DBC from *Ebbsfleet Garden City: Inclusive Growth Strategy (Hatch Regeneris for EDC, 2019)*

- 5.20 Clearly, local job generation has a wide urban and land use base, and provisions for mixed use strategic growth areas and retail/ service centres, are important, e.g. the town centre. Dartford’s employment locations vary in character, and local economic activity extends well beyond “B class” complexes/ uses. Strategy should recognise the particular future need to secure new high quality service sector jobs and investment (whether office based or through creative industries for example) alongside industrial and distribution sectors.
- 5.21 Local economic aims seek not just major inward investment but further indigenous growth and business expansion, which can be addressed through both unlocking the potential of existing employment land and the labour force for business, but also by ensuring new land brought forward by strategic scale schemes benefit local enterprises directly.
- 5.22 Under the NPPF (paragraph 82b), criteria or strategic sites should be identified to meet anticipated economic needs. This report has set out expanded and updated employment areas to meet anticipated needs, which can be complemented by other strategic sites in the Local Plan for wider economic needs. However economic policy criteria can also be included to provide additional flexibility for appropriate determination of planning applications for both anticipated and unanticipated needs.
- 5.23 In summary, with the economic strategy necessary for Dartford, identified employment area policy should therefore be complemented by other policy:

- Criteria allowing appropriate provision (additional to identified employment areas and retail centres) for highly valuable new proposals of demonstrable substantial additional potential that may emerge over time.
- Providing within large scale economic development for inclusive indigenous growth: premises/ land that is targeted towards local enterprises, either new or expanded, and training/ higher value jobs.
- Seeking environmental and sustainable transport outcomes as employment is a major factor in Dartford's growth, particularly ensuring major job concentrations are located by good quality public transport, and with local services supporting businesses and employees within walking distance.

5.24 The Local Plan's regeneration proposals must also focus heavily on future diverse economic potential by attracting investment to the most accessible/ best served centres in the Borough, notably Dartford town centre, but especially by unlocking the huge economic potential of land by Ebbsfleet International Station; business proposals for which must be brought forward to complement the identified employment areas.

APPENDICES

APPENDIX A: Potential New Sites Assessment

A1. Potential new sites identified in Table 4 (Section 2) has been collectively and consistently assessed.

A2. Section 3 outlines the method and individual findings results, which are set out below. This starts with some applicable national planning practice guidance, with bold emphasis added:

What can be considered by plan-makers when assessing whether sites / broad locations are likely to be developed?

Plan-makers will need to assess the **suitability, availability and achievability** of sites, including whether the site is economically viable.

This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period.

- Paragraph: 017 Reference ID: 3-017-20190722
- Revision date: 22 07 2019

What factors can be considered when assessing the suitability of sites / broad locations for development?

A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.

When considering constraints, plan-makers may wish to consider the information collected as part of the initial site survey, as well as other relevant information, such as:

- **national policy;**
- **appropriateness and likely market attractiveness for the type of development proposed;**
- **contribution to regeneration priority areas;**
- **potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.**

Plan-makers need to assess the suitability of identified sites or broad locations for different forms of development where appropriate, taking into account the range of needs for housing, economic and other uses.

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. For example, an emerging site allocation may enable development to come forward. This will have to be reflected in the assessment of achievability.

DBC Planning Policy Team 2021

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
- Revision date: 22 07 2019

What factors can be considered when assessing availability?

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
- Revision date: 22 07 2019

What factors should be considered when assessing achievability including whether the development of the site is viable?

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
- Revision date: 22 07 2019

What happens when constraints are identified that impact on the suitability, availability and achievability?

Where constraints have been identified, the assessment will need to consider what action could be taken to overcome them. Examples of constraints include policies in the National Planning Policy Framework and the adopted or emerging development plan, which may affect the suitability of the site, and unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners, which may affect the availability of the site.

- Paragraph: 021 Reference ID: 3-021-20190722
- Revision date: 22 07 2019

A3. How these have been applied is explained in section 3. Specific further notes on the matter of suitability:

- The factor from NPPF 82 of knowledge/ data driven, creative high tech industry, has applied local information including from the Inclusive Growth study for EDC Baseline (Hatch Regeneris, 2018)
- The environmental factor addresses, but is not restricted to, potential impacts including the effect upon landscapes.
- The sustainable transport factor has measurements taken from the centre of the site, based on reasonable potential walking routes (unless otherwise stated).

A4: Scores have been derived as explained in the table below, which is colour coded as follows:

1	Very poor
2	
3	Moderate
4	
5	Excellent

Site	Suitability factors					Avail-ability	Achievability factors	
	NPPF 82: knowledge/ data driven, creative high tech industry.	NPPF82: Accessible distribution	Regen priority areas	Environ-mental	Sustainable transport		Econ. viable	Market attractive-ness
Cotton Lane East and West (south of railway)	Proposals include B1 (37,500sqm) - no full detail yet of businesses. In general proximity (south of railway from) of businesses at Crossways. =3	On B2208. B8 would be part of development mix (51,000 sqm B2 or B8 proposed, plus B1). Access to nearby strategic road network is severely constrained by the recognised imperative to achieve major mitigations for M25 J1A upgraded. =3	The Borough regeneration focus is at the East and West ends of the urban area. This is located in the middle of urban area. Greenfield. =3	Located on the drop slope to the Thames, with long distance views and distinctive local topography. Prominent area, seen from the entrance to Kent from north (over QE2 Bridge). East of Cotton Lane is the site of viewpoint on previous OS maps (e.g. Landranger 177). Limited surrounding development. Potential Major landscape impact, unclear if can be successfully mitigated =1.	Stone Crossing railway station is c 1.5 km walk along Cotton Lane which lacks footpaths/ full lighting for part of its length. Local regular bus services available on London Rd c700m walk. Fastrack further. =3.	Promoted in Local Plan. =5	The land faces particular challenges to be brought forward for development. It is a former landfill site with potentially very significant remediation costs. As noted it is expected that any major trip generating will require a substantial contribution to a new M25 J1A. =1	In close proximity to Crossways but separated by railway line/ cutting. =3.
Bean Triangle	Poorly related to existing clusters, other business in	Proposed for open /local occupier	Just within EDC area.	Prominently located but potential to	Greenhithe railway station is c 2 km walk	Promoted in the Local	The likelihood of the land	Accessible location to highway

	the triangle not of a form that is likely to encourage the key sectors. =1	storage Located with the Bean A2(T) junction being upgraded. =4	Mostly greenfield. =3.	improve local environment e.g. landscaping but delivery/ details unclear. =3.	along the busy St Clements Way dual carriageway. Fastrack is c1.3km walk. =1.	Plan, few details. =4	being brought forward is question-able given its history and current Green Belt status =2.	network but remote for major quality industrial locations. =2.
Former Littlebrook Power Station	Modern advanced logistics facility. =2	Proximity to strategic road network (25 J1A). Development has been agreed on the basis of secured major mitigations for junction upgrade. =4.	North of Dartford town centre, PDL. =4.	Riverside prominent site, design has sought to landscape address mass of structure. Former power station had very major impact. =3.	Stone Crossing (c 2km direct) and Dartford station (2.5km direct) are not close but a shuttle bus has been secured. Devoted pedestrian route to Fastrack 700m. =2.	Under construction =5.	Under construction =5.	Has attracted a very high value occupier (Amazon). =5
Dartford Marshes	Very unclear site prospects. May be other hi- tech/ creative industries in NW of the Borough, but the land won't be well integrated being relatively isolated by marshland and utilities/ structures =1.	No information on any access arrangements/ mitigations. Inevitably would have to be via Bob Dunn Way loading directly on to M25 J1A =2.	Greenfield (green belt). =2.	Flat prominent site near rivers. Major impact, hard to mitigate effectively. =1	Dartford railway station is c 2km direct. Walk to Fastrack route is c 600m. =2.	Promoted in the Local Plan, few details. =4	The likelihood of the land being brought forward is uncertain, particularly due to given its strategic Green Belt status and location. =1.	Uncertain compared to competing facilities in the wider area. Not forming able to be promoted as an extension to established clusters =2

Phase 2 Northern Gateway North, Central Road, Dartford	Realatively well placed- but logistics based facility. =2.	In proximity of strategic road network via Bob Dunn Way to M25 J1A. In operation =3.	Proximity to Dartford town centre, in current strategic allocation. PDL. =5.	Adjoining industrial estate, river/ marshland and residential. =2.	Dartford railway station and Fastrack and regular local buses are 800m walk away =4.	Completed =4.	Completed =4.	Attracted good occupier. =4.
Land At Dartford International Ferry Terminal (Europort), Clipper Boulevard East, Stone	In close of some applicable businesses at Crossways, but expected to be logistics. =2.	In proximity of strategic road network via M25 J1A. With permission. =3.	The Borough regeneration focus is at the East and West ends of the urban area. This is located centrally in the urban area. PDL =4.	Surrounding by development at Crossways, but with an extensive river frontage. =3.	Stone Crossing railway station is c1.2km walk away. Fastrack is 500m walk away. =4.	Under construction =5.	Under construction =5.	Forms a perceived and functional part of Cross-ways. =4.
Sandpit Road land, Dartford	Site delivery prospects has some information but will require further investigation. Adjoining commercial land is a mix, including logisitics, engineering offices, and more traditional industries =2.	Ultimately would have loading on to M25 J1A to avoid the town centre =2.	North of Dartford town centre =4.	Adjoining industrial estate, river/ marshland. With suitable design details e.g. landscaping, most impacts could be mitigated. =3	Dartford railway station is just over 1km away, a local centre nearer. Relatively poorly served by buses (given urban area). Riverside walking route towards the town centre should be improved. =3	Promoted in the Local Plan, few details at present. =4.	Very limited in principle planning issues, although possible land re-mediation issues will need to be addressed =3.	Forms a perceived and functional part of Burnham Rd employment area. =4.
	Suitability factors					Avail-ability	Achievability	

APPENDIX B: Identified Area Reductions

B.1 The Dartford SHLAA considered residential proposals (including by actively reviewing the options for potential focused release of land). These outputs have been actioned. The non-employment planning permissions are generally deliverable and SHLAA sites are developable, so all are expected to occur. It is recommended they should be removed from identified employment areas.

B.2 Section 2 (Tables 2 and 3) showed little overall potential loss of employment land for de-designation, but potential specific removal options were identified. The wider implications of these on the current designations are considered/ mapped below, which suggests strong specific reasons for the overall retention of the employment areas (additional to the context of good Borough-wide demand).

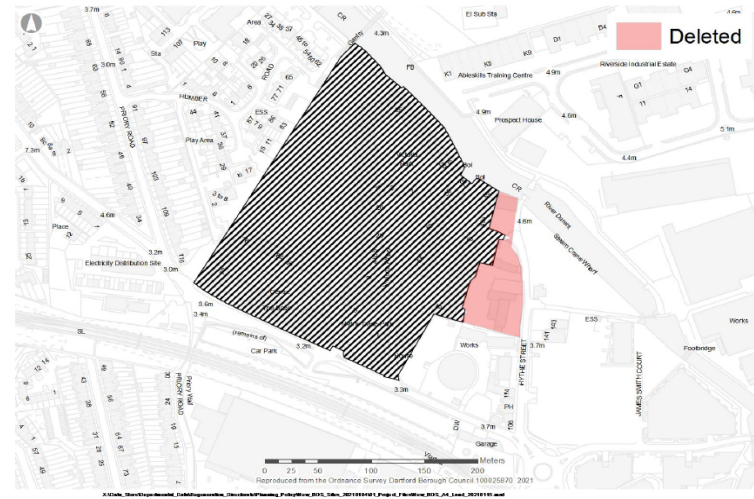
- *Three sites at West Hill employment area.* This area currently contains a wide mix of uses/ premises and the designated land is slightly fragmented overall, with two non-contiguous areas south of West Hill and one to north shown. Proposals do not impact on the largest, high profile and most industrial character use, the sorting office, and other office spaces remain, so the remaining area is feasible to retain. Therefore an area should continue be recognised via the Local Plan but with amended boundaries to create a tighter are more coterminous with employment land expected to endure.
- *One site at Victoria Road/ The Base employment area.* The residential proposal is on the eastern edge of the area, and redevelopment should contribute to the regeneration of Lower Hythe Street, which is a part redundant area located between the river and town centre. As with West Hill, but to a greater extent, the area warrants consideration against the strategic Local Plan priority of achieving regeneration in and around Dartford town centre. Potential for non-employment use can be recognised here in the Local Plan, without adverse economic impact. The Base modern business centre and Victoria Road industrial estate form a substantial cluster of employment land to the west and their current success suggests would they should remain protected in policy.
- *One very small site on the periphery Questor employment area.* This can be removed without any impact on the functioning of the area.
- *A non-operational strip at Rochester Way:* A review of detailed SSSI boundaries has highlighted an overlap with the area previously shown at Rochester Way and existing SSSI. This needs to be rectified with removal of a narrow slither of land.

B.3 Resulting proposed policy map removals from Identified Employment Areas are mapped below:

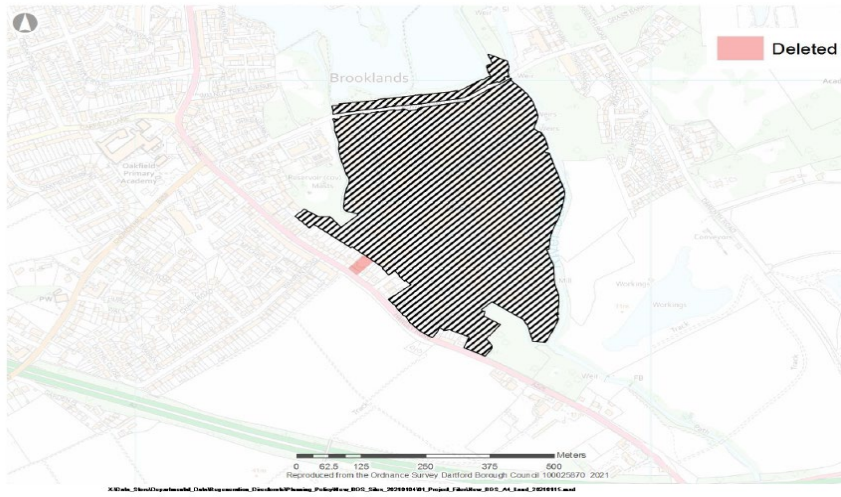
West Hill, Dartford



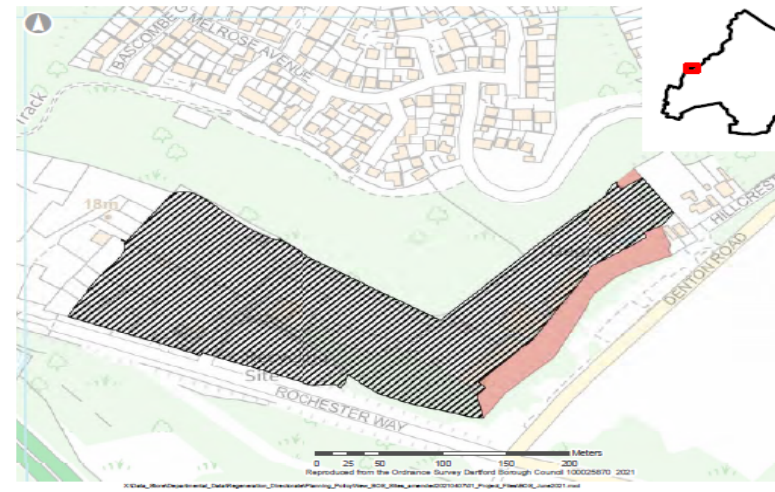
Victoria Road and The Base, Dartford



Questor, Dartford



Rochester Way, Dartford



APPENDIX C: Employment-generating Future Floorspace and Jobs in Aggregate

C1. This appendix sets out the derivation of future development level indications for non-residential premises, taking account of the principles outlined in section 4.

C2. Floorspace figures are calculated as follows:

<i>Sqm</i>	<i>a: Delivery to date (4years from 2017/18)</i>	<i>b: Identified pipeline (applications & allocated)</i>	<i>c: Future supply, delivery adjusted inc 10% buffer [=bx1.1]</i>	<i>d: Aggregate projected supply over 2017/18-2031/32 [=a+c]</i>	<i>e: Total average sqm [=d/15]</i>
Services, offices and community	31,336	269,240	296,164	327,750	21,883
Industrial and distribution	59,887	426,383	320,217*	380,104	25,340

C3. Firstly, recent delivery levels in the plan period are incorporated in column a). The final average (column e) however principally reflects future delivery projections. Column b sets out calculations of the future planned (net change) floorspace levels through planning permissions and appropriate applications and Local Plan site policy requirements i.e. the new allocation policies/ employment area designations. These pipeline figures are adjusted for delivery factors in column c:

- A buffer (10%) is added as commonly occurs e.g. in employment land reviews, deliverable housing land supply for Local Plans. This makes allowance within planning to ensure needs are met for delivery issues, a margin recognising factors such as the typical vacancy level within functioning markets, choice and competition, and the possibility of delays in individual sites materialising. In terms of the magnitude of this; regarding services, offices and community (for instance) it equates to between 3 and 4 years of recent supply: 26,924sqm.
- Industrial/ distribution in column c has had another adjustment leading to the 320,217* total. As set out in paragraph 2.6 there are special circumstances to the floorspace total for the Amazon site in Littlebrook, which is included in the industrial/ distribution pipeline (column b). Indeed it accounts for almost exactly half the total of the whole pipeline. It is considered this is an anomalous site to include/buffer in full. Therefore column c is based on including a plot ratio based, more standard 'dummy' estimated figure for the land as an alternative distribution facility, at 80,000sqm, included in the total and then the buffer applied.

C4. The resulting total floorspace levels (column d) is for 2031/32 inclusive. This is appropriate as:

- It is consistent with the Local Plan residential requirement timescale.
- It is justified against the anticipated delivery profile of industrial and distribution development. The pipeline includes consented development sites which are all moving forward in planning or 'on the ground' terms (with many under construction) and expected to be complete in the next few years. However it is possible unexpected delays can occur before completion; and one site is designated within a strategic extension but without permission and is anticipated to come forward in the mid/ late 2020s. Full completion by March 2032 is overall therefore reasonable.
- It is appropriate as a timescale for the predominance of other job generating developments. Many of these applicable sites are strategic mixed use proposals, and examining their documented point of delivery in the housing trajectory they are generally either deliverable with permission or expected in the mid 2020s; and regard is had to the policy requirements in the Local Plan for front loaded infrastructure delivery. The timescale is appropriate.
- It avoids stretching (lowering) delivery rates to 2037, which is a very long term period over which to fix economic development planning in a fluctuating market.

C5. The totals of the recent delivery and buffered pipeline level in column d is averaged from the 15years period to calculate annualised future rates in column e.

C6. The levels in column e, which can be rounded to 22,000sqm⁷ and 25,000sqm when considered against recent delivery levels, are relatively high. They can be compared with column a (looking at the past four years) where the annual average delivered is 7,834sqm for services, offices and community, and 14,971sqm for industrial and distribution.

C7. Additional future job indications are based on these floorspace figures and standard job density data. These are appropriate to express as a range, with low and high job densities. The starting point for density is the last Employment Density Guide (HCA, 2015). Services, offices and community floorspace figures used are 90% of the levels above, as applicable densities are expressed in terms of NIA floorspace. Results are as follows:

⁷ If focusing on retail and leisure needs specifically the appropriate data is set out in the Dartford & Ebbsfleet Retail and Leisure Needs Study (LSH, 2021). It confirms limited short/ medium term need for additional development, above that already permitted. As directly consumer expenditure and population based it is also not comparable to other economic sectors/ this study, and it should be the starting point when focusing on retail/ leisure needs/ policy.

<i>Jobs (FTE)</i>	<i>Higher job densities</i>	<i>Lower job densities</i>
Services, offices and community	5,991	10,917
Industrial and distribution	2,257	5,525
Total, to the nearest whole job	8,248	16,441

C8. The job densities for these whole development categories have been calculated on a breakdown of specific development types. For example, if industrial and distribution floorspace is projected to be 80% distribution, jobs from 0.8 of the floorspace total is calculated using densities of 77 or 200sqm per job. These reflect HCA densities/ figures used in studies in North Kent (77), and a less dense figure allowing for increased automation. Industrial B2 density is 36sqm in the lower density scenario. Services, offices and community densities vary between 10 and 100sqm per job, depending on type of development and scenario.

C9. The greater quantum of new projected service, office and community jobs, than from industrial/ distribution floorspace, is regarded as consistent with aspirations for higher quality jobs in the Borough (although changes in sectors such as distribution may generate higher value employment).