



# Housing Windfall SPD (Adopted Edition)

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**October 2014**

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## 1. Introduction

### Purpose of the Supplementary Planning Document (SPD)

- 1.1 This is a Supplementary Planning Document (SPD) adopted by Dartford Borough Council on 23<sup>rd</sup> October 2014. This SPD sets out the Council's approach to proposed "windfall" housing sites and how policy CS10 (4) of the Core Strategy<sup>1</sup> is to be applied in the assessment of these sites.
- 1.2 The guidance is intended to provide information to help with the interpretation of existing policy, ensuring transparency and consistency in the application of the policy; and assisting applicants to understand how policy criteria will be applied in the assessment of proposals. It will help to confirm whether windfall site proposals are consistent with policy CS10 (4) and suitable for housing.

### Core Strategy Policy CS10: Housing Provision

#### Windfall Sites

4. Planning applications for sites not identified as deliverable or developable in the SHLAA will be assessed in the same way as planned development by consideration of:
- a) The sustainability of the site for housing development;
  - b) Whether benefits of development outweigh disbenefits;
  - c) The capacity of the current and proposed infrastructure to serve the development taking into account committed and planned housing development;
  - d) Where spare capacity is not available, the ability of the site to provide for the infrastructure requirements it generates.

### Status of the SPD

- 1.3 This SPD is one of the documents in Dartford's Local Plan. The SPD is based on policy in the Core Strategy, which provides the strategy for development in the Borough up to 2026. The SPD should be read in conjunction with the Core Strategy and other Local Plan documents. It has benefited from public consultation and consideration of Strategic Environmental Assessment (SEA) requirements. To confirm, the SPD considers the residential suitability of site proposals; it does not seek to determine whether the loss of the existing land use is acceptable – where appropriate this matter should be also considered through other policies in Local Plan documents/ the Policies Map.

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<sup>1</sup> Dartford Core Strategy, adopted September 2011

## 2. What is a Windfall Site?

- 2.1 A windfall site is one which has not previously been identified by the Council as having potential for housing development. The National Planning Policy Framework (NPPF)<sup>2</sup> defines windfall sites as ***'Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.'***
- 2.2 In the Dartford context, any site which has not been identified through the Council's Strategic Housing Land Availability Assessment (SHLAA)<sup>3</sup> will be considered a windfall site, and Policy CS10(4) and this SPD will be applied. The Core Strategy explains that sites categorised as ***'currently not developable'*** or ***'not developable'*** in the SHLAA are considered to be windfall sites.
- 2.3 Windfalls in Dartford will also include (but are not limited to) developments of 1 to 4 dwellings, as sites of this size were not able to be included in the SHLAA. Windfall sites can come from various sources, and could include buildings that are now proposed to change to residential use.

## 3. Why is the Windfall Sites Policy Needed?

- 3.1 Dartford Borough is unusual in having a large housing land supply in relation to the size of its population. The Core Strategy provides for *up to* 17,300 homes in the 20 year period to 2026. This is recognised in the Core Strategy as meeting housing needs as well as providing an impetus for regeneration (Policy CS10). If the full amount is achieved, this will result in a 43% increase in households over the period. A planned increase of this magnitude has significant implications for the Borough and other development proposals that may subsequently emerge. It requires careful management of impacts and ensuring infrastructure capacity keeps pace with demands.
- 3.2 The Sustainability Appraisal (SA) considered the impacts of the level of development proposed, as well as the sites identified and the policies in the Core Strategy. It concluded that there could be significant adverse environmental and social impacts arising from the proposed levels of growth. There was a need to minimise the sustainability impacts and *'...manage the social, cultural and environmental changes that are likely to accompany that growth'*<sup>4</sup>. It was considered that the policies and site allocations in the Core Strategy achieved that by maximising opportunities for sustainable regeneration and offsetting the potential negative effects.<sup>5</sup>

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<sup>2</sup> National Planning Policy Framework, Department for Communities and Local Government, 2012

<sup>3</sup> Dartford Strategic Housing Land Availability Assessment, Dartford Borough Council, 2010

<sup>4</sup> Paragraph 30, Dartford Core Strategy Submission Document Sustainability Appraisal Non-Technical Summary

<sup>5</sup> Paragraph 28, Dartford Core Strategy Submission Document Sustainability Appraisal Non-Technical Summary

3.3 The windfall sites policy has been developed to ensure that unplanned development coming forward does not undermine the approach to development set out in the Core Strategy. This was prepared through a thorough process of consultation, evidence collection and Sustainability Appraisal. There are three essential conditions that need to be met<sup>6</sup>:

- That the level of housing delivery from windfall sites is carefully managed so as to reduce the risk that housing delivery between 2006 and 2026 exceeds 17,300;
- That housing coming forward from windfall sites meets the same high level of sustainability as the sites identified through the Core Strategy;
- That there is sufficient infrastructure capacity to support unplanned development.

## **4. Policy and Context**

### **Development Plan**

- 4.1 The Core Strategy was adopted by the Council in September 2011 and sets the long-term spatial strategy for Dartford Borough. Whilst the Core Strategy was prepared in advance of the National Planning Policy Framework (NPPF), Policy CS10 (4) on windfall sites is considered to be consistent with the NPPF. Consistency with the NPPF and the local considerations in response to the national guidance are set out in Appendix 3.
- 4.2 Central to the plan's strategy is the identification of three priority areas for development, with preference given to large strategic previously-developed or damaged sites. This allows new housing and other types of development to be sustainably planned and with the necessary supporting infrastructure. The focus on large sites within these areas enables the necessary infrastructure delivery and sustainability benefits to accrue to new and existing communities. In addition, it enables greater protection for other areas where development may be less appropriate, including areas of open land, Green Belt sites, contaminated sites and inappropriate infill in residential areas where this leads to over-intensification and pressures on services, facilities and open space (paragraphs 2.9-2.11). The adopted spatial pattern of development is set out in Policy CS1, with the stated objective of maximising regeneration benefits, promoting sustainable patterns of development and protecting the less appropriate areas (as above) from development.
- 4.3 Recognising that Dartford is within the Thames Gateway growth area, the Core Strategy states that 'there is enough suitable and available land for up to 17,300 new

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<sup>6</sup> Core Strategy paragraphs 3.18, 3.21-3.25, CS10, CS11

homes to be built between 2006 and 2026, although the actual pace at which homes will be delivered will depend on market conditions' (paragraph 2.6).

- 4.4 The Core Strategy sets out that delivery will be predominantly from large, previously developed sites that maximise regeneration benefits and are able to mitigate adverse impacts of development. As these have a long lead-in time, an element of supply from windfall sites can be helpful in enabling early delivery of housing and increasing flexibility where the larger sites are not coming forward. However, collectively these unidentified sites could potentially undermine long-term strategy by cumulatively overloading infrastructure, which has been planned to meet the long-term needs of the identified sites (paragraph 3.20-21). It also states that where identified sites do not come forward, it will only be appropriate to substitute alternative sites to address housing delivery where they meet the criteria for windfall sites in policy CS10 (paragraph 3.25). This approach was supported by the Sustainability Appraisal and has been found sound at examination.
- 4.5 The Plan requires that infrastructure capacity comes forward in tandem with development and the pace of development is dependent on capacity being available to meet the needs of development (paragraph 3.22, policy CS11). Unplanned development sites coming forward must not be considered in isolation, but rather in the context of planned development and informed assessment of forward delivery of housing, infrastructure capacity and infrastructure delivery. This is addressed by points c) and d) of CS 10(4), as well as policies CS11, CS16, CS21 and CS26 of the Core Strategy. Cumulative effects on infrastructure of planned development and existing windfall commitments should be taken into account.
- 4.6 The Core Strategy identifies three priority areas for development and provides policy guidance for development within these areas (CS1-CS6). The Core Strategy sets out the Council will support proposals for housing as identified through the strategic site allocations in Policies CS3 and CS5 and shown on the Policies Map. A more detailed breakdown of sites assessed as suitable and developable and forming the basis – as non windfalls – of the 'up to' 17,300 Core Strategy housing figure, is contained in the SHLAA.
- 4.7 Other policies in the Core Strategy which may be relevant to the assessment of windfall sites are CS6, which refers to safeguarded wharves; CS7 Employment Land and Jobs; CS11 Housing Delivery; CS13 Green Belt; CS14 Green Space; CS15 Managing Transport Demand; CS16 Transport Investment; CS17 Design of Homes; CS18 Housing Mix; CS19 Affordable Housing; CS21 Community Services; CS22 Sports, Recreation and Cultural Facilities; CS23 Minimising Carbon Emissions; CS24 Flood Risk; CS25 Water Management; and CS26 Delivery and Implementation. The relevant policies, considered jointly, seek to ensure that development provides regeneration benefits

and the potential adverse impacts of high levels of development in Dartford, as identified through the SA are mitigated.

- 4.8 Windfall sites will also need to comply with saved policies in the Dartford Adopted Local Plan 1995.

### **Compliance with National Policy and Guidance**

- 4.9 Since the Core Strategy was adopted, the government has released the National Planning Policy Framework (NPPF) and the National Planning Policy Guidance (NPPG) setting out the Government's economic, environmental and social planning policies. The SPD's criteria, as set out in Appendices 1 and 2, will help apply the framework's 'presumption in favour of sustainable development' (where engaged) by assessing the sustainability or otherwise of residential proposals.
- 4.10 The NPPF states that 'applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise'. The Core Strategy Policy CS10(4) will often be the relevant starting point against which applications for windfall sites are assessed; other Core Strategy policies may also be significant in the assessment; and any material considerations will be taken into consideration.
- 4.11 This SPD helps provide clarity on the implementation of CS10 (4); a 'practical framework' of planning policy, as sought by the NPPF (Appendix 3 outlines how the Core Strategy and this SPD complies with the NPPF).

## **5. Background Evidence**

- 5.1 The background evidence for this SPD is drawn from the evidence base for the Core Strategy. The main documents used are the Sustainability Appraisal, the Strategic Housing Land Availability Assessment (SHLAA), the Sustainability Assessment of Housing Sites, and the Infrastructure Background Paper. Technical evidence on accessibility and walking distance also provides important data in this SPD. The main points for consideration are summarised in Appendix 4.
- 5.2 The recent overall housing delivery context is also salient. With the strategic focus in Dartford Borough on large planned sites, windfalls have accounted for only 15% of the Borough's housing supply between 2006/7 and 2013/14 inclusive<sup>7</sup>. This shows that there has been no reliance on windfalls as a major component of residential land supply in Dartford.

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<sup>7</sup> Source: DBC monitoring of annual housing returns.



## 6. Assessment Process

### Policy Compliance

- 6.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposal is required to be in accordance with the development plan, unless material considerations indicate otherwise. The NPPF will be one such material consideration. Where development plan policies are pulling in different directions, a weighing up of relevant policies will be undertaken to consider the policy compliance of a proposal of a site as a windfall alongside its other attributes.
- 6.2 As with any planning application, to be successful a windfall proposal will need to demonstrate accordance with applicable development plan policies; and show, in particular for windfalls, that the criteria *a to d* in Core Strategy policy CS10(4), are satisfied. This process is summarised in Figure 1 below.
- 6.3 The considerations set out in Figure 1 are potentially relevant to all residential applications; the criteria may be common to both windfalls and planned residential development. Nevertheless, an evaluation of windfalls will be required since they do not benefit from successful consideration of these issues through the Dartford SHLAA and the Sustainability Assessment of Housing Sites (Appendix 5).
- 6.4 The considerations relating to Core Strategy CS10 in Figure 1 form the core of this SPD, and are outlined in the Appendices and discussed in the remainder of this section.

## Figure 1: Determination of a Windfall Site Proposal

### Dartford Development Plan considerations:

- *Is the proposed site acceptable against local policy “in principle” given the existing land use and proposed development; particularly having regard to the most appropriate Dartford Core Strategy policy? [AND...]*

### Core Strategy Policy CS10(4) a) and b) / SPD Appendix 1 :

- *As a windfall, using the key local sustainability factors and weighting in Appendix 1 to evaluate the benefits and disbenefits of the proposal, is the proposal a sustainable site for housing development in Dartford Borough? [AND...]*

### Core Strategy Policy CS10(4) c) and d) / SPD Appendix 2 :

- *As a windfall, is there sufficient infrastructure capacity to serve the development taking into account cumulative implications - committed and planned development - and identified future capacity (including its ability to provide infrastructure where applicable)? [AND...]*

### NPPF and other material considerations:

- *Does the proposal meet NPPF and other policy requirements, or are there other significant material considerations?*

## Assessment of Sustainability

6.5 Policy CS10 (4) requires that applications for windfall sites ‘...will be assessed in the same way as planned development...’ Part 4) a) of the policy requires consideration of the sustainability of the site for housing. As referenced in the policy, sustainability of planned development was assessed through the Sustainability Assessment of Housing Sites (see Appendix 5). The Windfall Sites Criteria table (Appendix 1) is based on the same criteria as those used in that assessment. Assessment against the criteria

in Appendix 1 serves to address the policy requirement for consistency with assessment of planned sites.

- 6.6 Some adjustments have been made to make the previous criteria more relevant to windfall sites. For example, the spatial pattern criterion has been removed, since it is considered that, by their nature, windfall sites could arise anywhere in the Borough and it would be too restrictive on such sites to restrict them to the priority areas identified in the Core Strategy. There has been some simplification and removal of the previous criteria, where these overlapped or where criteria are now incorporated as policies in the Core Strategy.
- 6.7 A focus on encouraging suitable residential proposals on previously developed “brownfield” land is a key theme within the Core Strategy and is considered consistent with the NPPF including the national Core Planning Principles, as set out at paragraph 17. NPPF paragraph 111 states it is appropriate for a locally-specific brownfield requirement to be set out. The Core Strategy sets out a monitoring target of 80% of residential development on previously developed land<sup>8</sup>. This target is consistent with Core Strategy objectives and is considered achievable, based on the identified sites. The application of Policy CS10 seeks to ensure that windfall sites do not undermine this target.
- 6.8 The criterion relating to brownfield or damaged land was given the highest weighting in the Core Strategy’s Sustainability Assessment of Housing Sites<sup>9</sup>. In order to ensure consistency between the assessment of planned and unplanned sites, in accordance with the policy requirement, brownfield considerations are given the ‘highest weighting’ within the assessment criteria for windfall sites, as set out at Appendix 1 of this SPD.
- 6.9 A significant level of planned development is expected to be delivered on brownfield land in the future. The availability of this land within Dartford has been a fundamental rationale behind the amount of growth and sustainable development locations identified through the Core Strategy. Table A below shows the type of land where housing development has been built over the plan period within Dartford Borough. This demonstrates that, to date, the Core Strategy target of 80% of housing built on previously developed land has been achieved overall. However, there are variations from year to year. There are known greenfield sites with planning consent which will

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<sup>8</sup> Core Strategy Appendix 3: Monitoring Framework pg 128. This will be monitored periodically and updated on the Council’s website

<sup>9</sup> See Paragraph 4.3 of the document. The other “greatest weighting” objective was the spatial pattern, which - as stated above – has been considered unreasonable to apply specifically to windfall proposals.

be delivered in the future. There is, therefore, a strong impetus to maintain the priority for brownfield site development in future windfall site proposals.

Table A: Dwellings on Previously Developed ‘Brownfield’ Land, by Year

<i>Year</i>	<i>Total</i>	<i>Brownfield<sup>10</sup></i>		<i>Greenfield</i>	
		<i>Actual</i>	<i>%</i>	<i>Actual</i>	<i>%</i>
2006 –07	659	646	98	13	2
2007– 08	603	537	89	66	11
2008 -09	610	506	83	104	17
2009 - 10	151	109	72	42	28
2010 – 11	362	257	71	105	29
2011 -12	322	248	77	74	23
2012 –13	422	292	69	130	31
2013-14	613	507	83	106	17
<b>Total</b>	<b>3742</b>	<b>3102</b>	<b>83</b>	<b>640</b>	<b>17</b>

6.10 Breaking data down further indicates that the windfall element of residential proposals accepted in recent years in the Borough has predominantly (83%)<sup>11</sup> been brownfield in nature. This demonstrates that the policy is working effectively; that windfall sites have been able to come forward during the period where planned delivery was slow; and it is possible for windfall sites to come forward that comply with the policy.

6.11 The accessibility of the site to public transport and local facilities is a key consideration in assessing proposed windfalls. As part of the transport modelling carried out in support of the Core Strategy, emphasis was placed on a significant modal shift away from cars, in order that planned development be acceptably accommodated. A 50% increase in the public transport share of journeys to work over the plan period, as compared to the base level, was assumed. This is an ambitious target, only considered achievable in the context of the Core Strategy planned integration of transport and land use, as well as the new and improved public transport infrastructure being delivered in the Borough. This significant modal shift is required to ensure that the highway system operates at an acceptable standard and that cumulative development does not result in unacceptable impacts.<sup>12</sup> It is therefore imperative that any unplanned development, in common with planned development, is well-located in respect of public transport, jobs, shops and community services, such as schools. This is reflected in the need to carefully apply the criteria in the “Accessibility” part of

<sup>10</sup> Notes- Firstly: Brownfield includes previously developed and severely despoilt/degraded sites. Secondly: Large sites may not be wholly one category or another. Some have been disaggregated and reported on a pro-rata basis reflecting individual characteristics.

<sup>11</sup> Source: DBC monitoring of annual housing returns. Proportion reflects same time period as Table A.

<sup>12</sup> Kent Thameside Transport Strategy Technical Summary Report , October 2008

Appendix 1. A detailed justification for the walking distance measures can be found within Appendix 3.

- 6.12 The rationale for this has been established through Dartford's sustainable development principles set in the Core Strategy. The quality of national and international connections serving this Borough allow economic investment in Dartford to be planned and viably occur in parallel with nearby residential development. The objective is to achieve a more sustainable local mix and pattern of future development, avoiding growth where large volumes of new residents undertake lengthy journeys to work.
- 6.13 Accordingly, the Core Strategy provides for significant employment growth in Dartford Borough alongside residential growth (policy CS7). The future local job level has been planned to grow in tandem with population growth. Whilst residents will always choose their location of work, this strategy encourages and provides the opportunity for a shift towards more local working, without the need for communities to grow as 'dormitory settlements'.
- 6.14 It is considered unnecessary and contrary to the Core Strategy's growth strategy for planned growth for residential development to occur on sites that are, by Dartford's standards, relatively unsustainable locations (see for example policies CS1(1), CS11, CS15(1a)). In this local context, a robust and reasonable application of the nationally derived distance thresholds in Appendix 1 are justified as Dartford has planned, and is delivering, a substantial increase in housing at locations identified as being highly accessible to current/ planned local jobs and services.

### **Capacity of Current and Proposed Infrastructure**

- 6.15 Many elements of Dartford's physical infrastructure are operating at full capacity or beyond; this is a key determinant of planning strategy in the Borough. The information used to assess the infrastructure implications of residential development are outlined in Appendix 2.
- 6.16 The level of growth proposed in the Core Strategy entails significant levels of new or improved infrastructure. The additional infrastructure needed, both in terms of capacity and location, has been identified through the Core Strategy with consideration given to how it will be delivered. (Infrastructure Delivery Plan, Core Strategy Appendix 2 updated November 2012<sup>13</sup>).

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<sup>13</sup> Infrastructure Delivery Plan (Living Document): Identified Projects and cost estimates Update November 2012

- 6.17 Dartford's Infrastructure Delivery Plan (IDP) and Background Paper provides information on existing deficiencies. Infrastructure deficiencies which are most likely to have a negative impact on existing and future residents in the Dartford context are currently primary school capacity, highway capacity, GP/primary health facilities and secondary school capacity. Additionally other elements of infrastructure, such as water supply and sewage capacity may be critical in some locations and may also be taken into consideration.
- 6.18 In assessing a windfall proposal, existing capacity and networks in the immediate locality will be considered, alongside any long-term and cumulative impacts<sup>14</sup>. Advice will be taken from service providers in determining whether the proposed development will be adequately supported by existing and/or proposed infrastructure, taking into account the capacity needed for Core Strategy planned development, including the SHLAA identified sites as well as the natural growth in population over the Plan period.
- 6.19 In the case of some windfall sites, there may be potential for the site to directly provide or substantially contribute towards infrastructure which is lacking. This will be taken into account in the assessment. However, a financial contribution towards infrastructure on its own, either through S106 or a CIL payment, may not always be adequate mitigation to address infrastructure deficiencies, where land and full funding provisions for any additional infrastructure have not been identified.

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<sup>14</sup> Developers are advised to also consider the possible direct and indirect implications of proposals on critical/designated green or physical infrastructure sites in the immediate vicinity, and to liaise with the responsible bodies such as utility companies or Natural England/Environment Agency etc as relevant.

## References

CLG (2012) National Planning Policy Framework (NPPF)

Dartford Borough Council (2010) Strategic Housing Land Availability Assessment (SHLAA)

Dartford Borough Council (2010) Sustainability Assessment of Housing Sites

Dartford Borough Council (2012) Infrastructure Delivery Plan and Background Paper

Dartford Borough Council (2012) Parking Standards SPD

Dartford Core Strategy Adopted September 2011

Department for Transport (2005) Inclusive Mobility

Department for Transport and CLG (2007) Manual for Streets

Enfusion for Dartford Borough Council (2010) Sustainability Appraisal

Institution of Highways and Transportation (IHT) (2000) Guidelines for Providing for Journeys on Foot

KTS Transport Strategy – Technical Summary Report, October 2008

*Dartford's documents are available via:*

*[www.dartford.gov.uk/by-category/environment-and-planning2/planning/planning-policy](http://www.dartford.gov.uk/by-category/environment-and-planning2/planning/planning-policy)*

## Appendix 1: Applying Policy CS10 (4)a & b

### Windfall Sites Sustainability Criteria

To be read alongside other criteria, as set out in Figure 1 and Appendix 2.

Key Objective	Decision-aiding question	Relevant policy
<b>Brownfield land: Highest Weighting Attached</b>		
CS- Preference given to previously developed or damaged sites. CS - Protection of open land from development. CS- Development in areas with most regeneration potential. NPPF- Encourage the use of brownfield land.	Is the site on previously developed or degraded land that can be safely and practicably brought into use?	CS1, para 2.7, 2.9-2.11; Appendix 3: Monitoring target of 80% of residential development on previously developed land <sup>15</sup> NPPF 17, 111
<b>Accessibility</b>		
CS- Reduce the need to travel. CS- Minimise car use. CS- Facilities located close to communities they will serve. CS- Promotion of areas with good existing public transport, or where development provides new or improved provision. NPPF- development located where need to travel will be minimised and use of sustainable transport modes maximised.	Is the development within walking distance <sup>16</sup> of a range of public / community facilities, e.g. primary school, GP or health centre, local shops, children’s playground, local park or higher level park? Are any new facilities proposed as part of the development?	CS15, CS21, CS22 NPPF 17, 37, 38, 69, 70, 73, 74
	Does the development have sufficiently good public transport access to encourage modal shift away from car use? Locally relevant criteria are as follows: <ul style="list-style-type: none"> <li>• Within an indicative 400m walking distance<sup>17</sup></li> <li>• Number of services available i.e. number of different point of interest destinations available e.g. Dartford town centre, hospital, secondary school, Bluewater,</li> </ul>	CS15, CS17, para 2.6, 2.7, 3.3, 3.44-3.48 NPPF 17, 34-39, 69 Kent Design

<sup>15</sup> This will be monitored periodically and updated on the Council’s website

<sup>16</sup> An acceptable walking distance for community facilities is taken to be 10 minutes (approx. 800m) DfT (2007) Manual for Streets and IHT (2000) Guidelines for Providing for Journeys on Foot

<sup>17</sup> IHT Guidelines for Providing for Journeys on Foot (2000), DfT Inclusive Mobility (2005): see Appendix 3 for further explanation. This will be measured against an actual pedestrian friendly walking route, not a radius around a point, taking into account gradients; quality of footpaths; road crossing points; desire lines and accessibility; safe and secure walking route to reduce fear of crime or anti-social behaviour etc



	<p>central London, major employment sites</p> <ul style="list-style-type: none"> <li>• Level of service i.e. are there more than 2 buses an hour in the daytime?</li> </ul>	
	Does the proposal include any transport improvements, including public transport and Fastrack, new footpaths or cycleways that will contribute to the sustainability of the development?	CS15, CS16 NPPF 32, 34-39
<b>Balanced and integrated communities</b>		
<p>CS- Create vibrant and sustainable communities.</p> <p>CS- Promote a pattern of development where complementary land-uses are closely interrelated.</p>	<p>Does the proposal provide for uses other than residential as part of the development (normally applicable to relatively large sites) e.g. community services and facilities, business and employment space?</p> <p>Do these contribute to the sustainability of the site by supporting the local community?</p> <p>Does it provide facilities which existing communities can share?</p> <p>Does it help support existing community facilities (particularly in villages)?</p> <p>Does the proposal create connectivity between existing and new communities?</p>	CS15(a), para 1.10, 2.7, 3.46 NPPF 17, 28, 37, 38, 58, 70
<b>Combatting Climate Change</b>		
<p>CS- Minimise carbon emissions through energy efficiency and use of renewable energy.</p> <p>CS - Manage the supply and quality of water.</p>	<p>Does the proposal act as an exemplar<sup>18</sup> of sustainable development for energy and/or water efficiency, surpassing applicable local and national policy requirements?</p> <p>Is it capable of providing an on or off-site CHP scheme?</p>	CS23 NPPF 17, 95, 96, 97

#### Notes

CS - Core Strategy

LP - Local Plan 1995 'saved' policies

NPPF - National Planning Policy Framework

<sup>18</sup> To act as an exemplar a development will need to demonstrate how it has gone beyond the requirements set out in the Core Strategy (or future national policy, if setting higher levels) for energy and/or water efficiency



## Appendix 2: Applying Policy CS10(4)c & d

### Windfall Sites Infrastructure Capacity

To be read alongside other criteria, as set out in Figure 1 and Appendix 1.

Infrastructure assessment aiding question (A) <i>What is the potential level of need/demand arising from the development?</i>		
Considerations	Note	Relevant policy /other documents
<p>1. Level of need/demand will be assessed in conjunction with third party providers. This will be identified through established methods of assessing demand</p> <p>2. Particular consideration will be given to the need/demand arising for the following infrastructure:</p> <ul style="list-style-type: none"> <li>• Education – primary and secondary provision</li> <li>• Highway network capacity</li> <li>• GP/primary health services</li> <li>• Water and sewerage capacity</li> </ul>	<p>The Council will specifically liaise with the following third Party Providers:</p> <ul style="list-style-type: none"> <li>• Kent County Council (KCC) including Kent Highways</li> <li>• Dartford, Gravesham and Swanley Clinical Commissioning Group and NHS England</li> <li>• Thames Water, Southern Water, South East Water<sup>19</sup></li> </ul>	<p>CS21: Community Services CS25 Water Management CS26: Delivery and Implementation</p>

<sup>19</sup> Water and sewerage undertakers will vary with location

**Infrastructure assessment aiding question (B)**  
*is there available capacity to serve identified demand arising form the development?*

Considerations	Note	Relevant policy /other documents
<p>1. Assessment of available capacity taking into account:</p> <ul style="list-style-type: none"> <li>• The ability of the site to provide for the requirements it generates</li> <li>• The capacity of current infrastructure to meet demand</li> <li>• The capacity of planned infrastructure to meet demand taking account of phasing of delivery</li> </ul> <p>2. Identification of available capacity will take into account :</p> <ul style="list-style-type: none"> <li>• travel distance</li> <li>• availability of infrastructure after taking into account longer term planned development, those with planning consent and demand arising from natural growth.</li> </ul>	<p>In carrying out the assessment the Council will take into account supporting evidence (submitted by providers) used to produce the most up to date version of the Dartford Infrastructure Delivery Plan. Updated partner and service providers strategic plans will be taken into account in the assessment.</p> <p>Where relevant and available providers may undertake further assessment or provide more updated information in connection with the windfall application. For example KCC may provide up to date forecast findings of local school capacity and the availability of school places after taking into account natural population growth and other planned development.</p> <p>The development management process enables the potential for appropriate mitigation measures to be identified to alleviate any capacity issues. Timely mitigation measures will be taken into account in the assessment.</p>	<p>Dartford Infrastructure Plan (Living Document) November 2012 – current version (original Appendix 2 Dartford Core Strategy), CS11: Housing Delivery and policies cited above, Infrastructure Delivery Plan and Background Paper February 2011, KCC: Commissioning Plan for Education Provision, Kent Thameside Transport Programme Annual Report, Investment Programmes (AMP) reports of water and sewerage undertakers, Kent and Sussex NHS property strategy and DGSCCG plan.</p>

## Appendix 3 Compliance with National Policy and Guidance

- 1.1 Since the Core Strategy was adopted, the government has released the National Planning Policy Framework (NPPF) and the National Planning Policy Guidance (NPPG) setting out the Government's economic, environmental and social planning policies. The policies apply to the preparation of local and neighbourhood plans, and to development management decisions. The Windfall Sites Criteria will help apply the national 'presumption in favour of sustainable development' (where engaged) by assessing the sustainability or otherwise of residential proposals.
- 1.2 The NPPF states that 'applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise'. The Core Strategy Policy CS10 (4) is often the relevant starting point against which applications for windfall sites should be assessed, although other policies and material considerations must also be taken into consideration.
- 1.3 Paragraphs 6 and 7 of the NPPF state that the planning system should contribute to sustainable development and that there are three dimensions to this:

**Economic-** The Core Strategy has provided for significant job growth, allocating land for a range of employment types. Physical infrastructure to support the planned growth in homes and jobs has been identified and coordinated, taking into account existing capacity, availability of land for infrastructure and location of development.

**Social-** The Core Strategy provides for housing growth to meeting housing needs as well as provide an impetus for regeneration (Policy CS10), together with the local services needed to support it located in accessible locations in relation to the planned development. It requires high standards in the design of homes. The Sustainability Appraisal has identified risks to community cohesion and alienation of existing communities. This is likely to be exacerbated by levels of housing provision exceeding those planned for or if infrastructure requirements do not keep pace with housing growth.

**Environmental-** The environmental objectives identified in the NPPF are embedded in the Core Strategy policies. Open space is protected as far as is consistent with providing identified levels of housing growth. Given potential pressures on the local environment and use of natural resources arising from the high levels of growth proposed, the Sustainability Appraisal concluded that in order to achieve sustainable development, high environmental standards are essential.

- 1.4 NPPF paragraph 8 goes on to state that these sustainability roles should not be taken in isolation, but that to achieve sustainable development, economic, social and environmental gains should be sought simultaneously through the planning system.
- 1.5 It is the Council's view that the Core Strategy is consistent with the NPPF, addressing these components of sustainability in an integrated way at the whole Plan level. The strategy set out in the Plan provides for the management of development so as to secure the delivery of development, whilst mitigating the risk of development resulting in unsustainable outcomes. The windfall sites policy is an essential component of this management strategy. Individual sites will need to be assessed for sustainability within the wider context of ensuring that development across the Borough as a whole remains sustainable.
- 1.6 Paragraph 10 of the NPPF states that plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. The Core Strategy and this SPD are consistent with paragraph 10 of the NPPF. The strategy for development set out in the Core Strategy reflects the opportunities for Dartford Borough's regeneration arising from bringing the identified large-scale degraded and despoiled sites back into beneficial use. The spatial pattern of development in policy CS1 emphasises the need to maximise regeneration benefits through development, as well as promote sustainable patterns of development. Consequently, the criteria for windfall site assessment set out in this SPD reflect the need for exacting standards and careful management of unplanned growth arising from the high growth strategy set out in the Plan.
- 1.7 Paragraph 15 of the NPPF states that Plans should contain clear policies about how the presumption in favour of sustainable development (as set out in paragraph 14) will be applied locally. Policy CS10 and this SPD provide local clarity for assessing sustainability of proposed windfalls in the context of high planned levels of growth.
- 1.8 Paragraph 17 of the NPPF sets out the core land-use planning principles, which apply at the plan-making stage as well as to decision-making and consequently to the assessment of windfall sites. These include having an up-to-date Plan to provide a practical framework within which decisions on planning applications can be made; encouraging the effective use of land by reusing land that has been previously developed (brownfield land); actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and identifying the housing needs of an area and setting out a clear strategy for allocating sufficient land which is suitable for development in the area. These national 'Core Planning Principles' are considered very closely aligned with the policies in the Core Strategy.

- 1.9 Paragraph 48 of the NPPF outlines when windfalls sites may or may not make an appropriate contribution to housing delivery. It states that ‘local planning authorities may make an allowance for windfall sites in the five-year (housing land) supply if they have compelling evidence’ and any allowance should have regard to ‘expected future trends’ and the Strategic Housing Land Availability Assessment (SHLAA). In Dartford’s case, the SHLAA demonstrates that windfall sites need only make a small contribution to housing land supply. Most of the housing land supply is provided for by specific named sites identified in the SHLAA, the majority of capacity being from large sites (see also para 4.11). The up to 17,300 homes identified in the Core Strategy consists of sites for 15,000 homes identified in the SHLAA up to 2026 plus 2050 homes built between 2006 and 2010, in addition to a small allowance for windfall sites<sup>20</sup>. There is, therefore a limited need to rely on windfall sites in the five year land supply.
- 1.10 Paragraph 52 states that ‘the supply of new homes can sometimes be best achieved through planning for larger scale development...local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development’. Dartford Council has considered this and concluded that, in the local context, larger scale development is the best way of achieving sustainable development. The SHLAA and the Core Strategy identifies larger scale sites that provide most regeneration benefits for the Borough and that maximise sustainability.
- 1.11 Paragraph 153 states that Supplementary Planning Documents should be used where they can help applicants make successful applications. They should not be used to add unnecessarily to the financial burdens on development. This SPD assists applicants by helping them to determine the circumstances in which applications are likely to be successful and does not increase financial burdens on development.
- 1.12 This SPD has been fully informed by the NPPF, and demonstrates the consistency of Dartford planning policies (notably the Core Strategy) with the delivery of sustainable development consistent with national policy. The SPD is fully in line with NPPF paragraph 153 principles on the role of SPDs, it provides for the assessment of windfalls commensurate with their role set out in paragraph 48, and the criteria will assist in implementing the presumption in favour of sustainable development when planning decisions are taken (NPPF paragraph 14).

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<sup>20</sup> Core Strategy CS10, para 3.19 and footnote 101

## Appendix 4 Background Evidence

1.1 The background evidence for this SPD is drawn from the evidence base for the Core Strategy. The main sources used are:

- National data on accessibility;
- the Sustainability Appraisal;
- the Housing Implementation Strategy;
- the Strategic Housing Land Availability Assessment (SHLAA);
- the Sustainability Assessment of Housing Sites;
- the Infrastructure Background Paper.

The key points from these documents are summarised below.

### National Data on Accessibility

1.2 In order to support the modal shift required by the Council's spatial strategy and encourage residents to walk, cycle or use public transport (or a combination of these) rather than using the car, the Council's Sustainability Assessment of Housing Sites (2010) requires a walk distance of 400m to a station or a bus stop with at least 2 buses an hour, which was consulted on as part of the evidence base for the Core Strategy. This approach is critical to ensuring that the new development required to be delivered within the Borough can be accommodated on the existing and improved road network. The Council considers that this distance is required to offer a genuine alternative choice for residents in preference to the car and, will seek to consider this measure in assessing windfall sites.

1.3 The 400m walking distance is based on guidance given by the Institute of Highways and Transportation (IHT) within Guidelines for Providing for Journeys on Foot (2000), which advises an average walking speed equates to approximately 400m in 5 minutes. Whilst the IHT Guidance refers to acceptable walking distances, it suggests that a desirable walking distance for journeys generally is 400m. In Dartford's context of seeking a significant modal shift, the 'desirable' distance is considered most appropriate. The 400m walking distance is also supported by the Department for Transport in their Inclusive Mobility (2005) guidelines, which indicate that 'In residential areas bus stops should be located ideally so that nobody in the neighbourhood is required to walk more than 400 metres from their home' (Page 32).

1.4 How far people will walk to a bus stop is influenced by the walking environment and quality of service. Walking environments should be pleasant and safe. The 400m walking distance should represent the distance that would be walked along a well-defined, safe and secure, and direct and accessible route. It is apparent that distances should be applied in the local context, and this document outlines the reasons why



planning decisions in Dartford should place a high premium on easy and convenient access to services.

### **Sustainability Appraisal**

1.5 The Sustainability Appraisal was a systematic process carried out throughout Plan preparation that evaluated the predicted social, economic and environmental effects of the policies and proposals contained within the development plan. The Appraisal identified the key sustainability issues and opportunities associated with the high levels of growth in housing and employment proposed for Dartford, as part of the Thames Gateway.

1.6 The SA concluded that the Core Strategy would make a significant contribution to sustainability objectives for Dartford, within the context of high growth. The final Non-Technical Summary stated:

*'In the previous SA of the Core Strategy Preferred Policy Approaches (2006) it was noted that the 'cumulative effect of development and an increased population could lead to significant effects on the use of energy and water resources, increases in air pollution and increases in greenhouse gas emissions contributing to global climatic changes. It was also noted 'that rapid population growth can lead to significant physical, economic and social changes, including impacts on cultural heritage, landscape, community cohesion and identity'. There was also a risk of alienating existing communities, who may not benefit from the increased growth (paragraph 27).*

1.7 The Report concluded that the Council, through the Core Strategy, had taken a very thorough approach to addressing the sustainability impacts arising from increased population and economic growth (paragraph 30). The delivery of this approach on the ground will be dependent on compliance with the strategy and policies set out in the Plan.

### **Housing Implementation Strategy**

1.8 The Housing Implementation Strategy demonstrates how Dartford will seek to address housing delivery and performance monitoring, and the actions that could be taken to respond to potential delivery constraints. It states that sufficient development opportunities have been identified that have the potential to provide for 17,300 within the Plan period. It states that front-loading of the housing supply with small sites that utilise planned infrastructure capacity, runs the risk that the planned infrastructure will be insufficient to cater for the full build-out requirements of the larger sites. It also states that substantial delivery from unidentified [windfall] sites has the potential to undermine the long-term strategy by cumulatively overloading planned future infrastructure capacity, unless a site is capable of providing for the requirements it generates (paragraph 9.7-9.10).

## Strategic Housing Land Availability Assessment and Sustainability Assessment of Housing Sites

- 1.9 The Strategic Housing Land Availability Assessment (SHLAA) identifies sites for residential development to enable a 15 year land supply for housing delivery up to 2026. A clear assessment methodology was used to review potential sites and stakeholder and landowner consultation was used to inform the assessment of sites.
- 1.10 Following initial assessment through the SHLAA, those sites identified as suitable were then subject to a sustainability assessment to ensure that housing sites identified through the SHLAA have the potential to lead to sustainable outcomes. As set out in the Sustainability Assessment of Housing Sites (2010), this was felt necessary as, 'given the significant challenges the Borough faces in meeting the Thames Gateway growth agenda, provision of housing capacity, in itself, is not a sufficient prerequisite in making a site acceptable for housing development. In order that the overall level of development leads to sustainable growth, individual sites will need to make a contribution to this. In the worst case, sites should have no worse than a neutral effect on sustainability' (paragraph 1.3).
- 1.11 The assessment methodology used in the Sustainability Assessment of Housing Sites (see Appendix 5 here) draws on the sustainability objectives developed for the Sustainability Appraisal of the Core Strategy. This was prepared taking into account local issues and involved consultation to ensure that the criteria were relevant and responsive to local matters. Sites in the SHLAA identified as deliverable, developable and currently undevelopable, other than those with planning consent were individually assessed against each of the sustainability objectives. For each objective, they were categorised according to whether there were sustainability constraints to development or whether benefits could arise from the development. For example, provision of on-site community services or facilities would be considered a benefit, whilst an adverse impact on wildlife sites would act as a disbenefit. Taking into account this balance of benefits and disbenefits, the sites were graded according to their overall sustainability and compliance with Core Strategy and national objectives. In determining how to carry out this balancing exercise, it was considered that an equal weighting for each of the objectives was not appropriate, as some were of greater importance and significance than others. 'Spatial pattern' and 'brownfield land' were given the highest weighting.
- 1.12 The SHLAA identified sufficient deliverable and developable sites to largely meet the up to 17,300 homes target in the Core Strategy, predominantly through large sites. The SHLAA states that it is not feasible to bring forward an equivalent level of housing capacity through a greater number of smaller sites. Any compensatory development of smaller sites in the early phases of the Plan will risk the future deliverability of the large identified sites, since the new strategic infrastructure proposed will not be

capable of supporting development on the planned sites in addition to those which have come forward as windfalls (paragraph 10.6).

### **Infrastructure Delivery Plan and Background Paper**

- 1.13 The Infrastructure Delivery Plan and Background Paper (2011) considers the infrastructure provision, requirements and delivery for Dartford Borough based on the development proposed by the Core Strategy and population growth forecasts. This identified types of infrastructure requirements that were relevant to Dartford and future infrastructure requirements to ensure sustainable communities are delivered. These infrastructure requirements are also relevant to the consideration of windfall sites.
- 1.14 The Infrastructure Background Paper states that ‘whilst the emerging Core Strategy is broadly in line with these [the South East Plan housing requirements] housing levels, this broad brush approach does not take into account the phasing or locational impacts of development and consequent infrastructure requirements’ (paragraph 2.6). It goes on to state that infrastructure planning has tended to be on the basis of known large development sites and has overlooked the cumulative demands arising from small and medium sized sites, which has contributed to pressure on existing services (paragraph 2.7). It acknowledges that consideration needs to be given to the cumulative demands arising from small and medium developments, which is again relevant to the consideration of windfall sites (paragraphs 2.8, 3.17, 3.34). It should be noted that since the preparation of the paper, population growth in the existing housing stock has significantly increased placing greater pressures on existing facilities, such as schools and health facilities, than had previously been projected.
- 1.15 The Paper highlights that existing infrastructure provision is sparse or absent in some areas of the Borough where existing residential development is limited (e.g. Ebbsfleet Valley), and that other areas have deficiencies in existing provision that are already running at or near full capacity. The paper states that ‘these considerations suggest that development on whatever scale will inevitably require the provision of new or extended facilities’. It is extremely important for the Borough to reduce infrastructure demand where possible through sustainable patterns of development, such as reducing road infrastructure by limiting car use. In addition, it is important that infrastructure requirements can be strategically planned and delivered through the development of the large identified sites in the priority areas identified through the SHLAA and the Core Strategy.
- 1.16 The information from the Infrastructure Background Paper has been used to develop the Infrastructure Delivery Plan, which is included in the Core Strategy (see Appendix 2 of the Core Strategy).

## Appendix 5 Sustainability Assessment of Housing Sites (from the Core Strategy evidence base)

The table below shows the assessment methodology used in the Sustainability Assessment of Housing Sites from the Core Strategy evidence base and how this is to be applied through the Windfall Site Criteria Table (Appendix 1) and Local Plan policies.

OBJECTIVE	DECISION-AIDING QUESTIONS	How Covered Now
<b>1 Balanced Communities</b>		
SA Promote thriving and balanced communities CS A stable, well integrated community, whose residents enjoy a choice of homes and easy access to local facilities.	<p>Could the site:</p> <ul style="list-style-type: none"> <li>▪ Promote mixed tenure and mixed use developments?</li> <li>▪ Maintain and provide sites for community services and facilities for example education, health, leisure and recreation, social care or enable access to existing ones?</li> <li>▪ Provide business and employment space as part of the development?</li> </ul>	Windfall Site criterion 'Balanced and Integrated Communities'
<b>2 Integrated Communities</b>		
SA Enable interaction between existing and new communities.	<p>Could the site:</p> <ul style="list-style-type: none"> <li>▪ Provide physical links between existing and new communities?</li> <li>▪ Provide facilities which existing communities can share?</li> <li>▪ Help support existing community facilities (particularly in villages)?</li> </ul>	Windfall Site criterion 'Balanced and Integrated Communities'
<b>3 Accessibility</b>		
<p>SA Enhance accessibility to jobs, education, community services and public transport, and be consistent with the emerging Local Transport Plan</p> <p>CS A community that has easy access to local everyday facilities and a realistic choice of travel options</p>	<ul style="list-style-type: none"> <li>▪ Accessibility of site to public transport: Within 400m of station, Fastrack, or bus</li> <li>▪ Frequency – more than 2 buses an hour during daytime and AM and PM peak hours</li> <li>▪ Potential for close relationship with jobs and community facilities – see Balanced communities above</li> </ul> <p>Could the site:</p> <ul style="list-style-type: none"> <li>▪ Provide improvements to the Fastrack network?</li> <li>▪ Provide improvements to the transport network which would have wider benefits beyond the site?</li> <li>▪ Provide opportunities to extend cycle/footpath networks?</li> </ul>	Windfall Site criterion 'Accessibility'

<b>4 Public Health</b>		
SA Improve the health and well being of the population and reduce inequalities in health CS A green borough with a network of landscaped paths, cycle routes, open spaces and a full range of opportunities to enjoy first class cultural and leisure pursuits and sports and recreation.	<p>Could the site:</p> <ul style="list-style-type: none"> <li>▪ Provide new health facilities?</li> <li>▪ Is the site in a ward of projected open space deficiency?</li> <li>▪ Provide green infrastructure/open space as part of the development?</li> </ul>	Core Strategy policies, CS14, CS 21, CS26, Local Plan RT18
<b>5 Phasing of Supporting Infrastructure</b>		
SA Ensure that the provision of new infrastructure is appropriately phased to facilitate access for existing and new communities.	<ul style="list-style-type: none"> <li>▪ Transport and accessibility covered in 3.</li> <li>▪ Community infrastructure covered in 4 and 1.</li> </ul> <p>Could the site have issues of phasing on site or in conjunction with other sites?</p>	Core Strategy policies Policy CS10 (4) CS11, CS16, CS21, CS26
<b>6 Housing</b>		
SA Ensure that all have access to a range of good quality housing to meet their needs, particularly key worker and affordable housing for identified local needs.	<ul style="list-style-type: none"> <li>▪ Not applicable to site appraisal since all sites will achieve this.</li> </ul>	Not applicable
<b>7 Sustainable Design and Construction</b>		
SA Promote sustainable design and construction practices	Not applicable to site appraisal since all sites should achieve this. See also 15. Climate Change and Energy below	Not applicable
<b>8 Environmental Health</b>		
SA Provide a healthy and safe environment	<p>See 5. Phasing of supporting infrastructure and 4. Public Health Could the site have issues associated with:</p> <ul style="list-style-type: none"> <li>▪ Noise</li> <li>▪ Contamination</li> <li>▪ Worsening of parking conditions</li> </ul>	Core Strategy policies CS14, CS 21, CS26, Local Plan H12, DL4, B1 NPPF para 121, 123 Parking Standards SPD National pollution control regimes, British Standards
<b>9 Economy and Employment</b>		
SA Promote a range of quality employment opportunities and sustainable economic growth CS A commercial hub in the borough at Ebbsfleet and providing	Is the site required/suitable for employment uses and will it contribute to the economic development of Dartford? Whole or part? Will it lead to loss of viable employment/jobs?	Core Strategy Policy CS7

opportunities for residents to access a wide range of jobs.		
<b>10 Landscape</b>		
SA Ensure that special and distinctive landscapes and townscapes, and the features within them, are conserved and enhanced CS The character of villages and countryside in the Green Belt protected and enhanced.	Does the site: <ul style="list-style-type: none"> <li>▪ Impact on landscape and townscape of value?</li> <li>▪ Have potential to enhance the quality and diversity of open land/countryside or townscape of character, including the public realm?</li> <li>▪ Is the site Green Belt land?</li> <li>▪ Will the site lead to coalescence (joining-up) of existing towns or villages?</li> </ul>	Core Strategy Policy CS13, CS14 Local Plan B1
<b>11 Land and Soil Quality</b>		
SA Maintain and improve the quality of land and soil in the region.	Does the site: <ul style="list-style-type: none"> <li>▪ Involve the development of high quality agricultural land? See 21. Reused Land</li> </ul>	Core Strategy Policy CS13
<b>12 Biodiversity</b>		
SA Protect and enhance the biodiversity and abundance habitats and indigenous species CS A green borough with a network of open spaces and biodiversity habitats and corridors.	Could the site impact: <ul style="list-style-type: none"> <li>▪ Valuable flora, fauna, wildlife habitats and species, both those statutorily designated and those of local value</li> <li>▪ Provide opportunities for new/natural space/open space/ biodiversity enhancement or networks, including enhance riverside access, where appropriate</li> </ul>	Core Strategy Policy CS14
<b>13 Cultural Heritage</b>		
SA Protect and enhance cultural heritage resources.	Could the site: <ul style="list-style-type: none"> <li>▪ Impact historical and archaeological environment (landscapes, site, buildings and settings, conservation areas), including resources of local value?</li> <li>▪ Have the potential to enhance the historical and archaeological environment?</li> </ul>	Local Plan B11, B12 NPPF 128, 131,132,135,137
<b>14 Minerals</b>		
Not applicable to site appraisal.	Not applicable	Not applicable
<b>15 Climate Change and Energy</b>		
SA To address the causes of climate change through reducing emissions of greenhouse gases; ensure Dartford & Gravesham are prepared for the impacts of climate change CS A sustainable borough	Could the site: <ul style="list-style-type: none"> <li>▪ Be of sufficient size to act as an exemplar of sustainable development</li> <li>▪ Be capable of providing on or off-site CHP scheme</li> </ul>	Windfall Site Criterion 'Environment'

leading the way with energy and water efficient buildings, widespread use of renewable energy and well adapted to climate change.		
<b>16 Air Quality</b>		
SA Protect and improve local and global air quality	▪ Is the site located in an Air Quality Management Area?	Core Strategy Map 12
<b>17 Waste</b>		
Not applicable to site appraisal.		
<b>18 Water</b>		
SA Protect and enhance the water environment (surface water i.e. rivers and lakes, groundwater, estuarine, wetlands) and manage water resources in a sustainable way CS A sustainable borough leading the way with water efficient buildings.	Does the site impact: ▪ River and tidal plains (including wetlands and flood defences), in particular from encroachment? ▪ Water Source protection zones ▪ Is site of sufficient size to act as exemplar of water efficiency	Core Strategy Policies 24 and 25  Windfall Site criterion 'Environment'
<b>19 Flooding</b>		
SA Reduce the risk of flooding	Which Flood risk zone is the site located and what is its likely flood vulnerability?	Core Strategy Policy CS24
<b>20 Spatial Pattern [Greatest weighting]</b>		
CS New residential and mixed use development focused in Dartford Town Centre, the area between Ebbsfleet and Stone, and the Thames Waterfront.	▪ Is the site located in one of the key areas?	Not considered relevant to assessment of windfall sites (see Assessment of Sustainability above)
<b>21 Brownfield Land [Greatest weighting]</b>		
PPS3 - preference for brownfield sites. This also includes land not strictly identified as previously developed under the PPS3 definition but is degraded or despoiled due to past quarrying activity.	▪ Has the site been previously used or is it damaged land?	Windfall Site criterion 'Brownfield land'

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