



Planning statement to accompany an application for Advertising Consent at roundabout on Junction of Brunel Way, Marsh St North and Halcrow Ave, Dartford, Kent, DA1 5TE

On behalf of: Marketing Force

Prepared by: R Woodfine BSc (Hons)

Date: 22/02/2024

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# Table of Contents

Introduction .....	4
Location & Site Description .....	5
Proposed Development .....	7
Planning History .....	9
Policy Justification.....	10
National .....	10
Local .....	11
Commentary .....	33
Principle of development.....	33
Design and Impact on Local Character and Amenity .....	34
Conclusion.....	37

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# Introduction

This planning statement accompanies an application for consent to display no.4 free standing, non-illuminated fascia adverts at the roundabout on the junction of Brunel Way, Marsh St North and Halcrow Ave, Dartford, Kent, DA1 5TE.

Planning Direct has been instructed to produce this statement on behalf of Mrs Woodward of Marketing Force, the applicant.

The statement should be read in conjunction with the following documentation:

- Site plan
- Location plan
- Appendix 1 - Sign specification 40"x24"
- Appendix 2 - Marketing Force Ethical Advertising Framework

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## Location & Site Description

The site is located at the roundabout on the junction of Brunel Way, Marsh St North and Halcrow Ave, Dartford, Kent, DA1 5TE

The site does not fall within any of the following designated sites of within the Dartford Local plan;

- Area of Special Character under policy DP2
- A conservation area under polices DP13 or DP15
- Sites of Special Scientific Interest under CS14
- Green Belt under policies CS13 or DP22

It does however, fall under the following

- Biodiversity opportunity area under DP25

This location has been identified by Kent County Council [the highways authority] as being suitable for sponsorship.



*The view of the site from the south*





*The site in its urban setting*

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# Proposed Development

The application is for the express consent for advertisement comprising of no.4 adverts on the roundabout at the junction of Brunel Way, Marsh St North and Halcrow Ave, Dartford, Kent, DA1 5TE

This application is for no.4 free standing advertisements consisting of non-illuminated and non-reflective signage with a matt finish mounted on 1200mmx50mm black posts situated 1m away from the roundabouts edge. These advertisements are for the sponsorship of roundabouts in partnership with Kent County Council (Highways Authority) and will provide a supplementary income to support the management of Dartford and Kent's highways.

The sign itself is made up of a 1016mm x 602mm fascia produced in full colour on vinyl and applied to a 3mm di-bond aluminium board. Sponsors are provided a space large enough for their company name, logo, contact details and a short message. Along the bottom of the sign is Kent County Council's branding and logo. (See appendix 1 for full details).

The signs will have a maximum height of 1m above ground level, with 30cm maximum height between the bottom of the sign and the ground level. The advertisements will be of the same design as that featured below



*Advertisement produced by the applicant following consent 08/00716/ADV at the junction of St Clements Way and Station Road. The sign shares the same scale and design as that of the proposed signage in this application.*



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# Planning History

There is no relevant planning history for this site.

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# Policy Justification

## National

### **NPPF (2023)**

#### Paragraph 10 (Achieving Sustainable Development)

*So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.*

#### Paragraph 141 (Achieving well-designed and beautiful places)

*The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.*

### **Strategic road network and the delivery of sustainable development**

#### Paragraph 60 (Special types of Development)

*Advertisements within the highway boundary of the SRN are not permitted and the company will remove any unauthorised advertisements placed within its land. An exception will be made for any functional or other advertisement by the company that is deemed necessary for information purposes, or for roundabout sponsorship, where this can be sited safely.*

#### Paragraph 61

*The company will not object to proposals for advertising consent for displays outside of the highway boundary of the SRN unless it has specific reason to consider that a road safety hazard resulting from driver distraction would be a direct consequence of the advertisement. The company will particularly consider whether distraction is heightened owing to factors such as size, luminance and the accumulation of advertisements. These factors could present a safety concern for advertisements that are located where particular attention should be given to the driving task, or where the advertisement incorporates elements of traffic sign design, such as directional arrows.*

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## Local

### **Dartford Core Strategy (Adopted 2011)**

#### **Policy CS2- Dartford Town Centre**

*1. In order to revitalise Dartford Town Centre and improve its range of attractions and environment, the Council will:*

*a) Work with landowners, developers and government agencies to increase the range and improve the quality of the food, comparison shopping and leisure offer.*

*b) Require planning applications for retail and leisure development within the town centre (Proposals Map 1) to demonstrate, commensurate to their size, their contribution to the achievement of the objectives set out in paragraph 2.18 above. In particular, how the proposal will ensure benefits are spread to the wider town centre.*

*c) Seek to deliver up to 1,030 homes and 300 jobs (B1 uses and A2 uses) in addition to jobs provided in retail and leisure uses. d) Work with its partners to deliver the following sites for mixed-use development, incorporating retail and/or leisure proposals at ground level, and a mix of uses on upper floors that could include housing, office use and community facilities subject to meeting the objectives in para 2.18:*

- Lowfield St*

- Hythe St (former Co-op site)*

- Kent Rd (former Westgate car park)*

*e) Encourage proposals for refurbishment, extension or redevelopment of the Orchards and Priory Shopping Centres to provide enhanced and/or increased shopping and/or leisure facilities.*

*f) On the Station Mound site, work with partners to facilitate a new Dartford station building, improved interchange facilities at the station and create a high quality gateway into the town centre, through redevelopment of the site for a mix of uses, which could include cafes, pubs and restaurants, housing, employment (B1), hotel, community facilities and supporting retail and leisure uses.*

*g) Enhance the social and recreational role of the Acacia Hall complex and improve its linkages with Central Park and the town centre. Explore options for the eventual replacement of Fairfield Pool on the Acacia Hall site.*

*h) Protect and enhance the town centre's historic environment, by requiring that development creates a sense of place by responding positively to the market town context and within and adjacent to the Conservation Area respecting the varied historic, heritage and archaeological context; work with landowners to improve buildings in the Conservation Area; maintain the historic garden landscape at Acacia Hall; and provide*

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*town heritage information in historically significant locations. The archaeological potential should be assessed prior to development through a desk-top study and investigated via fieldwork, where the desk-top study indicates this will be necessary, or through an archaeological watching brief, if appropriate. The approach to any finds of significance will be determined through an Archaeological Strategy or Framework, agreed in partnership with KCC.*

*i) Use available resources to improve the public realm, in particular through improvements to Central Park, street environment enhancements in the High Street and the area around Dartford station.*

*j) Enhance the biodiversity of the River Darent and create an Ecology Island between the two branches of the River Darent, as part of improvements to Central Park.*

*k) Work with its partners, with funding from development contributions and/or the Strategic Transport Programme (see Policy CS 16) to implement schemes giving greater priority to pedestrians, particularly at the eastern end of the High Street and Market Street and improving accessibility between bus stops and the main shopping area.*

*l) Require that new housing development contributes proportionally to the land and build costs of a new primary school at the Northern Gateway.*

*m) Require that planning applications for development in Flood Zones 2 and 3 are accompanied by a site specific FRA39 to demonstrate that development is safe and will pass part C of the Exception Test<sup>40</sup>, where applicable. These 41 sites to also be sequentially tested to direct 'more vulnerable' uses to the parts of the site at less risk of flooding, where possible.*

*n) Prepare a Dartford Town Centre Supplementary Planning Document to provide further guidance on the implementation of the strategy for the town centre. The Development Management DPD will identify the primary shopping area, and consider primary and secondary shopping frontages and the management of uses within these.*

*2. Planning applications must be supported by a transport assessment which takes into account all development proposals in the town centre as well as those at the Northern Gateway. A Travel Plan will be required for each application. Local improvements related to a proposed development will be required to be delivered by the development.*

*3. See Diagram 3 and see also Policy CS12.*

### **CS24: Flood Risk**

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1. To manage and mitigate flood risk the Council will:

- a) Ensure that sites in Flood Zone 2 and 3a, shown to be acceptable for development following application of the Sequential Test and parts A and B of the Exception Test, demonstrate that part C of the Exception Test can be passed and that residual risk is managed through a Flood Risk Assessment (FRA) and an appropriate Flood Plan. Windfall sites will be subject to the same tests to assess whether they are appropriate for the development proposed.
- b) Engage with the Environment Agency and Defra in the further stages of the Thames Estuary 2100 Project (TE 2100), and seek not to foreclose any medium or long-term options through proposals in this Plan. In particular, the Council will protect the Dartford Marshes from development, in the event that the area is required to implement flood protection proposals or compensation freshwater habitats.
- c) Require the SUDS 'management train' to be applied, as appropriate, in all new development. In Water Source Protection Zones, SUDS will need to demonstrate that any surface water run-off infiltrating the ground will not lead to deterioration of groundwater quality.
- d) Identify and implement a green infrastructure network through the safeguarding of existing areas of open space and a requirement for generous provision of green space and water bodies in new development (see Policy CS 14).

## **Dartford Development Policies Plan - Adopted 2017**

### Policy DP2: Good design in Dartford

Development will only be permitted where it satisfies the locally specific criteria for good design in the Borough:

- a) Responding to, reinforcing and enhancing positive aspects of the locality. Opportunities to create high quality places should be taken, particularly using prominent physical attributes (including the Borough's distinctive riverside environments, cliff faces, extensive network of open spaces and tree coverage).
- b) Ensuring appropriate regard is had to heritage assets (see policies DP12 and DP13); and that the character of historic settlements, including the market town of Dartford, is respected.
- c) Facilitating a sense of place, with social interaction, walking/ cycling, health and wellbeing, and inclusive neighbourhoods, through a mix of uses and careful design and layout. Good design should be reinforced and enhanced through integrating new development with the public realm, open space and natural features including rivers and lakes/ ponds. Within large developments, public art reflecting local character and



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heritage should be included.

d) *Providing permeability through clear pedestrian and cycle linkages, and where appropriate, active frontages, and a fine grain mix of buildings and spaces. Commercial and public facilities should be well integrated into their surroundings, both within the site and the wider locality.*

2. *In determining planning applications, the Local Planning Authority will consider how the height, mass, form, scale, orientation, siting, setbacks, access, overshadowing, articulation, detailing, roof form, and landscaping of the proposals relate to neighbouring buildings, as well as the wider locality. Appropriate weight will also be given to outstanding or innovative design that will help raise design standards in the wider area. Materials should support a sense of place, and be locally sourced or recycled from within the site where possible. Development shown to be suitable in these respects, and the principles in clause 1 above, will be permitted.*

#### *Design and Heritage*

3. *In areas of additional design sensitivity, and where heritage assets (e.g. Conservation Areas) or their setting is affected, and within Areas of Special Character, developments will need to demonstrate accordance with policies DP12 & DP13 as applicable. Particular consideration should be given to design objectives, including in paragraph 6.2. In these areas, proposals incorporating energy efficiency measures and micro-renewables that yield clear net benefits (in line with Policy DP11:2) will normally be viewed positively, provided that good design mitigates the impact on the townscape and they are in accordance with policies DP12 & DP13.*

#### *Safe and Accessible Design*

4. *Spaces should be designed to be inclusive, safe and accessible for all Dartford's communities, including young, elderly, disabled and less mobile people. The design of buildings, open space and the private and public realm should, where appropriate, reduce the fear of, and opportunities for, crime, paying attention to the principles of Safer Place (or any future equivalent) otherwise development will not be permitted.*

#### *Designing for Natural Resources, Flood and Waste Management*

5. *Layout and design should allow the efficient management/ reuse of natural resources and waste, in order for development to be permitted. Early consideration should be given to the achievement of on-site flood alleviation. Development will also be required*

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*to provide adequate and convenient arrangements for the storage of refuse and recyclable materials as an integral part of its design.*

#### *Advertisement and Signage Design*

*6. Signage and advertisements should be of a scale and design that is sympathetic to the building and locality, particularly in the designated Area of Special Advertisement Control, and should not have a negative impact on visual amenity, public safety or the safe and convenient movement of pedestrians, cyclists and vehicles, otherwise permission will not be granted.*

#### DP5 - Environmental And Amenity Protection

*1. Development will only be permitted where it does not result in unacceptable material impacts, individually or cumulatively, on neighbouring uses, the Borough's environment or public health. Particular consideration must be given to areas and subjects of potential sensitivity in the built and natural environment (including as highlighted on the Policies Map) and other policies, and other potential amenity/safety factors such as:*

- a) air and water quality, including groundwater source protection zones;*
- b) intensity of use, including hours of operation;*
- c) anti-social behaviour and littering;*
- d) traffic, access, and parking;*
- e) noise disturbance or vibration;*
- f) odour;*
- g) light pollution;*
- h) overshadowing, overlooking and privacy;*
- i) electrical and telecommunication interference;*
- j) HSE land use consultation zones;*
- k) land instability;*
- l) ground contamination.*

*2. Development should not materially impede the continuation of lawfully existing uses. Where any impacts cannot be adequately mitigated, planning applications are not likely to be permitted.*

*3. Planning applications on or in the immediate vicinity of landfill sites must be accompanied by a full technical analysis of the site and its surroundings, in accordance*

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*with Environmental Health and Environment Agency requirements for permitted sites. Analysis must establish that landfill gas will not represent a hazard on development of the site or that development will not cause adverse impacts on groundwater. Development will only be permitted where it has been clearly demonstrated that the proposed development can be safely, satisfactorily and fully achieved, including: a) avoidance of risks to neighbouring uses/ the wider area; and b) design quality, infrastructure objectives and other policy requirements such as affordable housing are not compromised as a result of high remediation costs.*

#### *DP24: Open Space*

*1. Development on playing fields, sports pitches, and any land shown on the Policies Map as Borough Open Space, will not be permitted unless it is clearly demonstrated that one of the following criteria is satisfied:*

*a) Where the sports/ open/ green space will be retained in its current primary function, with development limited to a small proportion of land, the proposal must support or enhance the existing space in this overall role. The proposal must not lead to any significant loss or deterioration in quantity and level of open space/ recreational provision.*

*b) Where development will result in a significant loss in the quantity of open space or loss of sports pitches, replacement provision will be delivered within accessible walking distance of the site; unless it is clearly demonstrated that the existing provision is surplus to current and future requirements for sports and recreation in the locality and the Borough, the amenity and health/ wellbeing of residents and/ or biodiversity. The replacement must be shown to be of an equivalent type and of equal or greater quantity and quality to that being lost.*

*2. Development of non-designated public amenity space will only be permitted where a convincing case is made in justification.*

*This must take account of:*

*a) the qualitative and quantitative value of the existing function in providing usable open space, relative to the value of alternative provision easily available in the locality, and;*

*b) national policy and the benefits/ dis-benefits demonstrated to arise from the specific development proposal.*

#### DP25 - Nature Conservation and Enhancement

1. Development on the hierarchy of designated sites, featuring nationally recognised and

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locally protected sites, shown on the Policies Map will not be permitted. Development located within close proximity to designated sites, or with likely effects on them, should demonstrate that the proposal will not adversely impact on the features of the site that define its value or ecological pathways to the site.

2. Proposals should seek to avoid any significant adverse impact on existing biodiversity features. Any potential loss or adverse impact must be mitigated, including with reference to the following guidance points:

a) Where mitigation measures require relocation of protected species this will only be acceptable when accompanied by clear evidence that the proposed method is appropriate and will provide for successful translocation.

b) Proposals should include provision for protection during construction, and mechanisms for on-going management and monitoring.

3. Developments will be expected to preserve and, wherever possible, enhance existing habitats and ecological quality, including those of water bodies, particularly where located in Biodiversity Opportunity Areas. Particular regard should be had to points a) and b) below. Development proposals where the primary purpose is to enhance biodiversity will normally be permitted where:

a) New biodiversity areas make use of native and local species as set out in the Kent Biodiversity Strategy and consider ecological links and adaptability to the effects of climate change

b) Biodiversity features strengthen existing green and ecological corridors; and contribute to the creation and enhancement of the Green Grid.

#### Large residential development and North Kent European Protected Sites

4. Large residential developments located within 10km from the North Kent European Protected sites that are located outside the Borough will be required to undertake a Habitats Regulation Assessment to demonstrate that the mitigation measures proposed are satisfactory to avoid potential adverse recreational effects to protected features. Information on mitigation options is available on the Council's website.

#### Trees

5. In all development proposals existing trees should be retained wherever possible. If retention is demonstrated not to be feasible, replacement provision should be of an appropriate tree species and maturity and/ or canopy cover taking into account the tree that is being replaced and the location.

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## Policy DP12 - Historic Environment Strategy

*1. Development should contribute to the conservation and enjoyment of the Borough's historic environment. The Local Planning Authority will work with developers on strategies to realise this in the context of site heritage opportunities and constraints.*

*2. Where heritage may be at risk, landowners will be expected to work proactively with the Local Planning Authority in bringing forward proposals to preserve or enhance these assets, to facilitate their successful rehabilitation and seek their viable reuse consistent with their heritage value and special interest.*

*3. Development proposals which may affect the significance of heritage assets (both designated and non-designated) or their setting should demonstrate how these assets will be protected, conserved or enhanced as appropriate. Proposals should aim to reflect and interpret the historic character of a site and conserve its most significant historical and/or architectural aspects.*

*4. A heritage statement should accompany all planning applications affecting heritage assets. On archaeological sites, a desk-based assessment will be required as a minimum. Applications affecting designated heritage assets will be assessed under Policy DP13. Applications affecting non-designated assets will be assessed against the criteria below.*

### *Non-Designated Heritage Assets*

*5. The Borough's non-designated heritage assets include:*

- a) Archaeological sites, including sites holding an interest as defined in the NPPF;*
- b) Applicable sites within Areas of Special Character, as defined on the Policies Map;*
- c) Sites with significant industrial heritage;*
- d) Land with historic landscape character;*
- e) Historic open space, parks and gardens.*

*6. Development proposals affecting non-designated heritage assets should establish the asset's significance. Development should conserve or enhance those aspects that have been identified as significant and, where possible, should seek to better reveal an asset's significance.*

*7. In determining planning applications affecting non-designated assets, the effect of the proposal on the asset's significance will be taken into account. A balanced judgement will be taken having regard to the significance of the heritage asset and the scale of any harm or loss of significance. Development resulting in a total loss of significance will not normally be permitted.*



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### Policy DP13 Designated Heritage Assets

1. *Designated heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. A heritage statement should establish the significance of the heritage asset in order to enable the assessment the impact of a development proposal. Any harm or loss will require clear and convincing justification.*
2. *In determining planning applications, the Local Planning Authority will pay close regard to:
  - a) *the significance of the heritage asset;*
  - b) *the desirability of maintaining and, where possible, enhancing significance; and*
  - c) *the desirability of ensuring viable uses are found for heritage assets, consistent with their conservation.**
3. *Where a proposal will lead to substantial harm or total loss of significance, permission will be refused unless it can be clearly demonstrated that the development is necessary for substantial public benefits to be achieved that will outweigh the harm or loss.*
4. *Where a proposal will lead to less than substantial harm, this will be weighed against the public benefits of the proposal.*

### Listed Buildings

5. *Development proposals affecting statutorily listed buildings should have special regard to the desirability of preserving the building or its setting. Loss of or harm to a statutorily listed building or its setting will only be permitted in exceptional circumstances in line with clauses 3 and 4 above.*

### Conservation Areas

6. *Development proposals affecting a conservation area should pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Proposals that would result in harm or loss of significance will be determined in line with clauses 3 and 4 above.*
7. *The demolition of any building in a conservation area will only be permitted where it is clear that it will not adversely affect the character and appearance of the area.*

### **Emerging Dartford Local Plan to 2037**

#### Policy S1: Borough Spatial Strategy

1. *Sustainable development will occur at planned locations in the Borough to meet assessed needs, securing new infrastructure provision and brownfield land re-use, creating neighbourhoods resilient and adaptive to climate change. Development should*

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*provide a diverse and complementary balance of uses and services within settlements, and minimise the necessity to travel by private vehicles.*

*2. Growth will be located at strategic allocations, sites in the identified housing land supply, and in line with the economic strategy. Development is directed to:*

*a) brownfield land not within the Green Belt; and*

*b) sites with good access by public transport and walking/ cycling to a range of local supporting services/ infrastructure.*

*3. The overriding priority for development in the Borough is at:*

*a) Central Dartford; and*

*b) Ebbsfleet Garden City These growth locations will be regenerated with the provision of new and improved infrastructure and strategic mixed use development.*

*4. Heritage assets will be conserved and enhanced in a manner appropriate to their significance.*

*5. Designated sites of biodiversity value will be protected, and improvement of ecological sites and networks maximised. Urban Area Principles*

*6. The Urban Area is defined as the area to the north of the A2 and outside the Green Belt. Within this area, complementary to strategic growth at Central Dartford and Ebbsfleet Garden City, developments with permission will be completed and additional development will occur at the Urban Area neighbourhoods of Dartford, Stone, Greenhithe and Swanscombe. This will include:*

*a) Residential development at sites in the identified housing land supply;*

*b) Provision of infrastructure, including for education and health facilities, and improvements to walking and cycling links, railway stations and the bus/ Fastrack networks;*

*c) Provision or enhancement of Green and Blue Infrastructure and Green Grid links;*

*d) Protection of shops and services at identified District and Local centres; and improvement of the quality of their environment where opportunities arise; and*

*e) Enhancements to the Rivers Thames and Darent for outdoor recreation, small scale river related leisure uses, walking and cycling, and ecology, where possible. Pre*

*Submission Dartford Local Plan – September 2021 27*

### *Economic Strategy*

*7. Significant jobs, major commercial activity and new employment premises will be prioritised within Central Dartford and Ebbsfleet Garden City. Economic development will occur at locations elsewhere in the urban area where this is consistent with sustainable growth patterns and provides suitable improvement and expansion/*

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*intensification of commercial locations. Economic growth will be based on a strategy of:*

- a) supporting the growth of existing local businesses within the Borough, and encouraging start-ups and small/ medium sized enterprises;*
- b) promoting enhanced productivity, targeting growth sectors and clusters of high technology or creative, industries; and*
- c) increasing professional and managerial employment.*

*8. Economic development and jobs growth will be delivered principally through supporting development opportunities, to deliver:*

- a) Planned strategic expansions at, or additional floorspace within, the identified employment areas.*
- b) Redevelopment for modern retail/ leisure premises and community facilities within the retail centres. The network of retail centres comprises:
  - i) Dartford Town Centre, which will attract a wide range of new businesses;*
  - ii) Bluewater, which will continue its regional economic contribution;*
  - iii) District Centres at Dartford, Ebbsfleet, Swanscombe and Longfield; and*
  - iv) Local Centres in the urban area and at villages.**

#### *Non-Urban Area Principles*

*9. The openness and permanence of the Metropolitan Green Belt in the south of the Borough and at Dartford Marshes will be maintained. Development will only occur where in full accordance with Green Belt policies.*

*10. Any residential or other development within the Borough's villages will be of proportionate scale and on non-Green Belt land.*

#### Policy D1:Central Dartford Strategy

*The high quality transformation of Central Dartford is actively supported as a destination to invest, be productive and creative, visit for shopping, leisure and services, and as a place to call home. Valued, good quality buildings and spaces will be repurposed, enhanced and better used. Development in and around the town centre will bring an expanded range of activities and services to the town including cultural and creative facilities, increasing economic vitality and the choice of jobs, providing new infrastructure, and will grow the resident community. In this respect, the following will apply:*

- a) Current projects and strategic plans will continue to advance, leading to completion of: the sympathetic refurbishment of the town centre's key streets, public spaces and historic buildings; transport and movement improvements; the renewal of Lowfield*

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*Street/ Brewery Square (Market Street)/ High Street; and the successful redevelopment of the Westgate and Priory Centre sites.*

*b) There will be significant further progress in and on the edge of the town centre. It will change, with a focus on:*

*i. improving links across Central Dartford, removing some of the barriers to movement that have been created by large sites, and making existing routes attractive and safe;*

*ii. facilitating, and connecting with, an enhanced Dartford railway station/ public transport interchange; and*

*iii. opening up and creating safe links/ spaces to and along the River Darent, with a more natural river channel and setting.*

*2. The Council and partners will:*

*a) Promote redevelopment of large/ unappealing buildings and underused land/ buildings where they are no longer contributing positively to Dartford's environment or commercial or cultural offer. Appropriate short term meanwhile use of vacant premises and/ or land is encouraged.*

*b) Support the strong contribution made by the Orchard Theatre, street market and independent traders, to retain Dartford's identity and vitality.*

*c) Plan ahead with providers and landowners to reserve land for public/ community service provision in advance of occupation of new dwellings.*

*d) Further enhance the public realm and connectivity, and the setting of heritage assets, with refurbished streets and green routes for pedestrians and cyclists. This will feature public spaces, squares or pocket parks as focal points for the town centre, with a high class street scene, public art and new riverside environment, and hard/ soft landscaping and shelter, including new trees.*

*e) Encourage access between the River Darent, the railway station and the town centre, particularly through wayfinding, upgrading of public spaces and currently unappealing environments, and overcoming severances to pedestrian and cycle movement created by the ring road (Home Gardens/ Westgate Street) and the railway embankment.*

*f) Secure major transport investment to: mitigate the current adverse impacts of traffic congestion; increase public transport capacity and services, reducing dependency on car travel; and enhance walking and cycling. The Council will seek full integration of rail, bus and Fastrack services, particularly at a new railway station and with new rail services for Dartford.*

*g) Seek parking that is flexible to use and promotes multi-purpose town centre visits. The Council will undertake a review of the parking strategy, looking at changing usage*

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*and the requirements of current and future residents, employees and visitors for short and long stay vehicle parking.*

Policy D2: Central Dartford Development Principles

*Development proposals in Central Dartford should:*

- a) Accord with Diagram 5 and the overall vision for Central Dartford, including by ensuring that development will not prejudice reasonable prospects for adjacent or nearby sites to come forward by virtue of overlooking or other outcomes, and contribute as required to local transport, public realm improvements, including public art reflecting local character and heritage, green infrastructure and social infrastructure requirements.*
- b) Support the town centre's role in providing jobs, retail/ leisure, cultural facilities and other local services, securing a wide mix of uses in the town centre. Proposals must seek to retain or promote market town features for the future, such as affordable space for independent traders, arts/ cultural industries, and new food and beverage uses/ other local businesses. Major development in the town centre should wherever possible provide:
  - i. flexible commercial premises, with space designed for local growth sectors, or businesses that will grow local professional/ managerial or high technology level employment; or*
  - ii. suitable new retail/ leisure facilities complementing current successful activities, or strategic visitor/ shopper attractions (for example a cinema/ other significant cultural or day and evening uses); or*
  - iii. community/ public facilities and local services to accommodate the requirements of Central Dartford's growing population, unless a lack of need is demonstrated.**
- c) Support the creation of a neighbourhood community with a mix of residential types and tenures.*
- d) Ensure integration of the scheme into the wider setting and movement patterns, including creating safe public open spaces and/or new pedestrian friendly streets. The sense of security of spaces and streets must be ensured, including for converted or extended buildings where features such providing front doors onto safe spaces and streets are expected.*
- e) Assess the heritage significance of the area and respond positively to local character and history, conserving and taking opportunities to enhance the significance of heritage assets.*
- f) Deliver a development that improves air quality and grows the proportion of journeys made by active and public transport modes. This should include:*



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- i. the integration, layout and design of development having safe and direct non-vehicular routes through the town centre as well as through provision of suitable infrastructure; and*
  - ii. parking arrangements with flexibility for changing needs and technology, and good cycle parking provision.*
  - g) Fully mitigate flood risk and ensure that the development is safe for the lifetime of the development, where located within an area at risk of flooding.*

#### Policy M1: Good Design for Dartford

*1. Development must demonstrate that it is designed in line with the National Design Guide and the National Model Design Code, considers the principles of Kent Design, and satisfies all of the following locally specific criteria for good design in the Borough:*

- a) Responding to, reinforcing and enhancing positive aspects of the locality. Opportunities to create appropriately distinctive high quality and beautiful places should be taken, particularly using and enhancing prominent physical attributes which include the Borough's distinctive riverside environments, extensive open spaces, biodiversity assets, landscape and tree coverage;*
- b) Ensuring appropriate regard is had to heritage assets and that the character of historic towns and villages and Areas of Special Character are respected;*
- c) Facilitating a sense of place with social interaction, a physical environment encouraging health and wellbeing, attractive active environments and travel options, and secure, inclusive and integrated neighbourhoods through a mix of uses and careful design and layout that ensures that commercial and public facilities are well integrated within the site and the wider locality;*
- d) Providing permeability for the site to sufficiently connect to its surrounds and for the public to traverse the site, through clear pedestrian and cycle linkages and, where appropriate, active frontages, open streets, and a fine grain mix of buildings and spaces;*
- e) Reinforcing and enhancing good design by integrating new development with the public realm/ open space, and providing biodiversity gain and natural features including rivers and lakes/ ponds; and*
- f) Meeting the requirements set out in any supplementary local design guidelines which will be produced after public consultation consistent with these principles and national requirements, to be adopted as formal Supplementary Planning Documents or design codes.*

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*2. Development must be shown to be suitable in terms of its height, mass, form, scale, orientation, siting, access, overlooking, overshadowing, articulation, detailing, roof form, and landscaping relative to neighbouring buildings and the wider locality. Materials must support a sense of place and relate well to the local character. Outstanding or innovative design which helps raise design standards in the wider area will be supported on appropriate sites which are not closely related to sensitive areas or assets.*

*3. The appropriate scale and density of development at a site should be the outcome of securing high quality development through a design-led process and demonstrated by agreed masterplans on large sites, having proper regard to:*

*a) the current built environment context including heritage assets;*

*b) the location of the site in the Borough and its characteristics:*

*i. Assessment of development potential using locally specific design or conservation guidance documents, and fulfilling applicable Plan objectives for the area;*

*ii. Outside the urban area, design should, in particular, be sympathetic to local landscape and townscape character;*

*c) providing spacious, green and good quality developments including clearly meeting or exceeding nationally described space standards for new homes, and fulfilling policy for amenity space and green infrastructure provision; and*

*d) the principle of securing a mix of uses and residential types, achieving efficient re-use of land where appropriate, and delivering regeneration at urban locations well-served by public transport and services.*

*4. Public spaces in and outside buildings and all accommodation must be designed to be inclusive, safe and accessible for all Dartford's communities, including young, elderly, disabled and less mobile people. The design of buildings, open space and the private and public realm must be in accordance with active design principles and reduce the fear of, and opportunities for crime.*

*5. Signage and advertisements must be of a scale and design that is sympathetic to the building and locality, particularly in the designated Area of Special Advertisement Control, and must not have a negative impact on visual amenity, public safety or the safe and convenient movement of pedestrians, cyclists and vehicles.*

## M2: Environmental and Amenity Protection

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*1, Development must demonstrate that it does not result in unacceptable material impacts, individually or cumulatively, on neighbouring uses, the Borough's environment or public health. Particular consideration must be given to the design of proposals in areas and subjects of potential sensitivity in the built and natural environment (including as highlighted on the Policies Map), and other potential amenity/ safety factors including:*

- a) air quality, in particular potential impacts within or immediately adjacent to air quality management areas;*
- b) water quality, including groundwater source protection zones;*
- c) intensity of use, including hours of operation;*
- d) anti-social behaviour and littering;*
- e) traffic, access, and parking;*
- f) noise disturbance or vibration;*
- g) odour;*
- h) light pollution;*
- i) overshadowing, overlooking and privacy;*
- j) electrical and telecommunication interference;*
- k) HSE land use consultation zones;*
- l) land instability; and*
- m) ground contamination and gassing.*

*2. Development must not materially impede the continuation of lawfully existing uses. Where impacts cannot be adequately mitigated, planning applications are likely to be refused.*

*3. Planning applications on or in the immediate vicinity of landfill sites must be accompanied by a full technical analysis of the site and its surroundings, in accordance with Environmental Health and Environment Agency requirements. Analysis must establish that landfill gas will not represent a hazard on development of the site or that development will not cause adverse impacts on groundwater. Development must clearly demonstrate that it can be safely, satisfactorily and fully achieved, including:*

- a) avoidance of risks to neighbouring uses/ the wider area; and*
- b) design quality, infrastructure provision, affordable housing and other policy requirements are not compromised as a result of high remediation costs or to allow for delivery uncertainties.*

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### Policy M3: Sustainable Technology, Construction and Performance

*1. The design, construction and whole life carbon cost of development must contribute to the mitigation of, and adaptation to, climate change. This includes, but is not limited to, reducing embodied and operational carbon emissions, improving energy performance and preserving water. Applicants should demonstrate best endeavours to use recognised assessment tools/ quality standards.*

#### *Preserving Resources*

*2. All residential development must demonstrate delivery of the water efficiency level of no more than 110 litres per person per day for all dwellings created. In order to demonstrate high levels of energy performance and water efficiency, non-residential development over 1,000sqm must achieve the BREEAM excellent standard, showing that available water credits have been met.*

*3. Development should aim to increase a building's length of life and its adaptability for future uses.*

*4. Development materials should be carefully considered in order to reduce embodied carbon and reduce/ prevent waste in all development. Materials for construction should be recycled or re-used from within the site, or sourced locally, where possible.*

*5. All development should achieve a layout and design that enables re-use, recycling and composting for the future occupiers. Convenient and suitable arrangements for the storage of refuse and recyclable materials must be made.*

#### *Energy and Carbon*

*6. All residential development should incorporate passive design in order to optimise solar and daylight access and reduce the risk of overheating and the need for cooling.*

*7. Major residential development must achieve a minimum on-site reduction in regulated carbon emissions of at least 19 per cent beyond Part L of the Building Regulations, unless it can be demonstrated that such provision is not feasible. This will be required until such time that amendments are made to national legislation/ policy which have the effect of surpassing this level of performance. Large residential development of 100 dwellings or more should also demonstrate additional significant zero and/ or low carbon or sustainable technology features across the site.*

*8. At applicable sites, the appropriate technology and systems should be deployed to minimise impact on heritage and character. Developments for Energy Generation and Storage*

*9. In determining applications for energy storage or small and large scale low/ zero carbon technology and installations, the economic and environmental benefits of the*

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proposal will be weighed against the individual and cumulative impact of the development. Development will only be permitted in line with national policy and where the following factors have been satisfactorily taken into consideration where applicable:

- a) Minimising landscape impacts and impacts on ecology and agriculture;
- b) Shadow flicker and glare;
- c) Electronic and telecommunication interference/ navigation and aviation issues; and
- d) Ensuring installations are removed when no longer in use and land is then restored.

#### Policy M5: Designated Heritage Assets

1. Designated heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Any harm or loss will require clear and convincing justification.
2. In determining planning applications, the local planning authority will pay close regard to: a) the significance of the heritage asset; b) the desirability of maintaining and, where possible, enhancing significance; and c) the desirability of ensuring viable uses are found for heritage assets, consistent with their conservation.
3. Where a proposal will lead to substantial harm or total loss of significance, permission will be refused unless it can be clearly demonstrated that the development is necessary for substantial public benefits to be achieved that will outweigh the harm or loss.
4. Where a proposal will lead to less than substantial harm, this will be weighed against the public benefits of the proposal.

#### *Listed Buildings*

5. Development proposals affecting statutorily listed buildings must have special regard to the desirability of preserving the building or its setting. Loss of or harm to a statutorily listed building or its setting will only be permitted in exceptional circumstances in line with criteria 3 and 4.

#### *Conservation Areas*

6. Development proposals affecting a conservation area must pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Proposals that would result in harm or loss of significance will be determined in line with criteria 3 and 4.
7. The demolition of any building in a conservation area will only be permitted where it is

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*clear that it will not adversely affect the character and appearance of the area, and suitable redevelopment or landscaping/ restoration of the site is secured.*

#### *Scheduled Monuments*

*8. Development proposals affecting Scheduled Monuments will only be permitted where they clearly conserve the asset or enhance its significance. Proposals resulting in loss or harm will only be permitted on a wholly exceptional basis and in line with criteria 3 and 4.*

#### *Geoarchaeological Sites*

*9. Sites designated for their geoarchaeological interests, including the Swanscombe Skull SSSI and Swanscombe Peninsula SSSI, are irreplaceable and therefore will be protected and conserved.*

#### Policy M6: Historic Environment Strategy

*1. Development must contribute to the conservation and enjoyment of the Borough's historic environment. The local planning authority will work with developers on strategies to realise this in the context of site heritage opportunities and constraints.*

*2. Where heritage may be at risk, landowners will be expected to work proactively with the local planning authority in bringing forward proposals to preserve or enhance these assets, to facilitate their successful rehabilitation and seek their viable re-use consistent with their heritage value and special interest.*

*3. Development proposals which may affect the significance of both designated and non-designated heritage assets or their setting must demonstrate how these assets will be protected, conserved or enhanced as appropriate. Proposals must aim to reflect and interpret the historic character of a site and conserve its most significant historical and/ or architectural aspects.*

#### *Non-Designated Heritage Assets*

*4. The Borough's non-designated heritage assets include:*

*a) Archaeological sites, including sites holding an interest as defined in the NPPF;*

*b) Applicable sites within Areas of Special Character;*

*c) Sites with significant industrial heritage;*

*d) Land with historic landscape character;*

*e) Historic open space, parks and gardens; and*

*f) Assets that may be designated through a local list, produced after public consultation.*

*5. Development proposals affecting non-designated heritage assets must establish the*



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asset's significance. Development must conserve or enhance those aspects that have been identified as significant and should seek to better reveal an asset's significance.

6. In determining planning applications affecting non-designated assets, the effect of the proposal on the asset's significance will be taken into account. A balanced judgement will be taken having regard to the significance of the heritage asset and the scale of any harm or loss of significance. Development resulting in a total loss of significance will normally be refused.

### Policy M13: Green Belt

1. Dartford Borough's Green Belt is shown on the Policies Map, and its essential characteristics are its openness and permanence. Inappropriate development in the Green Belt will be resisted in accordance with national planning policy.

2. Inappropriate development is by definition harmful to the Green Belt and will only be approved in very special circumstances. Very special circumstances will not exist unless potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

3. In assessing other harm, the local planning authority will use the following criteria:

- a) The extent of intensification of the use of the site;
- b) The impact of an increase in activity and disturbance resulting from the development, both on and off the site, including traffic movement and parking, light pollution and noise;
- c) The impact on biodiversity and wildlife;
- d) The impact on visual amenity or character taking into account the extent of screening required; and
- e) Impacts arising from infrastructure required by the development.

4. Where developments are considered to be not inappropriate in line with national planning policy, they will be supported where they contribute to the objective of conserving the Green Belt as a recreational, ecological and agricultural resource. Such developments will also be assessed against the following criteria where applicable.

### Re-use of Buildings

5. Applications for re-use of buildings must relate to lawful permanent buildings of substantial construction. The change of use of the curtilage to the building, any extension required to facilitate the change of use, and the impacts of such changes in use on the purposes of the Green Belt will be taken into account. The lack of demand for the existing lawful use will need to be demonstrated. In circumstances where

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*character and scale are important to the local setting, excessive external alterations and additions will not be permitted.*

#### *Replacement Buildings*

*6. The replacement of a building will be permitted where:*

- a) The replacement building remains in the same use; and*
- b) The replacement building will not be materially larger than the existing building it replaces, taking into account bulk, height, massing and scale. As a replacement, the building should be limited to an expansion of no more than 30% volume of the original building\*.*

#### *Extensions to Buildings*

*7. Extensions to buildings remaining in the same use will be permitted where:*

*They are proportionate and subservient in appearance, bulk, massing and scale of the original building; and*

- b) The proposal would not result in a disproportionate addition to the original building. The extension must constitute no more than a 30% volumetric increase over and above the original building\*, and maximising the volume of the building to 30% will not be appropriate in every circumstance.*

#### *Infilling or Redevelopment of Previously Developed Sites*

*8. Proposals for the infilling or redevelopment of previously developed sites must not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Developments that lead to over-intensification of the site will not be permitted.*

#### *Changes of Use*

*9. Changes of use of land must not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing use. Consideration will be given to the impacts on the Green Belt in terms of other harms set out in criterion 3 and of the impacts of associated works.*

#### *Agricultural Development*

*10. Development must not result in the loss of the best and most versatile agricultural land, disturb or damage soils of high environmental value, or impede the continuation of a lawfully existing agricultural development and/ or land use.*

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11. *Proposals for farm diversification, including shops, processing, workshops or sports and recreation, must be ancillary to the existing main use. It must be demonstrated that the activity is related to the main farm use and that the proposal will not create the need for new buildings or supporting infrastructure and facilities that may harm rural character.*

#### *Equine Development*

12. *Proposals for the use of land for horses or for the erection of stables and associated facilities and/ or operational development will be carefully considered. Assessment will include the location/ layout of all structures, the need for the size of structures and buildings proposed to serve the use of the land, and the quality of the structures, buildings and landscaping proposed. Structures, engineering works and buildings serving equine uses should be removed from the site when they are no longer in use and are no longer required to serve the equine use of the land.*

#### *Development for Outdoor Sport and Recreation*

13. *Proposals for outdoor sport and recreation must not adversely impact on the character and amenity of the locality or result in the deterioration of the land, landscape or biodiversity. The scale, siting, design, use and level of activity of built recreation development, together with the supporting infrastructure and services, will be taken into account when assessing the impact of a proposal.*

14. *Supporting infrastructure and facilities must not unacceptably harm local character. They must be directly associated with the main use and be of a scale, quality and design to minimise their impact.*

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# Commentary

## Principle of development

With the exception of provision 5 of policy M1 (Good Design for Dartford) within the Dartford Development Policies Plan (2017), there are no current policies that relate to the provision of advertising within Dartford. This does not however take into account the emerging local plan that was published for pre-submission in 2021, where there are several policies that relate to supporting local businesses and encouraging economic growth within Dartford. These are deemed relevant as the applicant works with Kent County Council to secure sponsorships of roundabouts from local businesses. This both helps boost the local economy and encourages growth whilst also providing income that can be used for the maintenance of the highways within Dartford.

The principle of this is set out in emerging policy S1, particularly within provision 7 which states *“Significant jobs, major commercial activity and new employment premises will be prioritised within Central Dartford and Ebbsfleet Garden City. Economic development will occur at locations elsewhere in the urban area where this is consistent with sustainable growth patterns and provides suitable improvement and expansion/intensification of commercial locations. Economic growth will be based on a strategy of: a) supporting the growth of existing local businesses within the Borough, and encouraging start-ups and small/ medium sized enterprises;“*

The proposal for advertisements at the junction of Brunel Way, Marsh St North and Halcrow Ave would meet this emerging policy, as the applicant works with Kent County Council to provide a legal platform for local businesses to promote themselves. This would help to encourage growth for these businesses.

The NPPF states that there should be a general presumption in favour of sustainable development and by supporting local business growth via the provision of advertising, the economic objective of the NPPF is met.

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## Design and Impact on Local Character and Amenity

### Policy Summary

Provision 6 of policy DP2 of the Development Policies Plan for Dartford adopted in 2017 makes specific reference to the design of advertisements. It states that “Signage and advertisements should be of a scale and design that is sympathetic to the building and locality, particularly in the designated Area of Special Advertisement Control, and should not have a negative impact on visual amenity, public safety or the safe and convenient movement of pedestrians, cyclists and vehicles, otherwise permission will not be granted.”



*Advertisement present on the roundabout at the Junction of Watling Street and Gore Road in a similar style and design of the proposed. Pursuant to consent 11/01611/ADV.*

### Discussion on Policy Compliance

#### Visual amenity

The proposed advertisements and their presence on the roundabout at Brunel Way, Marsh St North and Halcrow Ave would see negligible impact on the visual amenity of the streets due to the small scale design of the signs. The design of the signs at a size of 40” x 24” would provide ample space for local businesses to promote their business whilst not contributing to visual clutter within the street.

The design would also be one that is in keeping with similar adverts on nearby

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roundabouts. The advertisements will also follow the applicant's ethical advertising framework (Appendix 2) which ensures that the advertisements would be suitable for public display. For example, there would be no advertisements for companies in the sex industry nor advertisements for tobacco and alcohol manufacturers.

#### Public Safety and convenient movement of pedestrians, cyclists and vehicles

The proposed advertisements are of a size that would not interrupt driver visibility due to the low profile of the signs, with the peak of the signs sitting at a height of no more than 1000mm above ground level with the lowest part of the sign sitting at no more than 300mm above the ground. The total area covered by an individual sign is 0.6116sq.m and this would not obscure a vehicle nor a pedestrian. The Manual for Streets suggests that, in general, occasional obstacles to visibility that do not obscure vehicles or pedestrians do not have a significant impact on road safety. This supports that the proposed adverts would not lead to an increased risk to road users.

The signs would also not involve any displays similar to that of traffic signs in order to prevent any confusion for road users. Additionally, the proposed advertisements would not lead to any impact on the movement of pedestrians, cyclists or vehicles due to their siting on a roundabout.

#### Impact on local character

The proposed advertisements would be characteristic of other advertisements used across both Dartford and Kent County Council. Also, urban areas such as that surrounding Brunel Way, Marsh St North and Halcrow Ave feature a range of street furniture and signage.

#### Impact on Environmental quality and Amenity

The proposed advertisements included in this application would not contribute to air pollution. The applicant would also ensure there is minimal impact on any vegetation on the roundabout, but it is also expected that due to the small scale and nature of the signs, there would be negligible impact on vegetation once the signs are in place.

It must also be noted that the site is not classified as greenbelt under policies CS13 or DP22. The site is however located within a biodiversity opportunity area.

Policy DP5 also requires that developments take into account potential amenity factors such as;



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- a) air and water quality, including groundwater source protection zones;
  - b) intensity of use, including hours of operation;
  - c) anti-social behaviour and littering;
  - d) traffic, access, and parking;
  - e) noise disturbance or vibration;
  - f) odour;
  - g) light pollution;
  - h) overshadowing, overlooking and privacy;
  - i) electrical and telecommunication interference;
  - j) HSE land use consultation zones;
  - k) land instability;
  - l) ground contamination.

Policy DP25 states that proposals should seek to avoid significant adverse impact on biodiversity features and aim to preserve or enhance biodiversity features. The proposed advertisements would not require the loss of any biodiversity features and due to the small scale and form of the advertisements, it is not expected that they would cause any adverse impact on the vegetation sited on the roundabout. The proposal would also provide commercial income to the Borough, which can be used by the Borough in a number of ways such as enhancing biodiversity features.

Due to the type of advertisement and its design, it is not expected to contribute to any of the above and therefore the proposal complies with the following policies;

- DP2
- DP5
- DP22
- DP24
- DP25
- CS13

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## Conclusion

It is considered that the high-quality development makes a positive contribution to Dartford's economy as it would support local businesses. As discussed above, the proposed advertisements also meet the requirements set out by the relevant existing and emerging plans.

Furthermore, paragraph 141 of the NPPF states that "The quality and character of places can suffer when advertisements are poorly sited and designed" and "Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts". As set out above, the proposed advertisements would result in no harm to amenity and pose no risk to public safety.

It is the professional opinion of Planning Direct that this application ought therefore to be approved without delay.

The applicant expects the council to bring any potential issues arising with the proposal to the attention of Planning Direct at the earliest opportunity, in order that clarifications can be provided and/or solutions agreed where appropriate.