

AGENDA ITEM 6

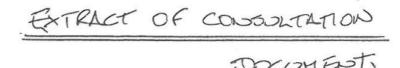
Ebbsfleet Development Corporation

Consultation

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Chapter 4



Proposed boundary of the Corporation

The boundary of the Ebbsfleet Development Corporation defines the area in which the Corporation will be focused on regenerating and redeveloping. The area shown at **Annex A** has been drawn to ensure that the Corporation can meet its objective to regenerate and redevelop the area as effectively as possible. In deciding the area to form the boundary we have worked closely with the local authorities to consider the extent of land to be included, taking into account the following factors:

- How each site would help deliver the objective of the Corporation to deliver a new garden city for the 21st Century;
- The existing man made and natural boundaries such as the A2 and other highways, the River Thames and the chalk spines which run through the area;
- The key planning constraints, in particular the Green Belt¹; and
- Existing and long established areas of built development, which are generally excluded.

Past experience has shown that Development Corporations are most effective when they focus their attention on specific sites where they can make the most impact. The proposed area is largely focussed on a small number of strategic sites which are predominantly brownfield and, with one exception (Springhead Quarter), contain little or no existing residential development.

Sites within the Boundary

The proposed area of the Corporation shown at **Annex A** is formed around key strategic sites. These sites, listed below, are located within Dartford and Gravesham Boroughs and are already identified in their Core Strategies and Local Plans. They do not form an entirely contiguous area. A contiguous area is not necessarily desirable, taking into account the distinct nature of the topography such as the chalk spine, major highways, quarries and consequent differences in elevation, and the existing development within the area.

Eastern Quarry
Northfleet West Sub Station
Springhead Quarter
Northfleet Embankment West

Ebbsfleet Swanscombe Peninsula Northfleet Embankment East

¹ There is one small area of Green Belt land within the proposed boundary of the Ebbsfleet Development Corporation, namely the area known as the Bean Triangle which lies between the A296 and A2 at the south west extremity of the proposed area. Inclusion of this land will not change its status as Green Belt land, which is defined in Dartford's Core Strategy 2011. There are no proposals to amend the status of the land as Green Belt. On the contrary, the reason for including this land, which is a highly visible site forming an access point into the area within the Corporation's proposed boundary, is to allow for the improvement of open land within the site as well as to lift the quality of development already authorised through Lawful Development Certificates or extant planning consents.

Alongside the above strategic sites we have included a number of smaller adjacent sites. In considering whether to include adjacent land, we worked closely with the local authorities and considered a range of factors including: whether this land might be needed to enable redevelopment of one of the strategic sites; or whether the land might be part of an important gateway to one of the strategic sites.

As can be seen at Annex A, it is proposed that the Development Corporation's area of responsibility should extend to the middle of the River Thames (the limit of the local authorities' current planning responsibility) adjacent to the riverbank sites for which it is responsible.

A downloadable version of the map at Annex A can be found on the website at: www.gov.uk/government/consultations/ebbfleet-development.

You can also access an interactive version of the map via the following link: http://goo.gl/D4lk32

Consultation question 2:

Are you satisfied with the proposed boundary of the Ebbsfleet Development Corporation, as set out in Annex A? (Yes, I am satisfied / I am broadly satisfied but I have some comments or concerns / No, I am not satisfied / Don't Know).

Please express any comments / concerns you wish to make...

Consultation question 3:

Do you think there are any areas which should be added into the area of the Ebbsfleet Development Corporation? (Yes / No / Don't know).

If yes, please provide details of the area(s) you would wish to see added in...

Consultation question 4:

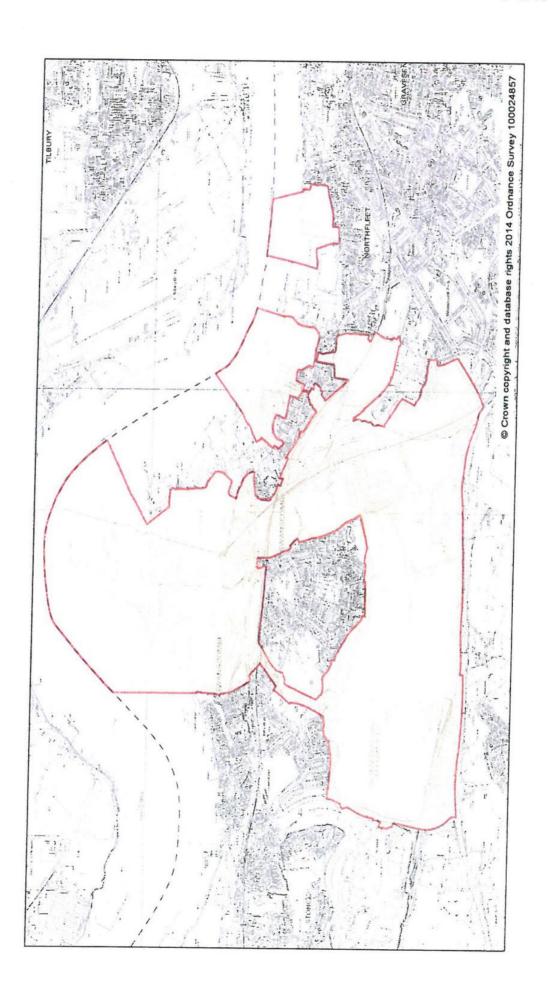
Do you think there are any areas which should be taken out of the area of the Ebbsfleet Development Corporation? (Yes / No / Don't know)

If yes, please provide details of the area(s) you would wish to see taken out...

You can if you wish download a copy of the map from the website and use this to highlight areas you wish to see added in, and / or taken out and send it back to us at:

Ebbsfleet Delivery Team 3rd Floor, Fry Building 2 Marsham St London SW1P 4DF

Annex A



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David Brazier
Cabinet Member for Environment & Transport



Cllr Prout & Cllr Martin
Dartford Borough Council
Civic Centre
Home Gardens
Dartford
Kent
DA1 1DR

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Your Ref: Our Ref: 15138 Date: 27 May 2014

Dear Geoff and Tony

Thank you for your letter dated 14 May 2014 concerning the implementation of Safe and Sensible Street Lighting in Dartford.

I am sorry to learn of Dartford Borough Council's concerns about public consultation with regard to this policy. I have seen Behdad Haratbar's letter of 19 May to your authority, and this has set out in detail the steps we have taken to discuss, debate and consult on this matter. It is important that we follow a consistent approach when implementing this policy on a countywide basis. For this reason, we have used Kent Police's statistics and knowledge, rather than local anecdotal evidence, to ensure that sites with a history of crime or accidents remain lit on an all-night basis.

Given the magnitude of the scheme, certain errors will be inevitable. When these are brought to our attention, they are investigated and changes made if necessary. An example of this in Dartford is the concerns raised regarding the Swanscombe area. We investigated this and found that in certain areas of Swanscombe the exclusion criteria had not been correctly applied, as a consequence we are planning to revert certain lights to all-night lighting operation. However, it is worth noting that such cases are rare. Thus far we have converted over 40,000 columns to Part-night Lighting, less than 2% of these were done in error.

We have always made it clear that we would be happy to review any area where individuals feel we have incorrectly applied the agreed exclusion criteria.

I note your request for a report on this subject for the Dartford Joint Transportation Board. An update report is being prepared and will be sent to Dartford Borough Council in time for the next meeting on 10 June.

I know that this may not be the response you would have preferred but over the next three years we have to make savings of around £270m whilst maintaining the

many frontline services that the community depends on. The intention here is to reduce energy consumption and carbon emissions by switching off lights when they are least needed, the savings generated from these will be used to support these services.

Yours sincerely

David Brazier

Member Services

Councillor David Brazier Cabinet Member Transport and Environment Kent County Council Sessions House Maidstone Kent

Please ask for: David Hook

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Direct Fax:

(01322) 343974

E-mail:

david.hook@dartford.gov.uk

DX:

142726 Dartford 7

We welcome calls via Typetalk

Your Ref: Our Ref:

Date:

14 May 2014

Dear David,

KENTCOUNTY COUNCIL'S SAFE & SENSIBLE STREET LIGHTING POLICY: PHASE II - IMPLEMENTATION IN DARTFORD

We write to you following concerns expressed by Councillors and members of the public over the roll-out of Phase 2 of the County Council's Safe and Sensible Street Lighting Scheme in the Borough which began in January this year.

Members of Dartford Borough Council support the aims of the scheme, recognising the need for Kent County Council to make savings and be mindful of the environmental effects of unnecessary energy use.

Members discussed the scheme in depth at Dartford's Joint Transportation Board (JTB) in March 2013; and received a presentation on the Scheme from Behdad Haratbar, your Head of Programmed Works for Highways and Transportation. Members were concerned at the lack of consultation around phase 1 of the programme, particularly within the Parishes. Dartford Members sought to positively input into the roll-out of Phase 2 of the Scheme in the Borough, drawing on their personal knowledge of Dartford to help County Officers to properly assess whether individual streets, Wards and Parishes should be included in Phase 2; or excluded under the terms of the agreed exclusion criteria. This offer was acknowledged and accepted at the March meeting by the KCC Officers present. Members received an update at the June JTB where Members were told "a high profile PR / Consultation exercise which will involve Parish, Town and District Councils will take place in due course." The Chairman of the JTB was assured that details of the responses for Dartford would be confirmed.

When phase 2 rolled out in Dartford many residents contacted the council and their local councillors to ask what was happening. Neither of us are aware of a single Dartford Parish directly consulted on the scheme in their area and nor are we aware of a specific request for views being submitted to Dartford's JTB nor Borough Councillors

in areas affected. Nor have any Dartford specific consultation results been fed back as was promised.

Following growing concern at Parish and Borough level, including several resident petitions submitted to Dartford members the Lighting Scheme was drawn-down for consideration by Dartford's Scrutiny Committee on 29 April 2014. We enclose for ease of reference, the relevant extract from the Minutes of that meeting [Min. No. 40] to help convey the strength and depth of feeling amongst Dartford Members and residents across the Borough over the implementation of Phase 2 of the Scheme to date.

At the conclusion of the Scrutiny Committee meeting on 29 April, Members resolved that we write to you as the KCC Cabinet portfolio holder with our concerns, on a joint basis, as the respective Chairmen of Dartford's Scrutiny Committee and Joint Transportation Board (JTB).

Members also endorsed the proposal that further consideration of Phase 2 of the Scheme be undertaken by the Board at their next meeting on 10 June 2014; including consideration of a comprehensive report from KCC Officers on the implementation of Phase 2 in Dartford to date; plus a review of implementation in those areas where Dartford residents and Members have raised concerns [against implementation] on the basis of a perceived increase in crime levels or concerns over road traffic safety.

We would welcome your response on the concerns of Dartford residents and Members, and also seek your assurance that a substantive report on the roll-out of Phase 2 of the Scheme and the way forward will be submitted by KCC Officers to Dartford JTB on 10 June 2014.

Yours sincerely

Councillor G T Prout Chairman, Scrutiny Committee Councillor A R Martin Chairman, JTB

cc: Councillor Paul Carter, Leader, KCC Councillor Kite, Deputy Cabinet Member, KCC Councillor Allen, Deputy Cabinet Member, KCC

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40. DRAW DOWN: KENT COUNTY COUNCIL (KCC) STREET LIGHTING POLICY - CONSULTATION AND IMPLEMENTATION

The Chairman welcomed Behdad Haratbar, Head of Programmed Works and Alan Casson, Project Manager Safe and Sensible Street Lighting from Kent County Council Highways Department to the meeting and thanked them for agreeing to attend and make a presentation.

The Chairman advised that, to enable KCC Officers to better respond to the concerns of all interested Dartford parties represented at the meeting over the implementation of the County Council's 'Safe and Sensible Street Lighting Scheme'; he proposed that the Committee be addressed in turn by the Labour Group Ward Councillor for Swanscombe, the Chairman of Sutton at Hone & Hawley Parish Council and finally by the Deputy Leader, in his role as Chairman of the Joint Transportation Board (JTB).

The Chairman explained that he had drawn-down the topic for discussion given that the County Council's Street Lighting policy affected all Wards in Dartford, both urban and rural. He appreciated the financial and environmental principles governing the new KCC Street Lighting policy; aimed at producing substantial savings of some £1M annually, allied to a significant reduction in the County Council's CO2 'footprint'.

However, the Chairman took issue with the lack of consultation at both Parish and Borough level over the policy's parameters (announced in 2013) and the subsequent roll-out of the Scheme to Dartford in 2014. In particular he held concerns over:

- The selection criteria for the inclusion of individual streets in Phase 2 of the Scheme – 'Part-night lighting';
- The lack of prior notification to Borough Councillors before Phase 2 of the Scheme was implemented;
- The implications Phase 2 of the Scheme held for an increase in crime for the Borough including Anti-Social Behaviour (ASB).

The Chairman invited the first speaker, the Labour Group Member for Swanscombe to enlarge on these issues, including the representations she had received from residents in the Ward.

She advised that as a recently elected Councillor [December 2013] her concerns focussed on the implementation of the Scheme, rather than the consultation process. She sought a response on the following points from KCC Officers:

- On what basis was Swanscombe selected for Phase 2 of the Scheme involving 'Part-night lighting'?
- Were the Exclusion Criteria' applied to Swanscombe in particular the criterion for existing or potential road safety and existing or potential crime?

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- What method was used to consult Swanscombe residents over the Ward's inclusion in Phase 2 of the Scheme?
- The results of a Freedom of Information (F.O.I.) request revealed that only 3 (three) Swanscombe residents had responded to the County Council's Street Lighting proposals;
- Was a better consultation process required? Simply posting notices of intent in public libraries was not sufficient;
- The onus was on the County authority to properly inform residents of the Scheme and listen to resident concerns;
- Shift workers residing in Swanscombe were particularly affected by the reduced street lighting provision under the Scheme which, during the Winter months, would be even more inconvenient;
- Kent Police beat officers operating in Swanscombe had agreed at a recent meeting with Ward Councillors that the crime rate was increasing following implementation of the Scheme;
- Some 600-800 residents had now signed a petition against the roll-out of Phase 2 in Swanscombe, would KCC Officers now review the inclusion of Swanscombe in Phase 2 of the Scheme as a result?

The Chairman of the Sutton at Hone & Hawley Parish Council then addressed the meeting with his concerns and those of other Dartford Parishes. He made the following principal points:

- His Parish (together with others in Dartford) had <u>not</u> been directly consulted by the County Council over the 'Safe and Sensible Street Lighting Scheme'. His Parish office had no trace of any direct communication written or electronic from KCC – he requested details be provided;
- To his knowledge residents had not been consulted either by means of e.g. a leafleting campaign;
- It was not clear to the Parish authorities whether the Scheme was on a trial basis or permanent, and as Parish Chairman he had written formally to the Leader of Kent County Council seeking clarification on this pivotal point;
- A second major point of concern for Parishes was the impact on road safety; in particular the prosecution of offending drivers in 30 m.p.h. zones where streets lights had been switched-off under Phase 1 of the Scheme as 'Surplus Lights'. He asked whether prosecutions were still legally enforceable in such cases;
- Parish records for crime and accident statistics indicated exclusion of S@H&H from the Scheme; what statistics source had KCC used to include his Parish in Phase 2 of the Scheme?
- Experiences in neighbouring Parishes e.g. Hextable [Sevenoaks] was that car crime and ASB tended to rise in areas that had formerly benefited from street lighting.

The Deputy Leader, in his role as Chairman of the Dartford Joint Transportation Board (JTB) then addressed the meeting.

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He advised that JTB had received a presentation on the proposed Scheme in March 2013 from the KCC Heads of Highways and Programmed Works. The Board was supportive of the overall fiscal and greening aspects of the Scheme, but held reservations over the specifics of implementation in Dartford.

The Board had requested feedback on Dartford's overall response to the Scheme from KCC Officers at the next meeting of the Board in June 2013 but this had not happened. He asked that a comprehensive report on Dartford's response from Parish and Borough level (not just an update on the roll-out of the Scheme) be submitted now by KCC Officers to the next meeting of the JTB [10 June 2014]. The report should also include details of the mechanism whereby Dartford Wards at Borough and Parish level could feed back their concerns to KCC and have their case for inclusion in Phase 2 reviewed.

The JTB Chairman expressed his disappointment that KCC had not tapped into the local knowledge available at Borough and Parish level, before rolling-out the Scheme in Dartford. He doubted whether, for example, Swanscombe would have been included in Phase 2 had the Ward's residents been properly consulted and their concerns addressed.

In addition to the concerns raised by the principal speakers, the following questions and concerns were raised by Ward Members on the Committee:

- Ingram Road [Princes Ward Dartford] on what basis had the street been selected for Phase 2 of the Scheme? What consultation had taken place with residents? All lights in the street were now switchedoff between 1 a.m. and 5.30 a.m. whilst surrounding streets retained at least partial lighting during these hours. Shift workers living in the area were particularly disadvantaged by the measure. An added concern was that Ingram Rd. backed onto Central Park which afforded criminals unlighted access into the rears of properties on Ingram Rd. Resident's perception was that crime had increased following implementation of Phase 2 of the Scheme;
- Were other emergency services e.g. Ambulance and Kent Fire & Rescue consulted over the specifics of Phase 1 and 2 of the Scheme and the impact implementation would have on their ability to respond to emergency situations?
- Technical concerns were expressed [by Members with the industry background] over the adequacy of KCC's light sensors being installed in light columns under Phase 2 of the Scheme. Members believed time clocks were also required for each column;
- What was the process for a Ward / Parish to challenge their inclusion in Phase 2 of the Scheme?

The Chairman thanked the Deputy Leader, Parish, Ward and Committee Members for their input and invited the KCC Head of Programmed Works to respond.

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Mr Behdad Haratbar made the following points in response to specific concerns raised by Parish and Borough Member's, drawing on the contents of his PowerPoint presentation:

Background

- The Safe and Sensible Street Lighting policy had been agreed by Kent County Council in 2011 and comprised two phases;
- Phase 1 Trial switch-off of surplus lights many of which were historical in nature and would not be included in a newly constructed lighting scheme in the present day;
- Phase 2 Conversion of selected lights to 'Part-Night lighting' according to set criteria;
- KCC had liaised closely with Kent Police over criteria to exclude areas with high crime rates or contained accident hot spots and continued to do so;
- Dartford JTB had been consulted on the proposals in the Spring of 2013 including Phase 2 measures in Dartford;
- A County wide public consultation had been undertaken during June-August 2013 with 75% of parties consulted responding positively to the proposals;
- Consultation was on the proposed hours of switch-off and the exclusion criteria to be used for Phase 2 rather than individual lighting columns;
- The public had been advised of the details of the Scheme via newspaper and radio adverts, Twitter and website entries and leaflets distributed to Districts, libraries and Gateways. This process was repeated prior to implementation in each district;
- KCC also wrote to all Parish and Town Councils including Dartford [Action – provide specific details];
- Full details of all lighting columns selected for conversion under Phase 2 'Part-Night lighting' were published on the KCC website two weeks prior to implementation in each district.

Key Facts of the Scheme

- 120,000 street lights managed by KCC in Kent;
- 22,000 roads of which 13,000 are unlighted;
- 25,000 illuminated signs and bollards [Action cost and whether under review];
- Carbon emissions of 29,000 tons annually (53% of KCC usage);
- Street lights consume 51 million kWh of energy annually;
- Without the measures contained in the Scheme KCC's annual energy costs estimated to rise to £6.4M in the current financial year;
- Carbon Tax started in April 2014 estimated at £600K for 2014/15 if Scheme not implemented;
- Energy costs expected to rise by 5-10% p.a. going forward;

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 Safe and Sensible Street Lighting Scheme will effect annual savings of £1M and reduce carbon emissions by 5,000 tons annually.

Phase 2 - 'Part-Night Lighting'

- 70,000 lighting units to be converted Kent-wide to part night lighting based on agreed exclusion criteria;
- In Dartford 3,700 of 8,400 KCC lights being converted equal to 44% compared to a 60% conversion rate County-wide;
- Decisions for conversion will be re-visited if representations made;
- Street lighting was for the benefit of pedestrians, not drivers whose modern vehicles had powerful headlights;
- Part-Night lighting did not impact on Kent Police's ability to prosecute drivers suspected of offences nor impact on 30 mph speed zones;
- KCC content with conversion technology, combination of light sensors with built-in timers and feeder pillars. Clocks in lighting columns switch on light when dark switch off when light;
- Hours for switch-off were confirmed as midnight to 5.30 a.m. GMT and 1 a.m. to 6.30 a.m. BST;
- Dartford, Tunbridge Wells, Sevenoaks, T&M, Ashford, Shepway and Dartford largely completed save for difficult sites where traffic issues remain to be resolved;
- Approximately 29,000 conversions completed to date, County-wide completion by the end of Summer 2014 to ensure required savings.

In concluding his presentation, Behdad Haratbar undertook to provide regular updates to JTB on the roll-out of the Scheme and relay details of his correspondence to Borough and Parish Members via the Committee's Clerk. He also undertook to confirm whether KCC were contemplating saving measures concerning the 25,000 illuminated street signs and bollards.

The Chairman thanked the KCC Head of Programmed Works for his detailed response and the Project Manager for the Scheme for attending Scrutiny.

He gave the following summary of the debate on KCC's Safe and Sensible Street Lighting Policy that evening:

- Dartford Members appreciated the need for KCC to reduce its light pollution and carbon footprint;
- Members also appreciated the case for significant fiscal savings given the advent of the Carbon Tax and increasing energy costs going forward;
- KCC had undertaken some (flawed) consultation with districts including Dartford on the principles of the Lighting Scheme, including at JTB, but not the detail or the time-table for implementation of the Scheme;
- Dartford Borough and Parish Members expected to be informed directly of KCC proposals not referred to a website two weeks prior to implementation - that did not constitute consultation.

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Following a proposal by the Chairman, Members RESOLVED:

- That the Chairman of the Scrutiny Committee jointly with the Chairman
 of the Joint Transportation Board (JTB); write formally to the
 responsible KCC Cabinet Member (copied to the Leader of the County
 Council) with the concerns of Dartford Members at both Parish and
 Borough level; over the lack of adequate prior consultation concerning
 implementation of the Lighting Scheme and its subsequent roll-out in
 Dartford.
- To note and support the proposal by the Chairman of the Joint Transportation Board (JTB) that a comprehensive report on the Scheme and its roll-out in Dartford be submitted by KCC Officers to the June 2014 meeting of JTB.

41. WORK PLAN ITEM: PRINCES PARK ANNUAL UPDATE

The Chairman welcomed the Financial Services Manager and the Leisure & Communities Officer to the meeting and noted the presence of the Cabinet Portfolio holder.

He thanked the Officers for their report and noted that a specific report on the Princes Park Mini Pitches had been considered by Cabinet on 3 April 2014.

In subsequent discussion with Officers the following points were confirmed for Members:

- Stadium Roof [para 3.5 agenda page 23]: any repairs required fell to the principal contractor to undertake at no cost to the Council or Dartford Football Club (DFC). The Council's architect continued to liaise with the contractor and their architect to identify and agree the work required, which did not impact on the operation of the facility on a daily basis. Officers undertook to update Members;
- Day-to-day maintenance of Stadium facility: the Council's insurers
 Zurich, undertake a regime of inspections to meet insurance
 requirements, including the lifts and boilers. DFC liaise with Council
 Officers on a regular basis and agree responsibility for repairs under
 the terms of the SLA;
- Pitch: Officers agreed Members comments regarding the poor state of the playing surface at Princes Park (even allowing for the unseasonably heavy rainfall in recent months) and the need to improve the surface for the new season. Officers undertook to report back to Members on the measures being taken including the drainage for the pitch which continued to be an issue;

3 1 JUL 2014

Mr Graham Blew
Clerk to Swanscombe & Greenhithe Town
Council
Council Offices
The Grove
Swanscombe
Kent
DA10 0GA

Regulatory Services Group PROW & Access Service Invicta House County Hall Maidstone

Maidstone Kent, ME14 1XX

Phone: 01622 696871

Ask for: Mrs Maria McLauchlan

Email: maria.mclauchlan@kent.gov.uk

Date: 30th July 2014

Your ref:

Our ref: PROW/DA/C340

Dear Mr Blew - for your information

Re: The Wildlife and Countryside Act 1981 – Section 53 Claimed amendment of the alignment of public footpath DS10 at Greenhithe in the Borough of Dartford

An application has been submitted by Swanscombe & Greenhithe Town Council under Section 53 of the Wildlife and Countryside Act 1981 that the Definitive Map of Public Rights of Way should be modified to amend the alignment of public footpath DS10 on the basis that is has been incorrectly recorded. The alignment recorded on the Definitive Map is shown as running in a straight line east from Bean Road and through 4 residential gardens. On the ground people have always walked east from Bean Road for approximately 68 metres then turned south for approximately 25 metres between the rear gardens of Valley View and Lorraine Court, and then turned east for approximately 33 metres to connect to Valley View between properties numbered 53 and 55.

I enclose a plan for your information.

The County Council has a duty to investigate every application it receives and as part of this process, I would be grateful if you would let me know of any evidence that you feel it might be worthwhile the County Council considering.

I would be grateful for your comments on this proposal before 29th August 2014.

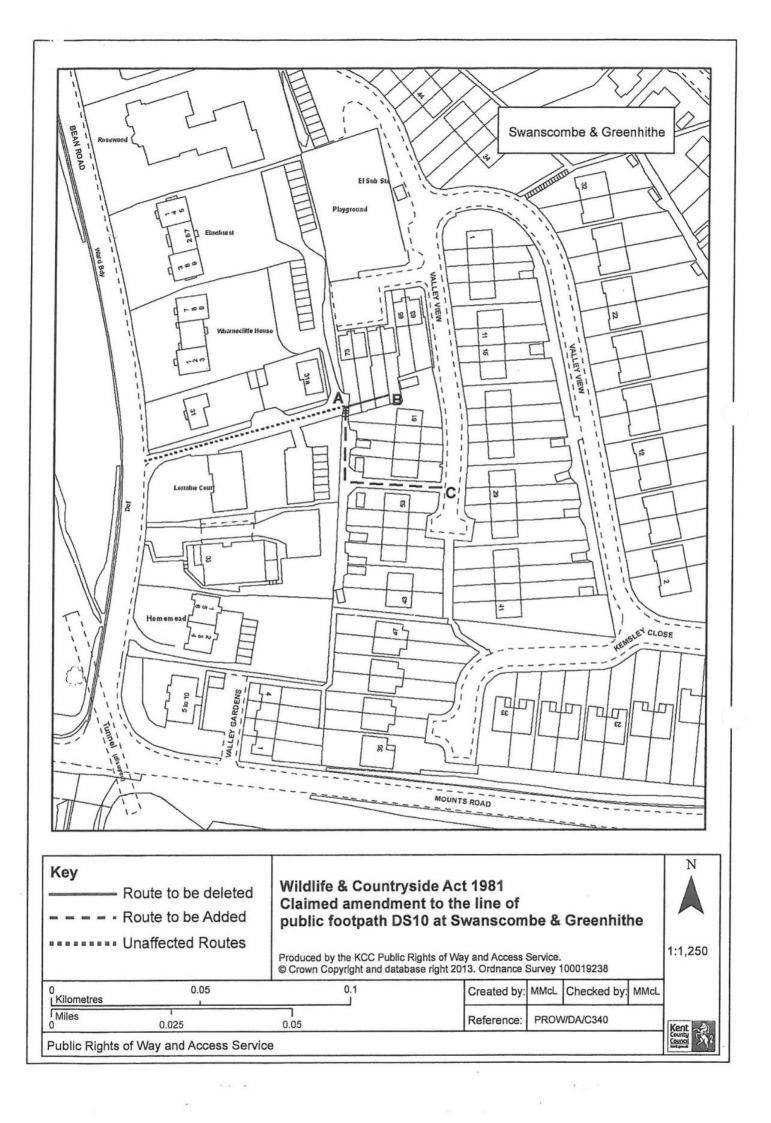
Yours sincerely

Whel

Mrs Maria McLauchlan

Public Rights of Way Officer

Enc.



3 1 JUL 2014

Mr Graham Blew
Clerk to Swanscombe & Greenhithe Town Council
Council Offices
The Grove
Swanscombe
Kent
DA10 0GA



Regulatory Services Group PROW & Access Service Invicta House County Hall Maidstone Kent, ME14 1XX

Phone: 01622 696871

Ask for: Mrs Maria McLauchlan Email: maria.mclauchlan@kent.gov.uk

Date: 30th July 2014

Your ref:

Our ref: PROW/DA/C339

Dear Mr Blew - for your information.

Re: The Wildlife and Countryside Act 1981 – Section 53 Claimed Public Footpath running from the High Street to the foreshore adjacent to the Sir John Franklin public house at Greenhithe in the Borough of Dartford

An application has been submitted by Swanscombe & Greenhithe Town Council under Section 53 of the Wildlife and Countryside Act 1981 that the Definitive Map of Public Rights of Way should be modified to show at public footpath status a route running from the High Street to the foreshore adjacent to the Sir John Franklin public house at Greenhithe. The application is based on evidence of long user which was brought into question following the erection of a gate across the route.

I enclose a plan for your information.

The County Council has a duty to investigate every application it receives and as part of this process, I would be grateful if you would let me know of any evidence that you feel it might be worthwhile the County Council considering.

I would be grateful for your comments on this proposal before 29th August 2014.

Yours sincerely

Ullel

Mrs Maria McLauchlan

Public Rights of Way Officer

Enc.

