

MINUTES OF THE PLANNING, MAJOR DEVELOPMENTS, TRANSPORTATION AND ENVIRONMENT COMMITTEE HELD AT THE COUNCIL OFFICES, THE GROVE, SWANSCOMBE ON WEDNESDAY 20 JANUARY 2016 AT 7.00PM

PRESENT:

Councillor B E Read (Chairman)

Councillor K G Basson Councillor D J Mote Councillor B R Parry Councillor A S Reach Councillor S J Ryan

ALSO PRESENT:

Martin Harding - ATC/RFO

ABSENT:

Councillor Dr J M Harman

431/15-16. APOLOGIES FOR ABSENCE.

Apologies for absence were submitted and accepted from Councillors' Mrs S P Butterfill (work commitments), J A Hayes (other commitments), L C Howes (holiday), K M Kelly (other commitments) and Mrs C K Openshaw (other commitments).

Recommended:

That the apologies for absence and reasons, as listed,

be formally approved.

432/15-16. SUBSTITUTES.

There were none.

433/15-16. DECLARATIONS OF INTEREST IN ITEMS ON THE AGENDA.

There were none.

The Chairman gave the opportunity for the meeting to be adjourned at this point to accept questions from the public.

434/15-16. ITEMS DEEMED URGENT BY THE CHAIRMAN / MATTERS ARISING FROM PREVIOUS MINUTES AND THEIR POSITION ON THE AGENDA.

There were none.

435/15-16. TO CONFIRM AND SIGN THE MINUTES OF THE MEETING HELD ON 2 DECEMBER 2015.

Recommended:

The Minutes of the meeting held on 2 December 2015

were confirmed and signed.

### 436/15-16. DARTFORD BOROUGH COUNCIL (DBC) PLANNING ENFORCEMENT NEWSLETTER – NOVEMBER 2015.

Members were informed that this publication was intended for councillors and council staff only and would be sent out to members "for information only" in the future.

Recommended:

That the item be noted.

### 437/15-16. M20 LORRY AREA - PUBLIC CONSULTATION.

Members received the consultation that Highways England had launched on 11 December 2015 with a deadline for responses of 25 January 2016.

Recommended:

That the item be noted.

### **TOWN PLANNING:**

438/15-16. The below planning applications had been received and responded to by the Town Clerk, in consultation with the Chairman, due to the timescales for responses..

DA/15/01645/FUL	Erection of an attached 2 bedroom house with associated parking and refuse store.  Adjacent 123A and 123B Knockhall Chase, Greenhithe.
OBSERVATIONS:	This Council has serious concerns on this application for the following reasons –  1) Given the size of the overall site it appears to demonstrate an over development of the site leaving only a small amount of community space.
	2) The site is on the junction with Knockhall Road and Knockhall Chase and there are now entrances for vehicles in and out on both roads, close to the junction which the Town Council feels presents a potential danger to both pedestrians and vehicle users. This danger is increased by the fact that both roads are also bus routes with two bus stop locations close by.
	For these reasons we object to the application and recommend that as wide a circulation of consultation to neighbouring properties is made as possible. We also recommend that our comments above are brought to the attention of the Highways Authority, to ensure they are fully aware of the bus arrangements, and bus stops, as these are not marked.

DA/15/01790/FUL	Erection of a detached 3 bedroom house with associated parking.
	Land Adjacent 188A Milton Road, Swanscombe.
OBSERVATIONS:	The Town Council recommends that neighbours on both sides of the road be consulted for their views/comments prior to consideration of this application. The Town Council would also respectfully request that the provision and suitability of off street parking and access/exit to the site is confirmed as adequate as this site is in close proximity to a bend in the road and is also currently a very busy bus route.
DA/15/01001/ECREM	Submission of reserved matters of siting, design, external appearance and landscaping pursuant to conditions 2, 19, 20, 21, 222 and 26 of outline planning permission DA/05/00308/OUT for Phase 1 development of 180 residential units including details of streets, buildings and structures, car parking areas, open spaces, materials, noise mitigation and drainage (Amended description) (Amended plans),
	Northfleet West Grid Sub Station, Southfleet Road, Swanscombe.
OBSERVATIONS:	The Town Council would respectfully request that due consideration is given to ensure that the arrangements for the future management and maintenance of all community facilities, including open space within the site, are clear and agreed prior to any decision being made on this application.
	Members wish to re-iterate that this development will place an additional strain on an already overloaded infrastructure and request that suitable financial contributions be obtained from the developer to deal with this. The Town Council feels strongly that the development must integrate fully with the existing, and proposed, communities and that one way of ensuring that this is enabled would be for the developer to include a linkage into the local Heritage Park (SSSI).
A/15/01466/ECCDNA	Submission of Construction Management Plan pursuant to conditions 33, 35 and 37 of outline planning permission reference DA/05/00308/OUT for redevelopment of site comprising a mixed use of up to 950 dwellings and non-

	residential floor space for: shopping, food and drink, hotel use; community, health, education and cultural uses; assembly and leisure facilities and associated works to provide the development.  Northfleet West Grid Sub Station, Southfleet Road, Swanscombe.
OBSERVATIONS:	The Town Council would respectfully request that due consideration is given to ensure that the arrangements for the future management and maintenance of all community facilities, including open space within the site, are clear and agreed prior to any decision being made on this application.
	Members wish to re-iterate that this development will place an additional strain on an already overloaded infrastructure and request that suitable financial contributions be obtained from the developer to deal with this. The Town Council feels strongly that the development must integrate fully with the existing, and proposed, communities and that one way of ensuring that this is enabled would be for the developer to include a linkage into the local Heritage Park (SSSI).

Recommended:

That the responses submitted be noted and endorsed.

## 439/15-16. PLANNING APPLICATIONS SUBMITTED BY DARTFORD BOROUGH COUNCIL FOR MEMBERS' OBSERVATIONS.

DA/15/01853/FUL	Demolition of existing detached garage and erection of a part two/part single storey side/rear extension.  1 Ames Road, Swanscombe.
OBSERVATIONS:	The Town Council recommends that the Planning Committee should consult with neighbours including those in the Sheltered Housing unit (Wardona Court) next door. We would also respectfully recommend that special attention is given to safety to the public using the adjacent public footpath linking Castle Street to Ames Road, together with the safety barrier protecting the public using this route. This is in regard to the need for this property to have adequate off street parking provision as well as safe entry/exit provision.

	Clarification is also sought as to the width of the proposed new garage (2.3m) being adequate to fit a car and allowing the car doors to open?
DA/15/01864/FUL	Erection of a single storey rear extension and conversion of rear of garage to habitable.
	41 Caspian Way, Swanscombe.
OBSERVATIONS:	The Town Council have concerns regarding this proposal resulting in the loss of an off street parking facility which would give rise to an increase in on street parking in an area where there is very limited capacity.
DA/14/679/EC	Construction of building to accommodate plant for the processing and transfer of construction, demolition and excavation wastes and commercial and industrial wastes with weighbridge and office, external processing plant, storage bays and fencing.
	Plot 14 and Units C1 and C3, Manor Way, Swanscombe.
OBSERVATIONS:	The Town Council have concerns regarding the consideration / decision and impact of this application prior to any future application for the proposed London Paramount Resort. Members also have concerns regarding the impact on traffic generation resulting from this proposal.
DA/15/01872/FUL	Erection of a single storey rear extension.
	25 Knockhall Chase, Greenhithe.
OBSERVATIONS:	No observations, please ensure all neighbouring properties are consulted prior to the decision of the application.
DA/15/01660/VCON	Variation of condition 24 (list of approved drawings) of planning permission DA/14/00502/FUL in respect of replacing drawings to incorporate balcony and enclosed ground floor lobby.
	Neptune Slipway, Pier Road, Greenhithe.
OBSERVATIONS:	The Town Council have concerns that the construction of the 1.8m privacy screen would obstruct the view of the Thames from public viewing points.
DA/15/01868/FUL	Erection of a single storey rear extension.

	8 Reservoir Close, Greenhithe.
OBSERVATIONS:	No observations, please ensure all neighbouring properties are consulted prior to the decision of the application.
DA/15/01890/FUL	Erection of a first floor side extension.
	14 Maritime Close, Greenhithe.
OBSERVATIONS:	The Town Council have concerns over the proposal as the increase in rooms may result in an increase in the need for off street parking in an area that already has very limited capacity.
DA/15/01881/ECREM	Submission of reserved matters pursuant to conditions 2 & 25 of planning permission DA/12/01451/EQVAR for the erection of 154 dwellings (comprising 1 x 1 bed, 3 x 2 bed, 71 x 3 bed, 67 x 4 bed and 12 x 5 bed units), and submission of details relating to fibre-optic connections (condition 30) pursuant to permission DA/12/01451/EQVAR.
	Part Phase 3A, Castle Hill, Eastern Quarry.
OBSERVATIONS:	No observations.
DA/15/01883/FUL	Conversion of existing integral garage into habitable room together with associated alterations to front elevation.  41 Pentstemon Drive, Swanscombe.
OBSERVATIONS:	The Town Council have concerns regarding this proposal resulting in the loss of an off street parking facility which would give rise to an increase in on street parking in an area where there is very limited capacity.
DA/15/01844/FUL	Erection of a four storey rear/side extension to provide four additional one bedroom flats with associated parking and vehicle crossover onto Bean Road.
	11 Cobham Terrace, Bean Road, Greenhithe.
OBSERVATIONS:	The Town Council feel that this proposal would be an overdevelopment and would result in an undesirable intensification of use which would be detrimental to the area and neighbouring residents.

	The Town Council also have concerns that this proposal is not in keeping with the Dartford Borough Council Plan for 1 bedroom properties (these should be built in the vicinity of railway stations).
	The continuity of the parking provision stated between the application and the plans raises further concerns as the amount of parking spaces does not appear to match in these 2 documents?
DA/15/01771/COU	Change of use of the ground floor unit at Ingress Park 4E from Use Class A1 (retail) to Use Class D1 (clinic/health).
	Commercial Unit 32, Grove House, Wainwright Avenue, Greenhithe.
OBSERVATIONS:	Concerns are raised regarding the loss of a unit for retail use.
DA/16/00045/FUL	Erection of an attached workshop (revisions to previously approved planning permission DA/15/00554/FUL in respect of alterations to design and alterations to roof of part of existing workshop).
	Monarch Autos, 164 Milton Road, Swanscombe.
OBSERVATIONS:	The Town Council has concerns that this site has already been the subject of a considerable amount of development from its original design and that his has resulted in an increase in traffic in the immediate vicinity, and this further proposal could be an overdevelopment of the site.
	The application states that the land is "currently being purchased from Dartford Borough Council and the Town Council would request that confirmation be supplied that Dartford Borough Council actually owns the piece of land in question as this area is constantly the source of residents' enquiries/concerns regarding litter and maintenance.
	Concerns are also raised regarding access being adequate/available for emergency services to the rear of the property, via the lane from Broomfield Road.
DA/16/00012/ECCDNA	Submission of details relating to utilities framework (condition 16) and signage design guide (condition 17) pursuant to planning permission DA/12/01451/EQVAR.

	Castle Hill, Eastern Quarry.	
OBSERVATIONS:	No observations.	

### 440/15-16. PLANNING APPLICATIONS SUBMITTED BY NEIGHBOURING/OTHER AUTHORITIES FOR MEMBERS' OBSERVATIONS.

20151201	Consultation on an application.	
	Sainsburys, Whigfield Bank, Northfleet.	
OBSERVATIONS:	No observations.	

## 441/15-16. GRANTED DECISION NOTICES SUBMITTED BY DARTFORD BOROUGH COUNCIL FOR MEMBERS' INFORMATION.

The following granted decision notices were noted.

DA/15/01499/FUL	Provision of bi-fold doors in rear elevation.  24 Empire Walk, Greenhithe.
DA/15/01614/FUL	Erection of a single storey rear extension and provision of a velux to rear roof.  19 Calcroft Avenue, Greenhithe.
DA/15/01680/FUL	Erection of a single storey attached garage and front porch.  26 Alamein Road, Swanscombe.

## 442/15-16. REFUSED DECISION NOTICES SUBMITTED BY DARTFORD BOROUGH COUNCIL FOR MEMBERS' INFORMATION.

The following refused decision notices were noted.

DA/15/01609/COU	Conversion of existing single property into 2 x 2 bed self- contained flats together with provision of an external rear staircase and entrance door to first floor flat, bin storage area and communal garden.
	60 Knockhall Road, Greenhithe.

here being no further business to transact, the Meeting closed at 7.45 pm.		
Signed:	<b>D</b>	
Signed: (Chairman)	Date:	

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#### **Dear Member Councils**

Please note that DCLG has extended the deadline and responses are now invited by 11.45pm on 22 February 2016.

As explained below, the consultation is proposing changes in the following areas:

- broadening the definition of affordable housing, to expand the range of low cost housing opportunities for those aspiring to own their new home
- increasing residential density around commuter hubs, to make more efficient use of land in suitable locations
- supporting sustainable new settlements, development on brownfield land and small sites, and delivery of housing allocated in plans
- · supporting delivery of starter homes

Kind Regards

Terry Martin Chief Executive Kent Association of Local Councils This page is intentionally left blank.



Consultation on proposed changes to national planning policy



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## Scope of the consultation

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Topic of this consultation:	<ol> <li>This consultation seeks views on proposed changes to national planning policy. It covers the following areas:</li> <li>Broadening the definition of affordable housing, to expand the range of low cost housing opportunities (paragraphs 6-12);</li> <li>Increasing the density of development around commuter hubs, to make more efficient use of land in suitable locations (paragraphs 13-18);</li> <li>Supporting sustainable new settlements, development on brownfield land and small sites, and delivery of housing agreed in Local Plans (paragraphs 19-33);</li> <li>Supporting delivery of starter homes (paragraphs 34-54); and</li> <li>Transitional arrangements (paragraphs 55-58).</li> </ol>
Scope of this consultation:	We are keen to hear the views of all parties with an interest in the proposed changes to national planning policy, so that relevant views and evidence can be taken into account in deciding the way forward.
Geographical scope:	These proposals relate to England only.
Impact Assessment:	A summary of evidence to support the proposed changes is included in this consultation document, and we have also published an accompanying Equalities Statement. We are keen to receive feedback on the evidence in these documents, and to receive any other relevant evidence that should be considered.

### **Basic Information**

То:	This is a public consultation about changes to planning policy in England and anyone with an interest in the proposals may respond.
Body/bodies responsible for the consultation:	This consultation is being run by the Planning Directorate in the Department for Communities and Local Government.
Duration:	This consultation will last for 11 weeks from Monday 7 December to Monday 22 February 2016.
Enquiries:	For any enquiries about the consultation please contact planningpolicyconsultation@communities.gsi.gov.uk or telephone 0303 444 1708
How to respond:	You may respond by completing an online survey at: https://www.surveymonkey.com/r/YZBLFJP

Alternatively you can email your response to the questions in this consultation to

planningpolicyconsultation@communities.gsi.gov.uk.

If you are responding in writing, please make it clear which questions you are responding to.

Written responses should be sent to:

Planning Policy Consultation Team
Department for Communities and Local Government
3<sup>rd</sup> floor Fry Building
2 Marsham Street
London SW1P 4DF

When you reply it would be very useful if you confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

- your name,
- your position (if applicable),
- the name of organisation (if applicable),
- an address (including post-code),
- an email address, and
- a contact telephone number

- 1. The purpose of planning is to help achieve sustainable development. The National Planning Policy Framework, published in March 2012, set out the Government's planning policies for England, and how they are to be applied. The Framework reinforces the central role of local and neighbourhood plans in the planning system. It promotes sustainable development, and the protection and enhancement of the natural and historic environment.
- 2. It is important that the planning system supports delivery of the high quality new homes that the country needs, including more larger homes appropriate for families. It is encouraging that community support for housebuilding has doubled in recent years, from 28 per cent in 2010 to 56 per cent in 2014, while opposition to local housebuilding has more than halved during the same period<sup>1</sup>.
- 3. This consultation is seeking views on some specific changes to national planning policy, while maintaining the overall balance of policy which was carefully established following extensive consultation. We are proposing changes in the following areas:
  - Broadening the definition of affordable housing, to expand the range of low cost housing opportunities for those aspiring to own their new home;
  - Increasing the density of development around commuter hubs, to make more efficient use of land in suitable locations;
  - Supporting sustainable new settlements, development on brownfield land and small sites, and delivery of housing allocated in plans; and
  - Supporting delivery of starter homes.
- 4. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. National planning policy must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions. National planning policy does not change the statutory status of the development plan as the starting point for decision making.
- 5. We are keen to hear views on our proposals from all interested parties so that we can consider these carefully in determining the way forward. We are also seeking views on the draft Equalities Statement for these proposals, which we are publishing alongside this consultation, and on the supporting evidence set out in this document. This will enable us to take account of all the relevant evidence in our consideration.

<sup>&</sup>lt;sup>1</sup> DCLG, British Social Attitudes survey 2014: attitudes to new house building

### Affordable housing

- 6. National planning policy requires local planning authorities to plan proactively to meet all housing needs in the area, including market and affordable housing. The current definition of affordable housing (set out in Annex 2 to the National Planning Policy Framework) includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.
- 7. It is important that the definition of affordable housing for planning purposes supports present and future innovation by housing providers in meeting the needs of a wide range of households who are unable to access market housing. The provision of affordable housing is about supporting households to access home ownership, where that is their aspiration, as well as delivering homes for rent.
- 8. The current affordable housing definition includes some low cost home ownership models, such as shared ownership and shared equity, provided that they are subject to 'in perpetuity' restrictions or the subsidy is recycled for alternative affordable housing provision. This limits the current availability of home ownership options for households whose needs are not met by the market.
- 9. We propose to amend the national planning policy definition of affordable housing so that it encompasses a fuller range of products that can support people to access home ownership. We propose that the definition will continue to include a range of affordable products for rent and for ownership for households whose needs are not met by the market, but without being unnecessarily constrained by the parameters of products that have been used in the past which risk stifling innovation. This would include products that are analogous to low cost market housing or intermediate rent, such as discount market sales or innovative rent to buy housing. Some of these products may not be subject to 'in perpetuity' restrictions or have recycled subsidy. We also propose to make clearer in policy the requirement to plan for the housing needs of those who aspire to home ownership alongside those whose needs are best met through rented homes, subject as now to the overall viability of individual sites.
- 10. By adopting the approach proposed, we are broadening the range of housing types that are taken into account by local authorities in addressing local housing needs to increase affordable home ownership opportunities. This includes allowing local planning authorities to secure starter homes as part of their negotiations on sites.
- 11. In parallel, the Housing and Planning Bill is introducing a statutory duty on local authorities to promote the delivery of starter homes, and a requirement for a proportion of starter homes to be delivered on all suitable reasonably-sized housing developments. We will consult separately on the level at which this requirement should be set. The Bill defines starter homes as new dwellings for first time buyers under 40, sold at a discount of at least 20% of market value and

- at less than the price cap of £250,000 (or £450,000 in London). Support is available through the Help to buy ISA to help purchasers save for a deposit.
- 12. We are carefully considering the equalities implications of these proposals and have published a draft Equalities Assessment alongside this consultation. We would welcome views on the draft assessment, and in particular any additional evidence that we should take into account in deciding the way forward.
- Q1. Do you have any comments or suggestions about the proposal to amend the definition of affordable housing in national planning policy to include a wider range of low cost homes?
- Q2. Do you have any views on the implications of the proposed change to the definition of affordable housing on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?

# Increasing residential density around commuter hubs

- 13. Paragraph 47 of the National Planning Policy Framework enables local planning authorities to set appropriate density levels for new housing development to reflect their local circumstances. Local planning authorities have a number of different approaches to setting policy on density. Some Local Plans continue to set overall density targets, other plans set out proposed density levels on specific sites, while some plans do not set any targets and determine density levels on a site-by-site basis to ensure that development is sensitive to the local context.
- 14. There are significant benefits to encouraging development around new and existing commuter hubs reducing travel distances by private transport, making effective use of private and public sector land in sustainable locations, and helping to secure the wider regeneration and growth of the local area. In this context, we are keen to support higher density housing development around commuter hubs to help meet a range of housing needs including those of young first-time buyers. For example, there is an opportunity to use non-operational railway land near existing stations to help deliver more housing. Adopting the nationally described space standard<sup>2</sup>, where viable, could be one way of helping ensure high density development is of a high quality.
- 15. We are proposing a change to national planning policy that would expect local planning authorities, in both plan-making and in taking planning decisions, to require higher density development around commuter hubs wherever feasible. We propose that a commuter hub is defined as:
  - a) a public transport interchange (rail, tube or tram) where people can board or alight to continue their journey by other public transport (including buses), walking or cycling; and
  - b) a place that has, or could have in the future, a frequent service to that stop. We envisage defining a frequent service as running at least every 15 minutes during normal commuting hours.

## Q3. Do you agree with the Government's definition of commuter hub? If not, what changes do you consider are required?

16. Given the potentially significant benefits, we are also interested in any further suggestions for proposals to support higher density development around commuter hubs through the planning system.

<sup>&</sup>lt;sup>2</sup> <u>https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard</u>

## Q4. Do you have any further suggestions for proposals to support higher density development around commuter hubs through the planning system?

17. In proposing this policy change, we do not envisage introducing a minimum density requirement in national policy. We consider that it is important for density ranges to be decided locally to be aimed at local needs. Setting a minimum density would be unnecessarily prescriptive, and could fail to take account of local character and increase the risk of lower quality development.

# Q5.Do you agree that the Government should not introduce a minimum level of residential densities in national policy for areas around commuter hubs? If not, why not?

18. The number of additional homes that can be delivered depends on both the density and the definition of commuter hubs. To provide an assessment of impact, we have considered all major train stations in built up areas with a population greater than 25,000. Where stations were within 0.5 miles of one another they were combined into a single transport hub. This gives around 680 potential transport hubs in England. We estimate that in 2013/14 34,000 homes were built within 0.5 miles of a transport hub at an average density of 34 dwellings per hectare<sup>3</sup>. If the average density at which these homes were built was increased to 40 dwellings per hectare, this could deliver an additional 6,000 homes within the same land area.

<sup>&</sup>lt;sup>3</sup> DCLG analysis using DCLG land use change statistics and DCLG housebuilding statistics

# Supporting new settlements, development on brownfield land and small sites, and delivery of housing agreed in Local Plans

### Supporting new settlements

- 19. Paragraph 52 of the National Planning Policy Framework recognises that local planning authorities may plan for the supply of new homes through larger scale developments such as new settlements or urban extensions. In doing so they should consider whether this is the best way of achieving sustainable development and consider, where appropriate, whether to establish Green Belt around or adjoining such settlements.
- 20. We propose to strengthen national planning policy to provide a more supportive approach for new settlements, within locally led plans. We consider that local planning authorities should take a proactive approach to planning for new settlements where they can meet the sustainable development objectives of national policy, including taking account of the need to provide an adequate supply of new homes. In doing so local planning authorities should work proactively with developers coming forward with proposals for new settlements in their area.
- Q6. Do you consider that national planning policy should provide greater policy support for new settlements in meeting development needs? If not, why not?

## Supporting housing development on brownfield land and small sites

21. We have already made clear our priority for ensuring as much use as possible of brownfield land in driving up housing supply. The National Planning Policy Framework states that planning should encourage the effective use of land by reusing brownfield sites provided they are not of high environmental value, and that local councils can set locally appropriate targets for using brownfield land. In the Housing and Planning Bill, we have set out our intention to require local planning authorities to publish and maintain up-to-date registers of brownfield sites suitable for housing. It is our intention that brownfield registers will be a vehicle for granting permission in principle for new homes on suitable brownfield sites. Our ambition is for 90% of brownfield land suitable for housing to have planning permission by 2020.

- 22. To ensure that all possible opportunities for brownfield development are pursued, we propose to make clearer in national policy that substantial weight should be given to the benefits of using brownfield land for housing (in effect, a form of 'presumption' in favour of brownfield land). We propose to make it clear that development proposals for housing on brownfield sites should be supported, unless overriding conflicts with the Local Plan or the National Planning Policy Framework can be demonstrated and cannot be mitigated.
- 23. Small sites of less than 10 units play an important role in helping to meet local housing need, and the majority of these sites are on brownfield land. In the year to June 2015, planning permission was granted for 39,000 dwellings on small sites, accounting for 16% of all dwellings granted planning permission<sup>4</sup>. However, in 2014 there were only 2,400 registered house builders who build between 1 and 100 homes per year compared to 5,700 in 2006. Building new homes on small sites, whether in rural or urban locations, can deliver a range of economic and social benefits, including:
- providing opportunities for small and medium-sized companies to enter the development market, helping to promote competition and quality in the housebuilding market;
- increasing build out rates in local areas;
- · creating local jobs and sustaining local growth, particularly in rural areas; and
- · making effective use of developable land.

# Q7. Do you consider that it would be beneficial to strengthen policy on development of brownfield land for housing? If not, why not and are there any unintended impacts that we should take into account?

24. In light of the clear benefits set out above of enabling development on small sites, we want to ensure that all proposals for sustainable development on small sites of less than 10 units are strongly supported by national policy. This will complement the measures in the Housing and Planning Bill to make it easier for applicants to secure permission in principle for development on small sites. Most Local Plans include clear policies supporting small windfall sites, but there continue to be concerns about the challenges and uncertainty associated with identifying small sites. We propose to apply the approach described above for brownfield land to other small sites, provided they are within existing settlement boundaries and well-designed to promote or reinforce local distinctiveness. In doing so we will retain protection against unwanted development of back gardens. We also intend to make clear that proposals for development on small sites immediately adjacent to settlement boundaries should be carefully considered and supported if they are sustainable. We would welcome views on how the proposed policy change to support small sites could impact on the calculation of local planning authorities' five-year land supply, and any clarification that may be needed on this point.

<sup>&</sup>lt;sup>4</sup> DCLG analysis of data provided by Glenigan on Local Authority decisions

- Q8. Do you consider that it would be beneficial to strengthen policy on development of small sites for housing? If not, why not? How could the change impact on the calculation of local planning authorities' five-year land supply?
- Q9. Do you agree with the Government proposal to define a small site as a site of less than 10 units? If not, what other definition do you consider is appropriate, and why?
  - 25. The vast majority of Local Plans adopt a criteria-based approach for small sites. We would welcome views on whether national planning policy should make clear that local planning authorities develop clear, positive Local Plan policies against which to assess windfall applications for small sites. This plan-led approach would increase transparency and create greater certainty for developers on whether these sites will come forward for development.
- Q10. Do you consider that national planning policy should set out that local planning authorities should put in place a specific positive local policy for assessing applications for development on small sites not allocated in the Local Plan?
  - 26. In the year to June 2015, 52,800 planning decisions were made by local planning authorities concerning residential development on small sites of less than 10 units. Of these, 13,600 applications were refused<sup>5</sup>. It is roughly estimated that around 5,000 of these refused applications may have been supported under the proposed more positive policy (drawing on DCLG analysis of decisions made by local planning authorities).

### Ensuring housing is delivered on land allocated in plans

27. While more needs to be done to ensure all areas have an up-to-date Local Plan in place, 83% of local planning authorities have now at least published a plan and 66% have an adopted plan in place. Across the country, provision has been made in plans for over 200,000 housing units each year, although in some of the areas of highest demand provision is below the level that would be needed to meet objectively assessed need. In the year to June 2015, planning permission was granted for 242,000 new homes 6. However, there is a significant shortfall between the number of homes that we need to build to keep up with housing requirements and the net additions to the housing stock.

<sup>&</sup>lt;sup>5</sup> DCLG planning applications statistics - Live Table P124

<sup>&</sup>lt;sup>6</sup> DCLG analysis of data provided by Glenigan on local planning authority decisions.

- 28. We recognise that there may be many reasons why homes cannot be built out at the anticipated rate of delivery, and it is important that there are sufficient incentives and tools in place to support the timely build out of consented development.
- 29. Driving up delivery rates depends on all partners playing their part. Local planning authorities can help to ensure that homes delivered match local requirements in a number of ways, including: allocating a good mix of sites in their Local Plans; efficient discharge of planning conditions; helping to resolve other blockages to development (such as other consents required); shortening the timescale by which development must begin; and ensuring a sufficient pipeline of deliverable planning permissions. Developers can also play their part, and we are discussing with house builders and others what steps should be taken to drive faster build-out.
- 30. One approach we are looking to take forward is to amend national planning policy to ensure action is taken where there is a significant shortfall between the homes provided for in Local Plans and the houses being built. Our proposal, announced at Autumn Statement 2015<sup>7</sup>, is to introduce a housing delivery test. We envisage this approach working by comparing the number of homes that local planning authorities set out to deliver in their Local Plan against the net additions in housing supply in a local planning authority area.
- 31. Understanding and identifying under-delivery relies on accurate and timely information prepared and made publicly available. The department publishes National Statistics on net supply of new homes by local authorities every year. This could provide the benchmark against which delivery rates are assessed. However, we would welcome views on the baseline against which local housing delivery should be assessed. Existing options include data in Authority Monitoring Reports against Local Plan targets<sup>8</sup>; or proposed housing trajectories. One approach could be to express significant under-delivery as a percentage below expected delivery. We envisage the assessment being made over a two-year period so that it is not distorted by short-term fluctuations.
- 32. To strengthen the incentive for delivery on consented sites, we propose to amend planning policy to make clear that where significant under-delivery is identified over a sustained period, action needs to be taken to address this. We would welcome views on what steps should be taken in these circumstances.
- 33. One approach could be to identify additional sustainable sites if the existing approach is demonstrably not delivering the housing required. These would need to be in sustainable locations, well served by infrastructure, and with clear

<sup>8</sup> See Regulation 34(3) of The Town and Country Planning (Local Planning) (England) Regulations 2012 (SI 2012/767)

<sup>&</sup>lt;sup>7</sup> Spending Review and Autumn Statement 2015 (HM Treasury)
<a href="https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/479749/52229\_Blue\_Book\_PU1865\_Web\_Accessible.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/479749/52229\_Blue\_Book\_PU1865\_Web\_Accessible.pdf</a> (page 41)

prospects for delivery which could be specifically set out as part of any future planning consent. A range of sites may be appropriate, which could include new settlements. In such instances local planning authorities may need to consider whether a review or partial review of their plans are needed, or whether such settlements can be delivered through additional development plan documents – such as Area Action Plans. Such an approach would present an opportunity for local planning authorities, working with developers and their local communities, to undertake rapid and targeted policy reviews, including appropriate consultation, so that additional land in sustainable locations can come forward.

## Q11. We would welcome your views on how best to implement the housing delivery test, and in particular

- What do you consider should be the baseline against which to monitor delivery of new housing?
- What should constitute significant under-delivery, and over what time period?
- What steps should be taken in response to significant under-delivery?
- How do you see this approach working when the housing policies in the Local Plan are not up-to-date?

Q12. What would be the impact of a housing delivery test on development activity?

### Supporting delivery of starter homes

34. National planning policy contains an exception site planning policy to release land specifically for starter homes<sup>9</sup>. This allows applicants to bring forward proposals on unviable or underused commercial or industrial brownfield land not currently identified in the Local Plan for housing.

### Unviable and underused commercial and employment land

- 35. National planning policy is clear that the planning system should support sustainable economic growth and local planning authorities should plan positively to meet the business development needs of their areas. A balance needs to be struck between making land available to meet commercial and economic needs, and not reserving land which has little likelihood of being taken up for these uses. Paragraph 22 of the National Planning Policy Framework is clear that where there is no reasonable prospect of land allocated for employment uses in the Local Plan coming into use, such land should not be subject to long term protection.
- 36. The Productivity Plan<sup>10</sup> set out our intention to bring forward proposals to extend the current exception site policy, and strengthen the presumption in favour of Starter Home developments, starting with unviable or underused brownfield land for retail, leisure and institutional uses. It also set out our commitment to consider how national policy and guidance can ensure that unneeded commercial land can be released for housing.
- 37. We want to ensure that unviable or underused commercial and employment land is released under the exception site policy for starter homes. We propose to amend paragraph 22 of the Framework to make clear that unviable or underused employment land should be released unless there is significant and compelling evidence to justify why such land should be retained for employment use. At a minimum, this would include an up-to-date needs assessment and significant additional evidence of market demand. As set out in Planning Practice Guidance, appropriate consideration should also be given to trends in land values for commercial and employment uses, against land values for other uses including residential.

<sup>&</sup>lt;sup>9</sup> Starter Homes Written Ministerial Statement, Minister for State for Department for Communities and Local Government, 2 March 2015, plus accompanying planning guidance at <a href="http://planningguidance.planningportal.gov.uk/blog/quidance/starter-homes/">http://planningguidance.planningportal.gov.uk/blog/quidance/starter-homes/</a>

<sup>&</sup>lt;sup>10</sup> Fixing the foundations: Creating a more prosperous nation (July 2015)

<a href="https://www.gov.uk/government/uploads/system/uploads/attachment">https://www.gov.uk/government/uploads/system/uploads/attachment</a> data/file/443898/Productivity Plan we b.pdf

- 38. To avoid uncertainty on land availability, we wish to ensure our policy is as robust as possible. We are interested in views on the level and type of evidence which would justify retention of employment and commercial land. We are considering the merits of expecting local planning authorities to adopt a policy with a clear limit on the length of time (such as 3 years) that commercial or employment land should be protected if unused and there is not significant and compelling evidence of market interest of it coming forward within a 2 year timeframe. We would welcome views on this approach.
- 39. There is no comprehensive data on the amount of underused or unviable employment land across England as a whole. Data 11 suggests there were approximately 850 hectares of greenfield land allocated for employment use in the West Midlands in 2012-13. If a similar situation were replicated across England, this would equate to roughly 13,000 hectares in England 12. However, many of these sites are likely to be in the process of being developed or there may be clear market interest in developing them, but we do not know how many or the extent the sites would be viable for residential development. As an illustration, if around 10% of the 13,000 hectares of allocated employment land were vacant or underused and around 50% of such sites could be viably developed, this could free up an additional 650 hectares for housing.

# Q13. What evidence would you suggest could be used to justify retention of land for commercial or similar use? Should there be a fixed time limit on land retention for commercial use?

40. Alongside these proposals, we propose to widen the scope of the current exception site policy for starter homes to incorporate other forms of unviable or underused brownfield land, such as land which was previously in use for retail, leisure and non-residential institutional uses (such as former health and educational sites). This will provide clarity about the scope of the exception site policy for applicants and local planning authorities, and release more land for starter homes.

# Q14. Do you consider that the starter homes exception site policy should be extended to unviable or underused retail, leisure and non-residential institutional brownfield land?

41. The current exception site policy states that a planning application for a Starter Home development on an exception site should be approved unless the local planning authority can demonstrate that there are overriding conflicts with the National Planning Policy Framework that cannot be mitigated. The interpretation

<sup>11</sup> West Midlands Joint Monitoring Survey database

<sup>&</sup>lt;sup>12</sup> DCLG analysis using the West Midlands Joint Monitoring Survey data and DCLG land use change statistics

- of this policy has created uncertainty for applicants seeking to bring forward the first Starter Home applications.
- 42. To ensure there is greater certainty that planning permission will be granted for suitable proposals for starter homes on exception sites, we propose to be clearer about the grounds on which development might be refused, and to ensure that this is fully embedded in national planning policy. Specifically, we propose to amend the exception site policy to make it clearer that planning applications can only be rejected if there are overriding design, infrastructure and local environmental (such as flood risk) considerations that cannot be mitigated.

Q15. Do you support the proposal to strengthen the starter homes exception site policy? If not, why not?

# Encouraging starter homes within mixed use commercial developments

- 43. We are keen to understand whether there is the potential to encourage a greater proportion of housing in general and starter homes in particular within mixed use commercial developments across the country, for example new town centre developments or existing town centre regeneration. As shopping patterns have changed, so have the shape of our town centres. Bringing starter homes into those centres will not only bring footfall, but help drive the regeneration of those towns, benefitting the wider community and helping to safeguard the future of town centres.
- 44. In cases where existing mixed use commercial developments contain unlet commercial units, we consider that where appropriate they could usefully be converted to housing including as starter homes. There would need to be clear evidence that the unit has remained unlet for a reasonable period or there is little likelihood of the unit being let for a commercial use.

Q16: Should starter homes form a significant element of any housing component within mixed use developments and converted unlet commercial units?

### Encouraging starter homes in rural areas

45. The Government's Rural Productivity Plan<sup>13</sup> set out priorities for growing the rural economy and the need to increase the availability of housing in rural towns and

<sup>&</sup>lt;sup>13</sup> Towards a one nation economy: a 10 point plan for boosting productivity in rural areas. https://www.gov.uk/government/publications/towards-a-one-nation-economy-a-10-point-plan-for-boosting-rural-productivity

villages to enable them to thrive. The use of rural exception sites is an established means for supporting sensitive housing growth where it is locally supported and meeting local needs.

- 46. Starter homes can provide a valuable source of housing for rural areas and, if classified as affordable housing, then we consider it should be possible to deliver starter homes through the existing rural exception site policy. Local planning authorities have been bringing forward rural exception sites for a number of years. Data on affordable housing units built on rural exception sites is collected by the Department for Communities and Local Government 14. In 2013/14 there were 1,642 units built. Rural exception sites are a useful tool for local planning authorities in rural areas to help meet a local community need.
- 47. We propose that starter homes on rural exception sites should be subject to the same minimum time limits on resale (5 years) as other starter homes to ensure local people are able to maximise the value of the home and secure a long term place in the local housing market. However, we also propose that local planning authorities would, exceptionally, have the flexibility to require a local connection test. This would reflect the particular needs of some rural areas where local connections are important and access to the housing market for working people can be difficult and would be consistent with existing policy on rural exception sites.

Q17. Should rural exception sites be used to deliver starter homes in rural areas? If so, should local planning authorites have the flexibility to require local connection tests?

Q18. Are there any other policy approaches to delivering starter homes in rural areas that you would support?

# Enabling communities to identify opportunities for starter homes

- 48. Neighbourhood plans prepared by local communities present a further opportunity to provide housing for young people wishing to enter the housing market. We want them to consider the opportunities for starter homes in their area as they develop their plans.
- 49. National planning policy currently considers limited affordable housing for local community needs as "not inappropriate" in the Green Belt, where this is consistent with policies in the Local Plan. This does not give express support to

<sup>&</sup>lt;sup>14</sup> DCLG (2015) Local Authority Housing Statistics: <a href="https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2013-to-2014">https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2013-to-2014</a>

neighbourhood plans which seek to allocate land in the Green Belt to meet housing need, where this is supported by the local community. We consider that the current policy can hinder locally-led housing development and propose to amend national planning policy so that neighbourhood plans can allocate appropriate small-scale sites in the Green Belt specifically for starter homes, with neighbourhood areas having the discretion to determine the scope of a small-scale site. This will support local areas in giving affordable home ownership opportunities to young people and young families by enabling a small level of development that is sympathetic to local concerns and is clearly supported by local people.

Q19. Should local communities have the opportunity to allocate sites for small scale Starter Home developments in their Green Belt through neighbourhood plans?

### Brownfield land in the Green Belt

- 50. We are firmly committed to making sure the best possible use is made of all brownfield land that is suitable for housing, to reduce the need as far as possible to release other land. This could potentially include some brownfield land that sits within the Green Belt that already has buildings or structures and has previously been developed.
- 51. We are committed to protecting the Green Belt, and are maintaining the strong safeguards on Green Belt set out in national planning policy. These policies set a high bar against inappropriate development in Green Belt, while recognising that some parts of the Green Belt contain living and working communities that need to thrive. National planning policy sets out that most development in the Green Belt is inappropriate and should not be approved except in very special circumstances.
- 52. Only 0.1% of land in the Green Belt is previously developed brownfield land suitable for housing, often with structures or buildings in place. Limited infilling or the partial or complete redevelopment of such land where this would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development is already deemed not inappropriate.
- 53. Since introduction of the initial exception site policy for starter homes in March 2015, we have given further consideration to the potential release of brownfield land in the Green Belt as part of our overall approach to delivering 200,000 starter homes. The Autumn Statement 2015 set out that we will bring forward proposals to amend national planning policy to allow for the development of brownfield land in the Green Belt providing it contributes to starter homes. We propose to change policy to support the regeneration of previously developed brownfield sites in the Green Belt by allowing them to be developed in the same way as other brownfield land, providing this contributes to the delivery of starter homes, and subject to local consultation. We propose to amend the current policy test in paragraph 89 of the National Planning Policy Framework that prevents development of brownfield land where there is any additional impact on the openness of the Green Belt to give more flexibility and enable suitable, sensitively designed redevelopment to

come forward. We would make it clear that development on such land may be considered not inappropriate development where any harm to openness is not substantial.

54. Based on data from the 2010 National Land Use Database, we estimate that across England there were 500 to 600 hectares of brownfield land in the Green Belt viable for starter homes development and not on open land 15. There is no data to indicate how much of this land has subsequently been built on (including potentially commercial or industrial units), or how much further land of this type may have become available.

Q20. Should planning policy be amended to allow redevelopment of brownfield sites for starter homes through a more flexible approach to assessing the impact on openness?

Open land includes: Agriculture, Agriculture and fisheries, Car Parks, Defence, Mineral workings and quarries, Refuse disposal, Vacant, Vacant land, Transport tracks and ways, Other Vehicle Storage, Recreation and Leisure

### Transitional arrangements

- 55. We have considered whether to propose introducing transitional arrangements for the changes set out in this consultation document. We recognise in particular that a change in the definition of affordable housing in national policy will require local authorities to consider their Local Plan policies in the context of relevant evidence. They may need to develop new policy as a result, and carry out a partial review of the Local Plan. The Planning Inspectorate has introduced a fast-track process for carrying out partial reviews of Local Plans which is intended to help local planning authorities make changes to their policies more easily. We propose to introduce a transitional period for the amended affordable housing definition so that local planning authorities can consider making amendments to their local policies. We would welcome views on the appropriate length of the transitional period to enable reviews to be undertaken. We envisage that a period of six to twelve months should be sufficient.
- 56. The Housing and Planning Bill is introducing a statutory duty on local authorities to promote the delivery of starter homes, and a requirement for a proportion of starter homes to be delivered on all suitable reasonably-sized housing developments.
- 57. We have carefully considered whether it would be appropriate for a transitional period to be introduced for any of the other proposed policy changes. Having considered the extent of their likely impact on plans that have already been adopted and plans that are in preparation, we have not identified a strong justification for transitional arrangements.
- 58. Our planning reforms since 2010 have placed Local Plans at the heart of the planning system. The Productivity Plan<sup>16</sup> and subsequent Written Ministerial Statement<sup>17</sup> made clear our commitment to ensuring that local planning authorities produce a Local Plan by early 2017. We do not intend that these policy proposals should slow down the preparation of existing Local Plans, nor do we consider it necessary for Local Plans now in the examination process to be revisited. However, we would welcome any views on this point.

## Q21. We would welcome your views on our proposed transitional arrangements.

<sup>&</sup>lt;sup>16</sup> Fixing the foundations: Creating a more prosperous nation (July 2015)

<a href="https://www.gov.uk/government/uploads/system/uploads/attachment">https://www.gov.uk/government/uploads/system/uploads/attachment</a> data/file/443898/Productivity Plan we b.pdf

http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statements/?page=1&max=20&questiontype=AllQuestions&house=commons%2clords&use-dates=True&answered-from=2015-07-20&dept=7

### General questions

Q22. What are your views on the assumptions and data sources set out in this document to estimate the impact of the proposed changes? Is there any other evidence which you think we need to consider?

Q23. Have you any other views on the implications of our proposed changes to national planning policy on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?

### **Summary of Questions**

- a) Affordable Housing
- Q1. Do you have any comments or suggestions about the proposal to amend the definition of affordable housing in national planning policy to include a wider range of low cost home ownership options?
- Q2. Do you have any views on the implications of the proposed change to the definition of affordable housing on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?
- b) Increasing residential density around commuter hubs
- Q3. Do you agree with the Government's definition of commuter hub? If not, what changes do you consider are required?
- Q4. Do you have any further suggestions for proposals to support higher density development around commuter hubs through the planning system?
- Q5. Do you agree that the Government should not introduce a minimum level of residential densities in national policy for areas around commuter hubs? If not, why not?
- c) Supporting new settlements, development on brownfield land and small sites, and delivery of housing agrees in Local Plans
- Q6. Do you consider that national planning policy should provide greater policy support for new settlements in meeting development needs? If not, why not?
- Q7. Do you consider that it would be beneficial to strengthen policy on development of brownfield land for housing? If not, why not and are there any unintended impacts that we should take into account?

- Q8. Do you consider that it would be beneficial to strengthen policy on development of small sites for housing? If not, why not? How could the change impact on the calculation of the local planning authorities' five-year land supply?
- Q9. Do you agree with the Government proposal to define a small site as a site of less than 10 units? If not, what other definition do you consider is appropriate, and why?
- Q10. Do you consider that national planning policy should set out that local planning authorities should put in place a specific positive local policy for assessing applications for development on small sites not allocated in the Local Plan?
- Q11. We would welcome your views on how best to implement the housing delivery test, and in particular:
  - What do you consider should be the baseline against which to monitor delivery of new housing?
  - What should constitute significant under-delivery, and over what time period?
  - What steps do you think should be taken in response to significant under-delivery?
  - How do you see this approach working when the housing policies in the Local Plan are not up-to-date?
- Q12. What would be the impact of a housing delivery test on development activity?
- d) Supporting delivery of starter homes
- Q13. What evidence would you suggest could be used to justify retention of land for commercial or similar use? Should there be a fixed time limit on land retention for commercial use?

- Q14. Do you consider that the starter homes exception site policy should be extended to unviable or underused retail, leisure and non-residential institutional brownfield land?
- Q15. Do you support the proposal to strengthen the starter homes exception site policy? If not, why not?
- Q16. Should starter homes form a significant element of any housing component within mixed use developments and converted unlet commercial units?
- Q17. Should rural exception sites be used to deliver starter homes in rural areas? If so, should local planning authorities have the flexibility to require local connection tests?
- Q18. Are there any other policy approaches to delivering starter homes in rural areas that you would support?
- Q19. Should local communities have the opportunity to allocate sites for small scale starter home developments in their Green Belt through neighbourhood plans?
- Q20. Should planning policy be amended to allow redevelopment of brownfield sites for starter homes through a more flexible approach to assessing the impact on openness?
- e) Transitional arrangements
- Q21. We would welcome your views on our proposed transitional arrangements.

#### f) General questions

- Q22. What are your views on the assumptions and data sources set out in this document to estimate the impact of the proposed changes? Is there any other evidence which you think we need to consider?
- Q23. Have you any other views on the implications of our proposed changes to national planning policy on people with protected characteristics as defined in the Equalities Act 2010? What evidence do you have on this matter?

# About this consultation

This consultation document and consultation process have been planned to adhere to the Consultation Principles issued by the Cabinet Office.

Representative groups are asked to give a summary of the people and organisations they represent, and where relevant who else they have consulted in reaching their conclusions when they respond.

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004.

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department for Communities and Local Government will process your personal data in accordance with DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

Individual responses will not be acknowledged unless specifically requested.

Your opinions are valuable to us. Thank you for taking the time to read this document and respond.

Are you satisfied that this consultation has followed the Consultation Principles? If not or you have any other observations about how we can improve the process please contact DCLG Consultation Co-ordinator.

Department for Communities and Local Government
2 Marsham Street
London
SW1P 4DF
or by e-mail to: consultationcoordinator@communities.gsi.gov.uk

#### **Graham Blew**

AGENDA ITEM

From:

Katie Gill <Katie.Gill@dartford.gov.uk>

Sent:

22 January 2016 16:23

Subject:

Dartford Development Policies Plan: 'Publication' Stage Public Comments

(Regulation 19)

Attachments:

Statement of Representations Procedure.pdf; Consultation Form DP Plan

22Jan16.docx

Dear Consultee,

**Dartford Development Policies Plan: 'Publication' Stage Public Comments** (Regulation 19) (The Town and Country Planning (Local Planning) (England) Regulations 2012)

You have been contacted because you previously expressed an interest in being kept informed about planning policy in Dartford.

Dartford Borough Council is now in the final stages of developing a Local Plan which will replace the 1995 Borough of Dartford Local Plan. The new Development Policies Plan will help deliver the adopted Core Strategy (2011) and update development management policies (used in deciding planning applications).

Following public consultation in December 2014 and 2013, the Council has now reached the publication ('Pre-Submission') stage of preparing the Plan. The purpose of this is to identify whether or not the Plan is 'sound' and legally compliant, prior to submitting it for examination by the Planning Inspectorate. Formal information on the process is provided on the attached notice.

Should you wish to make formal representations on the soundness/ legal compliance of the Plan please use the attached Word form to ensure they are duly made. Comments are public and will be forwarded for the consideration of the Planning Inspector.

Representations must be made in writing via <a href="ldf@dartford.gov.uk">ldf@dartford.gov.uk</a>, or to Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR. All responses to the document must be received within six weeks: by 4pm Friday <a href="mailto:4th March">4th March</a> 2016. You must ensure your comments are received in time.

For further information please see the Development Policies Plan publication document, and the supporting information (including associated evidence and Sustainability Appraisal) which is available on <a href="http://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/development-management-plan">http://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/development-management-plan</a>

Alternatively, copies of the Plan are available at local libraries. Plan hard copies and supporting documentation can be viewed at the Dartford Civic Centre (weekdays 8.45am to 5.15pm/ 4.45pm on Fridays).

If you have any queries please email or call the Planning Policy Team on 01322 343213.

Yours faithfully MJ Aplin

Mark Aplin Planning Policy Manager This page is intentionally left blank.

#### Town and Country Planning (Local Planning) (England) Regulations 2012 Regulations 18, 19 & 20

# Statement of Representations Procedure

**Document Title:** Dartford Development Policies Plan December 2015-

Publication (Pre Submission) Document

Subject Matter: The Development Policies Plan sets out planning policies that

will be used for development management to determine planning applications in Dartford. It will form part of Dartford's statutory development plan alongside the adopted Core Strategy, and will replace the remaining parts of the 1995 Local

Plan.

Area Covered: Whole of the administrative area of Dartford Borough Council

The Council will Publication receive representations from Friday 22<sup>nd</sup> Period:

January 2016 until 16:00 on Friday 4th March 2016

The Plan is available to view at local libraries and, along with other documentation, is available at the Dartford Civic Centre

during normal office hours.

Representations: Can be made using the Representation Form available via the

Council's website www.dartford.gov.uk/policyconsultation

Representations should be sent to:

LDF@dartford.gov.uk

or:

Planning Policy Team **Dartford Borough Council** 

Civic Centre Home Gardens

Dartford

Kent, DA1 1DR

You may include in representations a request to be notified of any of the following:

Submission of the plan by the Council for examination,

Issuing of recommendations by the Planning Inspector following examination,

· Adoption of the Plan if successful at examination.

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#### REPRESENTATION FORM

Development Policies Local Plan

# **Development Policies Plan**





For office use only

Reference No:

January 2016

All respondents should complete Sections 1 to 3 of this form. You are requested to complete section 4 equalities monitoring form.

Further copies of this representation form are available via: <a href="mailto:ldf@dartford.gov.uk">ldf@dartford.gov.uk</a>

Name	Dur Details and Consultation Procedures Feedback
Joh Title (if relevant)	
Job Title (if relevant)	
company/organisation name (if relevant)	
Client's name (if applicable)	
Postal address	
Email address	
Do you consider that the comments on presentatio	document is easy to read? Do you have any general n and clarity (other than the content of the Plan)?
Vere you provided with the low could this be improve	ne information you needed to respond to the document?

#### Section 2:

# Representations on the Development Policies Plan's soundness and legal compliance

The purpose of this stage is for you to make formal representations on whether the Plan meets national tests of compliance. Representations you make here will be considered, including at Examination in Public hearings, by the Planning Inspectorate.

If you are potentially unclear, or would like further information, please email <a href="mailto:ldf@dartford.gov.uk">ldf@dartford.gov.uk</a> or call 01322 843213.

[The National Planning Policy Framework details the tests of soundness at Paragraph 182 (page 43): <a href="mailto:www.gov.uk/government/uploads/system/uploads/attachment\_data/file/6077/2116950.p">www.gov.uk/government/uploads/system/uploads/attachment\_data/file/6077/2116950.p</a>

	1.	1. To which part of the Development Policies Plan Document does this representation relate? Please specify the Policy or Paragraph number.				
7.						

2. Do you consider the Plan to be legally compliant? [please circle or highlight]

Yes

No

3. Do you consider the Plan to be 'sound'?

[please circle or highlight]

Yes

a)

		b)	If 'No i. ii. iii. iv.	': do you consider the Plan to be unsound because it is:  Not Positively Prepared  Not Justified  Not Effective  Not Consistent with National Policy	
	4.	Please	use t	his box below to specify the reasons for your answers to questions 2&3	3.
Г		Please	be as	precise as possible.	7
1					
5	. 11	you an	swere	ed 'No' to questions 2 or 3a above on legal compliance/ soundness,	

please set out in the box below specific change(s) you consider necessary to make the Development Policies Plan legal/ sound. (For soundness matters, you should refer to the particular issue of soundness you selected in question 3b. For legal

# compliance, if you are considering matters of the Duty to Cooperate, please note that changes cannot be made through modifications on this at examination stage). You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or supporting text.

Dartford Development Policies Plan - Publication (Pre-Submission)

## Section 3: Final Representation Matters

6. Would you like to be notified of the following: [please circle or highlight]

#### Dartford Development Policies Plan – Publication (Pre-Submission)

i.	The submission of the Development Policies Plan Document for independent examination by the Secretary of State?		
	Yes	No	
ii.	The publication examination?	n of the Inspector's recommendations following the	
	Yes	No	
iii.	The adoption	of the Development Policies Plan Document if found sound?	
2	Yes	No	
-			
		1	

Your signature: Date:

Data Protection Statement: The information you provide will be held and used by Dartford Borough Council, in accordance with the Data Protection Act 1998, to help in the preparation of the Development Management Plan Scoping Report. Please note that all responses received will be available for public inspection. Your personal details will however remain confidential.

# ALL RESPONSES MUST BE RECEIVED BY 4pm Friday 4th March 2016

The Council cannot guarantee full account will be taken of late representations. Please ensure your comments are received by us in time. If you are having difficulty responding, please contact us in advance and see how we can help you respond within the deadline.

Completed forms should be sent to the following address:
Planning Policy Team
Dartford Borough Council
Civic Centre
Home Gardens
Dartford
Kent, DA1 1DR

Email address: LDF@dartford.gov.uk

Further electronic copies of this form are available:

- On the Council's website via: www.dartford.gov.uk/policyconsultation
- By telephone (01322) 343213

If you or anybody you know requires this or any other council information in another language please contact us and we will do our best to provide this for you.

Braille, Audio tape and large print versions of this document are available upon request.

Tel: 01322 343434 / Fax: 01322 343432 Email: <u>customer.services@dartford.gov.uk</u>

# Section 4 Equalities Monitoring

We want to find out if we are giving as good a service as we can to all our customers. To help us to do this, please complete the following form. The information we get from the replies will be held confidentially and will only be used for monitoring purposes.

#### Please tick as appropriate

1. Ethr	nic Grou	ıp:		
British Irish Any other w	hite backç	ground	0	
Mixed White and B White and B White and A Any other mi	lack Africa sian	an	0 0 0	
Asian or Asian British Indian Pakistani Bangladeshi Any other Asian background Black or Black British Caribbean African Any other Black background				
Chinese Chinese			0	
Other ethnic Any other gro			0	
2. Sex:	0	Female	0	
3.	Age:			
Under 16 16-19 20-24 25-59 60-64		0 0 0 0		

4.	טס you	nave	a disability	/?
	Yes	0	No	0
4a If you d	o, what	is the	nature of y	our disability?
Difficulty getting	around		0	
Hearing difficulty	,		0	
Difficulty seeing			0	
Learning difficult	ies		0	
Mental Health pr	oblems		0	
Other			0	

Thank you for taking the time to respond.

#### Regeneration Services

2 5 JAN 2016



Swanscombe and Greenhithe Town Council

Council Offices

The Grove Swanscombe

Kent DA10 0GA

Please ask for: Mark Aplin

Direct Line:

(01322) 343202

Direct Fax:

(01322) 343047

E-mail:

DX:

142726 Dartford 7

Your Ref: Our Ref:

Date:

22<sup>nd</sup> January 2016

Dear Consultee,

Dartford Development Policies Plan: 'Publication' Stage Public Comments (Regulation 19) Site: Keary Road Allotments

This is a letter for your information concerning planning policy documents in Dartford Borough.

The council is writing to you as we have identified you as landowner of the above open space. The Dartford 'Development Policies Plan' proposes to identify this land as Protected Local Green Space (PLGS) on the Policies Map of the Borough. This means any development proposals should meet policy requirements in the Plan ("DP23") which seeks to retain the special open environment and open characteristics of the land. This based on national planning policy that allows certain parcels of land to be given protection similar to the Green Belt.

The Plan's policies will form a basis for the council's decisions on planning applications it may receive from this area. If you wish to make formal written representations on the please see further information available www.dartford.gov.uk/policyconsultation via email (ldf@dartford.gov.uk) or phone 01322 343213.

Copies of the Plan are available at local libraries. Alternatively, Plan hard copies and supporting documentation can be viewed at the Civic Centre, Home Gardens, Dartford DA1 1DR (weekdays 8.45am to 5.15pm/ 4.45pm on Fridays). Formal information on the process is provided on the reverse of this letter.

Yours sincerely

Mark Aplin

Planning Policy Manager

Mark Afri

#### Regeneration Services

2 5 JAN 2016



Swanscombe and Greenhithe Town Council

Council Offices

The Grove Swanscombe

Kent DA10 0GA

Please ask for: Mark Aplin

Direct Line:

(01322) 343202

Direct Fax:

(01322) 343047

E-mail:

DX:

142726 Dartford 7

Your Ref: Our Ref:

Date:

22<sup>nd</sup> January 2016

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Yours sincerely

Planning Policy Manager

Mark Afri



# Lower Thames Crossing Route Consultation 2016 – Have Your Say Consultation closes on Thursday 24 March 2016

We are pleased to notify you that Highways England has today launched a public consultation on proposals for a Lower Thames Crossing, a new road crossing of the River Thames connecting Kent and Essex.

The proposal is for a new road which would connect the A2/M2 in Kent with a tunnel crossing east of Gravesend and Tilbury, before joining the M25 between junctions 29 and 30. There are three route options north of the river in Essex and two south of the river in Kent.

Find out more and have your say

This is your opportunity to let us know your views before we make our recommendations to the Department for Transport later this year. If you would like to find out more please visit our website <a href="www.lower-thames-crossing.co.uk">www.lower-thames-crossing.co.uk</a> where you can:

- View and download maps and other information about our proposals
- Provide your views by completing our online questionnaire
- Find out about one of our events where members of our team will be on hand to answer your questions.
- Find out where you can view the proposals at a location in your area where copies of consultation materials, maps and questionnaires are available.

Alternatively, you can call us on 0300 123 5000.

Please feel free to forward this email to any interested parties. This will help to ensure that those interested or impacted by the Lower Thames Crossing are aware of the consultation, know how to access further information and know how to respond.

Your views are important to us. Please provide your response by **24 March 2016**. We look forward to receiving your response.

Martin Potts Consultation Manager Highways England

1)

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# About you

The following questions will help us to understand the range of people and organisations who have responded to this consultation and to identify local issues. The information you provide will not be used for any purpose other than assessing responses to this consultation and for other reasons explained in this questionnaire.

1 Name
Optional
2 Postcode
3 Email address
This is optional but providing your email address will allow us to update you with any news on the consultation.
This is optional but providing your email address will allow us to update you with any news on the consultation.
This is optional but providing your email address will allow us to update you with any news on the consultation.  4 Are you responding on your own behalf or on behalf of an organisation or group?  O Providing my own response O Providing a response on behalf of an organisation or group
4 Are you responding on your own behalf or on behalf of an organisation or group?      Providing my own response
4 Are you responding on your own behalf or on behalf of an organisation or group?  O Providing my own response Providing a response on behalf of an organisation or group  Want to continue responding later?  Save your response and return later
4 Are you responding on your own behalf or on behalf of an organisation or group?  O Providing my own response O Providing a response on behalf of an organisation or group  Want to continue responding later?



# **Crossing location**

Our proposal is a crossing at Location C, east of Gravesend and Tilbury.

A new crossing at Location A (Route 1) performs poorly against the traffic related scheme objectives. As Location A does not provide an alternative route, traffic would still be funnelled through the existing corridor from junctions 2 to 29 and incidents at Dartford would potentially still cause long delays and severe congestion on local roads.

Route 1 would not provide additional connections to local roads and by attracting more traffic to the existing corridor, congestion on the adjacent A2 and A13 would also increase.

Construction would take at least six years and would cause considerable disruption to traffic using the existing Dartford Crossing with 40mph average speed restrictions and complex traffic management affecting millions of journeys. Even when the scheme is complete, there would be limited improvement for drivers as the current 50mph speed limit and closely spaced junctions would remain.

Additionally, a crossing at Location A would offer poor value for money in comparison to Location C and would perform poorly against other scheme objectives such as safety, noise and air quality.

A new crossing at Location C would provide a high quality, safer transport solution with a 70mph road providing improved journeys. Crossing capacity would increase by 70% in the opening year and, as a new route, it could be constructed without impacting the already congested Dartford corridor.

On opening it would draw 14% of existing traffic away from Dartford, improving journey times on the existing crossing by up to 5 minutes in peak time and improving journey times from Kent to the M25 by up to 12 minutes when using the new crossing. It would provide a clear alternative to the existing crossing when incidents occur and traffic flows on the A2 and the A13 would also improve.

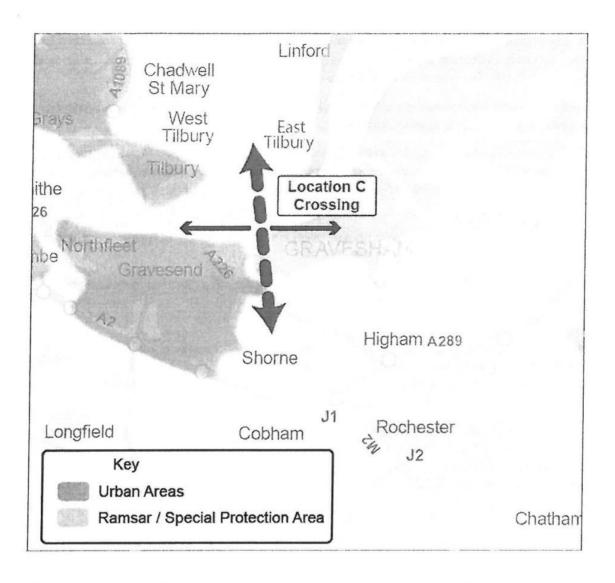
Significant economic growth and regeneration would be enabled by connecting key areas (such as Ebbsfleet, Swanscombe and Gravesend to the south and Tilbury and wider areas of Thurrock to the north) to the national road network. Improved access to jobs and services, and more opportunities for new businesses are estimated to generate double the wider economic benefits at Location C compared with Location A.

A crossing at Location C would have greater ecological impacts than one at Location A.

#### Conclusion

Location C is proposed because it offers far greater benefits than Location A. It would unlock significant wider economic growth and offers higher transport performance in terms of safety, capacity and resilience. In contrast, a new crossing at Location A would not meet the transport and economic objectives. Also, in comparison with Location C, it offers poor value for money.

We believe Location C best meets the economic and transport objectives, while balancing these with the community and environmental benefits and impacts. The following sections consider the benefits and impacts of crossing type, routes and junctions for a crossing at Location C.



5 Or	on balance, do you agree or disagree with our pro	posal for the location of a crossing, at Location C?
	Strongly agree	
	Tend to agree	
	Neither agree nor disagree	
	Tend to disagree	
	Strongly disagree	
	Don't know	
Please	se provide the reasons for your response	
Wan	nt to continue responding later?	
Save	ve your response and return later	
Don'	't want to continue at all?	
Clea	ar your answers from this computer	

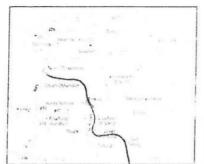


## Routes north of the river

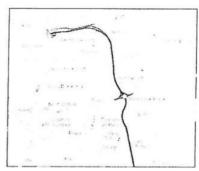
We are seeking your views on three routes north of the river. Each route would perform similarly with respect to solving the transport challenges and unlocking economic potential. Each would directly, to some extent, affect greenbelt and areas of ancient woodland.

	North of river					
Feature	Route 2	Route 3	Sound 4			
Air quality	Limited impact on air q improved air quality at	juality immediately adjacer Dartford	nt to the routes but			
	All routes reduce noise Dartford Crossing	disturbance for properties	s close to the existing			
Noise	Has the greatest impact in terms of noise disturbance as the route is closer to more densely populated areas.	Noise disturbance is less than Route 2 but greater than Route 4.	Has the least impact in terms of noise disturbance as the route is further away from urban centres.			
Biodiversity	Routes 2 and 3 have lo ecological sites than Ro		Greatest impact on ecological sites.			
Landscape	Routes 2 and 3 run throin Thurrock.	ough greenbelt	Route 4 runs through greenbelt in Thurrock and Brentwood.			
Cultural heritage	Requires land within West Tilbury conservation area and scheduled monuments. Potential impact on listed buildings.	Requires land within a scheduled monument. Potential impact on listed buildings. Avoids conservation areas. Has the least impact of Routes 2, 3 and 4.	Runs through Thorndon Park, a Registered Park and Garden and conservation area. Potential impact on listed buildings.			
Properties*	9 residential 3 agricultural	14 residential 22 traveller plots 3 agricultural	14 residential 9 commercial 3 agricultural			

6 There are three route options north of the river in Essex – Routes 2, 3 and 4. Where do you think the route should be located north of the river?







Route 2 would be closest to existing urban areas and have greater noise impacts than Routes 3 and 4. It would also impact on ecological and heritage sites and affect an Environment Agency flood storage area. It would involve upgrading the existing A1089, is constrained by closely spaced junctions and would mix local with long distance traffic.

Route 3 would be the shortest route and would be a completely new road which could be designed to modern highway standards over its whole length. Although it would impact local ecological and heritage sites, the impact would be less than Routes 2 and 4

Route 4 would involve a new road, an upgrade of the existing A127 and an upgraded junction where the A127 joins the M25. It would affect ancient woodland, a conservation area and a registered park and garden. The overall route is longer and more expensive than a longer and more expensive than a longer and more of the longer and more expensive than longer and more as longer and more expensive than longer and more as longer and more expensive than longer and longer an

(0)	Route 2
0	Route 3
0	Route 4
0	Another route
0	None of these
0	Don't know
Pleas	e provide the reasons for your response

Please provide the reasons for your response	
	*;

7 Thinking about the three route options north of the river, on balance do you agree or disagree with our proposal for each of these?

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Route 2	0	0	0	0	0	0
Route 3	0	0	0	0	0	0
Route 4	0	0	0	0	0	0

Want to continue responding later?

Save your response and return later...

Don't want to continue at all?

Clear your answers from this computer

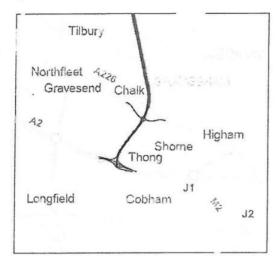


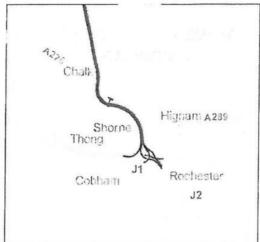
# Routes south of the river

We are seeking your views on two alternative routes south of the river. These would both have an impact on existing communities and protected sites, but differ in terms of impacts on transport and economics.

	South of river	
Feature	Western Southern Link	Esplain Southern Links
Air quality	Limited impact on air quality routes but improved air qua	immediately adjacent to the lity at Dartford.
Noise	Reduced noise disturbance existing Dartford Crossing. I between the Eastern and Woof noise.	for properties close to the There is little to differentiate estern Southern Links in terms
Biodiversity	Affects Claylane Wood ancient woodland and Shorne and Ashenbank Woods SSSI**. Less overall effect of the two options.	Affects areas of ancient woodland and local wildlife sites east of Shorne and Great Crabbles Wood SSSI**.
Landscape	Lesser area required within the Kent Downs AONB***.	Greater area required within the Kent Downs AONB***.
Cultural heritage	Potentially impacts the setting of listed buildings. Route is close to but not in the conservation area of Thong.	Potentially impacts the setting of listed buildings. Route is close to but not in the conservation area of Shorne.
Properties*	4 residential 3 commercial	10 residential 2 commercial

8 There are two route options south of the river in Kent - the Western Southern Link and the Eastern Southern Link. Where do you think the route should be located south of the river?





A Western Southern Link would connect to a new junction on the A2. This would be constrained by the High Speed 1 rail line and existing development. The junction would need to be of compact design and as such, some connecting roads would be limited to 30mph. This route would have less impact on the Kent Downs Area of Outstanding Natural Beauty.

An Eastern Southern Link would provide a direct connection from the M2 to the M25. This would create a motorway-to-motorway connection providing greater benefits than the Western Southern Link, estimated at £560m, at an additional cost of £200m. An Eastern Southern Link would impact Shorne village, would have a greater impact on ancient woodland, the Kent Downs Area of Outstanding Natural Beauty and would also affect a Site of Special Scientific Interest (Great Crabbles Wood).

(0)	Western Southern Link	
0	Eastern Southern Link	
(0)	Another route	
$\bigcirc$	None of these	
0	Don't know	
Pleas	se provide the reasons for your response	

9 Thinking about the two route options south of the river, on balance do you agree or disagree with our proposal for each of these?

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Eastern Southern Link	0	0	0	0	0	0
Western Southern Link	0	0	0	0	0	0

Want to continue responding later?

Save your response and return later...

Don't want to continue at all?

Clear your answers from this computer



## The proposed scheme

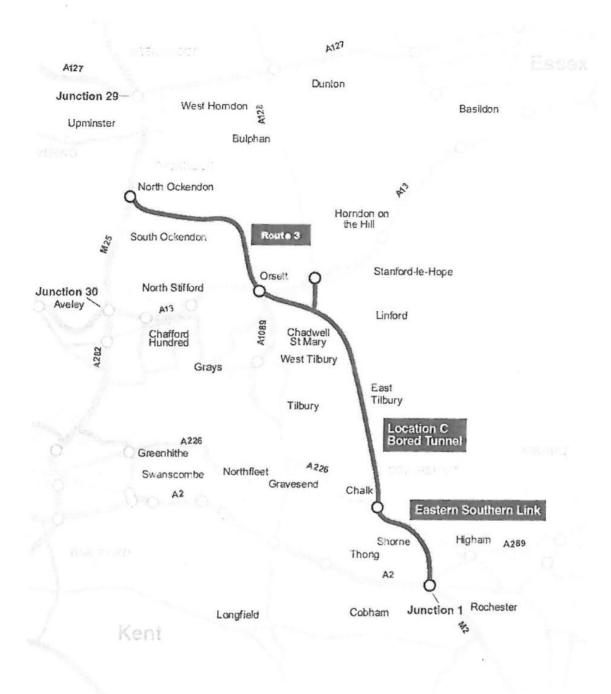
#### Key features of our proposal

Our proposed scheme would be a dual carriageway connecting junction 1 of the M2 to the M25 between junctions 29 and 30. This crosses under the River Thames just east of Gravesend and Tilbury. Of our potential options, this route would provide a 70mph motorway-to-motorway connection with the greatest improvement in journey times and a modern, high quality road along

A bored tunnel would provide the required capacity and would have the least impact of all crossing types on local communities, protected habitats and species. It would have two lanes in each direction with space for future capacity and would be about two miles long.

Route 3 would pass to the west of East Tilbury and then between Chadwell St Mary and Linford. The route would cross the A13 where an upgraded junction would be provided. To the north of the A13 it would pass to the west of Orsett and then pass north of South Ockendon before connecting with the M25 with a one-way junction allowing travel to and from the north on the M25.

The Eastern Southern Link would provide a direct connection with junction 1 of the M2 thereby creating a motorway-tomotorway link. It would pass to the east and north of Shorne, with some sections in deep cutting, before connecting to a junction with the A226 east of Chalk.

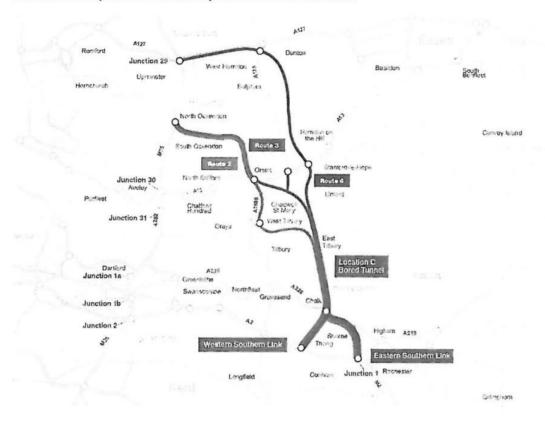


10 Having evaluated the options, our proposed scheme is a new bored tunnel road crossing at Location C, following Route 3 north
of the river and the Eastern Southern Link south of the river. On balance, do you agree or disagree with our proposed scheme?
Strongly agree
Tend to agree
Neither agree nor disagree
Tend to disagree
Strongly disagree
Don't know
Please provide the reasons for your response
Want to continue responding later?
Save your response and return later
Don't want to continue at all?
Clear your answers from this computer



# Junctions

We are proposing to create junctions with existing roads including the M2/A2, A226, A13 and M25. We would like to hear your views on whether you believe additional junctions would be beneficial.



11 We would welcome any comments you may have on our proposals for junctions.	
Want to continue responding later?	
Save your response and return later	
Don't want to continue at all?	
Clear your answers from this computer	



# Any other comments

ant to continue responding later?	
ave your response and return later	
on't want to continue at all?	
clear your answers from this computer	
respective additional and a second control of the c	



# Feedback on Consultation

13	ow did you hear about the consultation? (Please select all that apply)
	Received a letter or a leaflet from Highways England
	Received an email
	Received an email as a Dart Charge account holder
	Posters or other outdoor advertising
	Newspapers or magazines
	TV or radio
	Social media (e.g. Facebook or Twitter)
	Other online/website source(s)
	Nord-of-mouth
	ocal Authority
	Other source (please specify)
1	
14 [	you have any feedback on this consultation – events, information provided, advertising, etc.?
14 [	you have any feedback on this consultation – events, information provided, advertising, etc.?
	you have any feedback on this consultation – events, information provided, advertising, etc.?
Wan	
<b>Wan</b> Save	to continue responding later?
Wan Savo	to continue responding later?



# More about you

17 How often, if at all, do you do personally you use the Dartford Crossing, either by driving		
or being driven?		
O Daily		
Several times a week		
About once a week		
About once a fortnight		
About once a month		
About once every three months		
About once every six months		
About once a year or less		
Never Never		
Want to continue responding later?		
Save your response and return later		
Don't want to continue at all?		
Clear your answers from this computer		



# **Equality and Diversity**

18 What is your gender?

To help ensure that we are meeting our obligations under the Equality Act 2010 we would be grateful if you could fill in the following diversity survey. Completing the survey is voluntary and is not a requirement for your response to be accepted. The survey will not be linked to the information you have provided in your response and we will not share the information with anyone else. We will use the survey results to provide a summary of the types of people and organisations who responded to this consultation. It will not identify individuals.

0	Male
0	Female
0	Prefer not to say
19	Do you consider yourself as a person with a disability?  Yes
8	No
$\cup$	Prefer not to say
20 F	Please describe your ethnic background
0	Asian/Asian British
0	White
0	Black/Black British
$\bigcirc$	Chinese
$\overline{\bigcirc}$	Mixed Ethnic background
	Gypsy or Irish Traveller
	Other ethnic group
	Prefer not to say

21 /	Age		
0	Under 25		
	25-45		
	46-60		
0	Over 60		
	Prefer not to say		
Want to continue responding later?			
Save your response and return later			
Don	't want to continue at all?		
Cle	Clear your answers from this computer		